

Comments Received During 60-Day Comment Period on Proposed Changes to the IPEDS Data Collection (Amendment 3)

<b>Changes to the Student Financial Aid (SFA) Survey to Collect Data Needed Calculate Net Price for HEOA</b> <b>(Survey forms affected: Student Financial</b> <b>See pages 14-15 in Supporting Statement</b>		
<b>Commenter</b>	<b>Comment</b>	<b>NCES Response</b>
<b>Marla Harrington</b> <b>Financial Aid</b> <b>Coordinator</b> <b>Grand River</b> <b>Technical School</b> <b>Chillicothe, MO</b>	<p>On the Student Financial Aid survey, there needs to be an "unknown" category. If a student chooses to pay privately, and does not submit a FAFSA, we have no way of knowing the family income level.</p>	<p>The new data that are proposed be collected by income categories on the Student Financial Aid form are limited to recipients of Federal student Title IV aid. All recipients of Title IV aid are required to have completed a FAFSA, and therefore as you indicate, your institution has data on family income for them. Therefore, an unknown category will not be necessary.</p>
<b>Brian R. Lashley,</b> <b>Ph.D.</b> <b>Acting Director of</b> <b>Inst. Res.</b> <b>Eastern</b> <b>Connecticut State</b> <b>U.</b> <b>Willimantic, CT</b>	<p>Regarding the proposed changes for Student Financial Aid:</p> <p>disaggregating students by off-campus/on-campus will be no problem at all, but distinguishing between off-campus with parents vs. off-campus not with parents would involve certain assumptions. I could not guarantee accurate data along this dimension.</p>	<p>These changes were developed based on input from a meeting of the IPEDS technical review panel. According to the student financial aid officers at the meeting, data on whether students live off-campus with parents or off-campus without parents is available in their data systems. These data are used in identifying a student's estimated budget and financial aid eligibility. Therefore, I encourage you to contact your financial aid office to see if they are able to provide you the data for reporting to IPEDS. We recognize that this will require additional effort and reporting burden; however, it is the best way the technical review panel could determine to produce net price based on the different prices of attendances reported in the Institutional Characteristics survey component of IPEDS.</p>
<b>Dr. S. Wickes</b> <b>Westcott III</b> <b>Director</b> <b>Office of</b> <b>Institutional</b> <b>Research</b> <b>Clemson University</b> <b>Clemson, SC</b>	<p>Changes in data collection required by these new regulations require information that is no longer available. Detailed records of financial aid disbursements are not archived beyond the current year. In order to compile a 3-year history of financial disbursements as required under the new guidelines would require at least 4 years advanced notice. As it is, the</p>	<p>These changes were developed based on input from a meeting of the IPEDS technical review panel. According to the student financial aid officers at the meeting, the data needed should be available at your institution. Specifically:</p> <p>Prior Years Data. Federal regulations require that schools must retain financial aid records for a minimum of 3 years from the end of the financial</p>

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	<p>current reporting structure requires that we anticipate reporting requirements one year in advance of reporting the information to IPEDS.</p> <p>In addition to lack of historical data, our institution has no established process to collect information on a student's living arrangements. We consider this to be private information and it might be considered an invasion of the student's privacy to ask them to provide this information. If we agreed to establish a process for collection of this type of information, we would want a minimum of 5 years to develop, implement, and verify the reliability of the methods prior to beginning any official reporting.</p>	<p>aid award year (See 34 CFR 668.24; 34 CFR 668.27; and the Federal Student Aid Handbook, Chapter 9).</p> <p>Data on whether students live off-campus with parents or off-campus without parents are available. These data are used in identifying a student's estimated budget and financial aid eligibility. The data are collected from students on the FAFSA forms. Non-aid applicants who did not complete a FAFSA will be reported in the "Unknown" category.</p> <p>I encourage you to contact your financial aid office to see if they are able to provide you the data for reporting to IPEDS. We recognize that this will require additional effort and reporting burden; however, it is the best way the technical review panel could determine to produce net price based on the different prices of attendances reported in the Institutional Characteristics survey component of IPEDS.</p>
<p><b>Sam Lowther</b>  <b>Office of</b>  <b>Institutional</b>  <b>Research &amp;</b>  <b>Assessment</b>  <b>203 Samford Hall</b>  <b>Auburn University,</b>  <b>AL</b></p>	<p>As the IPEDS Keyholder for Auburn University, I would like to express concern over the proposal to collect financial aid information by living arrangements of students. While we could identify on-campus students fairly reliably, the requirement to break off-campus students into two categories is problematic for several reasons:</p> <ol style="list-style-type: none"> <li>1. Such information is not currently available.</li> </ol>	<p>These changes were developed based on input from a meeting of the IPEDS technical review panel. According to the student financial aid officers at the meeting, data on whether students live off-campus with parents or off-campus without parents are available. These data are used in identifying a student's estimated budget and financial aid eligibility. The data are collected from students on the FAFSA forms. Non-aid applicants who did not complete a FAFSA will be reported in the "Unknown" category you reference. Therefore, I encourage you to contact your financial aid office</p>

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	<p>2. Requesting such information from students would be onerous and, in my experience, largely fruitless. Further, there would be no way to come up with such information for students included in earlier years' cohorts, many of whom might no longer be enrolled.</p> <p>3. At least for our institution, the estimated costs of attendance are virtually identical for on- and off-campus students, irrespective of living arrangements. There would be no value for collecting such information, even if it were available.</p> <p>4. Off-campus students, even at a traditional campus like ours, are notoriously mobile. Information collected becomes outdated rapidly and students rarely update their status with the institution.</p> <p>5. It's not clear what constitutes "living with family." Are two married students sharing an off-campus apartment living with family? What about a single mother residing with her two children?</p> <p>6. According to the proposal, there will be a category of "unknown." Very likely, most institutions will use this field, resulting in information that is unusable for its intended purpose.</p> <p>Thank you for the opportunity to comment. I hope these points will be of value.</p>	<p>to see if they are able to provide you the data for reporting to IPEDS. We recognize that this will require additional effort and reporting burden; however, it is the best way the technical review panel could determine to produce net price based on the different prices of attendances reported in the Institutional Characteristics survey component of IPEDS.</p>

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<b>Mary Harrington</b> <b>Director</b>  <b>Brenda Wimberly</b> <b>Systems Analyst III</b>  <b>Institutional</b> <b>Research and</b> <b>Assessment</b> <b>University of</b> <b>Mississippi</b>	<p>The University of Mississippi wishes to comment on the proposed change to the 2009-10 IPEDS reporting of Student Financial Aid. We do not maintain data that identifies whether a student lives off-campus with family or off-campus without family. Although we could start collecting those data going forward, we could not disaggregate award data in this manner for the past three cohorts (2006-07 through 2008-09).</p> <p>We respectfully request that you reconsider this specific change.</p>	<p>These changes were developed based on input from a meeting of the IPEDS technical review panel. According to the student financial aid officers at the meeting, data on whether students live off-campus with parents or off-campus without parents are available in their systems. These data are used in identifying a student's estimated budget and financial aid eligibility, and are collected from financial aid applicants on the FAFSA form. Non-financial aid applicants for which the data are not available can be reported as "unknown." I encourage you to contact your financial aid office to see if they are able to provide you the data for reporting to IPEDS. We recognize that this will require additional effort and reporting burden; however, it is the best way the technical review panel could determine to produce net price based on the different prices of attendances reported in the Institutional Characteristics survey component of IPEDS.</p>

**Changes to revise collection of data for calculating student to faculty ratios**

Survey forms affected: Fall Enrollment

See page 15 in Supporting Statement

Commenter	Comment	NCES Response
<p><b>Misty Haskamp Institutional Research Analyst Columbia College Columbia, MO</b></p>	<p>Columbia College in MO is suggesting utilization of CDS I3 in addition to the student-to-faculty ratio.</p> <p>We noticed that the student the faculty ratio is somewhat misleading do to the formula establishing that a part time Adjunct is only considered as 1/3 an employee. For our Adult Higher Ed program, all of our faculty are part time adjunct, but that doesn't mean they are teaching only 1/3 a load.</p> <p>Utilizing the IPEDS formula, Columbia College Student-to-Faculty Ratio is 35:1. Only 4% of our courses have 30-39 students in them, and we have no course sections with more than 39 students. See below distribution of number of course sections within the size rage of class 2-9, 10-19, 20-29, 30-39 and so on (This is data from Fall 2008 course sections and comes from CDS I3).</p>	<p>I understand your concerns about the student-to-faculty ratio calculation and how part-time faculty are handled. We are considering methods of improving the student-to-faculty ratio data collection and calculation for the future, particularly because the 2008-09 data collection year was the first year that these data were collected. We added the student-to-faculty ratio data to the IPEDS data collection because it was mandated by the Higher Education Opportunity Act that was signed into law on August 14, 2009. However, we will carefully consider your suggestion of additionally collecting undergraduate class size data in the future to provide more context for the student-to-faculty ratio numbers that are reported.</p> <p>In the meantime, I'd like to make sure you are aware of the opportunity to provide further information in the "context" box that is provided on the student-to-faculty ratio data collection screen. You are able to enter text in that box that might help provide further context for interpreting the student-to-faculty ratio and that text will then be posted to the College Navigator website for users to read along with your data. This would be an appropriate place to include your institution's undergraduate class size distribution if you feel this would help provide a more accurate picture of the undergraduate experience on your campus.</p>

**Changes to Simplify IPEDS Reporting and Reduce Reporting Burden for Nondegree-granting Institutions**  
**(Survey forms affected: Institutional Characteristics, Human Resources, Fall Enrollment, Finance)**  
**See pages 16-18 in Supporting Statement**

Commenter	Comment	NCES Response
<p><b>Elaine Giuliano</b>  <b>Director of Education</b>  <b>Central Coast College</b>  <b>Salinas, CA</b></p>	<p>Just two words from a non-degree-granting institution:</p> <p>THANK YOU!</p> <p>Seriously, I have been preparing IPEDS reports for over 10 years and have found them incredibly burdensome and frequently irrelevant to our institution and population. Some of them are revealing and interesting to complete; in other cases I am left scratching my head wondering how significant any statistics about my employees could be when there are fewer than 20 of us working here at any given time. The Finance section always seemed somewhat intrusive to me, particularly as we have two audits a year — one business audit and one financial audit — to ensure our fiscal soundness.</p> <p>I understand the need to have an open and objective place for prospective students to compare schools across common standards; I appreciate that someone realized that non-degree-granting is very different in many ways from the traditional, degree-granting institutions.</p> <p>Thank you again for your time and attention.</p>	<p>I am writing in response to your comments of March 30, 2009, regarding the National Center for Education Statistics’ amended package for a three-year clearance for the Integrated Postsecondary Education Data System (IPEDS). Thank you for the interest in our data collection. We are pleased to hear that the proposed changes to the forms to accommodate nondegree-granting institutions are helpful to your institution. Please let me know if you have any further comments. If you are interested in becoming an IPEDS trainer for nondegree-granting institutions or participating in future meetings of our technical review panel on behalf of institutions like yours, please let me know. Again, we appreciate your ongoing interesting in IPEDS.</p>