



Oregon
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May 11, 2011

Office of Information and Regulatory Affairs
Attention: Education Desk Officer
Office of Management and Budget
725 17th NW, Room 10222
New Executive Office Building
Washington, DC 20503

Dear Sir or Madam:

I am writing to register the Oregon University System's dismay at the proposal by the Institute of Education Sciences to drop the collection of fringe benefits from its IPEDS Salaries Survey. As someone who has regularly completed IPEDS faculty surveys and relied on national data collected through IPEDS for the past 15 years, I can say that losing fringe benefits information will materially diminish our system's ability to evaluate faculty compensation.

1. IPEDS is the only comprehensive source of fringe benefits data for instructional faculty nationwide. At a time when medical insurance and retirement contributions constitute an ever-increasing proportion of overall faculty compensation, it mystifies us that IES would even consider ending the one source for reliable comparisons between states, across educational institutions, and over time. Other organizations, such as the American Association of University Professors, also collect fringe benefits data, but their surveys are voluntary and comparatively few colleges complete them.
2. Although IES believes that eliminating the collection of fringe benefits reduces institutions' reporting burden, in truth IPEDS burden is mainly occasioned by two things: having to develop new data sources, and having to make changes to existing processes. Dropping fringe benefits necessitates a change to existing IPEDS processes, so the change actually amounts to an increase in burden.
3. At the same time, dropping fringe benefits will not relieve institutions of the need to maintain a system that handles them. These data of necessity reside in every educational institution's HR or financial information system, so they remain readily available for reporting.
4. Finally, even if IES were to stop collecting fringe expenditures, the nation's colleges would continue to monitor them at their own campuses. Just as now, fiscally prudent colleges would analyze the proportion of faculty compensation being devoted to benefits and track changes in that proportion over time. The only difference would be, colleges would no longer be able to measure their expenditures against peers, against other states, and against the nation as a whole. Nor would

Congress or other shapers of federal policy.

Losing that ability would seriously compromise the educational sector's efforts to gauge the efficiency of expenditures on faculty benefits. We urge you to ask IES not to discontinue the collection of this vital piece of information.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. North". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tom North
Senior Research Analyst

c Bob Kieran
Abdus Shahid