

Supporting Statement for IPEDS 2008-2011 OMB Paperwork Reduction Act Submission

Amendment to current 3-year clearance for IPEDS (OMB No. 1850-0582)

**Submitted by
National Center for Education Statistics
U.S. Department of Education**

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Summary

The National Center for Education Statistics (NCES) is requesting an amendment to its clearance for the Integrated Postsecondary Education Data System (IPEDS) that covers the 2008-09, 2009-10, and 2010-2011 data collections. Current authorization for IPEDS expires January 31, 2012 (OMB No. 1850-0582). There is no need for an extension to that date at this time.

IPEDS is a web-based data collection system designed to collect basic data from all postsecondary institutions in the United States and the other jurisdictions. IPEDS allows NCES to report on key dimensions of postsecondary education such as enrollments, degrees and other awards earned, student financial aid, graduation rates, revenues and expenditures, faculty salaries, and staff employed. IPEDS incorporates technological improvements into the collection that enhance data submission and data availability. The IPEDS web-based data collection system was implemented in 2000-01, and it collects basic data from approximately 6,750 postsecondary institutions in the United States and the other jurisdictions that are eligible to participate in Title IV Federal financial aid programs. All Title IV institutions are required to respond to IPEDS (Section 490 of the Higher Education Amendments of 1992 (P.L. 102-325)). IPEDS allows other (non-title IV) institutions to participate on a voluntary basis. About 200 elect to respond.

On July 8, 2008, OMB granted IPEDS a three-year clearance (expiring July 31, 2011) for the IPEDS clearance package covering the 2008-09, 2009-10, and 2010-11 data collections (known hereafter as “Original Clearance Package”). Weeks later on August 14, 2008, Congress reauthorized the Higher Education Act of 1965, as amended (HEA), by enacting the Higher Education Opportunity Act (Public Law 110-315) (HEOA). HEOA required the *immediate* implementation of several new institutional reporting requirements so that the data are available on the College Navigator website by August 2009. To meet these statutory deadlines, NCES requested two amendments to its clearance package from OMB, in order to meet the August 2009 deadline for several new requirements in the new law. First, a change memo was sent to OMB on August 19, 2008 (known hereafter as “Amendment 1”). It included a small number of non-substantive changes to the 2008-09 data collection based on the new requirements. OMB provided clearance for those changes in a notice on August 26, 2008. Then, NCES submitted a revised clearance package (known hereafter as “Amendment 2”). It included a limited number of additional substantive changes to spring cycle of the 2008-09 IPEDS web-based data collection. OMB provided clearance for those changes in a notice on January 16, 2009, and extended the expiration date for the clearance to January 31, 2012.

NCES now requests a third set of revisions to the Original Clearance Package to meet additional HEOA requirements for the collection of data related to net price in the 2009-10 and 2010-11 data collections (known hereafter as “Amendment 3”). These changes do not affect the 2008-09 data collection now underway. These changes will allow NCES to make available on the College Navigator website data on institutional net prices and a multi-year tuition calculator. In addition, we are including two other sets of changes: First, we are including changes on how we collect data for the student-faculty-ratio which was added by Amendment 1. These changes are based on feedback we received during the 2008-09 data collection and will improve the reporting of data related to the new HEOA-mandated student-to-faculty ratio. Second, we are *deleting* some items from the survey forms for non-degree granting institutions. These will simplify IPEDS reporting and reduce reporting burden for nondegree-granting institutions.

The sections that follow summarize four sets of changes to the IPEDS data collection:

- Original Clearance Package: Changes requested in the original clearance package cleared by OMB in a notice on July 8, 2008;
- Amendment 1: Non-substantive HEOA-related changes cleared by OMB in a notice on August 26, 2008;
- Amendment 2: Substantive HEOA-related changes made beginning in the 2008-09 collection and cleared by OMB in a Notice of Action on January 16, 2009; and,
- Amendment 3: Additional changes to the collection beginning in 2009-10 for which NCES is now seeking clearance.

Notes:

NCES has chosen not to propose changes in IPEDS at this time in areas related to new *disclosure* requirements for institutions, such as graduation rates for students in certain federal student aid categories. Future clearance requests for the IPEDS data collection may include additions to IPEDS based on these new disclosure requirements. Any subsequent modifications to the IPEDS data collection would be made only with the approval of OMB after a period of public comment.

In response to the January 16, 2009, terms of clearance from OMB, NCES continues to pursue options for better integrating IPEDS with other ED data collections such as the National Student Loan Data Set (NSLDS). Staff at NCES, the Office of Postsecondary Education (OPE), and the office of Federal Student Aid (FSA) have begun preliminary conversations about how to work more collaboratively on financial aid data. These discussions include ways that we can better integrate, use, and disseminate data collected by the different offices. NCES is taking concrete steps to advance data integration, i.e. sharing data dictionaries and reporting instructions, and reviewing identifier crosswalks between OPE and IPEDS identifiers.

ORIGINAL CLEARANCE PACKAGE

*Changes requested in the original clearance package APPROVED by OMB on July 8, 2008
(The Notice of Action is included as Attachment A.)*

The following set of changes was already approved under the current clearance for the IPEDS data collection.

(1) Collect more detailed student financial aid data
(IPEDS component affected: Student Financial Aid)

Institutions now report all federal student grants provided to full-time, first-time students to IPEDS rather than distinguishing between Pell grants and other grants. It is important for the Office of Postsecondary Education (OPE) to be able to differentiate how students at different institutions are using particular federal grant programs. Likewise, all loans are now reported together in IPEDS, regardless of source. Given the substantial expansion of private loans, OPE requests more categories of loans to those awarded by the federal government from those from outside sources. These changes to how student financial aid data are collected in IPEDS also address recommendations made by the Secretary’s Commission on the Future of Higher Education to improve financial transparency by institutions and provide more information on college costs to consumers. The data will be displayed on College Navigator to help accomplish this goal. The proposed changes in categories are detailed below:

Current SFA Categories	Proposed SFA Categories	Data collected for full-time, first-time cohort	
		Number of recipients	Amount Received
➤ Any aid	➤ Any aid	X	
	➤ Any grant	X	X
	➤ Any loan	X	X
➤ Federal grants	➤ Pell grants ➤ Other federal grants	X	X
➤ State/local grants	➤ State/local grants	X	X
➤ Institutional grants	➤ Institutional grants	X	X
➤ Loans	➤ Federal loans ➤ Other loans	X	X

(2) Eliminate first-professional degree category
(IPEDS components affected: Institutional Characteristics, Completions, 12-Month Enrollment, and Fall Enrollment)

NCES has received with increasing frequency questions from the higher education community about the first-professional degree classification. Specifically, concerns were raised that due to changes in graduate education, the category of a first-professional degree has become outmoded. In addition, it has become increasingly important to be able to distinguish research-focused doctoral degrees from professionally focused doctoral degrees, such as a Doctor of Physical Education or a Doctor of Fine Arts.

Based on the suggestions from the IPEDS Technical Review Panel and comments from additional members of the higher education community, the revised categories for degrees are outlined in the

table below:

Current Award Categories (Baccalaureate and above)	New Award Categories (Baccalaureate and above)
➤ Bachelor's degree	➤ Bachelor's degree
➤ Postbaccalaureate certificate	➤ Postbaccalaureate certificate
➤ Master's degree	➤ Master's degree
➤ Post-master's certificate ➤ First-professional certificate (Post-degree)	➤ Post-master's certificate (Combines current post-master's and first-professional certificates into one category.)
➤ Doctor's degree	➤ Doctor's degree – research/scholarship ➤ Doctor's degree – professional practice ➤ Doctor's degree - other
➤ First-professional degree	<i>Eliminated</i>

The new degree categories will be defined as follows:

Doctor's degree - research/scholarship - A Ph.D. or other doctor's degree that requires advanced work beyond the master's level, including the preparation and defense of a dissertation based on original research, or the planning and execution of an original project demonstrating substantial artistic or scholarly achievement. Some examples of this type of degree may include Ed.D., D.M.A., D.B.A., D.Sc., D.A., or D.M, and others, as designated by the awarding institution.

Doctor's degree - professional practice - A doctor's degree that is conferred upon completion of a program providing the knowledge and skills for the recognition, credential, or license required for professional practice. The degree is awarded after a period of study such that the total time to the degree, including both pre-professional and professional preparation, equals at least six full-time equivalent academic years. Some of these degrees were formerly classified as "first-professional" and may include: Chiropractic (D.C. or D.C.M.); Dentistry (D.D.S. or D.M.D.); Law (L.L.B. or J.D.); Medicine (M.D.); Optometry (O.D.); Osteopathic Medicine (D.O); Pharmacy (Pharm.D.); Podiatry (D.P.M., Pod.D., D.P.); or, Veterinary Medicine (D.V.M.), and others, as designated by the awarding institution.

Doctor's degree - other - A doctor's degree that does not meet the definition of a doctor's degree - research/scholarship or a doctor's degree - professional practice.

Master's degree - An award that requires the successful completion of a program of study of generally one to two full-time equivalent academic years of work beyond the bachelor's degree. Some of these degrees, such as those in Theology (M.Div., M.H.L./Rav) that were formerly classified as "first-professional," may require more than two full-time equivalent academic years of work.

Four components of the IPEDS collection will be affected by these changes: Institutional Characteristics, Completions, 12-Month Enrollment and the Fall Enrollment components. NCES will implement the new definitions and categories for reporting Institutional Characteristics and Fall Enrollment information with the 2008-09 data collection year. As with all changes to IPEDS, the first collection year would be optional, and the second year use of the new definition would be mandatory. For Completions and 12-Month Enrollment data, implementation of the new categories would begin in the 2009-10 data collection year (reporting on awards granted between July 1, 2008 and June 30, 2009) as optional, becoming mandatory the following year. For any data collections prior to the

implementation date, institutions should continue to report data on first-professional degree programs under the existing definition.

(3) Revise IPEDS Finance

(IPEDS components affected: Finance)

Note: Changes to the IPEDS Finance forms will be optional for two data collection years (2008-09 and 2009-10) and mandatory in subsequent years. However, institutions are encouraged to make the change to the new forms as soon as possible.

On January 17-18, 2007, RTI International, the contractor for the IPEDS web-based data collection system, convened a meeting of the IPEDS Technical Review Panel (TRP) in Washington, DC, to discuss future enhancements to IPEDS finance forms to increase commonality and comparability of the data collected. The panel members included 46 individuals representing institutions, national associations, state governments, the federal government, and others.

The TRP members reviewed the IPEDS Finance component forms and reviewed all of the data elements currently being collected. The participants agreed that in order to increase the comparability across the IPEDS finance forms, it would be necessary to modify the forms and redefine some of the data elements being collected. The resulting data would have greater usefulness and would improve financial transparency of the institutional finance data being reported.

Based on the panel members' suggestions, NCES proposes the following changes to IPEDS Finance forms:

IPEDS Finance form for institutions that use FASB:

- 1) Add the following categories to Part A – Statement of Financial Position:
 - a. Assets:
 - Property, Plant, and Equipment
 - Accumulated Depreciation
 - Intangible assets, net of accumulated amortization
 - b. Debt related to Property, Plant, and Equipment
- 2) Change the categories of net assets on Part A to the following:
 - a. Unrestricted net assets
 - b. Temporarily restricted net assets
 - c. Permanently restricted net assets
- 3) Add the following categories to the Property, Plant and Equipment section (page 2) of Part A:
 - a. Construction in progress
 - b. Other
 - c. Accumulated depreciation
- 4) Delete “Property obtained under capital leases (if not included in equipment)” and clarify in the instructions to include property obtained under capital leases in the categories that best describe the property, such as equipment, buildings, etc.
- 5) Add a caveats box on Part B.
- 6) Pre-populate net assets at the beginning of the year (line 5 of Part B) with previous year’s collection of net assets at end of year. However, the keyholder would have the ability to overwrite it.

- 7) Change the title of Part C from “Student Grants” to “Scholarships and Fellowships” in order to be consistent with the form for GASB institutions.
- 8) Change the format of Part D (Revenues) so that they are reported in 3 columns:
 - a. Unrestricted
 - b. Temporarily restricted
 - c. Permanently restricted

However, sales and services of auxiliary enterprises and hospitals will be reported only in unrestricted revenues.

- 9) Add a revenue line for “net assets released from restriction” that can allow both positive and negative amounts.
- 10) Separate “Private gifts, grants, and contracts” to allow gifts to be reported separately from private grants and contracts.
- 11) Add an instruction to the screen clarifying that the endowment assets of foundations and affiliated entities should be included in reporting of Part H – Details of Endowment Assets.

IPEDS Finance form for institutions that use GASB:

- 1) Change line 2 of Part A – Statement of Net Assets to read “Capital Assets, net of depreciation” and delete the line for accumulated depreciation.
- 2) Change the second page of Part A as follows:
 - a. Change title to “Part A – Capital Assets”
 - b. Report only ending balance (discontinue beginning balance, additions, and retirements)
 - c. Combine “Equipment” and “art and library collections”
 - d. Delete “Property obtained under capital leases (if not included in equipment)” and clarify instructions to include property obtained under capital leases in the categories that best describe the property, such as equipment, buildings, etc.
 - e. Add a line for Other capital assets
 - f. Add a line for “intangible assets, net of accumulated amortization” after the line for accumulated depreciation
- 3) On Part B, report local operating grants and contracts separately from private operating grants and contracts
- 4) Add a line for sales and services of educational activities
- 5) Change Part C (Expenses and Other Deductions) to resemble the form for FASB institutions, adding columns for operation and maintenance of plant and interest, and removing the functional classification of depreciation. Operation and maintenance (O&M) of plant as a function will be used to allocate O&M to natural classes as it is in the form for FASB institutions. In addition, removing the functional classification of depreciation will require public institutions to allocate depreciation to appropriate functional categories – as independent institutions do.
- 6) Parts F and G, used for reporting component units using FASB and GASB standards, will be discontinued.
- 7) Add an instruction to the screen clarifying that the endowment assets of foundations and affiliated entities should be included in reporting of Part H – Details of Endowment Assets.

IPEDS Finance form for for-profit institutions:

No changes at this time

(4) Change race/ethnicity

(IPEDS components affected: Completions, 12-Month Enrollment, Fall Enrollment, Human Resources, and Graduation Rates)

On October 19, 2007, the U.S. Department of Education posted to the Federal Register the “Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education.” (See the Federal Register, Volume 72, Number 202, pp. 59266-59279: <http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/E7-20613.pdf>).

The proposed changes are necessary for the Department to implement the Office of Management and Budget’s (OMB) 1997 Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity. IPEDS will adopt new aggregate categories for reporting R/E data in accordance with the final guidance.

The guidance issued by the Department covers two separate issues: (1) the collection of R/E data by institutions and (2) the reporting of aggregate data to the Department. For **collecting** R/E data, institutions **must** use a two-question format, and the Department encourages institutions to re-survey students and staff (the two-question format is as follows: The first question is whether the respondent is Hispanic/Latino. The second question is whether the respondent is from one or more races from the following list: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White). For further details on the guidance for collecting data, please see the full Federal Register notice.

For **reporting** aggregate data to the Department, the guidance identifies nine categories that will be used for IPEDS. ED’s final guidance requires separating the category “Asian or Pacific Islander” into two separate categories, one for “Asian” and one for “Native Hawaiian or Other Pacific Islander.” Additionally, a category will be provided for reporting two or more races. This results in seven categories for reporting aggregate racial/ethnic data: Hispanics of any race, American Indian or Alaska Native, Asian, Black not-Hispanic, Native Hawaiian or Other Pacific Islander, White not-Hispanic, and two or more races. ED’s final guidance also allows IPEDS to continue to use the two categories for reporting non-resident aliens and for reporting counts when race/ethnicity is unknown, for the reasons given below.

Non-resident aliens – IPEDS has traditionally collected data on non-resident aliens separately from U.S. citizens and resident aliens (no race data will be available for non-resident aliens); and

Race/ethnicity unknown – this category has been used in IPEDS since 1990 to provide a mechanism for reporting U.S. citizens and resident aliens who do not designate a racial/ethnic category.

The current and new race/ethnicity categories for reporting data to IPEDS are outlined on the following page.

Current IPEDS Reporting Categories	New IPEDS Reporting Categories
1) Non-resident alien 2) Race and ethnicity unknown 3) Black, non-Hispanic 4) American Indian/Alaska Native 5) Asian/Pacific Islander 6) Hispanic, 7) White, non-Hispanic	1) Nonresident aliens 2) Race and ethnicity unknown 3) Hispanics of any race For non-Hispanics only: 4) American Indian or Alaska Native 5) Asian 6) Black or African American 7) Native Hawaiian or Other Pacific Islander 8) White 9) Two or more races

Educational institutions will be required to implement this guidance in order to report data for the 2010–2011 school year. Under the guidance, although not required to do so, educational institutions already collecting individual-level data in the manner specified by the notice are encouraged to immediately begin reporting aggregate data to the Department. However, because the 2007-08 IPEDS data collection year is already underway, the new R/E reporting categories will not be available for reporting in IPEDS until the 2008-09 collection year, which begins in Fall 2008.

The IPEDS Technical Review Panel (TRP) discussed the implementation of changes to race/ethnicity reporting in IPEDS in November 2006 after the Department issued preliminary guidance on August 6, 2006. Based on suggestions from that meeting of the TRP, changes to reporting race/ethnicity in IPEDS will be fully implemented as outlined below.

- **2008-09 and 2009-10 Collection Years**

Optional years for all components: Reporting using new race/ethnic categories will be voluntary: All five relevant IPEDS components (Fall Enrollment, Human Resources, Completions, 12-Month Enrollment, and Graduation Rates) will allow a combination of current and new race/ethnic submissions, and therefore IPEDS components would have five current race/ethnic categories plus seven new race/ethnic categories plus two remaining categories (“Race and Ethnicity Unknown” and “Non-resident alien”) — a combined “5+7+2 format”. Although the desire is that institutions will be able to collect and report the new race/ethnic data at this time, institutions would have the option to submit data using any of the following approaches:

1. Exclusively use seven new race/ethnic categories for everyone at the institution
2. Exclusively current five race/ethnic categories for everyone at the institution
3. Use “mixed reporting” - current categories for some individuals and new categories for others. The anticipation is that few institutions would select this option since it will be the most complex.

- **2010-11 Collection Year**

- Mandatory year for Fall Enrollment and Human Resources: Reporting using new race/ethnicity categories will be required.
- Optional year for Completions, 12-Month Enrollment, and Graduation Rates: Reporting using the new categories will remain optional; data in these components will be collected using the 5+7+2 format.
- **2011-12 and Beyond Collection Years**
Mandatory years for all IPEDS components: Institutions will be required to report using only the new race/ethnicity categories.

In the years with components that have optional reporting, institutions can report one way for one IPEDS component and another for other IPEDS components. The expectation is that most will report using new race/ethnic categories for Completions, 12-Month Enrollment, and Graduation Rates the year after they report using new race/ethnic categories for Fall Enrollment and Human Resources. The following table summarizes the proposed reporting timeline.

<i>Proposed Timeline for Reporting Race/Ethnicity Data to IPEDS</i>		
IPEDS Collection Year	Fall Enrollment and Human Resources	Completions, 12-Month Enrollment, and Graduation Rates
2008-09 and 2009-10	mixed format (5+7+2)	mixed format (5+7+2)
2010-11	new format (7+2) only	mixed format (5+7+2)
2011-12 and beyond	new format (7+2) only	new format (7+2) only
"5" includes: Black, non-Hispanic; American Indian/Alaska Native; Asian/Pacific Islander; Hispanic; White, non-Hispanic "7" includes: Hispanics of any race; For non-Hispanics only: American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, Two or more races "2" includes: Race and Ethnicity Unknown and Nonresident Alien		

AMENDMENT 1

Non-substantive HEOA-related changes submitted a change memo and approved by OMB on August 26, 2008 (The Notice of Action is included as Attachment B.)

OMB already approved the following HEOA-related changes that are considered non-substantive.

1) Add a check-box item to the **Institutional Characteristics** component to obtain information on alternative tuition plans. Indicate which of the following alternative tuition plans are offered by your institution: tuition guarantee, prepaid tuition plan, tuition payment plan, other (describe in Caveat box). A caveat box will be provided for the institutions enter additional contextual information.

2) Add an item to the **Fall Enrollment** component to allow, in combination with other data items already being collected, for the calculation of a Fall 2008 student-to-faculty ratio for programs with undergraduates. [see HEOA, Sec. 132(i)(M) for requirement]

- a. The number of full-time students enrolled in stand-alone graduate or professional programs such as medicine, law, veterinary, dentistry, social work, or public health, in which faculty teach virtually only graduate-level students
- b. The number of part-time students enrolled in stand-alone graduate or professional programs such as medicine, law, veterinary, dentistry, social work, or public health, in which faculty teach virtually only graduate-level students
- c. The number of full-time instructional staff teaching in stand-alone graduate or professional programs such as medicine, law, veterinary, dentistry, social work, or public health, in which faculty teach virtually only graduate-level students
- d. The number of part-time instructional staff teaching in stand-alone graduate or professional programs such as medicine, law, veterinary, dentistry, social work, or public health, in which faculty teach virtually only graduate-level students

3) Add the following text to the survey instructions for the item reporting the institution's website in the **Institutional Characteristics** to comply with HEOA Sec. 132(i)(V):

The webpage reported must contain the following information, or links to that information from that page:

- o Student activities offered by the institution
- o Services offered by the institution for individuals with disabilities
- o Career and placement services offered by the institution to students during and after enrollment
- o Policies of the institution related to transfer of credit from other institutions

4) Revise instructions to the **Student Financial Aid** component for the item that collects the "Number of students in the cohort who received any financial aid." The instructions will be clarified to include Federal Work Study to comply with HEOA Sec. 132(i)(R), as shown below:

Number of students in the cohort who received any financial aid during the year: Report the total number of students in your cohort who received any form of financial aid at any time during the year, including scholarships, grants, loans, and Federal Work Study.

AMENDMENT 2

Substantive HEOA-related changes made beginning in the 2008-09 collection and approved by OMB on January 16, 2009 (The Notice of Action is included as Attachment C.)

OMB already approved the HEOA-related substantive changes described below.

1) The following items will be added to the Student Counts page in the Student Financial Aid component. Undergraduate students are counted as of Fall 2007 for institutions reporting on a fall cohort, and for the 12-month period September 1, 2007 through August 31, 2008 for institutions reporting on a full-year cohort:

- a. Total grant aid awarded to undergraduate students, from the federal government, a state or local government, the institution, and other sources known by the institution
- b. Total number of students who received a Pell grant

Survey Affected: Student Financial Aid

2) A new, short component will be added to the Spring data collection to capture data on students with disabilities and 100 and 200 percent graduation rates. The graduation rates items will not be collected for long programs. The items are:

A) Please indicate the percent of all undergraduates enrolled in Fall 2008 who are formally registered with the office of disability services (or the equivalent office) at your institution as students with disabilities:

- 3 percent or less
- If more than 3 percent: _____%

Note: The language for this additional question, including the 3 percent cut off, was established by Congress in HEOA. See HEOA, Sec. 111(i)(1)(I).

B)(i) **For 4-year institutions**, for the 2000 cohort of bachelor's degree-seeking, full-time, first-time undergraduate students. Number of students in the cohort who completed their program within 200% of normal time (8 yrs)

B)(ii) **For less than 4-year institutions**, for the 2004 cohort of full-time, first-time undergraduate students.

- a. Number of students in the cohort who completed their program within 100% of normal time
- b. Number of students in the cohort who completed their program within 200% of normal time

Survey Affected: A separate 1-page survey will be created for 2008-09; however, these items will be incorporated into existing IPEDS components in subsequent year data collections

3) For the Student Financial Aid component, the new items previously added under the current IPEDS Clearance to the Financial Aid page as *optional* for 2008-09 reporting will now be *mandatory* for 2008-09. These items are:

- Number of students and average amount of aid received from all grants

- Number of students and average amount of aid received from Pell grants
- Number of students and average amount of aid received from Other federal grants
- Number of students and average amount of aid received from Federal loans
- Number of students and average amount of aid received from Other loans

Survey Affected: Student Financial Aid

AMENDMENT 3

Additional changes to the collection beginning in 2009-10 for which NCES is now seeking clearance

(1) HEOA-Related Changes

As a result of the recent passage of Higher Education Opportunity Act of 2008 (PL 110-315), NCES needs to request approval from OMB of additional changes to IPEDS data collection that will take effect beginning with the 2009-10 data collection. These changes will allow to comply with the legislated mandate to make available on the College Navigator website data on institutional net prices and a multi-year tuition calculator.

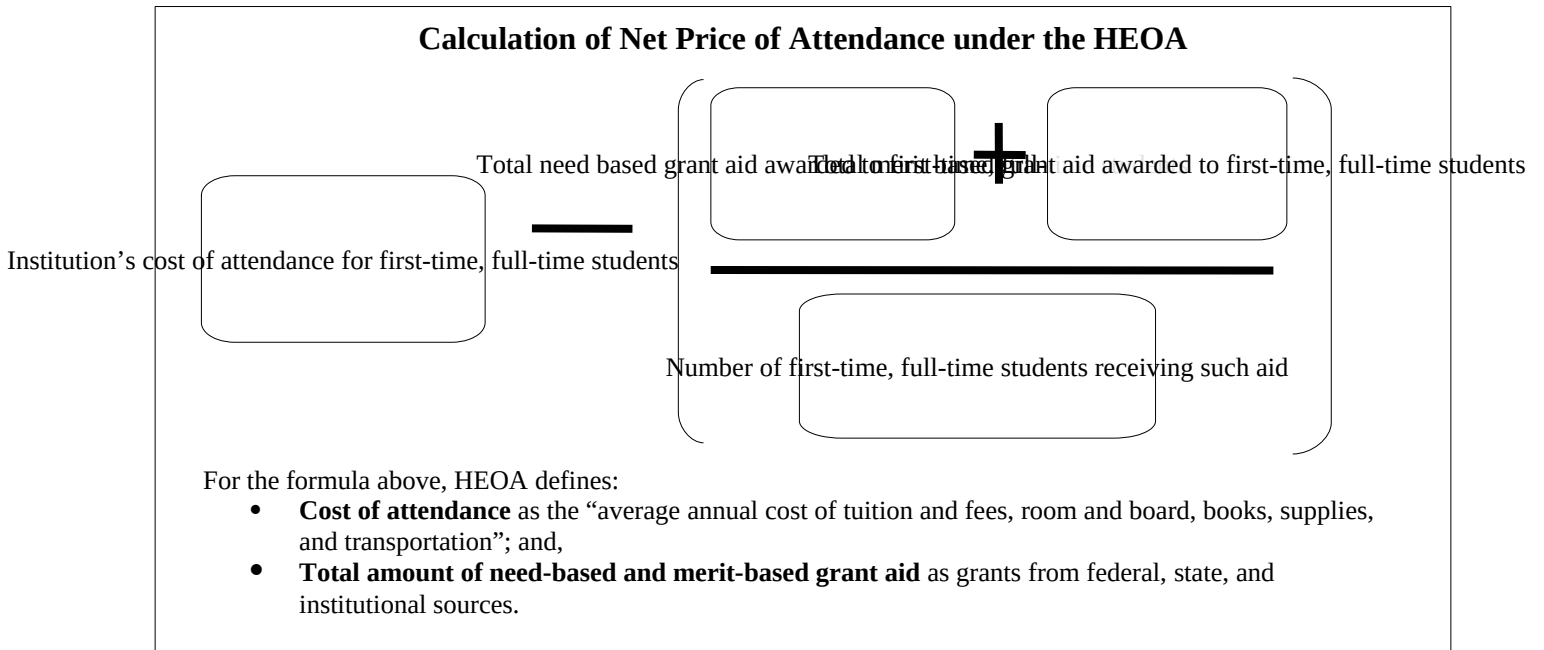
(a) Collect data to calculate various net prices of attendance and multi-year tuition rates.

Surveys affected: *Institutional Characteristics (fall collection) and Student Financial Aid (spring collection)*

HEOA requires the U.S. Department of Education to:

- (1) report on the College Navigator website *average institutional net price of attendance* for first-time, full-time aided students (this also forms the basis for transparency and accountability lists, or so-called “watch lists”); and,
- (2) report on the College Navigator website the *institutional net price of attendance for Title IV aid recipients by income categories*;

Per the HEOA, net price of attendance is calculated using the following formula:



Currently, not all of the data needed to calculate net price of attendance at the institution level is collected in IPEDS. Beginning on July 1, 2010, the Department of Education is required to post three years of average net price data on the College Navigator website for each institution. Average net

price data will be reported annually and used to develop three of six “College Affordability and Transparency Lists” related to institutional prices. The HEOA also includes a requirement that the net price of attendance for Federal Title IV financial aid recipients be disaggregated by income categories and made available on College Navigator. As such, we request approval for the addition of the data items described on the following pages beginning in the 2009-10 data collection. These changes were developed based on input from the IPEDS Technical Review Panel and comments received from the community over a 30-day comment period:

Changes to Institutional Characteristics Survey (fall collection)

Continue to report price of attendance for full-time, first-time undergraduate students as currently reported to IPEDS except:

- a) Break out tuition and required fees separately. This will be used in the multi-year tuition calculator.
- b) Report on **four** years of data rather than three to align the cost of attendance data with the SFA data, which lags one year. For example, in Fall 2009, IC will collect cost of attendance data for the following academic years:
 - o 2009-10
 - o 2008-09
 - o 2007-08
 - o 2006-07 (**new**)
- c) For the most recent year of tuition data and required fees data, ask if the amounts reported are guaranteed under a tuition guarantee plan. This will be used in the multi-year tuitions calculator.

Changes to the Student Financial Aid (SFA) Survey (spring collection)

- d) Add total grant aid received by (awarded to and accepted by) all first-time, full-time undergraduates from federal, state, and institutional sources.
- e) Add the unduplicated count of first-time, full-time undergraduates receiving grant aid from federal, state, and institutional sources.
- f) Add the count of the first-time, full-time undergraduate aid recipients and first-time, full-time Title-IV aid undergraduates living:
 - On-campus
 - Off-campus with family,
 - Off-campus not with family
- g) Add total grant aid awarded to and accepted by all first-time, full-time Title-IV aid undergraduates from federal, state, and institutional sources for each of the following income levels:
 - \$0-30,000
 - \$30,001-48,000
 - \$48,001-75,000
 - 75,001-110,000
 - \$110,001 and more.
- h) Add the unduplicated count of first-time, full-time undergraduates receiving grant aid from federal, state, and institutional sources for each of the following income levels:
 - \$0-30,000
 - \$30,001-48,000

- \$48,001-75,000
- 75,001-110,000
- \$110,001 and more.

(b) Revise collection of data for calculating student to faculty ratios

Survey affected: Fall Enrollment

Changes were made to the Fall Enrollment survey in 2008-09 to meet the HEOA requirement to display institutions' student-to-faculty ratios on the College Navigator website by August 2009 (see item 2 of section (b) AMENDMENT 1 above). During the collection of this data in 2008-09, the IPEDS Help Desk received comments from many institutional representatives suggesting ways to improve the methodology for calculating this measure. In addition, due to the timing of the two surveys that collect data needed to calculate the ratio, Human Resources and Fall Enrollment, some institutions were forced to revise, re-edit, and relock their Fall Enrollment survey after they had already completed and "locked" their data.

In response to feedback that the IPEDS Help Desk has been receiving based on the 2008-09 collection year, the following changes will be made to the methodology used in 2009-10:

1. Instead of reporting each of the components necessary to calculate the ratio, or having those components pre-populated from the Human Resources survey and prior sections of the Fall Enrollment survey as was done in the 2008-09 collection, institutions will now be asked to provide only their student-to-faculty ratio. A "worksheet" will be available to provide guidance on how to calculate the ratio. This will resolve issues involved with the "locking order" of the Human Resources and Enrollment components.
2. The worksheet provided will allow institutions to subtract instructional staff teaching exclusively non-credit courses from their full- and part-time numbers of instructional staff. For institutions that have a large amount of non-credit activity, most often public two-year institutions, this will better align the student data with the instructional staff data being used in the ratio, thus improving data quality.
3. The worksheet provided will allow institutions to add administrators and other professionals on campus who teach courses but who are not reported to IPEDS as instructors (since it is not their "primary function") to the instructional staff number used in their ratio. For many institutions, administrators and other professionals on staff teach courses throughout the year and allowing those instructors to be included in the instructional staff number would improve data quality.

A single line item asking for the institution's student-to-faculty ratio will comprise Part F, with an accompanying worksheet to assist in calculating the ratio. We anticipate that the burden will remain about the same for reporting institutions while improving data quality for this item.

(c) Incorporate Spring Supplement 2009 items into IPEDS beginning in 2009-10

Surveys Affected: Institutional Characteristics (fall collection) and new Graduation Rates 200 (spring collection)

Item 2 under section (c) AMENDMENT 2 above stated that a separate 1-page survey would be created for 2008-09; the items included in the Spring Supplement 2009 would be incorporated into existing IPEDS components in subsequent year data collections.

Beginning in 2009-10, the items that were included in the one-time Spring Supplement survey will be collected in IPEDS as indicated on the following page.

Spring Supplement 2009 Item	New location in IPEDS components
<p>A) Please indicate the percent of all undergraduates enrolled in Fall 20XX who are formally registered with the office of disability services (or the equivalent office) at your institution as students with disabilities:</p> <ul style="list-style-type: none"> <input type="radio"/> 3 percent or less <input type="radio"/> If more than 3 percent: _____% 	<p>Institutional Characteristics form beginning in 2009-10</p>
<p>B)(i) For 4-year institutions, for the 20XX cohort of bachelor's degree-seeking, full-time, first-time undergraduate students.</p> <ul style="list-style-type: none"> <input type="radio"/> Number of students in the cohort who completed their program within 200% of normal time (8 yrs) 	<p>A new survey component will be permanently added to the spring collection called Graduation Rates 200 (GRS200); it will be separate from the regular GRS component so not to confuse the two different cohorts that are being reported on.</p>
<p>B)(ii) For less than 4-year institutions, for the 20XX cohort of full-time, first-time undergraduate students.</p> <ul style="list-style-type: none"> c. Number of students in the cohort who completed their program within 100% of normal time 	<p>Beginning in 2009-10, less than 4-year institutions GRS forms will be aligned with the 4-year GRS forms to include reporting on the GRS for 100 percent of normal time in addition to 150 of normal time.</p>
<ul style="list-style-type: none"> d. Number of students in the cohort who completed their program within 200% of normal time 	<p>A new survey component will be permanently added to the spring collection called Graduation Rates 200 (GRS200); it will be separate from the regular GRS component so not to confuse the two different cohorts that are being reported on; for 2009-10, this form will also collect the number of student who completed within 100% of normal time to make up for the one-year gap of adding the 100% data to the regular GRS form for <4-year institutions.</p>

(2) Changes to Simplify IPEDS Reporting and Reduce Reporting Burden for Nondegree-granting Institutions

(Surveys affected: Institutional Characteristics, Human Resources, Fall Enrollment, Finance)

In 1999, before IPEDS data collection moved to the current web-based format, nondegree-granting institutions completed a shorter version of IPEDS reporting requirements via paper-based consolidated survey forms. However, when the transition to the web-based collection was made, the consolidated forms were not incorporated into the new system. The web-based system in general allows for customization of the IPEDS components for different types of institutions. RTI International called a meeting of the TRP to discuss whether the data collection for nondegree-granting institutions could be *further* refined to provide more relevant and better quality data for this group of institutions, while maintaining a reasonable reporting burden on these sometimes small and often under-resourced institutions.

A total of 2,300 non-degree-granting Title IV institutions report to IPEDS annually. Although IPEDS data in general are widely used, statistics for non-degree-granting institutions are rarely published. For instance, only one table in the annual NCES publication *Digest of Education Statistics* applies to these institutions. Further, IPEDS includes survey items that are not applicable to nondegree-granting institutions.

The following list of changes, based on suggestions from the IPEDS Technical Review Panel and comments from members of the higher education community, will improve data quality and comparability, and decrease institutional reporting burden:

CHANGES TO IPEDS COMPONENTS FOR NONDEGREE-GRANTING INSTITUTIONS	
Survey Component	Changes
Institutional Characteristics (fall collection)	<ul style="list-style-type: none"> • Eliminate Student Charges and Room and Board in Part D (currently only 42 non-degree-granting institutions report these data). • Eliminate Athletic Association in Part E (currently, less-than-2-year institutions do not report this information but 2-year and 4-year institutions that are non-degree-granting do).
Human Resources (winter collection)	<ul style="list-style-type: none"> • Consolidate the following categories—primarily instruction, instruction/research/public service, primarily research, and primarily public service—into one category: “Staff whose primary responsibility is instruction, research, and/or public service.” • Combine the EAP and Fall Staff sections into one section: for odd-numbered years, require the reporting of data by race/ethnicity and gender, and for even-numbered years, make optional the reporting of race/ethnicity and gender.
Fall Enrollment (winter/spring collections)	<ul style="list-style-type: none"> • Eliminate column 2 (transfers-in) and column 5 (non-degree/certificate seeking) from <i>Part A – Enrollment by Race/Ethnicity and Gender</i>. (Transfers-in data are rarely applicable to non-degree-granting institutions and are not a good measure for the population of students in the sector. Thus, many non-degree-granting institutions do not track transfers-in.)
Finance (FASB, for-profit) (winter/spring collections)	<ul style="list-style-type: none"> • <i>Part A – Balance Sheet Information</i>: Eliminate • <i>Part B – Summary of Changes in Equity</i>: Eliminate <ul style="list-style-type: none"> - Note that Total revenues (Line 01) would be collected in Part D, Line 09; and Total expenses (Line 02) would be collected in Part E, Line 07. • <i>Part D – Revenues and Investment Return</i>: <ul style="list-style-type: none"> - Eliminate Line 07 – Sales and services of auxiliary activities • <i>Part E – Expenses by Function</i>: <ul style="list-style-type: none"> - Eliminate Line 04 – Auxiliary enterprises
Finance (FASB, Not-for-Profit) (winter/spring collections)	<ul style="list-style-type: none"> • <i>Screening questions</i>: <ul style="list-style-type: none"> - Eliminate the endowment assets screening question (SQ3). - Eliminate the intercollegiate athletic expenses screening question (SQ4). • <i>Part A – Statement of Financial Position, Pages 1 and 2</i>: Eliminate • <i>Part B – Summary of Changes in Net Assets</i>: Eliminate <ul style="list-style-type: none"> - Note that Total revenues and investment return (Line 01) will be collected in Part D (Line 16), and Total expenses (Line 02) will be collected in Part E, Line 13. • <i>Part D – Revenues and Investment Return</i>: <ul style="list-style-type: none"> - Eliminate Line 12, Sales and services of auxiliary activities - Eliminate Line 13, Hospital revenue - Eliminate Line 14, Independent operations • <i>Part E – Expenses by Functional and Natural Classification</i>: <ul style="list-style-type: none"> - Eliminate Line 07, Auxiliary enterprises - Eliminate Line 09, Hospital services - Eliminate Line 10, Independent operations • <i>Part H – Value of Endowment Assets</i>: Eliminate

Table continues on following page

**CHANGES TO IPEDS COMPONENTS
FOR NONDEGREE-GRANTING INSTITUTIONS**

Survey Component	Changes
Finance (GASB) (winter/spring collections)	<ul style="list-style-type: none"> · <i>Screening questions:</i> <ul style="list-style-type: none"> - Eliminate the reporting models for special-purpose governments, such as the colleges and universities screening question (SQ3). - Eliminate the intercollegiate athletic expenses screening question (SQ4). - Eliminate the endowment assets screening question (SQ5). - Eliminate the screening question on the number of component units using GASB and FASB standards (SQ6). · <i>Part A – Statement of Net Assets:</i> Eliminate · <i>Part B – Revenues and Other Additions:</i> <ul style="list-style-type: none"> - Eliminate Line 05 – Sales and services of educational activities - Eliminate Line 06 – Sales and services of hospitals - Eliminate Line 07 – Independent operations - Eliminate Line 20 – Capital appropriations - Eliminate Line 21 – Capital grants & gifts - Eliminate Line 22 – Additions to permanent endowments · <i>Part C – Expenses and Other Deductions:</i> <ul style="list-style-type: none"> - Continue to collect operating and nonoperating expenses by function, but eliminate the following: <ul style="list-style-type: none"> o Line 11 – Auxiliary enterprises o Line 12 – Hospital services o Line 13 – Independent operations o Line 16 – Interest · <i>Part D – Summary of Changes in Net Assets:</i> Eliminate Note: Line 01 (Total revenues and other additions) is already collected in Part B (Line 25) and Line 02 (Total expenses and deductions) is already collected in Part C (Line 19). · <i>Part F – Component Unit That Uses FASB Standards</i> – Eliminate · <i>Part G – Component Unit That Uses GASB Standards</i> – Eliminate · <i>Part H – Details of Endowment Assets</i> – Eliminate · <i>Parts I, J, K, L – Data for Bureau of the Census:</i> No changes

SECTION A. Justification

A.1. Purpose of this Submission

The National Center for Education Statistics (NCES) is seeking an amendment to its three-year clearance for the Integrated Postsecondary Education Data System (IPEDS) for the 2009-10, 2010-11, and 2011-2012 collections, to accommodate new reporting requirements required by the Higher Education Opportunity Act of 2008. Current clearance covers the 2008-09 to 2010-11 survey years and is due to expire on July 31, 2011. We are therefore requesting a new three-year clearance in order to collect and process these new data.

a. The Design of IPEDS

Related Background Information

IPEDS was developed to address technical problems with previous postsecondary education statistical programs, including the Higher Education General Information Survey (HEGIS) and the Vocational Education Data System (VEDS). IPEDS was designed to collect accurate, reliable and timely data from the entire postsecondary universe. Although it was based on the HEGIS model, which provides institution-level data submitted either directly to NCES by the institution or through a central or state coordinating office, the IPEDS design allows for varying institution types. The institution-level data collection allows for aggregation of results at various levels and permits significant controls on data quality to be exercised by NCES.

IPEDS Components

The IPEDS system consists of several components that obtain and disseminate information on who provides postsecondary education (institutions), who participates in it and completes it (students), what programs are offered and what programs are completed, and the resources involved in the provision of institutionally based postsecondary education, both human and financial. These components include:

- Institutional Characteristics, including tuition and price information (IC);
- Completions (C);
- Fall Enrollment, including fall counts by race/ethnicity and gender, level of enrollment, age, and residence; and fall-to-fall retention.(EF)
- 12-Month Enrollment (E12) – unduplicated headcount and instructional activity data for the prior year;
- Human Resources (HR), including Employees by Assigned Position, Salaries (of full-time instructional faculty), and Fall Staff;
- Student Financial Aid (SFA);
- Finance (F); and
- Graduation Rates (GRS).
- Graduation Rates 200 (GRS200) – component to collect 200 percent of normal time graduation rates as required by HEOA to be published on College Navigator **(new)**

b. Proposed Modifications

1. Data Collection Method

We are proposing to continue using the IPEDS web-based system of collection for all components. This collection is organized into three phases based on data availability at the institutions: Fall, Winter, and Spring.

The Fall collection includes:

- Institutional Characteristics, including Institutional Price data
- Completions (and Compliance Report)
- 12 Month Enrollment (E12)

The Winter collection includes:

- Human Resources (HR)
 - Fall Enrollment (and Compliance Report) (EF)*
 - Finance*
- * Indicates that the component is available to respondents who wish to submit data early.*

The Spring collection includes:

- Student Financial Aid
- Graduation Rates
- Graduation Rates 200
- Fall Enrollment (if not completed during the Winter collection)
- Finance (if not completed during the Winter collection)

Institutions are able to enter data manually on a web-based form or, alternatively, to upload a file containing the data. In many instances, prior year data are provided for comparison purposes. The data are edited as they are being entered into the system, and respondents must either correct any errors identified or enter an explanation to submit their response to NCES. This process shortens data processing time and increases data quality. This approach also reduces burden on institutions by precluding the need for repeated callbacks from NCES contractors. The IPEDS system is accessible to persons with disabilities.

2. Data Content

We are proposing minimal modifications in data content over the next three years. The formats (see attachments) for reporting IPEDS data are very similar to those used for the 2001-02 through 2008-09 data collection cycles.

We anticipate that the IPEDS Technical Review Panel (TRP) may recommend consideration of additional data items; however, no major changes (additional items) will be made to the IPEDS forms without prior notification to OMB and subsequent approval. Minor clarifications (wording changes) or changes to instructions that impact consistency may be made without notifying OMB. The IPEDS TRP was formed to assist NCES contractors in a variety of ways including: making suggestions for updating the surveys with items that are more relevant to current postsecondary issues; discussing universe definitions; suggesting ways IPEDS can better serve the institutions and respondents; discussing outcomes and products; and discussing current issues. The TRP generally meets three times a year (but not on a

regular schedule) to discuss various topics of interest to the community of IPEDS data providers and data users.

How the panels work:

- Issue/topic is identified;
- Panelists with expertise in the topic are invited to attend the meeting;
- A background paper is prepared by a consultant and distributed to panel members for review prior to the meeting;
- Meetings are held and the topics are discussed at length;
- Discussion and any suggestions are summarized and posted to the IPEDS website;
- The contractor accepts comments from the public on the topic;
- Once comments are received, they are summarized and sent to NCES;
- Finally, a document is posted to the website that includes a summary of comments and NCES/IPEDS' intent to respond and/or implement actions as a result of the comments.

c. Need for System Clearance at this Time

On July 7, 2008, OMB granted IPEDS a three-year clearance (expiring July 31, 2011) for the IPEDS clearance package covering the 2008-09, 2009-10, and 2010-11 data collections (known hereafter as "Original Clearance Package"). Two weeks later on August 14, 2008, Congress reauthorized the Higher Education Act of 1965, as amended (HEA), by enacting the Higher Education Opportunity Act (Public Law 110-315) (HEOA). HEOA required the *immediate* implementation of several new institutional reporting requirements so that the data are available on the College Navigator website by August 2009. To meet these statutory deadlines, NCES requested two amendments to its clearance package from OMB, in order to meet the August 2009 deadline for several new requirements in the new law. First, a change memo was sent to OMB on August 19, 2008 (known hereafter as "Amendment 1"). It included a small number of non-substantive changes to the 2008-09 data collection based on the new requirements. OMB provided clearance for those changes in a notice on August 26, 2008. Then, NCES submitted a revised clearance package (known hereafter as "Amendment 2"). It included a limited number of additional substantive changes to spring cycle of the 2008-09 IPEDS web-based data collection. OMB provided clearance for those changes in a notice on January 16, 2009, and extended the expiration date for the clearance to January 31, 2012.

NCES now requests a third set of revisions to the Original Clearance Package to meet additional HEOA requirements for the collection of data related to net price in the 2009-10 and 2010-11 data collections (known hereafter as "Amendment 3"). These changes do not affect the 2008-09 data collection already underway. These changes will allow NCES to make available on the College Navigator website data on institutional net prices and a multi-year tuition calculator. In addition, we are including two other sets of changes: First, we are including changes on how we collect data for the student-faculty-ratio which was added by Amendment 1. These changes are based on feedback we received during the 2008-09 data collection and will improve the reporting of data related to the new HEOA-mandated student-to-faculty ratio. Second, we are *deleting* some items from the survey forms for non-degree granting institutions. These will simplify IPEDS reporting and reduce reporting burden for nondegree-granting institutions.

A federal register notice for a 60-day comment period for these changes was published on February 24, 2009 (FR Volume 74, p. 8239). A number of comments were received regarding these proposed changes. A table summarizing these comments is below.

Comment received	Response
Institutions do not have data on whether students living off-campus live on their own or with family (multiple comments)	These data are available because they are collected on the Federal Application for Student AID (FAFSA) for which offices of student aid have the data. Non aid applicants can be classified as “unknown.”
An institution does not have data on previous years of financial aid awarded	Federal regulations require institutions retain data on financial aid disbursements for at least 3 years; therefore, these data should be available.
The changes to the forms for non-degree-granting institutions make sense and will help reduce reporting burden for these institutions	Agree
The student-to-faculty ratio measure does not accurately represent class sizes; can class size also be collected?	This measure was mandated by HEOA and must be collected. The changes proposed here will allow for greater flexibility for reporting a student-to-faculty ratio in 2009-10 that better reflects the institution’s size.

d. Statutory Requirements for IPEDS Data

General Mandate

IPEDS, conducted by the National Center for Education Statistics, plays a major role in responding to the Center's Congressional mandate under Section 151 of P.L. 107-279, the **Education Sciences Reform Act of 2002**.

The mission of the Center shall be—

- (1) to collect and analyze education information and statistics in a manner that meets the highest methodological standards;
- (2) to report education information and statistics in a timely manner; and
- (3) to collect, analyze, and report education information and statistics in a manner that--
 - (A) is objective, secular, neutral, and non-ideological and is free of partisan political influence and racial, cultural, gender, or regional bias; and
 - (B) is relevant and useful to practitioners, researchers, policymakers, and the public.

The legislation goes on to indicate that the duties of the Center include:

- collecting, acquiring, compiling (where appropriate, on a State-by-State basis), and disseminating full and complete statistics (disaggregated by the population characteristics

- described in paragraph (3)) on the condition and progress of education, at the preschool, elementary, secondary, postsecondary, and adult levels in the United States;
- conducting and publishing reports on the meaning and significance of the statistics described above;
 - collecting, analyzing, cross-tabulating, and reporting, to the extent feasible, information by gender, race, ethnicity, ... and other population characteristics, when such disaggregated information will facilitate educational and policy decision-making; and other such activities including
 - assisting public and private educational agencies, organizations, and institutions in improving and automating statistical and data collection activities.

Data on Race/Ethnicity and Gender of Students

The collection and reporting of racial/ethnic data on students and completers are mandatory for all institutions that receive, are applicants for, or expect to be applicants for Federal financial assistance as defined in the Department of Education (ED) regulations implementing **Title VI of the Civil Rights Act of 1964** (34 CFR 100.13), or defined in any ED regulation implementing **Title IX of the Education Amendments Act of 1972**. NCES will implement the new racial/ethnic categories as a reporting option based on ED final guidelines and the implementation plan discussed in the Summary item 4 above.

Vocational Education Data

IPEDS responds to certain of the requirements pursuant to Section 421(a)(1) of the **Carl D. Perkins Vocational Education Act**. The data related to vocational program completions are collected from those postsecondary institutions known to provide occupationally specific vocational education.

Student Right-to-Know

Sections 668.41, 668.45, and 668.48 of the Student Assistance General Provision were amended to implement the Student Right-to-Know Act, as amended by the Higher Education Amendments of 1991 and further by the Higher Education Technical Amendments of 1993 and 1999. These final regulations require an institution that participates in any student financial assistance program under Title IV of the Higher Education Act of 1965, as amended, to disclose information about graduation or completion rates to current and prospective students. Data must also be reported to the Secretary of Education; this is accomplished through the IPEDS Graduation Rates (GRS) component.

Fall Staff Data

The collection and reporting of racial/ethnic data on the Fall Staff portion of the Human Resources (HR) component are mandatory for all institutions which receive, are applicants for, or expect to be applicants for Federal financial assistance as defined in the Department of Education (ED) regulations implementing **Title IV of the Civil Rights Act of 1964** (34 CFR 100.12). The collection of data are also mandated by Public Law 88-352, **Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972** (29 CFR 1602, subparts O, P, and Q).

Mandatory Reporting for Institutions with Program Participation Agreements

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).

Cost of Higher Education

Section 101 of the Higher Education amendments of 1965 (PL 105-244) requires that NCES collect the following information from institutions of higher education: "(i) tuition and fees for a full-time undergraduate student; (ii) cost of attendance for a full-time undergraduate student, consistent with the provisions of section 472; (iii) average amount of financial assistance received by an undergraduate student who attends an institution of higher education, including - (I) each type of assistance or benefit described in section 428(a)(2)(C) (i); (II) fellowships; and (III) institutional and other assistance, and (IV) number of students receiving financial assistance described in each" of the above categories.

IPEDS is to "collect information regarding the data elements described (in the paragraph above) with respect to at least all institutions of higher education participating in programs under Title IV, beginning with the information from academic year 2000 - 2001 and annually thereafter."

The requirement to collect data on price is satisfied through various items collected in the IC component during the Fall cycle (tuition and fees, room, board, and other expenses) and the SFA component in the Spring cycle.

Consumer Information

Section 132 of the Higher Education of 2008 (PL 110-315) requires that ED to "make publicly available on the College Navigator website, in simple and understandable terms," information regarding enrollments, degree completions, admissions, net price, college costs, students with disabilities, graduation rates, and many additional consumer information items.

A.2. Purpose and Use of IPEDS Information

IPEDS provides NCES with the basic data needed to describe the size of the post- secondary enterprise in terms of students enrolled, staff employed, dollars expended and degrees earned. The IPEDS universe also provides the institutional sampling frame used in most other postsecondary surveys such as the National Postsecondary Student Aid Study (NPSAS) and the National Survey of Postsecondary Faculty (NSOPF). Each of these surveys uses the IPEDS institutional universe for its first stage sample and relies on IPEDS data on enrollment, completions, or staff to weight its second stage sample.

In addition to usage within NCES and other areas of the Department of Education, IPEDS data are heavily relied on by Congress, other federal agencies, state governments, education providers, professional associations, private businesses, media, military and interested individuals. Finally, IPEDS data have recently been utilized to develop IPEDS Data Feedback Reports. Initially disseminated in the fall of 2004, these annual reports are sent to

almost all postsecondary institutions¹. They contain data and figures comparing each individual institution to a group of “comparison” institutions, using a variety of IPEDS data variables and derived variables, and are mailed to the Chief Executive Officers of each institution. The reports serve as a means of highlighting the utility of IPEDS data, as well as providing comparative data for use by institutions in meeting their institutional goals relative to their postsecondary “peers.”

Additional uses of IPEDS data, specific to individual survey components, include:

a. Institutional Characteristics

Institutional Characteristics data are the foundation of the entire IPEDS system. These data elements constitute the primary information that is necessary to interrelate and understand other descriptive kinds of statistical data about education, such as enrollments, staff, graduates, and finance. The information is essential to: 1) establishing the universe control file for IPEDS; and 2) developing data collection sampling frames. The IPEDS universe is used as the sampling frame for many other NCES studies, including the National Postsecondary Student Aid Study (NPSAS) and the National Study of Postsecondary Faculty (NSOPF).

In addition to the need for these data within NCES and the Department of Education (Title III and Higher Education Act programs and the Office for Civil Rights use data from IPEDS institutions), other federal agencies rely on the database and the resulting list of postsecondary institutions. NCES has utilized IPEDS data in fulfilling past information requests from the Air Force, the Immigration and Naturalization Service, the Department of Defense (including recruiting offices of all Armed Services), the Departments of Health and Human Services, Agriculture, and Labor, the National Science Foundation, the Veterans Administration, the Social Security Administration, and members of Congress. NCES continues to fulfill information requests as they are received, and has also significantly increased the volume of IPEDS data available on its public websites, allowing end users increased access to current and historic IPEDS data.

Much of the data collected through the IC component, especially admissions information and tuition (price) data, are of special interest to consumers. Consequently, NCES initially created IPEDS College Opportunities On-Line (IPEDS COOL), a web-based search tool where consumers could obtain information about postsecondary schools. In September 2007 ED unveiled the enhanced and redesigned search tool, now called [College Navigator](http://nces.ed.gov/collegenavigator) (see <http://nces.ed.gov/collegenavigator>).

Additionally, NCES provides on College Navigator data provided by the Office of Postsecondary Education (OPE), for the purpose of disseminating relevant information to consumers. These enhancements include: 1) information on Programs Accredited by Accrediting Agencies and State Approval Agencies Recognized by the U.S. Secretary of Education and 2) Campus Security data.

b. Completions and Compliance Report

Information on the number of students who complete a postsecondary education program by

¹ Institutions excluded from the mailing are those that do not provide any instruction at the undergraduate level.

type of program and level of award constitute the only national source of information on the availability and location of highly trained manpower. Types of programs are categorized according to the Classification of Instructional Programs (CIP). The CIP is a taxonomic coding scheme that contains titles and descriptions of instructional programs, primarily at the postsecondary level. Business and industry, the military, and other groups that need to recruit individuals with particular skills use these data extensively. The data also help satisfy the mandate in the Carl D. Perkins Vocational Education Act for information on completions in postsecondary vocational education programs.

Information on completions in postsecondary education programs has been used extensively. For example:

- Department of Education, Office of Postsecondary Education (OPE), use these data to respond to public inquiries regarding degrees awarded by different types of institutions, and for reference guides in preparation for budget justifications.
- Department of Labor, Bureau of Labor Statistics (BLS), uses these data in preparing the *Occupational Outlook Handbook* and in matching projections of labor supply and demand.
- State Occupational Information Coordinating Committees (SOICC) also require these data on an annual basis for assisting citizens in career planning and in making state and local area estimates of trained manpower.
- The Congressional Research Service, Library of Congress, uses these data to supply information to Members of Congress in order to assist them in assessing changing and developing needs of the Nation with respect to manpower and postsecondary education.
- The Department of Agriculture, Office of Higher Education Programs, uses these data to include program data on agriculture and home economics in various reports.
- The National Science Foundation, Division of Science Resource Studies, relies heavily on IPEDS Completions survey data, in conjunction with their own surveys, to study degree production, particularly in science, mathematics, and engineering fields.
- The U.S. Census uses the data collected in the IPEDS Finance for its State and Local Government Finance surveys. The data is essentially imbedded into the surveys and is rolled up into the parent state or local government for revenue, expenditures, debt and assets.
- The U.S. Office of Personnel Management uses these data to provide guidance to other Federal agencies in their recruiting efforts.
- The Office for Civil Rights (Department of Education) uses these data in reviewing institutional compliance with anti-discrimination statutes.
- The Department of Justice uses these data when court suits are brought in civil rights cases.
- The Department of Defense uses these data to identify institutions training significant numbers of individuals in occupational programs, and with particular military related skills.
- Private firms use these data for recruiting trained manpower and large corporations use the racial/ethnic completions data to identify the potential pool of new employees for EEO requirements.
- States also use data by program to compare changes in degree patterns among states and for manpower planning and projections.
- The Carnegie Foundation for the Advancement of Teaching has utilized these data for use in developing their institutional classification schemes.

c. **Enrollment**

Enrollment is probably the most basic parameter in postsecondary education since it indicates access to an educational experience that is potentially both economically and socially advantageous. Because enrollment patterns differ greatly among the various types of postsecondary institutions, there is a need for both different measures of enrollment and several indicators of access. Aspects of the enrollment collection are described below.

1. Enrollment and Compliance Report

Fall enrollment is the traditional measure of student access to higher education and IPEDS continues this important statistical series. The Education Department uses fall enrollment data in program planning and for setting funding allocation standards for such legislatively controlled programs as the College Work-Study Program and others. NCES collects fall enrollment data through this component of IPEDS to update its annual college projections, its mandated annual *Condition of Education* report, and the *Digest of Education Statistics*. The Bureau of the Census, the National Science Foundation, and most state education agencies depend heavily on annual fall enrollment data for such uses as economic and financial planning, manpower forecasting, and policy formulation. Educational and professional associations also use IPEDS enrollment data for a wide variety of purposes.

The data are necessary for the Office for Civil Rights (Department of Education) to perform functions mandated by Title VI and Title IX.

2. Residence of First-Time Students (required in even-numbered years)

IPEDS also collects data on the counts of first-time freshmen by state of residence, including data on the number who graduated from high school the previous year. These data are used to monitor the flow of students across state lines and calculate college-going rates by state. The primary purpose of this component is to provide states with more complete information about the attendance of their residents in college than the States can collect in their own surveys. States can then use resulting data to make estimates about the college-going rates of their high school graduates, examine problems caused by excessive student out-migration or in-migration, and determine the types of institutions that attract their citizens into other states. Such data are critical for postsecondary education planning at the state level.

States as well as various associations have made it clear that only a national agency can collect the data needed to examine residence and migration patterns. There are a number of national and state level issues that can be addressed by collecting and disseminating residence data. These needs include the following:

- planning/budgeting for institutional support - public and private;
- planning for shifting institutional demand by region, state, and institution;
- monitoring or establishing out-of-state quotas; and
- reassessing state support to private institutions serving large numbers of in-state students.

3. Age Data (required in odd-numbered years)

In 1987, NCES began collecting fall enrollment by age of student on a biennial basis. These data offer insight into the relationship between the changing demographics of college-going cohorts and enrollment in different types of postsecondary institutions; they permit detailed projections of enrollment by institutional type and by age. Because a student's dependency

status is strongly related to age, the data can also be used to provide estimates of the number of independent/dependent students attending a postsecondary institution, which should be useful in financial aid modeling and projections. In addition, the Department of Defense U.S. Military Entrance Processing Command has indicated a strong need for these data to identify institutions with a sufficient number of recruitment-age students to make recruiting efforts cost effective.

4. Unduplicated 12-Month Head Count (now a separate component)

The collection of unduplicated head count of students enrolled over a 12-month period provides a way of looking at enrollment that is especially valuable for institutions that utilize non-traditional calendar systems and institutions that offer short programs. An enrollment figure that encompasses an entire year provides a more complete picture of the services being provided by these schools.

5. Instructional Activity

The collection of instructional activity, as measured in total credit and/or contact hours delivered by institutions during a 12-month period, provides an overall indicator of the scope of educational activity provided by the institutions. NCES uses the total instructional activity measure as a basis for computing a total student full-time equivalency (FTE). FTE is commonly used by postsecondary institutions as a measure of size and performance, and is one of the best available indicators for the measurement of educational endeavors.

6. Total Entering Class

NCES began collecting total entering class data in the Winter of 2002, based on a recommendation from the TRP. These data are collected in order to address concerns that the cohort used by the Graduation Rates component is not representative of an institution's entering class because the GRS cohort is comprised only of full-time students. The collection of a total entering class allows for a more accurate picture of incoming students and also permits the calculation of the fall GRS cohort as a proportion of the total entering student body.

7. Retention Rates

NCES began collecting retention rates data in the Winter of 2003, based on a need identified by the TRP. Retention rates data provide an indicator of postsecondary performance that is broader in scope than completions data or graduation rates data, and is a critical measure of success as viewed by many 2-year and 4-year institutions.

d. Human Resources

Human resource data provide another basic measure of postsecondary education because they indicate the extent of the human infrastructure and knowledge base represented at institutions of higher learning. Because the size and type of staffing patterns vary greatly across postsecondary education, there is a need to measure different aspects of the human capital in postsecondary institutions. The Human Resources component measures this human capital in three different areas.

1. Employees by Assigned Position

This section was developed to allow institutions to properly classify all of their employees by full- or part-time status, faculty status and occupational activity; in addition, medical school staff are reported separately. By first completing the EAP, institutions are then able to differentiate which faculty are reported on the Salaries component and which are reported on Fall Staff.

2. Salaries

IPEDS data on the salaries of full-time instructional faculty are used by:

- the Department of Education's Grants and Contracts Service, which makes frequent use of the salary data collected by NCES to set standards for expected salary outlays during grants and contracts negotiations processes;
- the Bureau of Labor Statistics (BLS), Department of Labor, which includes salary data when developing its Occupational Outlook Handbook.

The House Labor and Human Resources Committee, the Office for Civil Rights, and the Bureau of the Census have requested trend data. State agencies rely on salary and fringe benefits data to determine budgets for their state-supported institutions and to make comparative studies with other states.

Institutions use salary and fringe benefits data to establish their own compensation packages, and institution officials study the compensation packages offered by their peers and/or competitors prior to developing their salary and fringe benefits schedules.

3. Fall Staff (required in odd-numbered years)

The fall staff section replaces the former EEO-6 survey, and is used by the Equal Employment Opportunity Commission in place of their data collection efforts. Under Public Law 88-352, Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, all institutions of higher education that have 15 or more (full-time) employees are required to keep records and to make such reports biennially to EEOC. NCES now collects the data and provides it to EEOC as required in their regulations. The Office for Civil Rights (OCR) and the Office of Federal Contract Compliance Programs (OFCCP) of the Department of Labor also use these data. The filing of Fall Staff data is mandated under Section 709(c) of Title VII.

The data provide information on staffing levels at the institutions for various occupational categories and are used extensively in peer institution analysis, manpower utilization studies, and in examining the health of the institutions. Good quality data on racial/ethnic composition of postsecondary employees are useful to EEOC and OCR for monitoring compliance with Title VII.

e. Student Financial Aid

The Student Financial Aid component was added to IPEDS to help respond to the request for information on the cost and price of higher education in the Higher Education Amendments of 1998. Data collected through this component allow prospective students to compare

average amounts of financial aid received by full-time, first-time degree or certificate-seeking undergraduates by type of aid received across institutions. Data collected here will also be used to calculate institutional net prices, as required in the Higher Education Opportunity Act of 2008. These data are posted on College Navigator.

f. Finance

Finance data are needed for reporting and projecting the revenues and expenditures of a national activity representing a significant component of the GNP. To enhance the comparability and utility of the finance data, IPEDS redesigned the data collection instruments to conform to the accounting standards governing both public and private institutions.

The Department of Education's Title III (Institutional Aid) grant program relies on the finance data to help determine whether or not an applicant college or university is eligible to receive a grant. These data are needed annually.

The Bureau of the Census relies on this form to collect data required in its census of governments. NCES and Census worked closely to ensure that one instrument satisfied the needs of both agencies. The Bureau of Economic Analysis also contributed significantly to this endeavor. The Office of Management and Budget asked NCES to collect these data because the Bureau's survey universe was a subset of the IPEDS universe. The Bureau of the Census also uses the data from other parts of the survey to:

- develop estimates of state and local governments' finances to provide to the Bureau of Economic Analysis for calculation of the Gross National Product; and
- collect supplemental data that their census of governments does not collect.

The Bureau of Labor Statistics and the Federal Mediation and Conciliation Service are secondary users of NCES/Census finance data.

The Office for Civil Rights has used finance data to determine states' or institutions' compliance with anti-discrimination laws. From these data OCR was able to determine whether or not predominantly black, publicly controlled institutions were being discriminated against through funding decisions made by state boards of higher education.

The Bureau of Economic Analysis of the U.S. Department of Commerce uses financial statistics to prepare totals and forecasts on total non-farm expenditures for structures and equipment, and to develop Gross National Product accounts.

Increasing numbers of state agencies use the NCES Finance report to assemble data to plan and evaluate their higher education policies.

Among associations, the American Council on Education (ACE), the Association for Institutional Research, the Brookings Institution, and the Carnegie Foundation for the Advancement of Teaching are frequent users of Finance data. Researchers from these and other organizations use the data to assess the economic future of the nation's colleges and universities. In addition, a recent project called the Delta Project has compiled IPEDS finance and other data into a researcher database on college costs.

g. Graduation Rates

The main GRS component provides a structure for calculating comparable graduation rate statistics across institutions. The data also provide much needed information to researchers as an outcome measure of institutional productivity, and offer insight into the relationship between the changing demographics of college-going cohorts within different types of institutions. The information collected in this component is used by institutions to help satisfy regulations regarding the Student Right-to-Know Act to disclose 150 percent of normal time graduation rates. The new Graduation Rates 200 component will collect consumer information on 200 percent graduation rates to meet requirements in the HEOA.

A.3. Use of Technology and Other Technological Collection Techniques

IPEDS implemented a web-based system in 2000 that makes use of advanced technology to reduce respondent burden and to improve the timeliness and quality of the reported data. NCES has taken several actions to facilitate the cooperation of postsecondary institutions responding to IPEDS. These actions include:

- a. The development of a fully automated web-based data collection for all components of IPEDS data. The data collection is organized into three modules, taking full advantage of data availability schedules.
- b. Survey components are customized based on screening information so that institutions are prompted to respond only to those items relevant to their institution. For example, if a private institution does not have a differential tuition charge to out-of-state students, they will be prompted for one tuition charge. Additionally, many data items (answered previously) will be available to the respondent on the collection instrument, so that only those items that have actually changed since the previous report need to be completed or updated.

The system allows for direct data entry as well as file upload and batch import. Edit checks and data verification procedures are built into the system, thus improving the efficiency of data collection by resolving errors at the time of data submission. Processing time and cost are thus reduced. All administrative functions are provided through the web, including nonresponse follow up, distribution of passwords, and other activities and correspondence. IPEDS also provides a Help Desk, which is available to respondents during and after data collection, to respond to questions, assist with data entry and error resolution, and provide general assistance with many other types of requests.

Data release is timelier. The system is designed to migrate reported/edited data to a SQL server as soon as the administrative functions have been performed and NCES has cleared the data. Institutions whose data have been migrated to the SQL server have immediate access to data for other institutions that have also completed the process through the NCES/IPEDS Peer Analysis Tool. This means that data may be available before survey closeout (for peer analysis). National data will become available within a matter of months after closeout.

- c. NCES works closely with State coordinators, many of who submit IPEDS reports for a subset of the institutions in their state. Increasingly, states obtain data from institutions electronically on a student unit record basis (data per student). Other states collect institutional data using either IPEDS forms or their own state forms, which are compatible with IPEDS. Data are then extracted from the state database in the IPEDS

format and file uploaded to the collection system. Thus institutions can provide data to their state and to NCES simultaneously.

- d. NCES will continue to encourage respondents to prepare IPEDS data in a format for uploading to the web-based collection instrument by providing detailed file specifications and instructions as well as "do's" and "don'ts" for data submission. In the Winter 2005-06 collection, IPEDS began offering data upload capabilities using Excel spreadsheet formats. This was encouraged by the IPEDS TRP members and was very well received by respondents.

A.4. Efforts to Identify and Avoid Duplication

NCES devoted considerable effort to assure that IPEDS does not duplicate other data collection activities involving postsecondary education providers. In developing IPEDS, NCES continues to assess the data collection efforts of other Federal agencies (e.g., National Science Foundation, Department of Agriculture, Department of Defense, Census Bureau, Equal Employment Opportunity Commission, Bureau of Labor Statistics) through an examination of their forms. In addition, NCES has in-depth discussions with the Department of Labor, as well as other Education Department offices (e.g., OCR, OPE, OVAE) to ascertain their needs for data and the role IPEDS can play in meeting those needs. Through meetings, workshops and TRPs, NCES works closely with other stakeholders including the State Higher Education Executive Officers (SHEEO), the National Association of College and University Business Officers (NACUBO), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), the National Association of Independent Colleges and Universities (NAICU), the American Association of Community Colleges (AACC), the Career College Association (CCA), the American Council on Education (ACE), the Consortium on Financing Higher Education (COFHE), the American Association of State Colleges and Universities (AASCU), the Western Interstate Commission for Higher Education (WICHE), the Southern Regional Education Board (SREB), and others. Duplication is avoided as various federal agencies, groups within the Department of Education, and other agency representatives share access to IPEDS data.

A.5. Methods Used to Minimize Burden on Small Businesses/Entities

Certain providers of postsecondary education included in the IPEDS universe of Title IV eligible institutions - operators of proprietary (private for-profit) schools - are small businesses. NCES has taken several actions to reduce reporting burden for these entities. These actions include:

- a. requesting a reduced set of data items from schools offering certificates below the baccalaureate level and
- b. maintaining a close liaison with the Career College Association, which represents proprietary postsecondary institutions, to assure the appropriateness of data being requested and the feasibility of collecting it.

A.6. Frequency of Data Collection

The survey components proposed for this request are those that will be collected beginning with the Fall 2009 collection and extending through the Spring 2012 collection, which will cover three full survey cycles (see Table 3). The survey data items are similar to those used for 2003-09, with a few additional items and minor modifications to improve clarity and enhance the use of the data.

A.7. Special Circumstances

None of the special circumstances described apply to these collections.

A.8. Consultations Outside the Agency

IPEDS was developed in conjunction with providers and users of postsecondary education data. Continuing a pattern that began with the initial development of the project in 1983, opportunities are taken throughout the year to discuss the project with data respondents, Federal agencies, data users, and any other interested parties.

Over the past 8 years, NCES has accelerated dialogue with these groups. Recommendations have been solicited and incorporated into our current plans. Identified below are organizations that have played a major consultative role:

- a. An IPEDS Technical Review Panel (TRP) was formed to assist in survey revisions and to discuss universe definitions. Representatives include state coordinators, federal representatives, educational association members, and institutional researchers and registrars from all postsecondary education sectors.
- b. The American Council on Education established an advisory group consisting of representatives from the various organizations involved in higher education issues. This group meets periodically with NCES to discuss the IPEDS project.
- c. Annual meetings are held with IPEDS state coordinators to obtain state input on IPEDS operations, survey revisions, analysis plans, and data needs.
- d. Meetings are held with the State Higher Education Executive Officers SHEEO/NCES Network.
- e. Visits are made to state education agencies, and to education agencies of U.S. territories, e.g. Puerto Rico.
- f. IPEDS workshops and presentations are made at various conventions and annual or regional meetings of educational and professional associations. IPEDS staff discuss proposed modifications or problem areas and receive input from the data providers.
- g. The Association for Institutional Research (AIR) continues to support a Higher Education Data Policy Committee to assist NCES with IPEDS.

The 60-day notice for this IPEDS 2008-2011 OMB Paperwork Reduction Act Submission package was published in the Federal Register on February 24, 2009, in Volume 74, on page 8239. A number of public comments were received in response to the Federal Register

notice. The comments and the responses to the comments are provided in a separate document, entitled “OMB IPEDS 2009-2012 Amendment 3 - 60 day comments.docx.”

A.9. Paying Respondents

There are no payments or gifts offered respondents.

A.10. Assurance of Confidentiality

IPEDS data are not collected under any pledge of confidentiality.

A.11. Justification for Sensitive Questions

These collections contain no questions of a sensitive nature.

Key to Abbreviations Used in Tables:

<u>IC</u>	Institutional Characteristics (includes price information)
<u>C</u>	Completions
<u>EF</u>	Fall Enrollment
<u>E12</u>	12-Month Enrollment
<u>HR</u>	Human Resources
<u>SFA</u>	Student Financial Aid
<u>F</u>	Finance
F-GASB	for public institutions following GASB (Statements 34/35)
F-FASB-NFP	for not-for-profit institutions and public institutions following FASB
F3-FASB-FP	for for-profit institutions
<u>GRS</u>	Graduation Rates – Student Right to Know graduation rates
GRS-4YR	for all 4-year institutions
GRS-4YRSUPP	to collect supplemental data on long programs at 4-year institutions
GRS-2YR	for 2-year institutions
GRS-2YRSUPP	to collect supplemental data on long programs at 2-year institutions
GRS-<2YR	for less than 2-year schools
<u>GR200</u>	Graduation Rates - 200 (to collect data on 200 percent of normal time graduation rates) [new beginning in 2009-10]
<u>SS09</u>	Spring Supplement 2009 [2008-09 data collection only]

A.12. Estimate of Burden

Table 1 shows the current approved response burden for the 2008-09 survey cycle, as amended by the notice of action on January 16, 2009.

Table 1. Approved Response Burden by Component 2008-09 (OMB 1850-0582)

Component	# of Institutions Responding (Estimated) ¹	2008-09	
		Estimated Burden	Total Burden Hours
Fall Collection			
Institutional Characteristics (IC) – Total			5940
4-yr academic form with price	2,400	0.9	2,160
4-yr academic form without price	200	0.6	120
4-yr program form without price	100	0.6	60
2-yr academic form with price	1,600	0.9	1,440
2-yr program form with price	600	0.9	540
< 2-yr academic form with price	200	0.9	180
<2-yr program form with price	1,500	0.9	1350
<2-yr program form without price	150	0.6	90
Completions - Total			16450
For 4-yr and 2-yr	4,900	3.0	14,700
For < 2-yr	1,750	1.0	1,750
12-Month Enrollment - Total			6090
4-yr form	2,600	1.1	2,860
<4-yr form			
For 2-yr	2300	1.1	2530
For < 2-yr	1750	0.4	700
Winter Collection			
Human Resources - Total			32415
Degree-granting >15 ft form	4,150	6.2	25,730
Degree-granting <15 ft form	50	6.2	310
Non-degree granting form			
For >15 ft	800	2.5	2,000
For <15	1,750	2.5	4,375
Spring Collection			
Fall Enrollment - Total			16730
4-yr form (AY)	2,500	3.2	8,000
4-yr form (PY)	100	3.2	320
<4-yr form (AY)	2,300	3.2	7,360
<4-yr form (PY)	1,750	0.6	1,050
Finance - Total			51400
F-GASB	2,000	12.0	24,000
F-FASB-NFP	1,800	8.0	14,400
F-FASB-FP	2,600	5.0	13,000

Table continues on following page

Component	# of Institutions Responding (Estimated) ¹	2008-09	
		Estimated Burden	Total Burden Hours
Graduation Rates - Total			20245
4-year	2200	5.0	11,000
2-year	2150	3.5	7,525
<2yr	1700	1.0	1,700
4 yr supp	30	0.5	15
2 year supp	10	0.5	5
Stud Financial Aid - Total			10980
Public academic yr form	1800	1.8	3240
Private academic yr form	2350	1.8	4230
Program yr form	1950	1.8	3510
Spring Supplement 2009 - Total			10980
4-year institutions	2200	1.5	3300
<4 yr institutions	3850	3.0	11,550
TOTAL			175,100
			175,100

¹ Estimates based on 2007-08 universe counts for Title IV eligible institutions.

One-Time Implementation Burden

OMB has also already approved the one-time implementation burden for the reclassification of first-professional and doctor's degrees of 19,720 hours. We estimated an average of 20 hours per institution. The total cost to respondents \$591,600 is based on the estimated response burden (hours) multiplied by \$30, which includes average clerical salary and associated computer costs (for running programs to extract data). Given the three-year implementation period planned, this one-time burden will be spread across the development, optional and mandatory years as institutions implement the change at different rates.

There will also be a one-time implementation burden estimate associated with the change in race/ethnicity reporting categories. On April 30, 2008, OMB approved a burden hour estimate (OMB CONTROL NUMBER: 1875-0245) for changes related to the U.S. Department of Education Guidance on the Collection and Reporting of Racial and Ethnic Data about Students, Teachers, and Education Staff. Information regarding this estimate and its impact on postsecondary institutions is highlighted in the table on the following page.

Table 2: Estimated Paperwork Burden for Designation and/or Redesignation of Race/Ethnicity

Paperwork Burden Activities	Number of Respondents	Hours per Respondent	Burden Hours
Changing the records of elementary and secondary students, teachers, and support staff.	55,714,000 ²	0.25	13,928,500
Changing the records of postsecondary students, teachers, and support staff.	19,900,000	0.25	4,975,000
Changing the records of other recipients and support staff.	1,000,000	0.25	250,000
Administering the change forms at the elementary, secondary, and postsecondary schools.	129,797	160.0	2,076,752
Administering the change forms by other recipients.	80	160.0	12,800
Administering the change process at the local and state education agencies.	14,442	160.0	2,310,720
Three-year Totals	76,758,319		23,553,772
Average Burden Hours Each Year			7,851,257

Annual Burden Calculation

Table 3 displays the estimated burden with the additional changes requested in this package for 2008-09 through 2010-11 for institutions responding to IPEDS using the web-based data collection system. Burden estimates change over the 3-year period to reflect cyclical nature of the surveys. The numbers of institutions responding reflect those that are required to respond (Title IV eligible) and will vary depending on whether the component is applicable to a particular type of institution.

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Table 3. Estimated Response Burden for IPEDS 2009-10 Through 2010-11 (Currently Approved and Revised)

Component	# of Institutions Responding (Estimated) ¹ 2008	2009-10 (Currently approved)		2010-11 (Currently approved)		# of Institutions Responding (Estimated) ¹ 2009	2009-10 (Revised)		2010-11 (Revised)	
		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours
Fall Collection										
IC – Total			11,140		11,140			10,895		10,895
4-yr academic form with price	2,400	1.4	3,360	1.4	3,360	2,400	0.9	3,360	1.4	3,360
4-yr academic form without price	200	1.1	220	1.1	220	200	0.6	220	1.1	220
4-yr program form without price	100	0.6	60	0.6	60	100	0.6	60	0.6	60
2-yr academic form with price	1,600	0.9	1,440	0.9	1,440	1,600	0.9	3,040	1.9	3,040
2-yr program form with price	600	0.9	540	0.9	540	600	0.8	1,080	1.8	1,080
< 2-yr academic form with price	200	0.9	180	0.9	180	200	0.8	360	1.8	360
<2-yr program form with price	1,500	0.9	1350	0.9	1350	1,500	0.8	2,700	1.8	2,700
<2-yr program form without price	150	0.6	90	0.6	90	150	0.5	75	0.5	75
Completions - Total			16,450		16,450			16,450		16,450
For 4-yr and 2-yr	4,900	3.0	14,700	3.0	14,700	4,900	3.0	14,700	3.0	14,700
For < 2-yr	1,750	1.0	1,750	1.0	1,750	1,750	1.0	1,750	1.0	1,750
12-Month Enrollment - Total			6,090		6,090			6,090		6,090
4-yr form	2,600	1.1	2,860	1.1	2,860	2,600	1.1	2,860	1.1	2,860
<4-yr form										
for 2-yr	2,300	1.1	2530	1.1	2,530	2,300	1.1	2,530	1.1	2,530
for < 2-yr	1,750	0.4	700	0.4	700	1,750	0.4	700	0.4	700
Winter Collection										
Human Resources - Total			56,800		32,415			56,015		32,160
Degree-granting – 15 or more	4,150	11.7	48,555	6.2	25,730	4,150	11.7	48,555	6.2	25,730
Degree-granting - <15	50	6.4	320	6.2	310	50	6.4	320	6.2	310
Non-degree granting form						2,550	2.8	7,140	2.4	6,120
For 15 or more	800	4.0	3,200	2.5	2,000					
For less than 15	1,750	2.7	4,725	2.5	4,375					

Table continues on following page

Component	# of Institutions Responding (Estimated) ¹ 2008	2009-10 (Currently approved)		2010-11 (Currently approved)		# of Institutions Responding (Estimated) ¹ 2009	2009-10 (Revised)		2010-11 (Revised)	
		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours
Spring Collection										
Fall Enrollment - Total			15,750		16,730			16,675		17,575
4-yr form (AY)	2,500	3.0	7,500	3.2	8,000	2,500	3.2	8,000	3.4	8,500
4-yr form (PY)	100	3.0	300	3.2	320	100	3.2	320	3.4	340
< 4-yr form (AY degree)						1,800	3.2	5,60	3.4	6,120
<4-yr form (AY nondegree)	2,300	3.0	6,900	3.2	7,360	500	2.7	1,350	2.7	1,350
<4-yr form (PY degree)						200	0.8	160	0.9	180
<4-yr form (PY nondegree)	1,750	0.6	1,050	0.6	1,050	1,550	0.7	1,085	0.7	1,085
Finance - Total			47,400		47,400			45,220		45,220
GASB form (degree)						1,600	10.0	16,000	10.0	16,000
GASB form (nondegree)	2,000	10.0	20,000	10.0	20,000	400	7.3	2,920	7.3	2,920
FASB NFP form (degree)						1,600	8.0	12,800	8.0	12,800
FASB NFP (nondegree)	1,800	8.0	14,400	8.0	14,400	200	7.0	1,400	7.0	1,400
FASB FP (degree)						800	5.0	4,000	5.0	4,000
FASB FP (nondegree)	2,600	5.0	13,000	5.0	13,000	1,800	4.5	8,100	4.5	8,100
Grad Rates³ - Total			20,245		20,245			26,020		26,020
4-year	2200	5.0	11,000	5.0	11,000	2,200	5.0	11,000	5.0	11,000
2-year	2150	3.5	7,525	3.5	7,525	2,150	5.0	10,750	5.0	4,250
<2yr	1700	1.0	1,700	1.0	1,700	1,700	2.5	4,250	2.5	1,700
4 yr supp	30	0.5	15	0.5	15	30	0.5	15	0.5	15
2 year supp	10	0.5	5	0.5	5	10	0.5	5	0.5	5
Grad Rates 200 – Total								14,850		9,075
4-year institutions	2,200					2,200	1.5	3,300	1.5	3,300
<4 yr institutions	3,850					3,850	3.0	11,550	1.5	5,775

Table continues on following page

Component	# of Institutions Responding (Estimated) ¹ 2008	2009-10 (Currently approved)		2010-11 (Currently approved)		# of Institutions Responding (Estimated) ¹ 2009	2009-10 (Revised)		2010-11 (Revised)	
		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours		Estd Burden	Total Burden Hours	Estd Burden	Total Burden Hours
Stud Financial Aid³ - Total			10,980		10,980			18,300		18,300
Public academic yr form	1,800	1.8	3,240	1.8	3,240	1,800	3.0	5,400	3.0	5,400
Private academic yr form	2,350	1.8	4,230	1.8	4,230	2,350	3.0	7,050	3.0	7,050
Program yr form	1,950	1.8	3,510	1.8	3,510	1,950	3.0	5,850	3.0	5,850
TOTAL			184,855		161,450			210,515		181,785

Note: The average annual burden house for across each of the three data collection years (2008/09. 2009/10. And 2010/11) is 189,136.

In all cases, if the data are readily accessible in machine-readable files, the time required is less than the estimated burden hours. Estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The number of institutions responding is estimated based on the 2007-08 universe; changes to these numbers for successive years are expected to be small.

The total cost to respondents is based on the estimated response burden (hours) multiplied by \$30, which includes average clerical salary and associated computer costs (for running programs to extract data). Total revised estimated costs to respondents for 2008-09 through 2010-11 are as follows:

	<i>Current</i> <i>(as approved by OMB)</i>		<i>Revised</i> <i>(with proposed changes)</i>	
	Total Burden Hours	Estimated Cost to Institutions	Total Burden Hours	Estimated Cost to Institutions
2008-09	175,100	\$ 5,253,000	No change	
2009-10	184,855	\$ 5,545,650	210,515	\$ 6,315,450
2010-11	161,450	\$ 4,843,500	181,785	\$ 5,453,550

A.13. Estimate of Cost Burden

There are no capital or startup costs associated with this data collection.

A.14. Cost to the Federal Government

We estimate a total cost to the government for the IPEDS 2008-9 through 2010-11 survey years of approximately \$27,738,100.

On an annual basis, over the three survey years, the contract costs will average about \$7.9 million per year. Federal S&E will be approximately \$1,300,000 the first year and about \$1,395,595 the third year. More than 95% of this amount will be spent in direct support of the institutional training and the collection, analysis, and reporting of the IPEDS data described herein. The contract amount includes all activities related to program support; data collection system maintenance; help desk support activities; programming and software modifications and documentation; training of contractor staff as well as institutional respondents; data collection, data review, and analysis; survey administration; imputations and data perturbation; file preparation, reporting, and data dissemination; Technical Review Panel meetings; AIR activities including training, dissertation and research grants, support of NCES Postdoctoral Policy Fellowships, and other related activities. The costs include personnel, fringe benefits, travel, supplies, computer related activities, consultants, other direct and indirect costs, plus overhead and G&A.

The time estimates and costs associated with the activities described above and in the IPEDS Statement of Work for the RFP are based on recent experience with the contractors that currently support the IPEDS operations (Westat, RTI International, IT Innovative Solutions, ORC-Macro, HigherEd.org, Inc., and others). IPEDS in-house staff costs are based on FY2009 pay schedules and an estimated 3.5% pay increase for each of the subsequent fiscal years.

A.15. Reasons for Change in Burden

The overall average change in response burden can best be explained by looking at the burden hour estimates on a component-by-component basis. Burden hours for the IPEDS Human Resources and the Fall Enrollment Surveys alternate from one year to the next because some of the questions are only asked every other year (this has been the case in past years as well).

Fall Collection

Institutional Characteristics: The 2009-10 current estimates for the **Institutional Characteristics (IC)** component were adjusted in the previous clearance package to incorporate the 200 percent graduation rate that had been collected on the Spring Supplement form in 2008-09. However, these items will not be included in IC, but rather in the new GRS200 survey. As a result, the *currently approved* 2009-10 estimates for all IC forms are reduced by 0.5 in the *revised* 2009-10 estimates. To reflect the additional year of pricing data and information on tuition guarantee plans added to the IC forms (with additional pricing data collection beginning in 2009), the burden has been increased by 0.1 for each of these forms. Finally, for the 2-year program form, and all of the <2-year forms, there is a reduction in burden of 0.1 to account for the deletion of items for non-degree-granting institutions. These alterations in burden are outlined below.

IC Form	Current 2009-10 estimated burden	Remove GRS200 from IC	Add 4 th year pricing data on forms with price	Remove items for non-degree-granting institutions	Revised 2009-10 estimated burden
4-yr academic form with price	1.4	-0.5	+0.1	-	1.0
4-yr academic form without price	1.1	-0.5	-	-	0.6
4-yr program form without price	0.6	-0.5	-	-	0.6
2-yr academic form with price	0.9	-0.5	+0.1	-	1.0
2-yr program form with price	0.9	-0.5	+0.1	-0.1	0.9
<2-yr academic form with price	0.9	-0.5	+0.1	-0.1	0.9
<2-yr program form with price	0.9	-0.5	+0.1	-0.1	0.9
<2-yr program form without price	0.6	-0.5	-	-0.1	0.5

Completions: No change.

12-Month Enrollment (E-12): No change

Winter Collection

Human Resources (HR): Burden of the forms varies every other year because data on fall staff is only required biennially (including 2009-10) from institutions with 15 or more full-time employees. In addition, burden estimates for non-degree-granting institutions, regardless, have been reduced to by 0.3 hours in 2009-10 to account for the consolidation of EAP and Fall Staff in odd-numbered years and by 0.1 hours in 2010-11 to account for the reduction in functional categories for employees in even numbered years.

Spring Collection

Fall Enrollment (EF): Estimates have been revised to account for the change in how student-to-faculty ratio data will be collected:

- Because data reporters will need to calculate this ratio using a worksheet provided in the data collection system, we have added 0.2 hours to all Fall Enrollment forms.
- To account for the reduction in items for non-degree-granting institutions, we have reduced estimates for those institutions by 0.1 hours.

Other fluctuations in burden result from alternating data collection cycles: the age of students is collected on the form in odd years and while in even years, residence and high school graduation status for first time, first-year students is collected.

Finance (F): We estimate burden to be reduced for nondegree-granting institutions because of a reduction in items suggested by the TRP. We have broken out burden for those institutions in Table 3 to reflect this change:

- For GASB nondegree-granting institutions, estimated burden decreases by 2.7 changing from 10.0 to 7.3 hours.
- For FASB non-profit nondegree-granting institutions, it decreases by 1.0 from 8.0 to 7.0 hours.
- For FASB nondegree-granting for-profit institutions, it decreases by 1.0 from 5.0 to 4.0 hours.

Graduation Rates (GRS): Estimates for the 2-year and <2-year forms have been and increased by 1.5 hours to account for the addition of data elements to calculate 100 percent graduation rates for these institutions as required by HEOA.

Student Financial Aid (SFA): we estimate an increase in burden of 1.2 hours to report the data required to calculate net price as required by HEOA. This increases the overall estimated burden hours for these forms from 1.8 to 3.0 hours per institution.

A.16. Publication Plans/Project Schedule

a. Schedule of Activities

TABLE 3. IPEDS 2009-10 SAMPLE PROJECT SCHEDULE³

Activity	Collection Period		
	Fall	Winter	Spring
First letter to CEOs	7/2009	--	--
E-mail to appoint/confirm keyholder	7/2009	11/2009	1/2010
Registration opens	8/2009	--	--
Data collection opens	9/2009	12/2009	3/2010
Data collection closes - keyholders	Open + 6 weeks	Open + 7 weeks	Open + 6 weeks
Data collection closes - coordinators	Open + 8 weeks	Open + 9 weeks	Open + 8 weeks
Draft data files delivered	Open + 20 weeks	Open + 20 weeks	Open + 20 weeks
Imputations complete	Open + 24 weeks	Open + 24 weeks	Open + 24 weeks
Draft First Look delivered	Open + 27 weeks	Open + 27 weeks	Open + 27 weeks

Survey activity will include registration period followed by a 6-7 week collection cycle. Registration must take place (only once) before data can be entered into the system. Data can be entered directly or through file or batch upload. However, respondents must resolve all errors/flags before data can be locked. This lock must take place before the collection period closes if data are to be considered as submitted in a timely fashion. Once the collection closes for institutions, coordinators have a two-week period for review. Once complete, the survey administrators (Help Desk) review the data, additional error resolution is performed, and a preliminary file is created for review by NCES. Once approved, imputations are run. Following NCES approval of the imputed file, data can be migrated to the Peer Analysis System and publications are prepared.

b. Distribution Methods

NCES distributes IPEDS data to users in a timely fashion and in a format that is easy to use. Specifically, IPEDS will be distributed in the following ways:

1. Data Dissemination Tools

IPEDS Data Center

In Spring 2009, NCES will release the IPEDS Data Center that will replace the IPEDS Peer Analysis System (PAS) and Dataset Cutting Tool (DCT) as the primary method of disseminating IPEDS data to the postsecondary education, policy, and research communities. The data center allows data users to create different reports and datasets, depending on their individual needs. Users can create reports that highlight a particular institution and compare it to other institutions, or they can simply create a report about a group of institutions. Users follow a step-by-step

³ The 2009-10 and 2010-11 collection schedules will follow a similar pattern.

approach to retrieve the data in the format of their choice. Institutions included in the report or dataset can be selected by name or abbreviation, by using variables or advanced grouping functions, or by uploading a previously saved group of institutions. Variables to be included in the report or dataset can be selected using the IPEDS variable tree, users can create their own variables using IPEDS variables, or they can upload a previously saved set of variables. Users can retrieve data for single or multiple institutions, rank or trend variables, create group statistics, generate pre-defined reports, and create custom data files as well as download survey data files. Throughout the data center, there is context help to aid users in understanding the different steps, as well as the IPEDS data. The data center is built to accommodate users from beginning to advanced levels.

Executive Peer Tool (ExPT)

NCES designed this system for data users at higher levels of administration within an institution who are unfamiliar with the procedures and data file organization of IPEDS data tools. It provides an easy 5-step process to analyze a predetermined set of variables and includes specific direction and instruction about the process of retrieving data, allowing the user to learn what tools are available in the full scale PAS. As institutions receive their IPEDS Data Feedback Reports, the ExPT can be used to produce the indicators in the report for different groups of institutions. Visit <http://nces.ed.gov/ipedspas/ExPT> for more information on this tool.

College Navigator

In response to the Higher Education Amendments of 1998, NCES developed a searchable website to provide up-to-date statistics on a broad range of postsecondary institutions for easy access by consumers. The site presents general information about each institution and its mission, as well as data on institution prices, financial aid, enrollment, degrees and awards conferred, graduation rates, accreditation, and program offerings. College Navigator is designed to help college students, future students, and their parents understand the differences among colleges and how much it costs to attend college. The site also provides direct links to each institution's home page; campus crime statistics; Federal Student Aid's website, which includes the Free Application for Federal Student Aid (FAFSA); the Campus Tours website; and various other postsecondary education websites. Visit <http://nces.ed.gov/collegenavigator/> for more information.

Data Analysis System (DAS)

This tool allows users to dynamically generate summary tables that provide sums, counts, and percentage estimates for 1 year of IPEDS data. Users can select and regroup categorical variables for producing estimates and identify ranges of values to form subgroups and estimates. Also included as part of the DAS is a table library that includes all FIRST LOOK tables, compendium tables, and state tables produced for IPEDS. The DAS was first released in winter 2004-05. Visit <http://nces.ed.gov/dasol/> for more information.

2. Survey Reports

NCES releases data in a wide variety of formats, including basic tables, descriptive reports, and more detailed analyses. A few of these types of reports are detailed below:

- (a) First Look Reports: Concurrent with the release of the data file for each IPEDS collection cycle, a predetermined set of tables called is produced and disseminated to the public. These tabulations include 1-year data tables and selected findings.
- (b) Descriptive Survey Reports: Shortly after First Look reports are produced, reports highlighting additional findings from the survey may be produced for various components. These reports are widely distributed to policymakers as well as the general public.
- (c) Analytic Reports: Comprehensive reports are produced periodically to analyze major policy issues, such as trends in minority enrollment and degrees, trends in faculty salaries, and trends in degrees by field of study.
- (d) Other NCES Reports: The *Digest of Education Statistics, Projections of Education Statistics*, and the *Condition of Education* contain major sections based on IPEDS data. These publications have large distributions to a broad spectrum of users of postsecondary education statistics.

A.17. Request to Not Display Expiration Date

The Department is not seeking approval to forego displaying the OMB approval expiration date.

A.18. Exceptions to the Certification

There are no exceptions to the certification statement.