

# Public Comments Received During the First 30-day Comment Period and NCES Responses

## Comments related to Outcome Measures 10-years Comment Numbers: 52, 49, 47 & 50

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0052

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Anonymous

**Address:** United States,

### General Comment

I have been a faculty member at a comprehensive urban school and have also been a frequent accreditation visitor. In both my roles, I have seen many students "stop out" for 4-6 years for various reasons and then come back successfully for the same or a different degree. These ought to be considered completers. I have also seen half-time students at 5-year schools complete their degree and go on to robust careers. I would advocate a 10-year period for completion, or at least a 10-year completion period specifically for 5-year schools. This will best capture the variety and success of American Higher Education.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0049

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Anonymous

**Address:** United States,

### General Comment

I feel badly for those community colleges that say they will have a great reporting burden, but I also think it is shame if students like me get lost in the shuffle. Before I completed my undergraduate degree, I took a number of years “off” of my program for a unique, non-credit study abroad program followed by a research stint in the U.S. I also was sidetracked pursuing a major that I found wasn’t right for me. When all was said and done, it was around ten years by the time I got my B.A. I went on to successfully achieve my master’s as well. I know others like me, and I think it is short-sighted not to figure out a way to capture our successes. Has anyone considered the possibility of looking at 10 year graduation rates as an alternative to, or in addition to, the 8 years proposed here?

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0047

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** anonymous

**Address:** United States,

## General Comment

I see that many community colleges have an issue with the 8 year cohort and think a 6 year cohort would better suit the community college sector. While I can’t comment on that, I understand their concern that it does not make sense to have a “one size fits all” approach. I would suggest that an 8 year cohort does not work for all BA programs either. Not all bachelor degree programs fit into the cookie cutter mold and are 4 year programs. There are five year bachelor’s programs as well. If the goal is to have an accurate portrayal of students who finish their degree, the cohort should be equally reflective of all institutions. I assume that the 8 year cohort is being proposed because it represents 200% of the 4 year BA. This makes sense for 4 year programs; it allows for part students to be counted and for a student to take a year off and come back and complete his degree. It does not make sense for 5 year bachelors programs. It does not allow the same for the students attending those programs to be counted as completers. I suggest having 3 rates, 6 years for community colleges as they have requested. 8 years for 4 year BA programs, and 10 years for 5 year BA programs. Alternatively, just use 200% of the degree length.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0050

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** C Jacobowitz  
**Address:** United States,

### General Comment

The effort by NCES to capture comprehensive student outcomes in regards to degree attainment is laudable, and the proposed methodology is an important step forward. However, the bottom line is students, parents, the media, government and other stakeholders often focus primarily on the “graduation rate” as a key indicator of institutional effectiveness. As such, a comprehensive overview of completion rates should be structured in a manner that assures that all completions can be captured accurately. Focusing on the 8-year outcomes of an entering student cohort does not allow for capture of all student outcomes.

It is crucial to separate the consequences of students’ personal choice from those factors that reflect a higher level of institutional control. Students take time off in the midst of their educational programs for many reasons such as volunteer service; for non-credit year abroad; because they run out of money and must work in order to afford additional tuition and living expenses; and to fulfill family obligations, including raising children, caring for elderly parents, and supporting a spouse’s education or career development. Students’ need to “stop out” of college for several years should not be counted against institutions in weighing their relative success in regards to student completion. This is especially important in light of the fact that students from disadvantaged backgrounds are more likely to need to “stop out” due to financial constraints, work schedules, or family obligations. These students may not graduate within the 8 year time frame due to time lost to “stopping out.” thereby unfairly skewing the completion rates of those institutions that outreach to the population that student aid targets for assistance.

The most accurate way to weight for “factors beyond the institution’s control” is to develop a method for counting only actual time in college. Once a student “stops out” of school and then subsequently returns – he no longer belongs in his original cohort; rather he belongs in a later cohort that reflects the gap during which he was not in school.

IPEDS already allows for some adjustment of cohorts based on military service or other limited factors; we suggest expanding this allowance to include any student who stops out and then returns to school. We further suggest that this method be allowed but not required of all schools, as some institutions may find the burden of managing such movement between cohorts to be excessive, while many others will appreciate the chance to demonstrate accurate completion rates for their students.

A simpler way of ensuring the capture of completions on students who “stop out” would be to assess completion rates on cohorts after 10 years, instead of 8 years. This would also have the advantage of addressing another issue – students who attend five-year bachelor’s programs on a part-time basis will only complete their degree in 10 years, and these completions are not captured by the proposed 8-year cut-off.

### **RESPONSE:**

Dear C Jacobowitz et al.,

Thank you for your comments submitted during the 30-day review process, responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education

Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

The Outcome Measures component represents a new collection for IPEDS and the postsecondary education community. During its multiyear development process, the Department of Education established committees and Technical Review Panels comprised of industry representatives. The creation of a single output measure for postsecondary education has great value to institutions of higher education for institutional research and improvement, prospective students and their families for decision-making about postsecondary education, and policymakers for guiding efforts to improve student outcomes and success in higher education.

It is true that this outcome measure will not allow for 200% of a 5-year bachelor degree program, but this measure is not intended to represent 200% of normal time to any particular kind of award. Instead, the TRP was quite adamant that this new measure simply reflect student cohort status at a particular point in time. The 8-year point in time represents a balance between collecting as many awards as possible while keeping the length of time elapsed to a minimum. Based on input from the postsecondary community and that of policymakers, NCES will propose to add a column to allow for the accounting of the number of awards granted 6-years after matriculation, and then again at 8-years. To keep burden low, both the 6-year and 8-year counts will be collected at 8-years. NCES will continue to study the utility of the new OM component of IPEDS.

Sincerely Yours,  
Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## **Comments related to Outcome Measures 6 year**

**Comment Numbers: 41, 40, 39, 37, 36, 35, 34, 33, 32, 31, 30, 28, 27, 26, 25, 24, 23, 22, 21 & 20**

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0041

Comment on FR Doc # 2013-19107

### **Submitter Information**

**Name:** Troy Vermeer

### **General Comment**

Department of Education Staff:

I encourage the use of a 6-year cohort vs. an 8-year cohort for future IPEDS collections. As a community college stakeholder I find the 6-year rate far more useful given that few students graduate after six years. And as an IPEDS Keyholder I would find data collection for a 6-year cohort much easier than for 8-year.

Finally, using a 6-year cohort accords with other research endeavors such as Voluntary Framework for Accountability and National Community College Benchmark Project. Thanks for your time.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0040

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Anonymous

**Address:** United States,

#### **General Comment**

Our community college has a rather extensive part-time student population, I urge you to consider a six-year rather than the proposed eight-year timeframe. A six-year cycle would be more appropriate and would align with VFA guidelines and other voluntary benchmarking reports (such as the National Community College Benchmark Project.). The proposed eight-year model should only apply to four-year institutions or none at all if the goal is a single standard. Anything more than six years is a waste of resources and overly burdensome on reporting institutions, in my opinion. Thank you.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0039

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Todd Schwarz

**Address:** United States,

#### **General Comment**

In response to the Dear Colleague communique of August 30, each of the three Idaho community colleges were consulted. The unanimous response was in favor of keeping IPEDS reporting cohorts consistent with the VFA 6-year cohort. Below you will find the separate institutional responses from each of the three schools:

College of Southern Idaho  
Twin Falls, Idaho

The College of Southern Idaho (CSI) is concerned that a number of existing outcome measures for higher education do not accurately represent the outcomes for community college students. Because of this

concern, CSI is investing time and resources to help develop better measures and outcome data through the Voluntary Framework of Accountability (VFA) data system. We are encouraged that the new IPEDS Outcome Measures generally align with the VFA system, with one notable exception: the eight-year cohort model is not well-suited to the community college student population. Furthermore, it runs counter to the current VFA efforts with the six-year cohort model that have been developed and adopted by leading community college researchers across the country. We respectfully request that you utilize a six-year cohort model for the community college student outcomes.

College of Western Idaho  
Nampa, Idaho

The College of Western Idaho is in support of the proposal to align IPEDS Measures with the VFA. As you are aware, the three community colleges including CWI are participating in the VFA process. Although CWI is in favor of the alignment, as a two year institution, we would not be supportive of an eight year cohort but would support maintaining the direction of the VFA which includes a two year and six year cohort. We believe that an eight year cohort would place an added burden on the institutions and would compromise the beta group work that has been and is underway by the VFA. Thank you for the opportunity to provide this input and let us know if you require anything else related to this subject.

North Idaho College  
Coeur d'Alene, Idaho

I am a Director of Institutional Effectiveness at a 2-year public community college and support the efforts to add an outcome measures component to IPEDS data collection but would suggest that a six-year cohort be used for community colleges. Our institution is participating in the Voluntary Framework of Accountability (VFA) beta testing and they have chosen to follow the student for six years instead of eight years. I trust the work that has gone into the development of the VFA and support their design choices.

Todd Schwarz, Ph.D.  
Administrator  
Idaho Division of Professional-Technical Education

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0037

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Anonymous  
**Address:** United States,

#### **General Comment**

Including the new Outcomes Measures in the IPEDS data collection is an appropriate next step in this age of greater accountability for higher education. However, the recommendation to keep the eight-year

tracking period, regardless of the type of institution, is disappointing to say the least.

Managing a one-size fits all approach is often easier for the owner of the process but it rarely delivers the intended results. We wouldn't expect to utilize a one-size fits all approach when it comes to teaching our students or managing our health, in fact it would be frowned upon. Why then, is it acceptable to revert back to a one-size fits all approach when it comes to reporting outcomes metrics for 4-yr and 2-yr colleges to IPEDS?

We not only live in an era of greater accountability, we live in an era of scarce resources and reduced funding. There is an expectation to do more with less. The IPEDS Outcomes Measures and the VFA have the opportunity to compliment, rather than compete against, each other but only if the eight-year timeline is changed to six for community colleges. The eight-year timeline is less meaningful for community colleges and creates undue burden to those colleges already participating in the VFA or those that have state mandates tied to a six-year tracking cycle.

Jackson College urges the Department of Education to reverse its decision to pursue the eight-year tracking model for community colleges and go with the six-year tracking approach instead.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0036

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Anonymous

**Address:** United States,

#### **General Comment**

While I appreciate that extended tracking time will benefit two-year schools, like mine, that have large part-time student populations, I urge you to consider a six-year collection timeframe rather than the proposed eight-year timeframe. A six-year cycle would be more appropriate to existing practices within our field and would align with VFA guidelines and other voluntary benchmarking reports (such as the National Community College Benchmark Project.). Thank you.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0035

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Victoria Ichungwa

### General Comment

Thank you for your invaluable work in the proposed IPEDS Outcome Measures. I believe that the two year community colleges would really benefit and appreciate your review of the 8 year cohort recommendattion. The Voluntary Framework of Accountability (VFA) is one comprehensive national accountability system created for community colleges as a community college measure of effectiveness. The VFA framework utilizes the 6 year cohort and maintaining this consistency is vital in adequately measuring the unique mission of community colleges.

Thank you and we hope that you will reconsider your recommendation of 8 year cohort and select the 6 year cohort instead.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0034

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Maureen Pettitt

### General Comment

While I applaud the proposed redesign, I do have a grave concern that the introduction of an eight-year cohort is inappropriate, as noted below, as well as adding an unnecessary institutional burden for 2-year colleges. Six-year cohorts are for good reasons more appropriate for predominantly 2-year degree-offering institutions; thus, this metric was selected for the VFA and other national accountability standards. While the eight-year model may be fine for 4-year institutions, measures focused on traditional 4-year institution metrics remained largely useless for the 2-year sector. I urge the Department of Education to reconsider and select the six-year cohort framework instead.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0033

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Nathan Wilson

### General Comment



The Illinois Community College Board (ICCB) greatly appreciates the efforts by the Department of Education in the redesign of IPEDS outcome metrics. However, there is concern about utilizing an eight-year cohort instead of a six-year cohort in tracking community college credential completion. Tracking community college completion with the six-year instead of an eight-year cohort allows for alignment between the American Association of Community Colleges (AACC) Voluntary Framework of Accountability (VFA) and IPEDS. A number of Illinois community colleges participate in VFA and the initiative continues to gain momentum nationally due to the metrics accurately reflecting the mission of community colleges. AACC went through an extensive vetting and pilot process in establishing the VFA metrics. Please also consider reporting burden and additional cost involved in tracking community college graduates for eight years instead of six.

Nathan Wilson  
Senior Director for Research and Policy Studies  
Illinois Community College Board

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0032

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Kristi Barnett

**Address:** United States,

#### **General Comment**

Bevill State Community College is pleased to learn of the redesign with the exception of one aspect, the 8 year cohort for all institutions. An eight-year cohort vs. a six-year cohort adds an unnecessary institutional burden and produces less useful data for community colleges. The six-year cohort is the standard for 2 year institutions and was even selected as the featured reporting measure by the Voluntary Framework of Accountability. Trying to push for a one size fits all solution seems to defeat the purpose of the redesign, as many old measures were so focused on traditional 4-year institutions that they remained largely useless for the two-year sector. We urge the Department of Education to reconsider and select the six-year cohort framework instead. Two year and four year institutions are very different models. They simply cannot use the same time frames for measurements. It is inappropriate and highlights a lack of understanding of two year colleges.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0031  
Comment on FR Doc # 2013-19107

### **Submitter Information**

**Name:** Anonymous  
**Address:** United States,

### **General Comment**

"While the redesign is overdue, I believe that the introduction of an eight-year cohort vs. a six-year cohort adds an unnecessary institutional burden and produces less useful data. Six-year cohorts are for good reasons more appropriate for predominantly 2-year degree offering institutions; that's why this measure was selected for the VFA and other national accountability standards at the first place. Research has shown that the greatest educational return is within the 6 year period; that after that time, little more is captured. Trying to push for a one size fits all solution seems to defeat the purpose of the redesign, as many old measures were so focused on traditional 4-year institutions that they remained largely useless for the two-year sector. I urge the Department of Education to reconsider and select the six-year cohort framework instead. Facilitating the ease of data use at the cost of data usability and comparability does not make much sense, and requiring community colleges to support yet another ill-designed measure seems wasteful."

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0030

Comment on FR Doc # 2013-19107

### **Submitter Information**

**Name:** Todd Carter  
**Address:** Liberal, KS, 67901

**Email:** todd.carter@sccc.edu

**Submitter's Representative:** Todd Carter

**Organization:** Seward County Community College and Area Technical School

### **General Comment**

Seward County Community College and Area Technical School believes that an eight-year cohort adds an unnecessary institutional reporting burden and results in less useful data. Six-year cohorts are more appropriate for 2-year degree offering institutions which is why the measure was selected for the Voluntary Framework of Accountability. We urge the Department of Education to reconsider and select the six-year cohort framework. Requiring community colleges to support a measure that has no practical value for improvement of student learning and quality improvement of the institution is not a responsible use of public resources.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0028

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Brad Eldredge

**Address:** Kalispell, MT, 59901

**Email:** beldredge@fvcc.edu

#### **General Comment**

While I am pleased that the department is redesigning the IPEDS data set, I would urge that the proposed eight-year graduation cohort be replaced with a six-year cohort for community colleges. Many Community Colleges, including Flathead Valley Community College, are participating in AACC's Voluntary Framework of Accountability. After careful thought, AACC determined that a six-year cohort was most appropriate for measuring community college students' outcomes. Creating a separate eight-year cohort for IPEDS would amount to a significant additional compliance burden. Our experience is that very few students who haven't graduated or transferred in six-years will go on to graduate and/or transfer in eight-years. Thank you for your consideration.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0027

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Kent Phillippe

**Address:** Washington, DC, 20036

**Email:** kphillippe@aacc.nche.edu

#### **General Comment**

On behalf of AACC, and the more than 1,100 colleges we represent, I would like to thank the department for reviewing and responding in a thoughtful manner to the last round of comments submitted on the IPEDS redesign.

However, I was disappointed to see the recommendation to keep the 8-year cohort for all institutions, regardless of the type of institution for the Outcome Measures (OM) section of the redesign. This one-size fits all approach is in direct conflict with the purpose of the redesign—creating measures that are more appropriate to the institutions.

In particular I disagree with one of the statements in the response “This was done to keep the burden to

respondents low and to facilitate ease of use by data users.” The 8-year cohort for colleges already reporting on a 6-year cohort for accountability purposes does not decrease burden—rather it increases burden. It will also add to confusion in the use of data, when national data and state data will not agree with Federal data due to unwillingness for the Federal data collection to follow widely accepted data procedures in outcomes reporting for community colleges. Right now more than 160 community colleges are reporting 6-year outcome data as part of the Voluntary Framework of Accountability beta testing phase, and all California community colleges have publically available data using a six-year cohort.

In addition, the argument that “If the Outcomes Measures section allowed for different durations to degree by type of institutions, we had difficulty reconciling how to explain the impetus for giving a student seeking the same award different amounts of time based on the institutional type” is not a valid argument. The measures are not about time to earn specific award types, but measures of student outcomes at an institutional level. As such, comparing a community college and a four-year college on the same metrics is a flawed perception even with similar times for the cohort. There are a lot of variables that impact these measures, and time allowed to earn an award is only one of them. Other equally important factors are: the number of credits required for the award; the attendance patterns of the students at the institution; the credits earned prior to entry; and the distribution of the levels of awards given in the institution. The cohort time is more about what is meaningful to the institution for accountability purposes, and for community colleges the 6-year cohort is the meaningful time frame. It provides enough time for most students to attain an outcome while providing data that is timely enough for policy and decision making.

AACC strongly urges NCES to use a 6-year cohort for community colleges in the new Outcome Measures of IPEDS.

Kent A. Phillippe  
Associate Vice President for Research and Student Success  
American Association of Community Colleges

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0026

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Lori Sundberg

**Address:** Galesburg, IL, 61401

**Email:** lsundberg@sandburg.edu

#### **General Comment**

Carl Sandburg College, a two year community college in Galesburg, Illinois would like to comment on the proposed eight year cohort being proposed. This will be a burden for community colleges and for other two year colleges and will provide little useful data. The six-year cohort framework is more appropriate which is why the Voluntary Framework for Accountability (VFA) identified a six year

benchmark as the more appropriate benchmark for 2-year degree offering institutions. We urge the Department of Education to reconsider and select the six-year cohort framework instead.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0025

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Joseph Baumann

#### **General Comment**

Aligning metrics across IPEDS, VFA, etc., is not only a good practice at the national level, it is the only way that an institution can be effective - we cannot serve our students and the public if we are faced with a barrage of performance metrics that are subtly different.

That said, I do not believe that IPEDS should change to tracking completion among student cohorts for eight years rather than the six years tracked by the VFA and other state-level metrics. It would add to the reporting burden for community colleges and would not add value over and above the six-year tracking that is already being done.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0024

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Anonymous

**Address:** United States,

#### **General Comment**

I appreciate most of the changes made in the redesign. However, as an employee at a community college, I am concerned about the choice of an eight-year cohort vs. a six-year cohort. Many community colleges have adopted the Voluntary Framework of Accountability, which uses a six-year cohort. Thus, the new IPEDS cohort places an additional collection and reporting burden on these colleges. Additionally, my state (North Carolina) has instituted a six-year cohort for state community college reporting, largely as a result of 'best practices' for community colleges suggested by the VFA, AACC, and others. I strongly recommend that two-year colleges be allowed to use a six-year cohort in IPEDS, rather than forcing them into an eight-year one. The eight-year one not only creates additional work for the colleges, but results in

data that is not comparable with most other measures of student outcomes in community colleges. Essentially, it would be wasted effort that wouldn't lead to institutional improvements.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0023

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Lisa Smith

**Address:** United States,

#### **General Comment**

Thank you for your work and intent in making data as useful as possible while keeping the burden low for reporting parties.

I would like to request a change to your recommendation of using an 8-year cohort for community colleges. A 6-year cohort is a more meaningful time frame for community colleges and is more commonly used already in measurements. For example, the American Association of Community Colleges' Voluntary Framework of Accountability (VFA) uses the 6-year cohort, and a number of institutions are already participating in this collection, even though the VFA is still in the beta-testing phase, because we believe in the intent of the VFA and think the data will be meaningful. It is beneficial to keep data collection methods and definitions as consistent as possible for institutions of a given institution type (community colleges vs. universities) to reduce public confusion of the meaning of data. Community colleges and universities differ in many ways (length of time to completion being one of the most notable ways), and a single time frame for measuring this is not very useful or meaningful because the institution types are not comparable in this aspect. A 6-year cohort also allows data to be available sooner for community college leadership so they can make decisions that are based on more recent data.

Please consider using separate cohort lengths for community colleges and universities.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0022

Comment on FR Doc # 2013-19107

#### **Submitter Information**

**Name:** Anonymous

## General Comment

I am a Director of Institutional Research at a 2-year public community college, and would like to express my support and agreement with the following well-articulated comment submitted by a colleague in the field:

"While the redesign is overdue, Polk State College and the Association of Florida Colleges (AFC) believe that the introduction of an eight-year cohort vs. a six-year cohort adds an unnecessary institutional burden and produces less useful data. Six-year cohorts are for good reasons more appropriate for predominantly 2-year degree offering institutions; that's why this measure was selected for the VFA and other national accountability standards at the first place. Trying to push for a one size fits all solution seems to defeat the purpose of the redesign, as many old measures were so focused on traditional 4-year institutions that they remained largely useless for the two-year sector. We urge the Department of Education to reconsider and select the six-year cohort framework instead. Facilitating the ease of data use at the cost of data usability and comparability does not make much sense, and requiring community colleges to support yet another ill-designed measure seems wasteful".

In addition, I would like to stress the importance of the availability of meaningful and useful IPEDS data for 2-year institutions. These colleges provide training and education to the vast majority of the skilled workforce, and the VFA measures have come into existence to pro-actively establish accountability measures for these institutions. The proposed IPEDS redesign to report completion on an eight-year cohort undermines the work that has been done by the VFA and will weaken the research on two-year institutions by forcing researchers to choose between two discrepant data sources for completion measures. Please also consider how the data will best serve the needs of a broad range of stakeholders invested in meeting the workforce demands, and in improving student success.

Thank you for your consideration and your review of this most important topic.  
Respectfully submitted,

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0021

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Laura Massell

**Address:** Winooski, VT, 05404

**Email:** lmassell@uvm.edu

## General Comment

I believe the eight-year cohort vs. a six-year cohort time frame adds an unnecessary institutional burden and produces less useful data. Six-year cohorts provide appropriate measures for both 4-year and for predominantly 2-year degree offering institutions; hence the selection of this measure for VFA and other national accountability standards. I urge the Department of Education to reconsider and select the six-year

cohort framework instead. Doing so would facilitate the meaningful use, high value, and appropriate burden to cost ratio we should be aiming for in our commitment to continuous improvement in US Higher Education.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0020

Comment on FR Doc # 2013-19107

### **Submitter Information**

**Name:** Peter Usinger

**Address:** United States,

### **General Comment**

While the redesign is overdue, Polk State College and the Association of Florida Colleges (AFC) believe that the introduction of an eight-year cohort vs. a six-year cohort adds an unnecessary institutional burden and produces less useful data. Six-year cohorts are for good reasons more appropriate for predominantly 2-year degree offering institutions; that's why this measure was selected for the VFA and other national accountability standards at the first place. Trying to push for a one size fits all solution seems to defeat the purpose of the redesign, as many old measures were so focused on traditional 4-year institutions that they remained largely useless for the two-year sector. We urge the Department of Education to reconsider and select the six-year cohort framework instead. Facilitating the ease of data use at the cost of data usability and comparability does not make much sense, and requiring community colleges to support yet another ill-designed measure seems wasteful.

### **RESPONSE:**

Dear Mr. Vermeer, Mr. Schwarz, Ms. Ichungwa, Ms. Pettitt, Mr. Wilson, Ms. Barnett, Mr. Carter, Mr. Eldredge, Mr. Phillippe, Ms. Sundberg, Mr. Baumann, Ms. Smith, Ms. Massell, Mr. Usinger, et al,

Thank you for your comments submitted during the 30-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

The Outcome Measures component represents a new collection for IPEDS and the postsecondary education community. During its multiyear development process, the Department of Education established committees and Technical Review Panels comprised of industry representatives. Alignment with other measures like the VFA does not directly fit within the Department's responsibility for this measure. The creation of a single output measure for postsecondary education has great value to institutions of higher education for institutional research and improvement, prospective students and their families for decision-making about postsecondary education, and policymakers for guiding efforts to improve student outcomes and success in higher education.



It is common practice for postsecondary education institutions to verify the degrees and certificates conferred for their alumni indefinitely. For virtually all institutions completing the OM component of IPEDS, these award records are digitized in a student information system with an award date. It is not clear how extracting historical information at an 8-year point in time will impose a greater burden than at a 6-year point in time. Further, the additional 2 years allows for more students, particularly those attending part-time, to be captured as completers in the OM component. NCES will continue to dedicate itself to better understand the burden of the OM component and find ways to reduce it.

After careful consideration and extensive discussion within the Department and with the AACC, NCES has decided to add a 6-year reference column in addition to the 8-year. To keep burden low, both the 6-year and 8-year counts will be collected at 8-year point in time. NCES will continue to study the utility of the new OM component of IPEDS. This change will result in an additional comment period.

Sincerely yours,  
Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## Career Education Corporation Comment #51

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0051

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Anonymous

**Address:** United States,

### Attachments

CEC Comment 9-9-13

Career Education Corporation appreciates having this second opportunity to comment on the proposed changes to the Integrates Postsecondary Data System.

As stated in our original comment, while we support the inclusion of all students in the IPEDS database, we do not believe that the Department of Education has the authority to make the proposed modifications to the IPEDS database through the regulatory process. Instead, it remains our belief that the Department should make its recommendations to the United States Congress for their consideration during the next reauthorization of the Higher Education Act of 1965. In the Department's response to our earlier comment, staff cited Section 153 of the Education Sciences Reform Act of 2002 (P.L. 107-279) which authorizes NCES to "collect, report, analyze and disseminate statistical data related to education in the U.S. and other nations." While it is true that the Education Sciences Reform Act establishes NCES as the entity responsible for conducting statistical analyses related to education, the specific elements included in the IPEDS database are clearly defined not in that Act, but instead in

the Higher Education Act of 1965, as amended, the Civil Rights Act of 1964 and the Carl D. Perkins Vocational Education Act. As such, we believe it is clear that despite the general authorities granted to NCES, Congress has been explicit with respect to IPEDS that it will dictate through legislation the nature of the collection, the student population to be included and the data elements to be required and reported to the public.

For example, the collection and reporting of race/ethnicity and gender data is established by Title VI of the Civil Rights Act of 1964 (34 CFR 100), in Title IX of the Education Amendments of 1972 (34 CFR 106) and Section 421(a) (1) of the Carl D. Perkins Vocational Education Act. Section 132 of the Higher Education Opportunity Act of 2008 (P.L. 110-315) provides an even greater level of specificity regarding information to be collected and made available to consumers by NCES. In this case, statute provides a complete and comprehensive list of data elements to be collected via IPEDS and reported by NCES through College Navigator, and this list appears in the form of a full, detailed and exclusive list of data elements. The list is not illustrative of Congressional intent, but is instead explicit in this regard, serving as further evidence that Congress intends to determine the specifics of IPEDS through the legislative process.

During the 2008 HEA reauthorization process, the Secretary of Education sought to make a number of changes to the IPEDS database including the expansion of the IPEDS database to include all students and not just first-time-full-time students. This request was explicitly denied by the then leaders of the U.S. House of Representatives Committee on Education and Labor who expressed concern that such significant changes would render useless the earlier information collected by IPEDS for the purpose of monitoring higher education trends over time. These leaders emphasized that any changes to the IPEDS database had to be accomplished via the legislative process and they were purposeful in denying the request to expand the IPEDS database to include a larger population of students.

In fact, the statute specifically states that IPEDS is to collect information regarding first-time-full-time students, including the new requirement to collect information regarding costs incurred by and financial support provided to first-time-full-time students in order to inform the net price calculator. In addition, Title XI, Section 1103 of the Higher Education Opportunity Act specifically requires the Comptroller General of the United States to conduct a study about both the institutional burden of submitting required data to IPEDS as well as the feasibility of collecting additional information within the database, and to submit both an interim and a final report to the relevant authorizing committees. This reporting requirement further clarifies the intent of Congress to engage the Department of Education and the Comptroller General in conducting a study to inform subsequent legislative debate and decision regarding the expansion of IPEDS. The legislation neither instructs or permits the Department of Education to take direct action to implement the recommendations of the Comptroller General or the Department's Technical Review Panels with regard to expanding the database or adding additional items to the collection.

Therefore, while we are not challenging the general authority of NCES to collect data necessary to analyze and report on education, we are asserting that this general authority does not trump the specific requirements dictated via statute to NCES with regard to the data elements to be collected via IPEDS and reported to the public, including through College Navigator and the College Scorecard.

#### Is This Collection Necessary to the Proper Functions of the Department?

In the August 8, 2013 *Federal Register* solicitation for a second round of comments regarding the continuation and expansion of the IPEDS database, the Department of Education asked if this collection is necessary to the proper functions of the Department. Clearly these additional data elements are not necessary to the proper function of the Department since the Department has managed to administer Title IV programs since 1965 without access to these data.

The Department obtains the information it needs to administer the Title IV program through the Free Application for Federal Student Aid, institutional Cost of Attendance data, and institutional and programmatic accreditation results. In addition, NCES has a number of tools that it uses routinely to monitor the condition of higher education more generally, including the Beginning Postsecondary Students (BPS) survey and the National

Postsecondary Student Aid Study (NPSAS). As a result, we do not believe that the expansion of IPEDS is necessary either in order for NCES to fulfill its statutory mission or the Department to administer its Title IV programs.

It is unfortunate that IPEDS data informs so many public policy debates and decisions given that it excludes the majority of students currently enrolled in postsecondary education. However, Congress has been clear in its legislative prohibition against a federal student unit record data system and in its sole and exclusive authority to expand or modify IPEDS data collection. So while we agree with the Department's intent, we believe that the Department must rely upon the legislative process to enact the proposal in law.

Will this information be processed and used in a timely manner?

The Department received a number of public comments attesting to the challenges that institutions will face if the Department moves forward with its currently proposed, retrospective reporting model. It can be extremely challenging to go back in time to create new records, and doing so can require extensive changes to data systems as well as additional data input, which can be costly and time consuming. The Department's response to these comments was that it would delay the implementation by one year so that institutions could have more time to prepare for these changes and so that the retrospective collection of data would go back to 2007 rather than 2006. While we appreciate this small concession on the part of the Department, we continue to believe that the proposal represents a retroactive application of new standards which will require institutions to go back in time to modify potentially tens of thousands of records that were originally created many years ago. Retroactive application of new standards is expressly prohibited by the Administrative Procedure Act.

While the Department is quick to point to the rising cost of higher education as a barrier to student success, the Department continues to add to those costs rather than working to help contain them. Each time it adds a new reporting requirement, institutions must respond by hiring additional staff, modifying existing data systems or implementing new data systems that can track and collect the necessary data. Even more burdensome are regulations that require institutions to go back in time and adjust old records while also collecting additional information to complete new records. The Department must recognize that for many institutions, these additional reporting requirements for IPEDS come on the heels of significantly expanded reporting requirements that were included in the persisting sections of the recently promulgated Gainful Employment regulations. This reporting requirement forced some institutions to make significant changes to their website design and architecture in order to allow for posting of data directly on program pages, which was extremely burdensome in terms of cost and personnel resources. Since the Department seems reticent to eliminate old requirements as it implements new ones, the growing reporting burden coupled with the intensified focus on additional student services to promote higher student outcomes has resulted in a national trend in administrative cost structures that have, or will soon, exceed the cost of instructional delivery.

The Department does need to provide institutions time to make the necessary modifications in their databases, but it must also implement the collection of additional data elements in a **prospective** manner. While it is true that doing so will delay the publication of outcomes data until 2022, given that the Department has failed to provide any evidence that the proposed data elements will influence student decisions in a positive way or improve student outcomes, there appears to be no justification for the additional burden the proposal would impose upon already resource-constrained institutions. We believe it is in the best interest of students, institutions, and the Department for the Department to conduct a comprehensive study to determine which data elements are actually of interest and importance to students when selecting an institution of higher education, and which data elements lead to improved student outcomes.

It is quite possible that for the growing majority of non-traditional students, information regarding parking availability at campus locations, the ability to complete a credential by attending class on the same days and at the same time each semester or online (so that working students can attend without requiring adjustments to their work or childcare schedule every semester), access to required classes and student services in the evening and on weekends and level of faculty "real-world" experience in their field (as opposed to just their academic credentials) may be more relevant than graduation rates since non-traditional students typically understand that their overall life demands will likely dictate their academic pace. Besides, data collected on students who enrolled

in 2007 is likely to have little relevance to a student who enrolls in college in 2015 or 2016 and will graduate in 2022 given how the economy and job market demands are likely to change several times within that 15 year time period.

Is the estimate of burden accurate?

We believe that the projected time burden underestimates the extra time it will take for institutions to extract new budget and finance information required for the new Finance Form and Academic Libraries component. We are concerned that the lack of clarity around definitions accompanying the voluntary time burden reporting element in this past year's survey resulted in inaccurate and inconsistent reporting that likely underestimated the full time burden. Instructions should take into account the varying institutional management structures that exist among institutions, including those that have centralized administrative support functions that serve a number of campuses as opposed to embedding all administrative support functions within each institution.

How might the Department enhance the quality, utility and clarity of the information to be collected?

It is not uncommon among institutions working to increase their selectivity ranking to admit a substantially different population of students in the Fall cohort as compared to the Spring cohort, and as 1<sup>st</sup> time students versus transfer students. This is especially true if the Fall cohort serves as the basis for measurement of institutional selectivity. As a result, the proposal to administer the admissions survey as part of the Winter collection and to include only those students enrolled in the Fall semester could yield information that is misleading and that artificially inflates the selectivity of the institution and the academic qualifications of the students it serves. This schedule also ignores the growing trend for institutions to provide multiple points of entry throughout an academic year in order to serve the needs of non-traditional students, which may not align with the traditional Fall/Spring academic calendar.

With respect to the FASB for For-Profit Finance Form, we believe that all Federal, state and local taxes paid by all institutions should be captured and recorded as institutional Expenses. The current proposal appears to limit reported tax expenses to income tax expenditures, but proprietary institutions pay a number of taxes in addition to income tax (some of which, in turn, support subsidies provided to public institutions), and all should be reflected in the reported statement of expenses.

Finally, the Department of Education has empirically identified 8 risk factors that serve as significant barriers to student success. These risk factors include: delayed entry to college, student age over 25, financial independence, having dependents, being a single parent, working full-time while attending college, attending part-time, and enrolling in college having not completed a high school diploma. In earlier work, the Department determined the statistical impact of each of these risk factors on student graduation rates and even provided estimates of adjusted outcomes when taking into account the risk factors exhibited by various groups of students. For example, the Department determined that if students have one or more child and graduate at a rate of 49.1%, this is statistically equivalent to a graduation rate of 70.1% among a traditional student population. While the Department did not perform multi-variant analysis, it can be assumed that the rate adjustments would be even greater in order to make fair comparisons of outcomes at institutions serving large numbers of low risk students versus those that serve a large population of students who have three or more risk factors, which is not uncommon among open-enrollment institutions and those that cater to the needs of working adult students.

We believe that in order to enable students make "apples-to-apples" comparisons of institutional outcomes and to help students better understand their likely outcomes based on the outcomes of other students with the same demographic background and risk characteristics, the Department must transition all of their data collections to include information about each institution's student risk profile. Coupling the Department of Education's work with a recent Department of Labor study (Adult Learners in Higher Education: Barriers to Success, ETA Occasional Paper 2007-03) about workforce preparation and adult education, we believe that to make the data NCES collects more meaningful and useful, the Department must include as a required data element a measure of the percentage of students in each cohort that have zero or one of the 8 Department of Education published risk factors (low risk students), two or three of these published risk factors (moderate risk students) and/or three or more risk factors (high risk students).

Without adjustments for student risk profile, published outcomes will continue to serve as unsound justification for the shifting of precious federal resources away from the students who need them most (and for whom the Higher Education Act of 1965 was originally written and passed) in order to subsidize more affluent and traditional students who have the luxury of attending higher cost, selective institutions. In addition, outcomes taken out of context of the population enrolled will continue to incentivize increased institutional selectivity, which further reduces educational access by those who have been underserved in the past.

Again, we thank the Department for their efforts to create a more inclusive IPEDS database and for this second opportunity to provide comments, but we encourage the Department to work with the appropriate Congressional committees to make these changes through the appropriate legislative process.

## **RESPONSE:**

Dear Career Education Corporation,

Thank you for your comment dated September 9, 2013, responding to a request for comments on the proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

In addition to administering and monitoring Title IV programs, the Department (specifically NCES) has the responsibility of describing the condition of all area of education in the United States, including postsecondary education (Education Sciences Reform Act of 2002). The Department has these responsibilities and others for which the IPEDS collection is used to satisfy.

It is true that the HEOA did prohibit development, implementation, or maintenance of a Federal database of personally identifiable information on individuals (with some exceptions for the tracking of students receiving federal student aid). However, this does not prevent the addition of aggregate data items to the existing IPEDS data collection.

In addition to prescribing specific items to be added to IPEDS, the 2008 HEOA explicitly called for a committee that may, among other things, consider additional or alternative measures of student success. Where specified, IPEDS collects information as directed in statute. However, where information constructs are not specified, NCES and our various data collection contractors utilize a process to establish the most appropriate method to collect the new information. A Technical Review Panel (TRP) is often employed to inform and advise our contractors and, in turn, NCES on several aspects of development of new measurement constructs including but not limited to their utility, limitations, and availability from postsecondary institutions. In this particular case, a TRP recognized the importance of making this information available as soon as possible, and therefore suggested that NCES move forward with a retrospective method. This process and the resulting metric do not violate the Administrative Procedures Act.

To say that IPEDS does not include the majority of students is not an accurate statement. There are particular items in IPEDS that are limited to full-time, first-time students as specifically defined in statute, such as institutional average net price from the 2008 HEOA, and the Student Right to Know Act graduation rates collected through IPEDS. Conversely, there are many other components to IPEDS that are not limited to this student population and have never been limited in such a way. For example, IPEDS collects data on total enrollments and degrees/certificates awarded to all students, not only first-time, full-time undergraduate students. In fact, the "Consumer Information" section of the HEOA specifically details that College Navigator must display "The number of certificates, associate degrees, baccalaureate degrees, master's degrees, professional degrees, and doctoral degrees awarded by the institution."

As stated in detail in the response to comments during the 60-day Federal Register Notice (FRN), NCES is sensitive to reporting burden and discusses this at each TRP. The burden of the IPEDS data collection has been and remains a crucial factor in decision making surrounding the collection. NCES is very sensitive to the need to balance increased reporting burden with the utility of the data requested. Each Technical Review Panel meeting, regardless of the topic being discussed, is specifically charged with the task of minimizing the additional institutional burden as a result of increased IPEDS reporting requirements. Further, entire meetings of the IPEDS Technical Review Panel have been dedicated to the topic of IPEDS reporting burden.

[TRP #41, Managing Reporting Burden](#) (March 2013)

[TRP #30 - Tools and Resources for Reducing IPEDS Burden](#) (March 2010)

These meetings of the TRP have had a significant impact in how the IPEDS collection is designed and implemented. This is evident in the citations provided in the Supporting Statement Part A. NCES is aware of the careful balance that must be made between the burden of the collection on postsecondary institutions and the value of the information collected for regulatory purposes. Although there is no formal method established for the calculation of burden, NCES has employed the recommended practice of working with respondents to better understand burden and the respondent experience. NCES strives to provide accurate burden estimates based on these interactions and empirical data from the collection systems. In response to GAO's study (<http://www.gao.gov/products/GAO-10-871>), IPEDS added the question at the end of each survey component about the amount of time it took to complete, and burden estimates will be adjusted accordingly in the future.

The type of studies and data collection you suggest related to "risk factors" are likely more appropriate for a national sample survey than a full institutional collection like IPEDS. Many of the "risk factors" discussed are obtained through student interviews, and statistics such as the percent of the cohort that are financially independent, have dependents, etc., are things that the institution would know only for students who filed a FAFSA. Further, information like whether the student is working full-time while attending college may not be known by the institution at all, regardless of whether the student filed a FAFSA. We do appreciate your thoughts on this topic as well.

Sincerely yours,  
Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## TICAS

### Comment Number: 46

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0046

Comment on FR Doc # 2013-19107

# Submitter Information

**Name:** Lauren Asher  
**Address:** Oakland, CA, 94612  
**Email:** ljasher@ticas.org  
**Submitter's Representative:** Matthew Reed  
**Organization:** The Institute for College Access & Success

## Attachments

TICAS IPEDS Comments - final 09-09-13

September 9, 2013



Ms. Kate Mullan  
Acting Director, Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW., LBJ, Room 2E103  
Washington, DC 20202-4537  
[ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov)  
(submitted electronically via: [www.regulations.gov](http://www.regulations.gov))

Dear Ms. Mullan:

We are writing in response to the request for comments on the proposed revision of the Integrated Postsecondary Education Data System (IPEDS), published in the Federal Register on August 8, 2013, docket number ED-2013-ICCD-0029. The Institute for College Access & Success (TICAS) is an independent, nonprofit organization that works to make higher education more available and affordable for people of all backgrounds. By conducting and supporting nonpartisan research and analysis, TICAS aims to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society.

As TICAS has long recommended, incremental changes to IPEDS could result in substantial improvements in the availability of meaningful data about student borrowing and outcomes, as interest in these data from all quarters continues to grow. The recent efforts of the U.S. Department of Education (ED) to make better data available to students and consumers through the College Scorecard and the Financial Aid Shopping Sheet underscore the urgent need for better information on these fronts. For example, without cumulative debt at graduation for all colleges, the College Scorecard compares median debt figures that are apples-to-oranges, not distinguishing between colleges where few or all students borrow, or where few or all students graduate.<sup>1</sup>

We appreciate the detailed response to our May 2013 comments on this proposal, included in the supporting documents of the current request for comments.<sup>2</sup> In particular, we acknowledge the need to minimize reporting burden, but point out below where our recommendations would not constitute an additional burden or where the benefits to students, families, and policymakers justify limited additional reporting. In several cases, IPEDS is the best vehicle for collecting the data and making them widely available in a timely fashion. In this submission, we respond to ED's concerns about selected recommendations and provide additional comments on changes to ED's proposals.

### **Cumulative debt at graduation**

There is an urgent need for better data on cumulative student loan debt at graduation, and collecting these data in IPEDS is the only way to make comprehensive institution-level debt data widely available in the near future. While we commend ED for working toward obtaining cumulative debt data through the National Student Loan Data System (NSLDS), such data will not be available until late 2014 at the earliest. They will also be incomplete, since private (non-federal) student loans are not included in that database. ED's response also mentions the availability of cumulative debt data in the National Postsecondary Student Aid Study (NPSAS) and the

postsecondary longitudinal sample surveys. Although those data are helpful for analyzing national student-level patterns, the data cannot be broken out by institution or state and are not available every year.

With a new version of the College Scorecard due to be released this fall and the second annual release of the Financial Aid Shopping Sheet due to be released this winter, comprehensive data on cumulative debt at graduation are needed as soon as possible. Therefore, we continue to recommend that IPEDS immediately start collecting data on cumulative debt at graduation for completers of undergraduate certificates, associate's degrees, and bachelor's degrees.

### **Graduation rates for Pell Grant recipients**

Similarly, collecting graduation rates for Pell Grant recipients in IPEDS is the best way to make that information widely available in the near future. While we commend ED for working toward the collection and reporting of comprehensive data on this topic using NSLDS, such data may not be available for several years, and the utility of these data cannot be evaluated until they are available.<sup>3</sup> Also, as mentioned above, NPSAS does not have data at the institution level.

Additionally, collecting these data in IPEDS would not constitute an additional reporting burden because colleges are already required to calculate and disclose graduation rates for Pell Grant recipients, Subsidized Stafford Loan recipients without Pell Grants, and all other students.<sup>4</sup>

Unfortunately, an investigation found that many colleges do not make these data available.<sup>5</sup> This uneven compliance and the decentralized nature of the data that are disclosed hamper the ability of researchers, policymakers, and consumers to understand which colleges not only enroll substantial numbers of low-income Pell Grant recipients, but also graduate them. The only colleges for which this reporting requirement would constitute additional burden are those that are not already calculating and disclosing the data, and as such are not complying with federal law. The additional burden on noncompliant colleges should not be of concern to the Department, and in fact, bringing them into compliance should be a goal. Therefore, IPEDS should immediately begin collecting graduation rates for Pell Grant recipients.

### **Annual private (non-federal) loan data for all undergraduates**

We strongly urge ED to discuss options for collecting data on private borrowing for *all* undergraduates, not just first-time, full-time students, at a meeting of the IPEDS Technical Review Panel (TRP), as suggested in NCES' response to our May 2013 comments.<sup>6</sup> With more students following non-traditional pathways through higher education and private student loan volume beginning to rise again, it is crucial that consumers and policymakers have timely data about private student loans for *all* undergraduates at each school. The value of these new data would justify the additional reporting, particularly because IPEDS is uniquely positioned to collect data that are available to colleges but not otherwise available to ED. At this time, colleges are still the best source of data on private student loan usage at the institution level. Lenders currently require school certification for the vast majority of private loans, so schools do have information on most such loans. A TRP would provide a valuable opportunity to discuss the best ways colleges can overcome any challenges to reporting based on the information available to them and provide the most helpful data on their students' private loan borrowing.

### **Reporting better graduation-rate data**

ED has taken a number of promising steps to implement the recommendations of the Committee on Measures of Student Success (CMSS), but we are disappointed to learn that the Department has decided to postpone collection of the expanded outcomes measures from 2014-15 to 2015-

16. Consumers, policymakers, and colleges all need these new data to inform ongoing decisions and cannot afford to wait four years for these new data to become available.

In our May 2013 comments, we recommended that only "vertical transfer" (e.g., 2-yr to 4-yr institutions) be included in success measures because subsequent enrollment at any other institution of higher education, regardless of level, is not necessarily a sign of student success. We agree with ED and the TRPs that it would be more helpful to collect data on the level of program students transfer into rather than the level of the college's overall offerings, but that degree of fine-grained data collection would be too burdensome at this time. However,



that limitation does not preclude making any changes to the student success measures. Although imperfect, including only “vertical transfers” based on institution level is still more meaningful than counting all subsequent transfers in determining what counts as a student success.<sup>7</sup>

Furthermore, reporting the institution level of a transfer student’s new school would not constitute a significant burden. Since colleges reporting transfer data already document that a former student has subsequently enrolled at another school, there is very little additional burden to record the level of the student’s new school as listed in IPEDS.

In addition, we concur with comments submitted by representatives of community colleges that 2-year schools should report the outcome measures six years after a student’s entry. This would reduce burden on these schools by aligning with other reporting requirements. We agree with ED’s proposal to collect outcome measures eight years after a student’s entry at 4-year schools.

### **Better data about and for veterans and service members**

We recommend that IPEDS also collect data on completions and retention in addition to the data on veteran and service member enrollment and access to services included in the current proposal. As noted in ED’s response to our May 2013 comments, collaboration between ED, the Department of Veterans Affairs (VA), and the Department of Defense (DoD) is ultimately the best way to collect these data and provide them to consumers and policymakers.<sup>8</sup> However, until such data are available, IPEDS is still the best vehicle for collecting data on these student populations so the data can be included in ED’s consumer information tools as soon as possible.

### **Data integration**

We continue to strongly urge ED to address in a concrete way the problems created by the lack of a common identifier for colleges across different federal datasets.<sup>9</sup> We acknowledge that the identifiers were created for different purposes, but believe that ED still can, and should, at a minimum create a definitive crosswalk and mapping tools to help users integrate Federal Student Aid (FSA) data with IPEDS data using OPEID numbers. In a June 2012 presentation, NCES staff indicated that work was progressing on those tools, yet no such tools have been made available.<sup>10</sup> We strongly urge NCES, FSA, and the Office of Postsecondary Education (OPE) to move forward with this project as quickly as possible. Ultimately, ED should continue to work toward common identifiers for colleges across all federal agencies, including identifying and making public any statutory or regulatory changes that may be needed to make this possible.

Thank you for the opportunity to share our suggestions and concerns on this important topic. Please feel free to contact me or my colleague Matthew Reed via email at [ljasher@ticas.org](mailto:ljasher@ticas.org) or [mreed@ticas.org](mailto:mreed@ticas.org), or by phone at (510) 318-7900, with any questions.

Sincerely,  
Lauren Asher  
President

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<sup>1</sup> TICAS. February 13, 2013. Blog post. “New College Scorecard: Two Steps Forward, One Step Back.” <http://views.ticas.org/?p=982>.

<sup>2</sup> U.S. Department of Education, National Center for Education Statistics. 2013. “Public Comments Received During a 60-day Comment Period and NCES Responses.” <http://1.usa.gov/17RgV89>.

<sup>3</sup> NSLDS recently revised reporting rules to help facilitate calculation of graduation rates for financial aid recipients. The first full year after these revisions went into effect is 2013-14, which means six-year graduation rates for students entering four-year colleges this year will not be available until at least 2019.

<sup>4</sup> 20 U.S.C. 1092(a)(7)(A).

<sup>5</sup> Education Sector and the American Enterprise Institute. 2011. *The Truth Behind Higher Education Disclosure Laws*. [http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure\\_RELEASE.pdf](http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure_RELEASE.pdf).

<sup>6</sup> U.S. Department of Education, National Center for Education Statistics. 2013. "Public Comments Received During a 60-day Comment Period and NCES Responses." <http://1.usa.gov/17RgV89>.

<sup>7</sup> One way to further refine this information is to identify the school the student transfers to by the predominant credential it awards, rather than the highest award it offers. The predominant credential is already used for several institutional comparisons in the College Scorecard and Financial Aid Shopping Sheet.

<sup>8</sup> U.S. Department of Education, National Center for Education Statistics. 2013. "Public Comments Received During a 60-day Comment Period and NCES Responses." <http://1.usa.gov/17RgV89>.

<sup>9</sup> For more information, see TICAS. March 2, 2012. Blog post. "Report from Education Department Advisory Group Calls for Improvements to Financial Aid Data." <http://views.ticas.org/?p=842>.

<sup>10</sup> U.S. Department of Education, National Center for Education Statistics. June 4, 2012. Presentation at 2012 Forum of the Association for Institutional Research (AIR), New Orleans, LA. "IPEDS R&D: An Update on CMSS, NPEC, and TRPs."

## RESPONSE:

Dear Ms. Asher,

Thank you for your comment dated September 9, 2013, responding to a request for comments on the proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS.

NCES has carefully considered your suggestions to collect data on cumulative student loan debt at graduation and graduation rates for Pell Grant recipients through IPEDS. The Department of Education also feels that this is important data to have at the institutional level, and as noted, the National Student Loan Data System (NSLDS) has already made the necessary changes to its processes in order to provide this information in the future. Adding items to collect this information through IPEDS would be duplicating efforts both for the Department of Education and for the Title IV institutions reporting this information. Further, IPEDS would not be able to provide this data any sooner than it is expected to be available from the National Student Loan Data System (NSLDS). If IPEDS were to collect this information, it would not be available in the IPEDS Data Center until late in 2015, at the earliest.

Your comment about differentiating between transfer from a 2-year institution to a different 2-year institution as opposed to transfer from a 2-year to a 4-year institution in the proposed new Outcome Measures component was an issue that was discussed and carefully considered by the two IPEDS Technical Review Panels held on this topic. The IPEDS TRP felt that this would impose an unnecessary reporting burden on institutions.

The Outcome Measures component represents a new collection for IPEDS and the postsecondary education community. During its multiyear development process, the Department of Education established committees and Technical Review Panels comprised of industry representatives. Alignment with other measures like the VFA does not directly fit within the Department's responsibility for this measure. The creation of a single output measure for postsecondary education has great value to institutions of higher education for institutional research and improvement, prospective students and their families for decision-making about postsecondary education, and policymakers for guiding efforts to improve student outcomes and success in higher education.

It is common practice for postsecondary education institutions to verify the degrees and certificates conferred for their alumni indefinitely. For virtually all institutions completing the OM component of IPEDS, these award records are digitized in a student information system with an award date. It is not clear how extracting historical information at an 8-year point in time will impose a greater burden than at

a 6-year point in time. Further, the additional 2 years allows for more students, particularly those attending part-time, to be captured as completers in the OM component. NCES will continue to dedicate itself to better understand the burden of the OM component and find ways to reduce it.

After careful consideration and extensive discussion within the Department and with the AACC, NCES has decided to modify the proposed information collection review (ICR) for IPEDS. The resulting modification will allow for a reporting of the number of students that received an award at the 6-year point in time in addition to the 8-year point in time. This information will only be collected once after the 8-year time period.

NCES appreciates your comment regarding the desire to have completion and retention data on veterans and servicemembers collected in IPEDS in addition to the other proposed items. However, the November 2011 IPEDS TRP on this topic discussed the possibility of adding completion and retention information for veterans and servicemembers and the TRP ultimately suggested that IPEDS is not the appropriate instrument for collection of this information. As mentioned in NCES' previous response, given that servicemembers are a particularly transient population due to the nature of their work, an institution level data collection, such as IPEDS, would not capture their educational activity well. That is, IPEDS does not capture the movement of individual students between institutions. ED continues to work closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they work with their already existing data systems to provide this information.

With respect to your comment about the need for a definitive crosswalk between the various institutional identifiers to aid in integrating data from NCES, the Office of Federal Student Aid (FSA), and the Office of Postsecondary Education (OPE), NCES has been working on creating this type of crosswalk. The complexity of the work impacts the speed at which a resource like this may be made available, however NCES does recognize the utility that such a resource would bring.

Thank you again for your comments and your interest in the IPEDS data collection.

Sincerely,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## **Comment Number: 18**

**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0018

Comment on FR Doc # 2013-19107

## **Submitter Information**

**Name:** Braden Hosch

**Address:** Wethersfield, CT, 06109

**Email:** bjhosch@gmail.com

## **General Comment**

The Outcomes Measures (OM) Survey valuably responds to policy concerns about capturing student outcomes over time and including transfers when known. The Technical Review Panel (TRP) recommended that these data be reported at summary level for four cohorts but not to disaggregate data by gender or race/ethnicity as required on the Graduation Rate (GR) Survey. This recommendation was well-intentioned to reduce institutional burden but misguided.

Institutions will already have to gather unit-record data to report on these measures, and the gender and race/ethnicity of these students at the unit-record level is readily available (because required on other IPEDS surveys). The added reporting burden of an hour to report these data for disaggregated groups (x 7,500 institutions) is significantly outweighed by the value to institutions and policy makers to see the data disaggregated by gender and race/ethnicity given the extensively documented differences in outcomes among these populations. The OM survey should be modified to include collection of these data disaggregated by gender and by race/ethnicity.

## **RESPONSE:**

Dear Mr. Hosch,

Thank you for your comment dated August 20, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

In particular, we appreciate your support of the new proposed Outcome Measure (OM) component. The decision to not collect these data disaggregated by race/ethnicity or gender was made in an effort to allow for expanded data on student outcomes in IPEDS while minimizing the increased institutional reporting burden as much as possible. At the two meetings of the Technical Review Panel (TRP) held on the topic of expanded outcome data, this issue was discussed at length and ultimately the TRP suggested that the data not be collected at this level of detail.

As the new OM component matures, this is a topic that a future meeting of the TRP may wish to address.

Sincerely Yours,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## **Comments related to Department of Veterans Affairs facility codes**

### **Comment Numbers: 19 & 48**

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0019

Comment on FR Doc # 2013-19107

## **Submitter Information**

**Name:** Ryan Gallucci

**Address:** Washington, DC, 22201

**Email:** rgallucci@vfw.org

**Organization:** Veterans of Foreign Wars of the U.S.

## General Comment

To Department of Education:

On behalf of the men and women of the Veterans of Foreign Wars of the United States (VFW) and our Auxiliaries, we would like to offer comment on Department of Education's plan to collect information on student-veterans in higher education. The VFW generally supports the initiative by the National Center for Education Statistics (NCES) to ask six specific questions through which institutions of higher learning would report additional information to the Integrated Postsecondary Education Data System (IPEDS).

The VFW has one recommendation to enhance the quality, utility, and clarity of the information to be collected. IPEDS plans to ask schools which benefits are available to potential students to include Post-9/11 GI Bill and the Yellow Ribbon Program. IPEDS should instead ask a more directed question to improve the quality of information collected. The VFW recommends the following language:

“If your school is eligible for GI Bill program participation, please disclose Department of Veterans Affairs facility codes and any Yellow Ribbon tuition-matching agreements.”

The VFW believes that this specific collection will enable VA to regularly update its institutional crosswalk with Department of Education to comply with P.L. 112-249, which directed VA to develop a school comparison tool for college-bound veterans. Thanks to presidential Executive Order No. 13607 and P.L. 112-249, Department of Education and VA have worked closely to cross-reference school codes for Title IV and GI Bill eligibility. However, if IPEDS does not collect this data, this newly-developed school crosswalk will quickly become obsolete. The VFW believes that the institutional crosswalk is critical to ensuring veterans have access to quality information before choosing an academic institution.

The VFW was proud to play a role in the recent IPEDS Technical Review Panel that developed these potential new questions, and we believe that they will offer greater transparency in higher education for our student-veterans. We hope IPEDS will consider this minor change to the GI Bill eligibility question to ensure that the VA-Department of Education institutional crosswalk can remain relevant through periodic updates.

Sincerely,

Ryan Gallucci

Deputy Legislative Director

Veterans of Foreign Wars of the U.S.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0048  
Comment on FR Doc # 2013-19107

## **Submitter Information**

**Name:** Robert Worley  
**Address:** Washington, DC,

## **General Comment**

September 9, 2013

Subject: Docket No. ED-2012-ICCD-0029: Comment Request: Integrated Postsecondary Education Data System (IPEDS) 2013-2016 (DUE SEP 9th, 2013)

Dear Director,

Department of Veterans Affairs (VA), Education Service respectfully requests that the Department of Education (ED) include the collection of VA facility codes under ED-2012-ICCD-0029 updated to the Integrated Postsecondary Education Data System (IPEDS) 2013-2016.

### **BACKGROUND**

Over the past two years VA and ED have been working together to implement Executive Order 13607, Establishing Principles of Excellence for Educational Institutions Serving Servicemembers, Veterans, Spouses, and Other Family Members.

The Executive Order requires VA and ED to, “develop a comprehensive strategy for developing Servicemember and Veteran student outcome measures that are comparable, to the maximum extent practicable, across Federal military and Veterans educational benefit programs.”

As part of those efforts VA and ED have been developing a data crosswalk that links ED’s database of schools to VA’s lists of approved programs. An effective crosswalk will allow VA and ED to share data about educational institutions across agencies, improve consumer information available to education beneficiaries, and allow VA to track outcome measures that compare education benefit programs.

However, because the two lists of schools are so different the process of creating the crosswalk has been resource intensive for both agencies. Additionally, due to addition of newly approved programs and changing of old programs the crosswalk will require considerable resources to maintain and keep it up to date.

ED-2012-ICCD-0029 already asks if a school is GI Bill approved.

The proposed IPEDS collection will ask educational institutions if the “Post-9/11 GI Bill” and “Yellow Ribbon” program are “available to veterans, military service members or their families”.

In order for a student at a particular educational institution to be eligible for the Post-9/11 GI Bill a program at the institution must be approved for the VA education benefits. All institutions with approved programs are assigned a VA facility code.

VA respectfully proposes adding an additional question to this collection that says the following, “Please list all VA facility codes associated with your institution.”

Alternatively, if ED does not want to add an additional question, VA recommends modifying the current question “Is the Post-9/11 GI Bill available to veterans, military service members or their families? Yes/No” to read “Is the Post-9/11 GI Bill available to veterans, military service members or their families? If so, please list all VA facility codes associated with your institution.”

Adding facility codes to this collection will enhance the quality, utility and clarity of the collection. By adding the collection of VA facility codes to the IPEDS database, both VA, ED and the public at large will have access to an effective crosswalk between both lists of approved programs. That list will be updated and validated annually by the educational institutions themselves. Currently, there is no process for ED and VA to maintain or validate the crosswalk they are developing.

The addition of facility codes to the IPEDS collection will ensure that VA and ED will be able continue to share data about educational institutions across agencies, improve consumer information available to education beneficiaries, and allow VA to track outcome measures that compare education benefit programs.

Burden on the schools will be minimal.

Over 90% of educational institutions only have one corresponding VA facility code and 98% of institutions have less than four facility codes. Those facility codes rarely change and once entered into IPEDS will likely not require any additional work by the school year to year.

Respectfully Submitted,  
Robert M. Worley, II  
Director, Education Service  
Veterans Benefits Administration  
U.S. Department of Veterans Affairs

## **RESPONSE:**

Thank you for your comment dated August 23, 2013, responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS.

IPEDS/NCES will work with the Veterans Administration toward a solution for updating the VA facility code/OPEID/IPEDS ID crosswalk. Ideally this work will result in a solution that will not increase the burden on IPEDS responders. This approach will have the additional advantage of including non-IPEDS programs that are in the OPEID code system, as well as IPEDS Unit IDs.

If this approach is not successful, we would welcome the opportunity to revisit this request for consideration by the IPEDS Technical Review Panel for inclusion in the next round of revisions.

Sincerely yours,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## **Comment Number: 45**

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**Docket:** ED-2013-ICCD-0029  
Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0045

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Chris Cate

**Address:** Washington, DC, 20006

**Email:** research.director@studentveterans.org

## General Comment

Student Veterans of America (SVA) would like to offer comment on the Department of Education's plan to collect information on student veterans in higher education. The proposal to collect information regarding student veterans is a positive step forward from previous IPEDS surveys. However, there are still specific items that should be discussed and included that would add quality, utility, and clarity of the information to be collected.

We would like to encourage the IPEDS surveys to expand the scope of the proposed questions to include veteran specific services that the institution may offer to student veterans and military personnel. Much research and advocacy has occurred since the Technical Review Panel focusing on best practices and institutional policies for veterans in higher education which should be reflected and included in the IPEDS surveys. This includes research found in the American Council on Education's (ACE) Veteran Friendly Tool-Kit, Operation College Promise (OCP) reports, Association of Private Sector Colleges and University's (APSCU) Blue Ribbon Taskforce Best Practices Guide, and GI Jobs Military Friendly Schools List.

In addition, the SVA would like to request that the Department of Education include the collection of VA facility codes in the updated IPEDS surveys expanding the current surveys which only asks if the institution is GI Bill approved. The inclusion of VA facility codes provides the potential for more accurate data and improved measurement of student veteran and service member outcomes by strengthening the data crosswalk program between the Department of Education and the Department of Veterans Affairs already in development as a result of Executive Order 13607. By not asking for the VA facility codes, it increases the possibility that the crosswalk program could rapidly become outdated and of little resource to future beneficiaries.

We would also like to take the opportunity to comment on the Measures of Success proposed changes to increase the inclusion of veteran and military personnel and the quality of their data. To better measure the proportion of veterans and military service members who withdraw from school, we propose a qualifying question asking the number of veterans or military personnel who withdrew from their programs due to being activated or a service related medical condition. Also, expanding the questions of 2-year college outcomes to include the number of transfers from 2-year to 4-year colleges and/or questions on the 4-year college surveys asking the number of student veterans transferring from other 2-year will add considerable depth and breadth to the student veteran academic outcomes. Finally, including separate questions for veteran and military personnel on retention, transfer, course completion, and graduation/program completion will allow institutional researchers and other data users to conduct peer comparisons in serving these students.



SVA would like to thank the National Center for Educational Statistics (NCES) for having a Technical Review Panel on veterans in higher education. We were grateful to be included and pleased to participate in the Technical Review Panel. It is our hope that the proposed additions to the IPEDS survey as well as all the public comments will begin to meet external and institutional researchers, veteran and military service members, and policy makers demand for more information on veterans in higher education. We hope IPEDS will consider our comments and proposed changes to the IPEDS survey to ensure that the best possible data on veterans in higher education is collected.

## **RESPONSE:**

Thank you for your comments responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS.

IPEDS/NCES will work with the Veterans Administration toward a solution for updating the VA facility code/OPEID/IPEDS ID crosswalk, in ways that will not increase the burden on IPEDS responders. This approach will have the additional advantage of including non-IPEDS programs that are in the OPEID code system, as well as IPEDS Unit IDs. If this approach is not successful, we would welcome the opportunity to revisit this request for consideration by the IPEDS Technical Review Panel for inclusion in the next round of revisions.

NCES also appreciates your thoughtful comments on how better data may be made available to veterans and servicemembers as well as providing policymakers and the public more information about the education benefit programs offered to these students. The IPEDS TRP held on this topic suggested that IPEDS is not the appropriate vehicle for collecting graduation rate information for these students, especially given that servicemembers are a particularly transient population due to the nature of their work, and IPEDS, as an institution level data collection, would not capture this activity well. That is, IPEDS does not capture the movement of individual students between institutions. ED is working closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they work towards providing this information from their already existing data systems.

The Technical Review Panel meeting of November 2011 identified many issues that could compromise the quality of veterans data that institutions could currently provide, including availability of data at institutions and states, definitional inconsistencies, and the suitability of IPEDS aggregate data collections as an appropriate data collection vehicle. While we do not anticipate expanding the IPEDS data collection beyond the published proposed changes at this time, progress is being made in some of the problematic areas, and the IPEDS Technical Review Panel may suggest additional items for collection in the future.

Sincerely yours,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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## **Comment Number: 29**

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**Docket:** ED-2013-ICCD-0029  
Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0029

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Sue Day-Perroots

**Address:** Morgantown, WV, 26506sue

**Email:** sue.day-perroots@mail.wvu.edu

## General Comment

As a member of two national organizations that represent Summer Session, we have struggled with collecting consistent data on Summer enrollments and headcount at institutions across the U.S. Summer enrollment often varies greatly from the Fall and Spring terms and by institution and is estimated to fluctuate. In recent years with declining financial support, many institutions have targeted Summer as a means to increase revenue as well as time to graduation. Summer may even provide a greater indicator of college going rates and economic times than standard terms. In addition to enrollment data, it would be beneficial if this data were collected on undergraduate, graduate, professional levels as well as online and campus based.

### RESPONSE:

Thank you for your comment dated September 2, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

We appreciate your suggestion to expand the IPEDS data collection to include summer session enrollment metrics. Changes to IPEDS are made through the mandate of legislation, or the suggestions of the IPEDS Technical Review Panel, which is charged with addressing emerging areas of importance and concern in postsecondary education. The TRP works to decrease IPEDS reporting burden and retain the federal data necessary for policymaking and analysis, and has not yet discussed the possibility of including summer session items in IPEDS. We will pass your suggestion along to the panel for consideration.

Sincerely yours,

Richard J. Reeves

Program Director

Postsecondary Institutional Studies Program

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### Comment Number: 15

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0015

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Max Ketterman

**Address:** Tallahassee, FL, 32399-0400

**Email:** max.ketterman@fldoe.org

## General Comment

I have made some editorial edits to the content of the IPEDS site

My suggested changes are -

The IPEDS is a web-based data collection system designed to collect basic data from all Title IV-eligible postsecondary institutions in the United States and the other jurisdictions. IPEDS enables the Department to report on key dimensions of postsecondary education such as student enrollment, graduation rates, degrees and other credentials earned, tuition and fees, institution's average net price, student financial aid, institution's revenues and expenditures, faculty salaries, and staff employed.

### RESPONSE:

Thank you for your comment dated August 19, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS.

As your comments refer to text from the IPEDS OMB Paperwork Reduction Act Submission, and not text from the IPEDS website, we will take your comments into consideration when we prepare our next OMB submission.

Sincerely yours,

Richard J. Reeves

Program Director

Postsecondary Institutional Studies Program

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### Comment Number: 13

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0013

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** jean public

**Address:** not available, NJ, 08822

**Email:** jeanpublic1@yahoo.com

## General Comment

s dept of labor alrady has mos tof this information. i see no need at all for further collection by the us dept of education. what do they need this information for. this project should be shut down immediately. the taxpayers are being assaulted and gouged fo rhigh taxes for information that the us govt already has. why do taxpayers need to pay taxes so two different agencies can do practically the same thing. what a stupid unnecessary wasteful way to govern.

### RESPONSE:

Thank you for your comment dated August 8, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

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 enables NCES to report on key dimensions of postsecondary education such as enrollments, degrees and other awards earned, tuition and fees, average net price, student financial aid, graduation rates, revenues and expenditures, faculty salaries, and staff employed.

The National Center for Education Statistics devotes considerable effort to assure that IPEDS does not duplicate other federal 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, Veterans Administration) 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, FSA, 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 Association of Private Sector Colleges and Universities (APSCU), 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.

Sincerely yours,

Richard J. Reeves

Program Director

Postsecondary Institutional Studies Program

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## Comment Number: 44

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0044

Comment on FR Doc # 2013-19107

### Submitter Information

**Name:** Richard Hershman

**Organization:** National Association of College Stores

### General Comment

On behalf of the National Association of College Stores (NACS), I write to express our views on how might the Department of Education enhance the quality, utility, and clarity of the information to be collected under IPEDS. Thank you for the opportunity to submit comments.

Headquartered in Oberlin, Ohio NACS is the professional trade association representing the collegiate and K-12 bookstore community. We represent more than 3,000 collegiate and elementary and secondary bookstores including school owned and operated bookstores, affiliated non-profit and student owned cooperatives, small privately owned bookstores, and contract managed bookstore companies. NACS member stores serve nearly all college students while supporting the academic missions of education institutions.

Specifically we wish to raise the “books and supplies” data element collected and presented in IPEDS’ “cost of attendance.” Books and supplies has become the most misunderstood and misquoted statistic in higher education today. It is frequently miscited in the press, by policymakers and others as solely college textbook spending. However, the recent Student Watch survey and other studies suggest required course materials may only make up an estimated 56% of average books and supplies cost estimates at many schools.

As the GAO discovered in their recent report to Congress “College Textbooks: Students Have Greater Access to Textbook Information,” GAO-13-368, June, 2013: “While the Bureau of Labor Statistics publishes data annually on college textbook pricing, there are no comparable, nationally representative [government] data sources that estimate student spending.”

Books AND supplies as a bundled cost category (does not exist in HEA’s Cost of Attendance definition) has become a catch-all miscellaneous account line in IPEDS. For example, most public colleges and universities in California include textbooks, supplies, equipment, lab and other course fees, software, and computer hardware other than a computer in this category of “books and supplies.” This data is supplied by the California Student Aid Commission based on a student survey that was last conducted in 2007 and inflation adjusted since. While the commission breaks down spending through its survey questions and estimates for each category that makes up books and supplies, institutions provide students the information as simply “books and supplies.” Due to this approach by California institutions in what they

include in books and supplies, they report within IPEDS some of the highest average budgets for books and supplies than any other state.

State legislatures in a number of states have incorrectly used IPEDS “books and supplies” estimates to calculate sales and use tax revenue from the sales of college textbooks. The inflated and inaccurate cost estimates, have subsequently helped defeat tax relief legislation for students and parents in more than a dozen states, resulting in as much as a 10% increase in costs for students in the 24 states that continue to tax textbooks.

The US Department of Education provides little standards or guidance in how to calculate these budget estimates for books and supplies and what is allowable and how they should be presented. The U.S. Department of Education presents the data itself with no explanation as to what may or may not be included in this cost of attendance category. Even the most casual review of the College Navigator website leads to wildly different book and supply numbers for seemingly similar types of institutions.

The result is the current data collection and reporting in IPEDS is not as helpful as it could and should be for prospective and existing students comparing college costs and budgeting for college. The way the data is presented also leads to broad misunderstanding by policymakers in higher education and elected officials over the actual dollar impact of textbook spending by students versus other more significant cost factors that may deserve greater attention as policymakers and institutions work to make college more affordable and accessible.

We urge the Department to explore non-burdensome common sense approaches to improve how course materials are included in the cost of attendance IPEDS data set and how the Department presents the data.

Sincerely,

Richard Hershman  
Vice President of Government Relations  
National Association of College Stores

## **RESPONSE:**

Thank you for your comment dated September 9, 2013, responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

Estimates of expenses for books and supplies reported to IPEDS are those from the Cost of Attendance report used by the institution’s financial aid office in determining financial need. Instructions for calculating all cost of attendance amounts, including books and supplies, are included in the Financial Student Aid Handbook, available at <http://www.ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook>. We instruct respondents to talk to their financial aid office to get these numbers, to ensure that they are reporting correctly.

However, we appreciate your concern for the accurate and comparable reporting of this item, and we will pass along your comments to the Office of Federal Student Aid.

Sincerely yours,

Richard J. Reeves

## **Comment Number: 17**

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0017

Comment on FR Doc # 2013-19107

## **Submitter Information**

**Name:** Daniel Suvak

**Address:** North Canton, OH, 44720

**Email:** dsuvak@walsh.edu

## **General Comment**

"Circulation" on the library form will have to be carefully defined:

Does it include renewals?

Does it includes reserves?

Similarly, for "circulation" of digital materials, is this defined as full-text downloads?

Also, many databases do not contain full-text, but their use is important. It may be useful to request information about the number of "searches" in databases.

### **RESPONSE:**

Thank you for your comment dated August 30, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

We are currently writing the Academic Libraries component instructions, which will be based on the current Academic Libraries Survey instructions. Thank you for your suggestions for clarification. The preview materials (survey form and instructions) will be available upon the approval of this Information Collection Review (ICR).

We do not anticipate expanding the IPEDS data collection beyond the published proposed changes at this time. The Technical Review Panel carefully considered how to balance the collection of useful information and respondent burden. However, the TRP may suggest additional items for the Academic Libraries component in the future.

Sincerely yours,

Richard J. Reeves  
Program Director



## **Comment Number: 38**

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0038

Comment on FR Doc # 2013-19107

## **Submitter Information**

**Name:** Chip Stewart

**Address:** New York, 10031

**Email:** cstewart@ccny.cuny.edu

## **General Comment**

In the Academic Libraries (AL) component, under Question 2--Library Collections/Circulation, "Serial Titles" is listed. I suggest this be dropped, since the concept has proven very elusive recently, because of increasing multi-faceted electronic database access to articles. It is for this reason that the major library surveys recently dropped this question, including the Department of Education's own Academic Library Survey for 2012.

This development occurred AFTER the TRP for Academic Libraries, so I suggest this proposal now be brought up to date.

This will save libraries and the Census Bureau many annual burden hours trying to clarify confusions. Thank you for your serious consideration of this suggestion.

### **RESPONSE:**

Thank you for your comment dated September 6, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

We also appreciate your bringing this to our attention. We will remove the Serial Titles item from the IPEDS Academic Libraries component.

Sincerely yours,

Richard J. Reeves

Program Director

Postsecondary Institutional Studies Program

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## **Comment Number: 42**

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System



**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0042

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Elizabeth Morgan

**Address:** Claremont, CA, 91711

**Email:** emorgan@cmc.edu

## General Comment

We need explicit rules on how to report shared library facilities and resources to IPEDS. I work for one of the Claremont Colleges, in which 7 distinct institutions support a shared library system through a complex financial formula, which is paid into a central services agency (Claremont University Consortium) which in turn provides all library services and employs the library staff, supports its facilities, etc. All 7 institutions can't claim an equal portion of the library or divide up specific employees or resources on a per-college basis. We will be utterly at sea about how to accurately represent this very important and very expensive shared resource without highly detailed instructions which take our unique situation into account.

### RESPONSE:

Thank you for your comment dated September 7, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

We are currently writing the Academic Libraries component instructions, which will be based on the current Academic Libraries Survey instructions. Thank you for your suggestions for clarification. We will make sure that this issue of shared library resources is addressed in detail. The preview materials (survey form and instructions) will be available later this fall when this Information Collection Review (ICR) is approved.

Sincerely yours,

Richard J. Reeves

Program Director

Postsecondary Institutional Studies Program

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### Comment Number: 43

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0043  
Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Linda Miller  
**Address:** United States,

## General Comment

Dear Richard-

Being unfamiliar with how this system works, I just recently found your response to our comment of 5/13/13 (both copied below); please excuse my delay. While we did answer some of the questions in 2010, we were not able to in 2012, and that is still the case.

Many thanks, Linda

### RESPONSE:

Thank you for your comment dated September 9, 2013, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

We would appreciate the opportunity to discuss in detail your suggestions for clarifying the instructions for the Academic Libraries component. Guidance which would aid you in reporting would, no doubt, be useful to others as well. Please contact the IPEDS help desk at 877-225-2568 and at [ipedshelp@rti.org](mailto:ipedshelp@rti.org). The preview materials (survey form and instructions) will be available upon the approval of this Information Collection Review (ICR).

Sincerely yours,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program

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### Comment Numbers: 14 & 16

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0014

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Frank Carey  
**Address:** Amherst, NY, 14226  
**Email:** [fcarey@daemen.edu](mailto:fcarey@daemen.edu)

## General Comment

Any changes seem to be in order, and not unduly burdensome.

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**Docket:** ED-2013-ICCD-0029

Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

**Comment On:** ED-2013-ICCD-0029-0010

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2013-2016

**Document:** ED-2013-ICCD-0029-0016

Comment on FR Doc # 2013-19107

## Submitter Information

**Name:** Emily Dibble -- Keyholder

**Address:** United States,

## General Comment

(1) Is this collection necessary to the proper functions of the Department: Yes

(2) will this information be processed and used in a timely manner: Every year the timeliness of processing is improving -- keep up the good work \*AND\* the necessary funding for these improvements.

(3) is the estimate of burden accurate: This is worth updating annually, perhaps with end-of-survey items that specify the current official estimate of burden and provide KeyHolders with the opportunity to indicate what their institutions estimated burden was.

(4) how might the Department enhance the quality, utility, and clarity of the information to be collected: Quality, utility and clarity have been improving steadily. Perhaps the instructions/examples for uploading data files (Key-Pair and the other way) could be presented separately instead of being lumped together.

(5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology.

\*Let keyholders and others keep the same password for the entire reporting year. I believe we had to change passwords halfway through the 2012-2013 reporting year.

\*For Financial Aid reporting, consider offering a sample (raw data) spreadsheet layout that would ensure all the data elements and categorization is attended to. I understand that IPEDS doesn't collect unit record data, but institutions must work with unit records in order to aggregate at the multiple levels required for reporting.

## RESPONSE:

Thank you for your comments, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

NCES is very sensitive to the need to balance increased reporting burden with the utility of the data requested. Each Technical Review Panel meeting, regardless of the topic being discussed, is specifically charged with the task of minimizing the additional institutional burden as a result of increased IPEDS reporting requirements. In addition, IPEDS respondents are asked to estimate the amount of time it took to complete IPEDS and these data are reviewed annually and changes to burden estimates are made when

necessary.

Your insight into how the instructions may be improved is appreciated. NCES will work to review the instructions and determine if future versions of IPEDS should have the instructions/examples for uploading data files presented separately instead of together. In addition, we will review the password reset policy and determine if allowing keyholders to keep the same one will result in less burden. The idea of creating a worksheet that will facilitate the organization and reporting of financial aid data is one that NCES has considered before. Ultimately, the engineering and support of another technology to help with the submission of IPEDS data has been found to be an inefficient use of government resources. We will continue to consider the creation of this tool and hope that advances in technology will allow for an efficient solution in the near future.

Sincerely yours,

Richard J. Reeves  
Program Director  
Postsecondary Institutional Studies Program