

IPEDS Forms Clearance for 2008-09 to 2010-11 Comments and Responses for 60-Day Comment Period

The Department of Education (ED) has carefully considered the submissions of public comments from postsecondary institutions and organizations received during the 60-day public comment period that ended March 31, 2008. NCES proposed a limited number of changes to the IPEDS web-based data collection to: (1) collect more detailed financial aid data, (2) improve the categorization of post-baccalaureate certificates and degrees, (3) increase the comparability of IPEDS finance data, and (4) make the reporting of race/ethnicity consistent with OMB standards. A discussion of the comments received regarding these four areas and ED's response to them follows.

(1) Comments on Proposed Changes to IPEDS Student Financial Aid

One comment was received from a representative from The Institute for College Access & Success (TICAS) in support of the proposed changes to the IPEDS Student Financial Aid (SFA) component. The TICAS representative writes:

“These proposed changes to SFA will greatly improve the usefulness of these data to the research and policy communities. In order to estimate the actual cost of college for students who receive financial aid, it is necessary to know how many students receive financial aid grants from any source and the average amount received. The existing SFA format does not collect this information, but the proposed format does. Given the increasing prevalence of non-federal (private) student loans, it is important to have accurate data on the breakdown of student loans by the ‘federal loans’ and ‘other loans’ categories. The proposed changes also address this issue. The proposed changes are incremental and only require respondents to provide new totals or sub-totals from the same underlying student-level data regarding financial aid. Therefore, these changes should not impose much additional burden, while the additional benefit will be great.”

(2) Comments on Proposed Elimination of the First-Professional Degree Category and Creation of New Doctor's Degree Categories

Only one comment regarding the elimination of first-professional degree category was received, from Bastyr University. It requested clarification of how it should classify a doctor's degree in Naturopathic Medicine and Audiology. Under the proposed changes, reporting institutions must decide under which doctor's degree definition their degree program fits. For example, some institutions' Ed.D. programs are strongly practice oriented, and best fit the Doctor's degree - professional practice category, while others research-intensive programs best fit the Doctor's degree - research/scholarship category. Bastyr University, like other institutions reporting to IPEDS, will need to examine its own degree program to determine under which new category it best fits.

(3) Comments on Proposed Changes to the IPEDS Finance Forms

Six comments were received concerning proposed changes to the IPEDS Finance forms. The comments were received from public institutions or system offices that report under GASB accounting standards. Commenters included representatives from the following institutions and organizations:

- Colorado Higher Education Financial Advisory Committee
- North Dakota University System
- University of Illinois
- University of Kentucky
- University of Missouri System
- University of North Carolina System

The proposed changes to the finance forms will require GASB institutions to allocate plant operations and maintenance (O&M) and depreciation across the functional operating expenses — as private institutions reporting under FASB now do. Institutions are concerned that it will be difficult to associate depreciation, interest expense, and plant operations & maintenance (O&M) with functions in order to report to IPEDS Finance. Some public institutions are already allocating O&M and depreciation across functional areas. For institutions that don't, the following conditions should help alleviate some of the burden of this change:

- Proprietary software companies should be able to make these changes for their clients en masse, reducing the programming costs to individual institutions. Software providers such as Banner and Peoplesoft should already have made these adjustments for their not-for-profit clients, and should easily be able to make them available to public institutions.
- The National Association of College and University Business Officers (NACUBO) has indicated that it will provide guidance on implementation of these changes, which should help reduce the transitional burden on institutions as well as help ensure consistency and comparability of data.

Another concern raised by commenters was that because institutions' fiscal years do not align with the IPEDS data collection year, and because institutions report on the previous fiscal year, providing only one *data collection* year for the transition would not provide enough time for institutions to make necessary adjustments to their systems to report the appropriate fiscal year's data under the new accounting requirements. Thus, to allow institutions more time to make these changes and at the recommendation of NACUBO, NCES will extend the optional period for reporting under these changes for an additional IPEDS data collection year. Thus, the changes will be optional for the 2008-09 (reporting on the most recent fiscal year ending before October 1, 2008) and 2009-10 (reporting on the most recent fiscal year ending before October 1, 2009) data collections and mandatory for the 2010-11 (reporting on the most recent fiscal year ending before October 1, 2010) data collection.

A second concern raised by commenters is the addition of a new field to Part C (Expenses and Other Deductions) of the Finance forms. This new field would indicate what percentage of instructional expenses is associated with credit-bearing instruction and non-credit instruction. Some noted that this would be a difficult and burdensome task involving "an in-depth analysis of all instructional expenses." This is an important change that NCES plans to continue to pursue. That being said, after we submitted the initial IPEDS forms clearance package and the federal register notice was posted on 1/29/2008, HR 4137 was adopted by the House on 2/7/2008. The bill (see Section 133 (j) (3) (D)) calls for us to report "the average annual percentage change and dollar change in an institution's per student instructional spending over the three most recent

preceding academic years.” In order to do this, we will need to collect non-credit expenses separately from credit expenses, as we proposed in these changes to the IPEDS finance forms.

However, in our initial IPEDS clearance package we made clear the following:

Congress is actively engaged in the process of reauthorizing the Higher Education Act (HEA), with the prospect of legislation being passed this year. NCES has chosen not to propose changes in IPEDS at this time in areas in which Congress may impose new reporting requirements, such as calculations of net price of attendance and graduation rates for particular categories of students. The IPEDS data collection proposed in this notice may need to be modified at a later point in light of Congressional action on HEA. Any subsequent modifications to the IPEDS data collection would be made only with the approval of OMB after a period of public comment.

Since this change could now be affected by legislation, NCES has decided to pull it from the proposed set of changes in this package. We will address it again, along with any other requirements that Congress passes in the final reauthorization legislation.

(4) Comments on Proposed Implementation of Race/Ethnicity Reporting Categories

None.