

Integrated Postsecondary Education Data System (IPEDS) 2015-2016

Supporting Statement Part A OMB Paperwork Reduction Act Submission

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Submitted by:

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Summary

The Integrated Postsecondary Education Data System (IPEDS), conducted by the National Center for Education Statistics (NCES), within the U.S. Department of Education’s (ED) Institute for Education Sciences (IES), 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 IPEDS web-based data collection system was implemented in 2000-01, and it collects basic data from approximately 7,500 postsecondary institutions in the United States and the other jurisdictions that are eligible to participate in Title IV Federal financial aid programs. All Title IV institutions are required to respond to IPEDS (Section 490 of the Higher Education Amendments of 1992 (P.L. 102-325)). IPEDS allows other (non-title IV) institutions to participate on a voluntary basis. About 200 elect to respond. IPEDS data are available to the public through the College Navigator and IPEDS Data Center websites.

Effective Fiscal Year 2015, public institutions using the Government Accounting Standards Board (GASB) accounting standards were required to implement GASB Statement No. 68, "Accounting and Financial Reporting for Pensions – an Amendment of GASB Statement No. 27." This new statement instructs public institutions with defined benefit pension plans to report an actuarially based pension liability and related pension expenses and deferrals in their General Purpose Financial Statements (GPFS). As a result, public institutions that participate in their state’s employee retirement system or have systems of their own will have to add their portion of unfunded pension liability and recognize expenses related to this liability on their GPFS. The change will have a significant impact on the reporting of balance sheet information and expenses to the IPEDS Finance component.

After consultation with the National Association of College and University Business Officers (NACUBO) – which represents more than 2,500 colleges, universities, and other higher education service providers across the country to maintain the quality of measurement for postsecondary education financial data collection – NCES is proposing to add a screen to the Public GASB Finance Form for the 2015-16 collection cycle with four new fields: the additional (or decreased) pension expense, additional pension liability (or asset), deferred inflows of resources and deferred outflows of resources that resulted from implementation of GASB Statement 68. Adding these four fields will allow NCES and IPEDS data users to proportion out the amount of increases or decreases due to liabilities, assets, net position, and benefits expenses that occurred as a result of the new standard and to properly calculate ongoing per capita costs (e.g. cost per Full-Time Equivalent Student) of education. Not adding these fields would result in higher education costs showing a one-time increase representing ongoing pension liabilities accrued through 2015.

ED requested emergency clearance processing (approved in November 2015; OMB# 1850-0582 v.17), due to GASB’s revision of their reporting standards that also impacts reporting of some of the institutions in IPEDS, to revise the 2015-16 IPEDS Finance forms and continue the remaining parts of the 2015-16 IPEDS collection as previously approved (OMB# 1850-0582 v.13-15). As part of the emergency clearance, new screening question was added to the 2015-16 IPEDS Finance survey for institutions to indicate whether they have additional (or decreased) pension expense, additional pension liability (or assets), or additional deferral to report as a result of GASB Statement 68. For the institutions that answer “yes”, four fields have been added to collect the amounts of the additional (or decreased) expense, additional liability (or assets), deferred inflows of resources, and deferred outflows of resources (see table 1). This submission extends the public comment period under regular approval process (with a 60-day followed by a 30-day public comment periods) on the revisions approved under the emergency clearance process (OMB# 1850-0582 v.17).

Table 1: Proposed Changes to the Public GASB Finance Forms

Change	Implementation Year	Source	Estimated burden
Add a new screening question: <ul style="list-style-type: none"> Did your institution recognize additional (or decreased) pension expense, additional liability (or assets), or additional deferral related to the implementation of GASB Statement 68 for one or more defined benefit pension plans (either as a single employer, agent employer or cost-sharing multiple employer) in Fiscal Year 2015? 	2015-16	GASB Standard 68	Minimal

Based on the information provided, institutions reporting “Yes” will subsequently be asked to provide pension liabilities and expenses as follows:

Table 1: Proposed Changes to the Public GASB Finance Forms

- o Additional (or decreased) pension expense
- o Additional pension liability (or asset)
- o Deferred inflows of resources
- o Deferred outflows of resources

The ease of calculating total pension liability may differ among institutions under various benefit plans and arrangements. Based on consultations with NACUBO and a review of the GASB accounting standard, NCES estimates that the proposed change to the 2015-16 IPEDS Finance Form will on average add an extra 30 minutes of burden for each institution that is subject to GASB reporting standards (approximately 2,000 institutions), with a total added burden of approximately 1,000 hours to the IPEDS collection. GASB Statement 68 requires institutions to recognize Net Pension Liability for the first time in 2015, which is the difference between the total pension liability and the pension plan's net position. NCES believes that institutions can derive the proposed additional three fields from their calculation of fiscal year 2015's Net Pension Liability, which is included in their financial statements.

Section A. Justification

A.1. Purpose of this Submission

The National Center for Education Statistics (NCES) is seeking authorization to amend the Finance form in the approved 2015-16 Integrated Postsecondary Education Data System (IPEDS) collection (OMB No. 1850-0582 v.13-15).

a. The Design of IPEDS

Related Background Information

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

IPEDS Components

1. Data Collection Method

The IPEDS system consists of several components that obtain and disseminate information on who provides postsecondary education (institutions), who participates in it and completes it (students), what programs are offered and what programs are completed, and the resources involved in the provision of institutionally based postsecondary education, both human and financial. The IPEDS web-based system collection is organized into three phases based on data availability at the institutions: Fall, Winter, and Spring. The Winter and Spring components open simultaneously to allow respondents who wish to submit Spring data early to do so.

The **Fall** collection includes:

- Institutional Characteristics (IC);
- Completions (C); and
- 12-month Enrollment (E12).

The **Winter** collection includes:

- Student Financial Aid (SFA);
- Graduation Rates (GR);
- 200% Graduation Rates (GR200);
- Outcome Measures (OM); and

- Admissions (ADM).

The **Spring** collection includes:

- Fall Enrollment (EF);
- Finance (F);
- Human Resources (HR); and
- Academic Libraries (AL).

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

2. Data Content Determination

The formats for reporting 2015-16 IPEDS data are informed by the IPEDS Technical Review Panel (TRP) and are very similar to those used for the 2001-02 through 2014-15 data collection cycles. The IPEDS TRP was formed to assist NCES contractors in a variety of ways including: making suggestions for updating the surveys with items that are more relevant to current postsecondary issues; discussing universe definitions; suggesting ways IPEDS can better serve the institutions and respondents; discussing outcomes and products; and discussing current issues. The TRP generally meets three times a year (but not on a regular schedule) to discuss various topics of interest to the community of IPEDS data providers and data users.

How the panels work:

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

b. Need for Clearance at this Time

Clearance will allow IPEDS to update the Finance survey component with a new screening question and four additional fields that will allow for NCES and the higher education industry to continue to accurately measure expenses related to postsecondary education. In addition, this clearance helps assure that IPEDS maintains a consistent set of data items in order to collect data from the various institutions at the needed time and with the needed detail. This is important since the utility and quality of data collected in one component in some cases are dependent upon, and in all cases are enhanced by, data collected in other components. Internal consistency and the inherent relationships among IPEDS components also permit reliability indicators to be established for many of the IPEDS data elements. The capability for assessing reliability on an on-going basis and, in turn, being able to address individual and systemic problems as they occur, will result in significantly better postsecondary education data. Moreover, the concept of a data system rather than stand-alone, independent survey components also allows for the elimination of duplication of effort and thus reduces response burden. The web-based data collection system will continue to allow NCES to comply with the Higher Education Act, which required the redesign of the data collection system, so as to improve the timeliness and quality of IPEDS data, by increasing the efficiency of data collection.

d. **Statutory Requirements for IPEDS Data**

General Mandate

IPEDS, conducted by NCES, plays a major role in responding to the NCES's Congressional mandate under the Education Sciences Reform Act of 2002 (20 U.S.C., § 9573).

Mandatory Reporting for Institutions with Program Participation Agreements

The completion of all IPEDS surveys, in a timely and accurate manner is mandatory for all institutions that participate in or are applicants for participation in any Federal financial assistance program authorized by Title IV of the Higher Education Act of 1965, as amended. The completion of the surveys is mandated by 20 USC 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19).

Vocational Education Data

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

Data on Race/Ethnicity and Gender of Students

The collection and reporting of racial/ethnic data on students and completers are mandatory for all institutions that receive, are applicants for, or expect to be applicants for Federal financial assistance as defined in the Department of Education (ED) regulations implementing Title VI of the Civil Rights Act of 1964 (34 CFR 100.13), or defined in any ED regulation implementing Title IX of the Education Amendments Act of 1972. NCES has implemented the new reporting requirements for race-ethnicity and use of the new race/ethnicity aggregate reporting categories is mandatory for the collection of 2010-11 data.

Data on Race/Ethnicity and Gender of Staff

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

Student Right-to-Know

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

Consumer Information

Section 101 of the Higher Education amendments of 1965 (PL 105-244) requires that NCES collect the following information from institutions of higher education: tuition and fees; cost of attendance; average amount of financial assistance received by type of aid, and the number of students receiving each type.

Section 132 of the Higher Education Opportunity Act of 2008 (PL 110-315) requires that ED "make publicly

available on the College Navigator website, in simple and understandable terms,” information regarding enrollments, degree completions, admissions, net price, college costs, students with disabilities, graduation rates, and many additional consumer information items.

A.2. Purpose and Use of IPEDS Information

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

In addition to usage within NCES and other areas of the Department of Education, IPEDS data are heavily relied on by Congress, other federal agencies, state governments, education providers, professional associations, private businesses, media, military, and interested individuals. Finally, IPEDS data are used in the IPEDS Data Feedback Reports, annual reports that are sent to all postsecondary institutions. They contain data and figures comparing each individual institution to a group of “comparison” institutions, using a variety of IPEDS data variables and derived variables, and are mailed to the Chief Executive Officer of each institution. The reports serve as a means of highlighting the utility of IPEDS data, as well as providing comparative data for use by institutions in meeting their institutional goals relative to their postsecondary “peers.”

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

a. Institutional Characteristics

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

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

Much of the data collected through the IC component, are of special interest to consumers, and are made available through College Navigator, a web-based college search tool (see <http://nces.ed.go/collegenavigator>).

Additionally, NCES makes available on College Navigator data provided by the Office of Postsecondary Education (OPE) and the Office of Federal Student Aid (FSA) for the purpose of disseminating relevant information to consumers. These enhancements include: information on accreditation, varsity athletics, cohort default rates, 90/10 data, and campus security data.

b. Completions and Compliance Report

IPEDS information on the number of students who complete a postsecondary education program by type of program and level of award constitutes the only national source of information on the availability and location of highly trained manpower. Types of programs are categorized according to the Classification of Instructional

Programs (CIP). The CIP is a taxonomic coding scheme that contains titles and descriptions of instructional programs, primarily at the postsecondary level. Business and industry, the military, and other groups that need to recruit individuals with particular skills use these data extensively. The data also help satisfy the mandate in the Carl D. Perkins Vocational Education Act for information on completions in postsecondary vocational education programs.

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

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

c. **Enrollment**

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

1. Fall Enrollment and Compliance Report

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

for a wide variety of purposes. The race/ethnicity and gender data by level are necessary for the Office for Civil Rights (Department of Education) to perform functions mandated by Title VI and Title IX.

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

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

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

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

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

In 1987, NCES began collecting fall enrollment by age of student on a biennial basis. These data offer insight into the relationship between the changing demographics of college-going cohorts and enrollment in different types of postsecondary institutions; they permit detailed projections of enrollment by institutional type and by age. Because a student's dependency status is strongly related to age, the data can also be used to provide estimates of the number of independent/dependent students attending a postsecondary institution, which should be useful in financial aid modeling and projections. In addition, the Department of Defense U.S. Military Entrance Processing Command has indicated a strong need for these data to identify institutions with a sufficient number of recruitment-age students to make recruiting efforts cost effective.

4. Total Entering Class

NCES began collecting total entering class data in the 2002-03 data collection, based on a recommendation from the TRP. These data are collected in order to address concerns that the cohort used by the Graduation Rates (GR) component is not representative of an institution's entering class because the GR cohort is comprised only of full-time, first-time students. The collection of a total entering class allows for a more accurate picture of incoming students, and also permits the calculation of the fall GR cohort as a proportion of the total entering student body.

5. Retention Rates

NCES began collecting retention rates data in the 2003-04 data collection, based on a need identified by the TRP. Retention rates data provide an indicator of postsecondary performance that is broader in scope than completions data or graduation rates data, and is a critical measure of success as viewed by many 2-year and 4-year institutions.

6. Unduplicated 12-Month Head Count

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

7. Instructional Activity

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

d. Student Financial Aid

The Student Financial Aid component was added to IPEDS to help respond to the request for information on the cost and price of higher education in the Higher Education Amendments of 1998. Data collected through this component allow prospective students to compare average amounts of financial aid received by full-time, first-time degree or certificate-seeking undergraduates by type of aid received across institutions. Data collected here are also used to calculate institutional net prices, as required in the Higher Education Opportunity Act of 2008. These data are posted on College Navigator.

e. Graduation Rates

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

f. Finance

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

The Department of Education's Title III (Institutional Aid) grant program relies on the finance data to help determine whether or not an applicant college or university is eligible to receive a grant. These data are needed annually. The Government Accountability Office published a report on Postsecondary Education Financial Trends in Public and Private Nonprofit Institutions for the U.S. Senate Committee on Health, Education, Labor, and Pensions that used IPEDS finance data. The National Science Foundation is a regular user of IPEDS finance data. The Bureau of the Census relies on this form to collect data required in its census of governments. NCES and Census worked closely to ensure that one instrument satisfied the needs of both agencies. The Bureau of Economic Analysis also contributed significantly to this endeavor. The Office of Management and Budget asked NCES to collect these data because the Bureau's survey universe was a subset of the IPEDS universe. The Bureau of the Census also uses the data from other parts of the survey to:

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

The Bureau of Labor Statistics and the Federal Mediation and Conciliation Service are secondary users of NCES/Census finance data. The Office for Civil Rights has used finance data to determine states' or institutions' compliance with anti-discrimination laws. From these data OCR was able to determine whether or not predominantly black, publicly controlled institutions were being discriminated against through funding decisions made by state boards of higher education. The Bureau of Economic Analysis of the U.S. Department of Commerce uses financial statistics to prepare totals and forecasts on total non-farm expenditures for structures and equipment, and to develop Gross National Product accounts. Increasing numbers of state

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

Among associations, the American Council on Education (ACE), the Association for Institutional Research, the Brookings Institution, the Carnegie Foundation for the Advancement of Teaching, and The Delta Cost Project are frequent users of Finance data. Researchers from these and other organizations use the data to assess the economic future of the nation's colleges and universities.

g. **Human Resources**

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

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

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

On an annual basis, institutions also classify all of their employees by full- or part-time status, faculty status, and occupational category; in addition, medical school staff are reported separately.

Salary outlays for full-time instructional staff and other full-time employees are also collected annually. These data are used by:

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

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

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

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

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

- a. The development of a fully automated web-based data collection for all components of IPEDS data. The data collection is organized into three modules, taking full advantage of data availability schedules.

- b. Survey components are customized based on screening information so that institutions are prompted to respond *only* to those items relevant to their institution. For example, if a private institution does not have a differential tuition charge for out-of-state students, they will be prompted for *one* tuition charge. Additionally, many data items (answered previously) will be available to the respondent on the collection instrument, so that only those items that have actually changed since the previous report need to be completed or updated.

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

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

- c. NCES works closely with state coordinators, many of who submit IPEDS reports for institutions in their state. Increasingly, states obtain data from institutions electronically on a student unit record basis (data per student). Other states collect institutional data using either IPEDS forms or their own state forms, which are compatible with IPEDS. Data are then extracted from the state database in the IPEDS format and file uploaded to the collection system. Thus institutions can provide data to their state and to NCES simultaneously.
- d. NCES will continue to encourage respondents to prepare IPEDS data in a format for uploading to the web-based collection instrument by providing detailed file specifications and instructions as well as "do's" and "don'ts" for data submission. Three upload formats are available for institutions to use: a fixed length format, a key value pair format, and an XML format.

A.4. Efforts to Identify and Avoid Duplication

NCES devotes considerable effort to assure that IPEDS does not duplicate other data collection activities involving postsecondary education providers. In developing IPEDS, NCES continues to assess the data collection efforts of other Federal agencies (e.g., National Science Foundation, Department of Agriculture, Department of Defense, Census Bureau, Equal Employment Opportunity Commission, Bureau of Labor Statistics, 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.

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

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

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

A.6. Frequency of Data Collection

The survey components proposed for this request are those that will be collected beginning with the Fall 2015 collection and extending through the Spring 2016 collection, which will cover one survey cycle. The survey data items are similar to those used through 2014-15, with the additional items and modifications to improve clarity and enhance the use of the data as described in this submission.

A.7. Special Circumstances

None of the special circumstances described apply to these collections.

A.8. Consultations outside the Agency

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

NCES has a strong relationship with many stakeholder groups that provide feedback on proposals for IPEDS. Identified below are organizations that have played a major consultative role:

- a. An IPEDS Technical Review Panel (TRP) was formed to assist in survey revisions and to discuss universe definitions. Representatives include state coordinators, federal representatives, educational association members, and institutional researchers and registrars from all postsecondary education sectors.
- b. The National Postsecondary Education Cooperative (NPEC) is responsible for IPEDS research and development activities. NPEC's mission is to promote the quality, comparability and utility of postsecondary data and information that support policy development at the federal, state, and institution levels. The NPEC IPEDS R&D Panel does this by developing a research and development agenda for IPEDS, identifying topics that will help improve the quality, comparability, and utility of IPEDS data for the postsecondary education community, consumers, and policymakers, as well as providing expertise to NCES on related IPEDS R&D projects.
- c. The American Council on Education established an advisory group consisting of representatives from the various organizations involved in higher education issues. This group meets periodically with NCES to discuss the IPEDS project.
- d. Annual meetings are held with IPEDS coordinators to obtain state input on IPEDS operations, survey revisions, analysis plans, and data needs.
- e. IPEDS workshops and presentations are made at various conferences and annual or regional meetings of educational and professional associations. IPEDS staff discuss proposed modifications or problem areas and receive input from the data providers as part of the data collection training.

A.9. Paying Respondents

There are no payments or gifts offered to respondents.

A.10. Assurance of Confidentiality

IPEDS data are not collected under any pledge of confidentiality.

The PRA language for IPEDS is made available on homepage for the data collection center. The current statement for the 2015-16 collection reads as follows:

“According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1850-0582.

Summary of Time Burden Estimates by Institution Type and Keyholder Experience, 2015-16 Data Collection		
	Estimated Range	Estimated Average
4-year institution		
New Keyholder	189-351 hours	234 hours
Returning Keyholder	126-234 hours	156 hours
2-year institution		
New keyholder	156-293 hours	183 hours
Returning keyholder	104-196 hours	121 hours
<2-year institution		
New keyholder	69-116 hours	80 hours
Returning keyholder	47-77 hours	53 hours

These IPEDS reporting burden estimates include the time it takes to review instructions, query and search data sources, complete and review the components, and submit the data through the Data Collection System.

If you have any suggestions for improving this form or comments concerning the accuracy of the time estimate(s) or the status of your individual submission, please direct them to ipedshelp@rti.org.”

A.11. Justification for Sensitive Questions

These collections contain no questions of a sensitive nature.

A.12. Estimate of Burden

Annual Burden Calculation

Table 5 displays the estimated burden to respondents for the 2015-16 data collection. The estimated number of institutions responding reflects those that are required to respond (approximately 7,300 Title IV eligible institutions) and those that voluntarily respond (approximately 200 per data collection year). Table 4 shows estimated ranges for institutions based on the institution type and keyholder experience.

In the previous IPEDS request for clearance, submitted for the 2011-12 through 2013-14 data collections, based on an NCES-commissioned study of burden estimates and revisions across federal agencies, NCES proposed to ask respondents to voluntarily report the time required to prepare and complete each component of the IPEDS data collection at the end of the survey form. This voluntary collection was implemented in the 2012-13 data collection, and the results from the Fall data collection were used in establishing burden estimates for the Fall components. Results from the Winter and Spring data collections will be used in future estimates. Response rates for this item on the three Fall survey components are shown in the Table below.

Table 2. Response Rates for IPEDS Preparation Time Item, Fall 2012

	Returning Keyholders	New Keyholders
Institutional Characteristics	75%	81%
Completions	62%	67%
12-month Enrollment	75%	80%

Response rates for the preparation time items are high enough to incorporate these data into burden estimate calculations. The response rates for the Completions component are lower than for the other two Fall components due to the fact that more data are uploaded by states and systems for this component; the item does not appear on the import layouts.

NCES anticipated using the keyholder reported times in two ways:

1. To gauge whether the recalculated burden estimates from the previous clearance submission are realistic, compared to what keyholders report;
2. To determine whether the 50% additional time premium established for new keyholders accurately represents what new keyholders experience.

The times to prepare and complete the Fall components reported by both experienced and new keyholders are, on average, much lower than the recalculated burden estimates from the previous IPEDS clearance package. As to the second point, the keyholder reported times support the belief that it takes new keyholders longer to prepare and submit their IPEDS components. While the premiums reported for the Fall vary from component to component, and are somewhat less than the 50% used in IPEDS burden calculations, NCES proposes to retain the 50% premium for the current clearance submission, and reevaluate for the next submission, when there will be additional responses to take into account. The table below summarizes the preparation hours reported by experienced and new keyholders, and shows the average premium for new keyholders:

	Total preparation hours, experienced keyholders	Number of experienced keyholders responding	Average preparation hours, experienced keyholders	Total preparation hours, new keyholders	Number of new keyholders responding	Average preparation hours, new keyholders	Average Premium for New Keyholders
IC	19,452	4,819	4.04	4,720	851	5.55	37%
C	18,909	3,976	4.76	4,886	710	6.88	45%
E12	16,382	4,722	3.47	3,364	751	4.48	29%

Table 4 shows that in the 2015-16 IPEDS data collection, there are estimated 77,600 responses from 7,500 institutions, resulting in 1,050,870 estimated annual burden hours across all respondents. In all cases, if the data are readily accessible in machine-readable files, the time required is less than the estimated burden hours. Estimates include the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The number of institutions responding is estimated based on the 2014-15 universe; changes to these numbers for successive years have been small.

Table 4. Summary of Estimated Response Burden by Survey Component: 2015-16

Survey Component	Number of institutions (respondents)	Approved 2015-16		Revised 2015-16	
		Avg hours per institution	Total hours	Avg hours per institution	Total hours
Institutional Characteristics	7,500	5.7	42,750	5.7	42,750
Completions	7,500	11.6	87,000	11.6	87,000
12-month Enrollment	7,500	7.2	54,000	7.2	54,000
Student Financial Aid	7,500	28.7	215,250	27.7	207,750
Graduation Rates	6,400	12.6	80,640	12.6	80,640
200% Graduation Rates	6,400	3.7	23,680	3.7	23,680
Outcome Measures	4,900	32.7	160,230	32.7	160,230
Admissions	2,500	3	7,500	3	7,500

Fall Enrollment	7,500	14.2	106,500	14.2	106,500
Finance	7,500	13.4	101,500	13.53	101,500
Human Resources	7,500	21.1	158,250	21.1	158,250
Academic Libraries	4,900	4.3	21,070	4.3	21,070
Total	77,600 responses from 7,500 respondents	--	1,049,870	--	1,050,870

The total cost to respondents in 2015-16 is based on the estimated response burden (hours) multiplied by \$38.65, which includes average data analyst and associated computer costs (for running programs to extract data). Total estimated costs to respondents for the 2015-16 are as follows:

Table 5.	Estimated Total Burden Hours for All Institutions	Estimated Cost to All Institutions	Average Estimated Costs Per Institution
2015-16	1,050,870	\$40,616,126	\$5,416

A.13. Estimate of Cost Burden

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

A.14. Cost to the Federal Government

We estimate a total cost to the government for the IPEDS 2015-16 will be \$9.6 million. On an annual basis, over the three survey years, the contract cost is estimated at \$8 million per year. Federal S&E will be approximately \$1,600,000 per year. More than 95% of this amount will be spent in direct support of the institutional training, and the collection, analysis, and reporting of the IPEDS data described herein. The contract amount includes all activities related to program support; data collection system maintenance; help desk support activities; programming and software modifications and documentation; training of contractor staff as well as institutional respondents; data collection, data review, and analysis; survey administration; imputations; file preparation, reporting, and data dissemination; TRP meetings; and activities including training, dissertation and research grants, and other related activities. The costs include personnel, fringe benefits, travel, supplies, computer related activities, consultants, other direct and indirect costs, plus overhead and G&A.

The time estimates and costs associated with the activities described above and in the IPEDS Statement of Work for the RFP are based on recent experience with the contractors that currently support the IPEDS operations (RTI International, IT Innovative Solutions, AIR, and others).

A.15. Reasons for Change in Burden

No change to the approved estimated annual response burden is being requested.

A.16. Publication Plans/Project Schedule

a. Schedule of Activities

TABLE 6. IPEDS 2015-16 PLANNED DATA COLLECTION SCHEDULE

Title	Title	Date	Survey Components
Registration	Opens Register by	August 5, 2015 August 26, 2015	IC-Header
Fall Collection	Opens Keyholder close Coordinator close	September 2, 2015 October 14, 2015 October 28, 2015	Institutional Characteristics (IC) Completions (C) 12-Month Enrollment (E12)
Winter Collection	Opens Keyholder close Coordinator close	December 9, 2015 February 10, 2016 February 24, 2016	Student Financial Aid (SFA) Graduation Rates (GR) 200% Graduation Rates (GR200)

			Admissions (ADM) Outcome Measures (OM)
Spring Collection	Opens Keyholder close Coordinator close	December 9, 2015 April 6, 2016 April 20, 2016	Fall Enrollment (EF) Finance (F) Human Resources (HR) Academic Libraries (AL)

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

Frequent communications occur with the institution over the course of the data collection to ensure compliance with this statutorily mandated collection. The planned 2015-16 Communications and Follow-up Schedule is detailed below.

Table 7. IPEDS 2015-16 Data Collections Communications / Follow-up Schedule

Collection	Correspondence type	When	Why
Registration	Email to keyholder	Early August - Registration open	UserID + password
	Letter to CEO	Early August - Registration open	UserID + password; importance of keyholder selection; thank you
	Email, Mailed packet	At registration	Welcome to new keyholders
	Letter to CEO	Late August	No registered keyholder
	Letter & phone call to CEO	Mid September	No registered keyholder
Each collection: Fall Winter Spring	Email to keyholder	Open	Collection open
	Email to keyholder	Close - 4 wks	No data entered
	Email to New keyholder	Close - 4 wks	All surveys not locked
	Thank you Email to CEO	Close - 3 wks	All surveys locked
	Phone call to CEO/KH	Close - 2 wks	No data entered
	Phone call to New keyholder	Close - 2 wks	All surveys not locked
	Email to keyholder	Close - 2 wks	All surveys not locked
	Email to keyholder	Close - 1 wk	All surveys not locked
Additional for Spring	Email to keyholder	Late March	No data entered since Winter
	Email - This Week in IPEDS	Twice in February	Reminder that Spring surveys are open
Additional for Spring	Email Affected Keyholders/Coordinators/Finance Reporters	November 2015	Announcement of upcoming changes to Finance component
	Email Affected Keyholders/Coordinators/Finance Reporters	December 2015	Detailed information about changes to Finance component/links to more information

b. Distribution Methods

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

1. Data Dissemination Tools

IPEDS Data Center: The IPEDS Data Center is the primary method of disseminating IPEDS data to the postsecondary education, policy, and research communities. The data center allows data users to create different reports and datasets, depending on their individual needs. Users can create reports that highlight a particular institution and compare it to other institutions, or they can simply create a report about a group of institutions. Users follow a step-by-step approach

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

Trend Generator: The IPEDS Trend Generator is a quick and easy way to see IPEDS data over time. Users can create trends, see graphs, download data, and print. Trend data can be displayed at an aggregate level, or by institutional and student characteristics.

Executive Peer Tool (ExPT)

Now part of the IPEDS Data Center, NCES designed the ExPT to be used in conjunction with the IPEDS Data Feedback Reports (DFRs). Using the ExPT, users can duplicate DFRs with different sets of comparison institutions, and incorporate additional indicators not included in the printed DFR. Custom reports generated with this tool can be saved as PDF files with full informational and methodological notes. A detailed online user guide is available. Visit <http://nces.ed.gov/ipeds/pas/ExPT> for more information on this tool.

College Navigator: In response to the Higher Education Amendments of 1998, NCES developed a searchable website to provide up-to-date statistics on a broad range of postsecondary institutions for easy access by consumers. The site presents general information about each institution and its mission, as well as data on institution prices and average net price, admissions, financial aid, enrollment, program offerings, degrees and awards conferred, graduation and retention rates, accreditation, varsity athletic teams, campus security, and cohort default rates. College Navigator is designed to help college students, future students, and their parents understand the differences among colleges and how much it costs to attend college. The site also provides direct links to each institution's home page and net price calculator, the College Affordability and Transparency Center; Federal Student Aid's Prepare for College website and the Free Application for Federal Student Aid (FAFSA); and the Occupational Outlook Handbook. Visit <http://nces.ed.gov/collegenavigator/> for more information.

Free Application for Federal Student Aid (FAFSA) on the Web: The Office of Federal Student Aid (FSA) now uses IPEDS data on graduation and retention rates, college costs, and net prices in their online FAFSA application. When students look up schools to which they want their FAFSA information sent, they are presented with information on these schools based on IPEDS data.

Tabulated Data: IPEDS data are tabulated and are available through the Tables Library.

2. Survey Reports

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

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

spectrum of users of postsecondary education statistics.

A.17. Request to Not Display Expiration Date

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

A.18. Exceptions to the Certification

There are no exceptions to the certification statement.