April 26, 2022

Stephanie Valentine,
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20024

Dear Stephanie Valentine:

Re: ED-2022-SCC-0026

This letter is submitted on behalf of the 15 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. We recognize the Integrated Postsecondary Education Data System (IPEDS) is a critical source for postsecondary education data that the higher education community needs to understand and analyze postsecondary enrollment, degree completion, institutional finance and staffing, and equity.

The proposed changes, refinements, and clarifications to the IPEDS data collections are needed to reflect the full spectrum of postsecondary opportunities, ensure consistent reporting across institutions, and streamline data use. These updates will provide essential information to students and their families, institutional leaders, researchers, and policymakers to help inform higher education decision-making, target interventions and investments, and strengthen student success.

In this letter, PostsecData seeks to highlight our support for many of these changes and provide recommendations and considerations for implementation and other continued improvements. Our primary recommendations include:

1. Incorporate measures of noncredit offerings and noncredit enrollment and disaggregate measures of noncredit enrollment by race/ethnicity and gender.
2. Adjust reporting guidelines on classification of undocumented students and Deferred Action for Childhood Arrival (DACA) students to accurately reflect student demographics.
3. Consider more inclusive approaches to reporting based on students’ gender.
4. Add median standardized test scores (ACT and SAT scores) and include other admission considerations in Admissions (ADM) survey.

PostsecData also encourages ED to consider additional changes, such as further disaggregation of Outcome Measures and 12-month Enrollment Surveys, and updates to better measure the
nuances of student financial aid, and the addition of data collected on students by disability status. Finally, PostsecData supports several of ED’s other proposed changes, including revising terminology used for nonresident students, clarifying information for student enrollment classification for institutional reporting, and several other small changes and clarifications outlined in more detail below.

1. **Incorporate measures of noncredit offerings and noncredit enrollment and disaggregate measures of noncredit enrollment by race/ethnicity and gender.**

To promote informed decision-making, data collections should aim to count all students and all outcomes. Grounded in this principle, PostsecData strongly supports the proposed inclusion of IPEDS survey questions related to noncredit course offerings and enrollment because these new data will build a more complete picture of today’s postsecondary system. For too long, noncredit enrollees have remained invisible in IPEDS, and as a result, missing from postsecondary analyses. The addition of measures of the types of noncredit education offered and noncredit course enrollment more fully captures the diverse education courses and programs institutions offer, sheds light on student engagement with noncredit coursework, and is an important first step in understanding the broader implications of noncredit courses for institutions. Further, ED should consider additional reporting in future IPEDS cycles to illuminate not just enrollment in noncredit education, but completion and other student outcomes for noncredit programs, as well as additions to the Human Resources and Finance surveys.

Noncredit courses include many types of instruction, and these reporting updates will detail whether institutions offer noncredit workforce education, contract-based customized training, developmental education, personal enrichment courses, adult basic education (ABE), adult High School diplomas or equivalents, English as a second language (ESL), and continuing and professional education opportunities. In many cases, these programs serve an important educational and skill development pathway for students and require dedicated institutional resources and support. However, available data on levels and rates of participation in noncredit education remains limited, and the addition of these fields to the IPEDS survey will provide critical information to better understand the prevalence of and participation in these courses.

In response to ED’s directed question about whether to disaggregate noncredit enrollments by race/ethnicity and gender, PostsecData strongly recommends including this disaggregation. In accordance with President Biden’s Executive Order 13985, the “lack of data [disaggregation] has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort.” Similarly, the **Advisory Committee for Equitable Policymaking Processes** calls for data disaggregation to avoid masking the inequities that are pervasive in our systems. PostsecData strongly agrees with this assessment of the pivotal nature of disaggregated data in informing decision-making, and strongly recommends disaggregating
these IPEDS data elements to better understand the equity implications of noncredit participation.

2. Adjust reporting guidelines on classification of undocumented students and Deferred Action for Childhood Arrival (DACA) students to accurately reflect student demographics.

Proposed changes to several IPEDS surveys would require institutions to classify undocumented students’ race/ethnicity as unknown and consider DACA students as nonresidents. While we appreciate the clarification and effort to promote consistency across institutional reporting, the proposed approach raises several concerns. These changes obscure information about the self-identified race/ethnicity of undocumented students and DACA recipients, and inaccurately group DACA recipients with international students. Failing to accurately count DACA and undocumented students’ race/ethnicity accurately could also jeopardize institutional eligibility for Minority Serving Institution (MSIs) designations, further limiting institutions’ ability to pursue supplemental resources that are intended to be available to these schools.

While the ‘nonresident’ category is helpful for understanding international enrollment and should be maintained, it should only be used for students who enter the U.S. specifically for postsecondary education and who generally return to their home country after their studies are complete. By definition, DACA recipients meet neither of these criteria. DACA eligibility is restricted to those brought to the U.S. as children and recipients could not be considered as arriving to attend postsecondary education. The program also provides eligibility for work permits, meaning recipients are not expected to leave the country after finishing or leaving school. Further, students “who have been admitted as legal immigrants for the purposes of obtaining permanent resident status” are currently classified using the race/ethnicity categories they self-report to their school. DACA recipients should be treated similarly in IPEDS reporting.

Classifying undocumented students as unknown race/ethnicity limits our understanding of the actual demographics served collectively by higher education and by particular institutions. Institutions are required to ask students to self-identify their race/ethnicity information, regardless of immigration status, and re-classifying these students as race unknown does a disservice to the field’s understanding of race and ethnicity’s relationship to access, completion, and other critical components of postsecondary education.

Instead, ED should provide guidance to institutions to classify both undocumented students and DACA students with the race/ethnicity category that they report to the institution, while retaining the use of the nonresident category for international students. More specifically, ED should define domestic students (the group for which race and ethnicity are reported) as those who completed high school or a GED equivalency within the U.S. and were not on an F-1 visa at the time of high school graduation to permit the inclusion of most undocumented and DACA recipient students. Doing so will generate accurate and comprehensive
information needed to examine enrollment, persistence, and other student success metrics across race/ethnicity lines, while improving consistency in how these students are classified across institutions.

PostsecData also recommends ED consider forming a working group or hosting a Technical Review Panel (TRP) to best determine how to collect additional reporting from institutions to measure enrollment and completion of DACA and undocumented students. This working group or TRP should prioritize the need to understand the higher education experiences of this group while also taking appropriate precautions to protect student privacy and employ data minimization practices.

3. Consider more inclusive approaches to reporting based on students’ gender.

PostsecData strongly supports the addition of information on ‘Gender Unknown’ and ‘Gender Other than Provided Categories (Men/Women).’ These additional categories signal an effort to ensure students’ gender identities can be more accurately reported, and they reflect institutions’ stated interest in moving beyond the limitations imposed by the current use of binary gender categories. However, we urge ED to reconsider the approach to reporting on these populations.

The proposed survey would still require institutions to include students in one of two categories (men or women) to complete survey questions about race/ethnicity and age, even if they know this information is inaccurate or do not have information on students’ genders. In other words, in order to get an accurate count of students in each race/ethnicity and age group category, institutions must count students as either men or women. The proposed changes include the addition of a new question asking institutions to separately identify counts of students whose gender is unknown or who do not identify as men or women but does not provide any additional information on how institutions classify those students in earlier questions. The proposed changes acknowledge that the existing categories for gender are insufficient but does not go far enough to improve accuracy and consistency in data reporting.

Institutions currently use varying approaches in reporting data for students who do not identify as men or women or whose gender is unknown, creating inconsistencies in the data reporting across schools and the proposed revisions do not fully address these inconsistencies. While the proposed changes ask institutions to identify the counts of students for whom gender is not known or not listed, it does not offer an opportunity to correct counts for men and women, meaning it is not clear in which binary gender category these students are assigned for other reporting purposes.

PostsecData recommends that IPEDS incorporate these new proposed categories in all cases where gender is currently used, to avoid requiring institutions to classify students with gender categories that do not align with students’ actual identities. At a minimum, institutions should be required to provide data on enrollment counts across all four gender
categories as a supplement to current reporting, so that is clear where students whose
gender is not known or not listed are classified in other reporting.

Further, the use of the term “other” in describing students may exacerbate marginalization,
and ED should consider carefully whether another term might be more appropriate, or
whether this category might simply be described as “Gender Not Listed.” Finally, ED should
explore expanding additional gender categories that align with other students’ gender
identities, while protecting student privacy and adhering to other field best practices.

4. Add median standardized test scores (ACT and SAT scores) and include other
admission considerations in Admissions (ADM) survey.

PostsecData supports the addition of reporting fields for median test scores. Median test
scores are easily understood and this inclusion, in addition to the 25th and 75th percentiles
already collected, will provide clearer data about the admissions practices of institutions,
and can be used by prospective students and to inform research and policy. PostsecData also
applauds the inclusion of IPEDS questions about other considerations that institutions use
in the admissions process, including work experience, personal statements/essays, and
legacy status. The proposed changes to admissions considerations will help students by
improving transparency in admission processes and inform efforts to promote equity in
college access. ED should also consider additional questions about institutional admissions
practices, including questions on institutional recruitment practices, whether or not
institutions consider first-generation status in their admission processes, whether or not
institutions use demonstrated interest in their admissions decisions, whether and how they
use information on criminal justice involvement, and whether they offer early decision or
early action admission deadlines for applicants.

The undersigned PostsecData partners also would like to share feedback on several additional
changes ED should consider for the upcoming IPEDS collection cycles beyond what’s included in
the current proposal, including:

1. Updates to the Outcome Measures and Graduation Rates surveys. ED should add
disaggregates to the Outcome Measures survey across students’ race/ethnicity, gender
and age, and require Outcome Measures for all institutions, including those who are not
degree-granting. ED should also explore ways to streamline Graduation Rate and
Outcome Measures surveys, such as adding race/ethnicity disaggregation to the Outcome
Measures survey. Doing so will maximize the available information while streamlining
requirements on institutions and could reduce the reporting burden.

2. Alignment of 12-month Enrollment and Fall Enrollment surveys. ED should add
disaggregates to the 12-month Enrollment survey to reflect students’ gender,
race/ethnicity, age, state of residence, first-time or transfer status, enrollment intensity,
degree seeking status, major field of study, and participation in distance education. While
the Fall Enrollment survey includes many of these disaggregations, this survey misses
students who do not start in the Fall and leads to an incomplete picture of student enrollment at institutions whose students do not primarily start in the Fall semester, including many community colleges and for-profit institutions. To continue to reduce burden on institutions, PostsecData recommends exploring ways to consolidate the Fall Enrollment and 12-month Enrollment surveys while preserving the critical information, especially demographic disaggregates, contained in each.

3. **Updates to the Student Financial Aid survey.** ED should work to improve several measures related to student financial aid, including allowing institutions to more accurately report room and board costs for students living at home, requiring reporting on cumulative loan burdens for graduating students at different degree levels, and information about students’ use of private loans.

4. **Consider disaggregating data by disability status wherever data is disaggregated by race, ethnicity, or gender.** PostsecData recommends that IPEDS require institutions to submit data on individuals with disabilities enrolled at institutions of higher education and that such data is disaggregated in any place where it is disaggregated by race, ethnicity, or gender. Under the Americans with Disabilities Act, a person with a disability is a member of a protected class. Collection of data on outcomes in higher education pertaining to students with disabilities should be viewed no differently than data collection on other protected classes under the law, including race, ethnicity, age, and gender. Collecting similar data on the outcomes of students with disabilities at institutions of higher education would aid the development of equitable and accessible initiatives and increase data transparency on individuals with disabilities.

PostsecData also supports several other proposed changes, clarifications, and survey additions, including:

1. **Cross-cutting changes to terminology used for nonresident students:** PostsecData strongly supports the proposed changes to classification terminology in race/ethnicity measurements, from ‘nonresident alien’ to ‘nonresident.’ Revising the terminology from ‘nonresident alien’ to ‘nonresident’ humanizes international students included in this category, and there is no additional cost or burden for any stakeholders in doing so. This change is in line with recommendations made by the Advisory Committee for Equitable Policymaking Processes, which emphasized the importance of using clear, specific, and respectful language.

2. **Count part-time graduate student enrollment:** PostsecData supports the proposed addition of enrollment counts for part-time graduate students in the 12-month enrollment survey. Current reporting requirements only include graduate students who are enrolled full-time, which likely dramatically underestimates total enrollment in graduate education. The proposed graduate part-time column will allow for increased accuracy in classification and reporting of student enrollment data, and in measuring full time-equivalent enrollment for graduate students. Institutions can use this data to assess
student outcomes data and other student success and persistence metrics based on enrollment status.

3. **Count degree/certificate-seeking (DCS) and non-degree/non-certificate-seeking (NDNCS) to streamline calculations of the percentage of students receiving aid:** PostsecData supports the proposed addition of counts for degree/certificate-seeking (DCS) and non-degree-seeking (NDNCS) to the Student Financial Aid (FSA) survey component to ease calculations of the share of students who are receiving Pell grants or other types of financial aid.

4. **Clarify student enrollment classification for Outcome Measures (OM) survey:** PostsecData supports the clarification to categorize students based on their fall enrollment when reporting student enrollment status. This clarification clearly explains how institutions should report student classifications and ensures cohesive procedures, improving data reliability and consistency.

PostsecData is excited to see the proposed changes to IPEDS, which would make reported data more useful and impactful for students and the field of postsecondary education. We appreciate ED’s proactive and deliberate efforts to modernize this critical postsecondary data system to meet the needs of today’s students, institutions, policymakers, and data-users. Ensuring IPEDS collects robust institutional characteristics, enrollment, completion, outcome measures and financial information is integral to successfully using data to inform policymaking at the federal, state, and institution levels and to promoting the use of consumer information in college-going decisions. We hope that ED will consider our proposed solutions and recommendations to further enhance the quality of postsecondary data available in IPEDS.

We look forward to continuing to work with ED to promote and improve IPEDS and appreciate your thoughtful and detailed approach to these improvements. If you have any questions, please contact Amanda Janice Roberson, Director of Research and Policy at the Institute for Higher Education (ajroberson@ihep.org).

Sincerely,

ACT
Achieve Atlanta
Association for Career and Technical Education
Braven
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