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## **Comments Received:**

U.S. News & World Report strongly encourages IPEDS to collect graduation rate data – 150% of normal time to complete – on full-time, first-year degree seeking students who IPEDS defines as first generation. This first generation graduation rate collection could structurally resemble IPEDS current collection of graduation rates involving Pell-awarded students.

As the Principal Data Analyst at U.S. News & World Report, my team and I regularly communicate with four-year institutions that are already collecting statistics on students who are first in their families to attend college. They do this because they say it is important to measure the extent they are engaging, supporting and educating persons who are statistically shown to have lower propensity than other students to complete their studies; even when controlling for Pell eligibility.

Currently schools compute these statistics using different definitions of first generation students, making inoperable comparisons among different schools. IPEDS is the entity best positioned to create a definition that schools would adapt their data collection toward, and eventually report comparable statistics. This would also provide the higher education community another measure of economic mobility to pair with outcome measures involving students awarded Pell Grants.

As we have stated in the past and continue to believe, more data is better for all parties.

Sincerely, Eric Brooks Principal Data Analyst U.S. News & World Report