

**1. Please clarify what is “new” about the “Spring Collection Fall Enrollment 4 Year Form.**

The only changes proposed to the Fall Enrollment form are those associated with the two global changes proposed: (1) changing the race/ethnicity categories and (2) eliminating the first professional degree category.

**2. What was the outcome of the March 2008 IPEDS TRP meeting where the 2000 OMB terms of clearance item on non-credit activity was discussed?**

Before IPEDS converted to the web-based model in 2000, the Institutional Characteristics survey forms used from 1994 to 1999 documented whether institutions offered noncredit activity in-state, out-of-state, and in-district. This segment included a checkbox for institutions to indicate “yes” or “no” whether noncredit activity was offered. No data on headcounts or level of activity was collected, and no data on noncredit activity has been collected since 1999.

On October 28-29, 2002, IPEDS convened a Technical Review Panel meeting to discuss “Issues of Concern to Community Colleges” and focused on particular issues that community colleges have when responding to the IPEDS surveys including the institutions’ ability to respond to some of the data items and combined reporting issues for those community colleges that report to a District office. Non-credit enrollment and its related activity and whether NCES would try to measure non-credit were discussed. The panel discussed the need for more information on non-credit enrollment activity, an important issue from the workforce development and adult literacy perspectives, but there were no immediate suggestions and this issue was deferred for a future TRP discussion.

In the October 7-8, 2003 TRP, “Planning for IPEDS: 2004 and Beyond”, the issue was again discussed. Concerns were expressed with the skewed ratios of faculty to students and faculty expenditures for institutions with a significant amount of non-credit enrollment. To complicate matters, some courses offered as non-credit at one institution or within one state, may be offered for credit at another institution or state, a concern for data quality of this item. Additionally, some states don’t collect data on their non-credit students, a particular issue with employer/workforce development related non-credit courses. Again the issue of collecting data on noncredit activity was deferred for a future TRP discussion.

The March 11-12, 2008 TRP “Collecting Data on Noncredit Instructional Activity” was convened to discuss the possibility of collecting noncredit activity within the IPEDS enrollment surveys. The panel discussed the possibility of including several new data items that would capture noncredit instructional activity by headcount and contact hours in the 12-Month Enrollment component.

The panel suggested that IPEDS is the correct collection vehicle for noncredit activity and that noncredit activity should be collected using two categories—Workforce Preparation and/or Advancement and Community/Leisure (see table 1).

Table 1. Suggested Classifications for Noncredit Instructional Activity  
(12-month Enrollment)

	For-Credit	Workforce Preparation and/or Advancement	Community/Leisure
<b>Contact Hour Activity</b>	Currently required*	Optional—1 year	Optional—1 year
<b>Duplicated Headcount</b>	Currently required	Optional—1 year	Optional—1 year
<b>Unduplicated Headcount</b>	Currently required	Optional—3 years	Optional—3 years

\*For-credit will include both contact hour and credit hour activity for undergraduate and academic programs, if applicable.

The TRP suggested that if NCES chooses to collect unduplicated headcount enrollment for noncredit activity, reporting should be optional for 3 years. It was further suggested that NCES consider conducting a validity study measuring the data quality of this item, preferably during the optional collection period. The TRP also suggested that initially, IPEDS should only collect noncredit headcount, and unduplicated headcount enrollments. Any attempt to classify noncredit activity by level—such as pre-collegiate, pre-dual enrollment, undergraduate, or graduate—should wait.

Next steps: RTI International will post the TRP suggestions for further technical comments from the postsecondary education community. TRP participants have suggested that because of the current burden associated with the race/ethnicity changes, NCES should not introduce any changes non-mandated changes to IPEDS for the next couple of data collection year. Thus, NCES plans to pursue changes associated with non-credit activity only after race/ethnicity changes have been implemented, and after it addresses any reporting requirements that come out of reauthorization of HEA, if it occurs this year.

**3. Is the “Total Entering Class” information able to be used to calculate alternative graduation rates from the traditional full-time student GRS cohort? If so, has any systematic review of the differences that the two methods yield been done?**

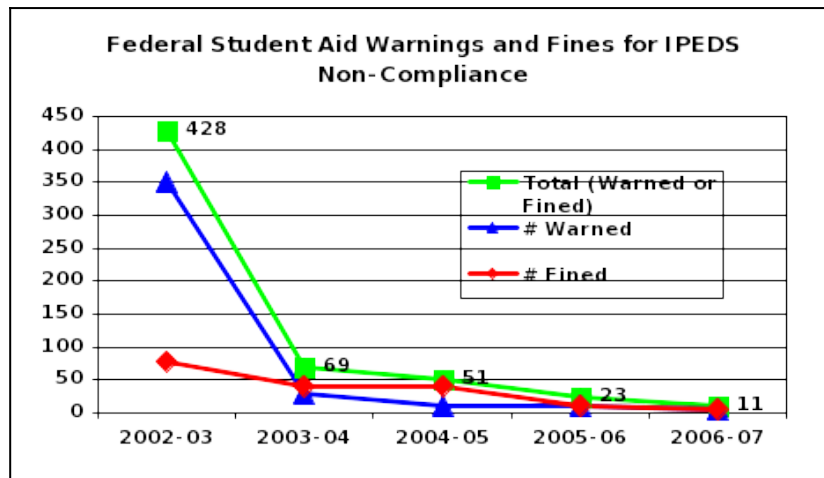
Total entering class information does not allow us to calculate alternative graduation rates. Instead, total entering class is used to calculate the percentage of entering students counted in calculating the GRS graduation rate. This percentage provides context for current graduation rates that track only first-time, full-time students. At institutions like some community colleges, the GRS cohort represents only a small proportion of the “total entering class,” which is one of the reasons we will be discussing a part-time GRS cohort at the GRS TRP in July.

**4. In SS part A, page 30, table 1 footnote, NCES notes that “Although a small number of non-Title IV institutions also participate...burden for these institutions is not included since their participation is voluntary.” Since such burden would definitely be included in the totals for an all-voluntary survey, OMB does not agree with the rationale for excluding it here. Please revise the burden tables accordingly.**

IPEDS differs from other all voluntary surveys because for non-Title IV institutions, IPEDS is not only voluntary, but institutions must actually seek out IPEDS and ask to participate. Upon contacting us, we will allow them to participate but we do not do follow-up calls like we do with Title IV institutions. That being said, we have added burden estimates for the 100 non-Title IV institutions, on average, that seek out and choose to participate in IPEDS each year if OMB insists. This increases the overall burden estimate for IPEDS in 2008-09 by 2,080 hours, from 157,810 to 159,890. Part A with revised Table 2 is attached.

**5. What does NCES mean by “appropriate action,” in the sentence on SS Part B, item B3, referring to institutional nonresponders being referred to the FSA office?**

The completion of all IPEDS surveys, in a timely and accurate manner, is mandatory for all institutions that participate in or are applicants for participation in any Federal financial assistance program authorized by Title IV of the Higher Education Act of 1965, as amended. The completion of the surveys is mandated by 20 USC 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19). This legislation authorizes the Secretary of the Department of Education to impose a civil fine of up to \$27,500 for each violation, for noncompliance to IPEDS reporting requirements. The Office of Federal Student Aid (FSA) is the entity that determines the appropriate action. Each year in June, NCES is required to forward to FSA the names of the institutions that did not respond to the IPEDS surveys for that data collection year. In each case, FSA determines (by looking at amount of Title IV funds drawn down and number of nonresponse surveys) whether the noncompliant institution will be warned or fined, and, if fined, the amount of the fine. The figure below shows the compliance history since FSA began assessing fines and warnings for non-compliance in 2002-03.



**6. What is the status and scheduled completion date of the three validity studies currently mentioned in SS Part B, item B4? What specifically will the graduation rate study demonstrate?**

**Finance.** NCES recently decided to discontinue the Finance study after problems with study design and response rates were identified by ESSI, who took over the study from the original contractor. Please see the attached memo for details.

**Human Resources.** NCES released the Human Resources study last month. It is available here: <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2008150>.

**Graduation Rates:** The study is currently underway. It is expected to be released this winter. Validation studies require comparison of the data under review to a secondary source with accurate, known values. The best way to obtain accurate graduation rate data is to calculate rates using student unit record (SUR) data provided by states. Using the rates calculated from the SUR data as a comparison tool, the study will assess the quality of the IPEDS GRS data. Because IPEDS definitions may sometimes be interpreted differently from institution to institution, the study will include an examination of which students have been erroneously included or excluded from the IPEDS graduation rates – an element of the research that can only occur by looking at student-level records. The results of this study will help NCES to ensure that IPEDS is capturing the correct students in the cohort as defined by the Student Right-to-Know Act of 1990, both correctly identifying all full-time, first-time degree/certificate-seeking undergraduates, and excluding those who do not meet these criteria.