



May 16, 2019

James Woodworth  
Commissioner  
National Center on Education Statistics (NCES)  
U.S. Department of Education  
550 12<sup>th</sup> Street SW  
Washington, DC 20024

Dear Commissioner Woodworth:

The undersigned 34 members of the Postsecondary Data Collaborative (PostsecData) commend the Department of Education's request for input on upcoming data collection activities through the Integrated Postsecondary Education Data System (IPEDS). PostsecData is a nonpartisan coalition of organizations representing students, higher education institutions, states, employers, and privacy and security experts who are committed to advocating for and using high-quality postsecondary data to increase student success and reduce educational inequity.

IPEDS is an invaluable resource to the field, serving as the primary source of institution-level information on college access, success, price, and more for institutions across the country. It provides data to inform student choices, evidence to support policymaking, and comparable information to allow for institutional and state benchmarking. We support a robust IPEDS that provides thorough, accurate data on our higher education system.

We believe that reducing the burden on institutions of higher education in reporting data allows schools to focus their limited resources in other areas, such as using data to improve student success. At the same time, the data collected by IPEDS is critical to researchers and the general public in promoting transparency across institutions. For this reason, the National Center for Education Statistics (NCES) should seek ways to minimize reporting burden on institutions while protecting the information contained in and usability of the IPEDS collections. The current NCES request to identify duplicative data reporting requirements across various federal agencies could lead to helpful reductions in burden at the institution-level, but we urge NCES to avoid creating new gaps in data availability because of this effort. Seeking stakeholder input is a key first step towards helping to streamline federal data collections in ways that reduce institutional reporting burden while still producing quality information.

After identifying data elements that may be duplicative, we urge NCES and the rest of the Department of Education to put in place the proper legal agreements and to build the technological capacity for data sharing across federal agencies and across offices throughout the Department of Education. Doing so will ensure that critical information remains accessible and transparent to students, families, federal and state policymakers, and other institutions while reducing the burden on colleges. Legislation could streamline collections in a more fulsome way through creation of a secure, privacy protected student-level data network. However, we appreciate NCES's attempts to improve data collection and publication while preserving a critical source of information on institutions in the meantime.

The undersigned PostsecData partners also would like to share feedback on several of the specific changes for the upcoming IPEDS collection cycles, including the following:

- Differentiation of certificates of less than one year under the Completions survey would add nuances to the current understanding of how short-term credentials are used by postsecondary institutions and students. However, we encourage NCES to explore ways to better align the proposed categories with existing Pell eligibility standards on program length. In addition, we are concerned that the term “recognized postsecondary credential” could cover many certificates that are ineligible for Pell Grants, student loans, or other financial assistance and confuse the resulting aggregate information. A more appropriate definition would align with the eligible program definitions in the Higher Education Act.
- Adding distance education enrollment to the 12-month Enrollment survey would provide significant information about the enrollment of online and other distance education students. Understanding the total enrollment over the full calendar year will provide more accurate figures than counting students enrolled in distance education only at the time of the Fall Enrollment survey.
- Adding disaggregates to the 12-month Enrollment survey to reflect students’ enrollment intensity and first-time or transfer status will help the public to better understand the different attendance patterns of today’s students. 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.

Finally, while NCES is taking specific steps to identify duplicative reporting requirements, it also should consider incorporating new data elements that reflect the current issues in higher education. For instance, IPEDS should consider measures such as room and board costs for students living at home, cumulative loan burdens for graduating students at different degree levels, and information about students’ use of private loans. In addition, a greater emphasis on disaggregating key data elements by race/ethnicity and Pell status is essential to highlight inequities in the higher education system and to underscore the importance of closing these gaps.

Thank you for the opportunity to comment on the proposed IPEDS changes. We once again commend the Department of Education for taking steps to reduce institutional reporting burdens while enhancing the quality of data available for decision-making. If you have any questions about these comments, please contact Mamie Voight, vice president of policy research at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

AccuRounds  
Achieve Atlanta  
Advance CTE  
Association of Public & Land Grant Universities  
Boston Centerless  
California EDGE Coalition  
Campaign for College Opportunity

Center for Law and Social Policy (CLASP)  
Chiefs for Change  
Colorado Center on Law and Policy  
Complete College America  
Education Reform Now  
Georgetown Center for Education and the Workforce  
Higher Learning Advocates  
Institute for Higher Education Policy  
Knowledge Alliance  
National College Access Network  
National Skills Coalition  
NASPA – Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Center for Higher Education Management Systems  
New America Higher Education Initiative  
Nexus Research and Policy Center  
NIRSA: Leaders in Collegiate Recreation  
The Ohio State University - Office of Institutional Research & Planning  
Pretty Good Consulting, Inc.  
Public Insight Data  
South Asian Fund for Education, Scholarship and Training (SAFEST)  
Skills2Compete – Colorado  
Stephanie Michelle Hall – Analyst at The Century Foundation  
Student Veterans of America  
The Institute for College Access and Success (TICAS)  
uAspire  
United Negro College Fund, Inc. (UNCF)