

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

July 2016

Integrated Postsecondary Education Data System (IPEDS) 2016-19

ED-2016-ICCD-0020

Comments on FR Doc # 2016-14937

Comments related to OM

Comments number 71, 72, 75, 76

Document: ED-2016-ICCD-0020-0071

Name: Anonymous Anonymous

I would like to comment on the burden and inconsistency of asking for outcome measures by Pell recipients. First, for the current disclosure mandate for completion/grad rates by Pell, we have always followed the NPEC guidance here: <https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2010831rev> It says: "Students are to be considered to have received a grant or loan if they received it for the period used in determining the cohort - fall term or full year." Asking institutions to now, instead, report by receiving Pell at any time during enrollment conflicts with that. What institutions disclose might now be different from what IPEDS is mandated to collect and post. Throw in the fact that IPEDS Fin Aid survey asks for aid awarded and you now appear to be asking for Pell disbursed, I just think you are asking for plenty of confusion and inaccurate reporting. Further, the Outcome Measures survey is becoming a huge burden to institutions. If the plan is to take the current 4 cohorts and break those out by Pell status so we now have 8 cohorts, I am starting to wonder if a unit-record level database is better here, even though I have always been against one. That is, what happens when you want to then layer that with subsidized Stafford loan status, sex, and/or race? Or, you all take another stab at calculating Pell completion rates from the NSLDS and Clearinghouse data by getting institutions to clean up their Clearinghouse data. We, for one, did find a problem with our coding of graduated status with Clearinghouse and corrected it so that in the future, data matched from NSLDS to Clearinghouse should produce accurate rates for our institution. Last, financial aid offices will have to be involved in OM reporting and I am not sure they all have the ability to easily or quickly report aid data from 6, 8, or 10 years ago. This might be ancient history to many offices. It will involve significant resources and time at many institutions, especially for those using separate fin aid and enrollment systems.

Document: ED-2016-ICCD-0020-0072

Name: Anonymous Anonymous

If Pell vs. non-Pell is added, then that would rule out automating the report because basically a list of IDs would have to be sent to Financial Aid, and they would have to identify each student as Pell or non-Pell.

Document: ED-2016-ICCD-0020-0075

Name: Jessica Sharkness

I am concerned about the definition of "Pell grant recipient" that is proposed. On page 6 of supporting statement A, the definition for Pell grant recipient is given as anyone "who received a Pell Grant at any time over the 8-year period." This differs from how we have historically been defining Pell grant cohorts, which is by Pell status during the *first semester* at the institution (as NPEC describes it, "Students are to be considered to have received a grant or loan if they received it [for] the period used for determining the cohort fall term or full year." See <http://nces.ed.gov/pubs2010/2010831rev.pdf>, page A-24).

My worry about broadening/altering the definition of Pell Grant recipient is threefold:

1. Pell Grant graduation rates reported in compliance with HEOA (Sec. 488(a)(3)) will not match those reported to IPEDS in the OM survey.
2. As a cohort of students moves through college, the number who receive Pell grants will in all likelihood increase, but our institution's counting of such students will become increasingly biased. The reason for this is that we will only know about the Pell status of students who stayed at our institution -- we will not be able to count as a Pell recipient anyone who left our institution and subsequently received a Pell grant at another institution. The two groups (Pell recipients and All

other students) then become muddled; it will be impossible to say that those in the "non-Pell-recipient" group have definitively not received a Pell grant.

3. It is going to be very burdensome and time-consuming to redefine the Pell cohorts in our data collection & reporting systems. Since we have already tagged students as a Pell recipient based on their first semester at our institution, it would be much simpler to continue using that definition.

In short, I would recommend redefining "Pell recipient" to refer to the first semester at the institution, in order to be more in line with the current HEOA reporting and to minimize burden on institutions.

Document: ED-2016-ICCD-0020-0076

Name: Sherri Anonymous

Tracking Pell graduation rates: I am not opposed to providing this data and tracking these students if it provides good, useable information in which future decisions will be based upon. Just need to be clear on Pell awarded vs accepted. Many institutions have internal definitions as well.

Response

To Whom It May Concern,

Thank you for your feedback posted on June 30, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

After the 60-day and the 30-day public comment period, NCES will hold a Technical Review Panel (TRP) late August of 2016 to allow a representative group of higher education institutions and data users to review all the proposed changes to the Outcome Measures survey including the issues brought forth in your comments (i.e., counting only entering students who received a Pell award in their first year versus ever received a Pell award over the 8-year period; aid awarded versus aid disbursed; breaking the four cohorts into sub-Pell cohorts and considering the institutional burden and small cell sizes that may result from more sub-cohorts; considering the overall institutional burden on coordinating campus offices such as financial aid and enrollment offices as well as third-party entities such as NSLDS and Clearinghouse).

We thank you for taking the time to provide comments which will be carefully discussed at the upcoming TRP. A summary of the TRP will be publicly posted mid-to-late September before further clarifications and instructions can be provided to IPEDS data reporters.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM Comment number 79

Document: ED-2016-ICCD-0020-0079

Submitter Name: Katherine Valle on behalf of The Honorable U.S. Representative Robert C. "Bobby" Scott

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AND THE WORKFORCE
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July 21, 2016

Ms. Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Docket Number ED-2016-ICCD-0020

Dear Ms. Mullan:

On behalf of the Democratic members of the U.S. House Committee on Education and the Workforce, I thank you for the opportunity to submit comments on the proposed revisions to the 2016-2019 Integrated Postsecondary Education Data System (IPEDS). The Committee oversees programs that affect millions of Americans—from school teachers and small business owners to students and retirees—and is working during the 114th Congress to build on vital reforms to higher education.

I applaud the U.S. Department of Education (ED) for its revised proposal to collect graduation rates on two new first-time, full-time student cohorts: Pell Grant recipients and Subsidized Stafford Loan borrowers who did not receive a Pell Grant. I appreciate ED's efforts to collect more comprehensive data on student outcomes—especially for low- and middle-income students—and hope that this information will be available in a form disaggregated by race/ethnicity, gender, and age.

As you look to further improve IPEDS, I urge you and your team to continue your work to incorporate outcome measures for an even wider set of students. More than 40 percent of postsecondary students no longer fall into the first-time, full-time category that IPEDS currently measures. To ensure that the data encompasses a wider number of students, I support your effort to disaggregate these two new graduation rates by part-time attendance and transfer status. Your commitment to hold a Technical Review Panel (TRP) to investigate this possibility is an important first step toward creating an infrastructure that meets contemporary data needs. However, graduation rates for student characteristics such as race/ethnicity, gender, and age should also be disaggregated by attendance intensity and transfer status. I encourage you to use this upcoming TRP or future ones to examine this possibility.

Ms. Kate Mullan
July 21, 2016
Page 2

Additionally, non-traditional students—including veterans, first-generation, homeless students, and students with dependents, disabilities, and many other underrepresented populations—comprise an increasing portion of our nation’s higher education system. Although IPEDS does not currently collect enrollment or completion measures on these student populations, it must consistently and comprehensively strive to capture important indicators that account for all non-traditional postsecondary students. I firmly believe that, with ongoing enhancements like those proposed for 2016-2019, IPEDS has the potential to provide information necessary to empower students, families, policymakers, and institutions to make key decisions concerning higher education.

Again, I commend ED’s proposal for heeding calls from stakeholders to include student outcomes for Pell Grant recipients and Subsidized Stafford Loan borrowers. The 2016-2019 proposed revisions to IPEDS are a significant step forward in providing the higher education community with more information on how outcomes for low- and moderate-income students vary across institutions and how these students compare with more well-resourced classmates. I look forward to the continued improvement of IPEDS to adapt data collection in order to fully reflect our nation’s 21st century students.

Sincerely,



ROBERT C. “BOBBY” SCOTT
Ranking Member

Response

Dear Mr. Scott,

Thank you for your letter posted on July 25, 2016, which responds to a 30-day request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) 2016-19. The National Center for Education Statistics (NCES) recognizes your comments to the Department’s proposed revisions for the IPEDS Graduation Rates survey component. We greatly appreciate your support of IPEDS’ efforts to collect information on graduation rates for Federal Pell Grant recipients and Unsubsidized Loan Recipients not receiving Pell Grants.

We also appreciate and have taken into consideration your suggestions for other ways in which the Department might expand the IPEDS collection on a variety of student populations, including nontraditional students. The proposed IPEDS changes that were submitted to the Office of Management and Budget relate to the collection of data that have already been described in the Higher Education Act (HEA), as amended, as well as based on several expert Technical Review Panel meetings held in the past. Although the Department agrees that the populations outlined in your letter are important, expansion of the collection beyond what is described in the HEA, as amended, to include information by race/ethnicity, gender, and age would require further technical investigation by NCES to determine the industry’s capacity to access, aggregate, and report the more detailed information.

While we continue to improve the IPEDS collection and take into consideration your suggestions for the future collections, the NCES Postsecondary Sample Surveys already collect helpful data that informs our understanding of these student populations. With the current suite of postsecondary data collections, it is NCES goal to work with higher education institutions and the research community to improve NCES’ ability to measure outcomes for all postsecondary education students.

Thank you again for your comments and interest in this proposal.

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM
Comment number 82

Document: ED-2016-ICCD-0020-0082

Name: Jamey Rorison

This letter is submitted on behalf of the 22 undersigned members of the Postsecondary Data Collaborative (Postsec Data), in response to the revised proposal for the Integrated Postsecondary Data System (IPEDS) 2016-2019 collection.



July 22, 2016

Kate Mullan
Acting Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW., LBJ, Room 2E-343
Washington, DC 20202-4537

Dear Ms. Mullan:

This letter is submitted on behalf of the 22 undersigned members of the Postsecondary Data Collaborative (PostsecData), in response to the revised proposal for the Integrated Postsecondary Education Data System (IPEDS) 2016–2019 collection. PostsecData comprises organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

We appreciate your detailed response to our April 18, 2016 recommendation letter and are very encouraged by the newest iteration of the proposal. The addition of the "Pell recipients" and "Non-Pell recipients who receive subsidized Stafford loans" cohorts in the Graduation Rate (GR) survey will provide data comparable to commonly used graduation rates. The proposed calculation also should manage reporting burden, as it aligns with the Higher Education Opportunity Act of 2008 disclosure requirements.

For the Outcome Measures (OM) survey, we look forward to the discussion and outcomes of the August 2016 Technical Review Panel, and offer our organizations as resources to participate in that meeting. Supplementing the existing OM cohorts with four matching Pell recipient cohorts, in lieu of a fifth cohort that combines students of different enrollment and attendance patterns, could allow for a more meaningful and nuanced analysis of the data. Collecting graduation rates in this way with OM could also provide a more complete understanding of outcomes for all Pell recipients, beyond the first time, full-time students covered in the GR survey.

We value the Department of Education's efforts to improve postsecondary data systems and to collect more comprehensive data on student outcomes—especially for low-income students. This revised proposal reinforces the commitment by the National Center for Education Statistics to collect better data on the outcomes of millions of low-income students and the institutions that serve them.

Thank you for the opportunity to comment on the revised IPEDS proposal as well as for thoughtful consideration of our previous feedback and recommendations. If you have any questions, please do not hesitate to call or email Jamey Rorison at jrorison@ihep.org or (202) 861-8244.

Sincerely,

Association for Career and Technical Education
Association of Public & Land-grant Universities
California Competes
Campaign for College Opportunity
Complete College America
Data Quality Campaign
Education Commission of the States
George Washington Institute of Public Policy

Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
National Association for College Admission Counseling
National Center for Higher Education Management Systems
National College Access Network
New America
Pell Institute for the Study of Opportunity in Higher Education
Southern Education Foundation
The Education Trust
The Institute for College Access & Success
Veterans Education Success
Western Interstate Commission for Higher Education
Workforce Data Quality Campaign
Young Invincibles

Response

Dear Mr. Rorison,

Thank you for your feedback received on July 22, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

We thank you for submitting a comment on behalf of the 22 organizations, the Postsec Data. In your comments, we have received your membership's support on the proposed changes to the Graduation Rates Survey to collect the HEA, as amended, required disclosures on Pell and Stafford loan graduation rates. Thank you also for your membership's support of the upcoming IPEDS Technical Review Panel (TRP), which will allow a representative group of higher education institutions and data users to review all the proposed changes to the Outcome Measures survey including the issues brought forth in your comment (i.e., the disaggregation of the four Outcome Measures cohort by Pell status).

We thank you for taking the time to provide comments which will be carefully discussed at the upcoming TRP. A summary of the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM Comment number 83

Document: ED-2016-ICCD-0020-0083

Name: Andrew Watt

Submitter's Name: Nou Yang

Attached please find the comments on behalf of Capella University

July 25, 2016

Kate Mullan, Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 2E103, Washington, DC 20202
(submitted electronically via regulations.gov)

Dear Ms. Mullan,

Please accept the following comments from Capella University in response to the Department of Education's Notice dated June 20, 2016, regarding changes to the Integrated Postsecondary Education Data Systems (IPEDS) 2016-2019, docket ID #ED-2016-ICCD-0020-0068.

We appreciate the opportunity to provide comment and we have four recommendations and comments.

First Time/Full Time

First, the IPEDS Graduation Rate survey requests and reports data on the traditional first-time undergraduate population. Capella University's mission is to "extend access to high-quality bachelor's, master's, specialist, doctoral, and certificate programs for adults who seek to maximize their personal and professional potential." In contrast to the traditional first-time undergraduate population, the average Capella student is thirty-nine years old and enrolled part-time. Because of this mission, our cohort size for the IPEDS graduation rate is less than 1% of our University population (often only 1-3 students), which has led to a very small or 0% graduation rate. This is not representative of our graduation rate or our student population. Although there is the option to provide context to our graduation rate in the IPEDS College Navigator, when pulling datasets or reports to analyze (which many institutions or agencies do) this context does not accompany the data.

Therefore, we suggest having a threshold where if the first-time, full-time undergraduate population is less than a certain percentage of the University's population, the institution could have the option to skip this portion of survey since it is not a representative graduation rate; or, provide an option for institutions like ours to provide a rate that is representative of our student population. The Outcome Measures survey does provide a more comprehensive view of undergraduate outcomes, but we are a still primarily graduate institution and would like to be able to report on graduate outcomes.

Reported Programs Without Completions

We have many degree level and CIP code combinations where in any given reporting year there may be no completions. Capella offers 51 degree programs and 165 specializations. Currently we have to sift through the degree level and CIP code combinations, and manually remove those with no completions. To ease the burden of uploading Completions data, we'd like to update all of our degree level and CIP code combinations annually and then enter the number of completions based on this full list.

Finance Survey Standard

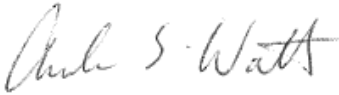
Regarding the Finance survey; we report our financial information on a US GAAP FASB (Financial Accounting Standard Board) Basis and not on a GASB (Government Accounting Standards Board). Therefore, we would prefer to be consistent and report financial information to IPEDS in the FASB format. Capella does not report expenses on a functional class basis within our financial statements and therefore information provided in the IPEDS Finance survey is time consuming and burdensome to accumulate. It is also inconsistent with the way information is presented in our financial statements.

Pell Grant Status

We would like to express agreement with the comments from others regarding the need for clarification on Pell Grant status. A student's Pell Grant status can change from year to year as well as 'Pell awarded' and 'Pell received'.

We recognize the value and insights that IPEDS data provides and applaud your continued efforts to evaluate.

Respectfully,



Andrew Watt
Chief Operations Officer
Vice President, Colleges and University Operations

Response

Dear Mr. Watt,

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

We thank you for submitting a variety of comments considering the IPEDS data collection.

The cohort of first-time, full-time degree- or certificate-seeking students used in the collection of graduation rates data is required by the Student-Right-to-Know and Campus Security Act of 1990 (P.L. 101-542). The final 1999 SRK regulations (34 CFR 668.41, 34 CFR 668.45 and 34 CFR 668.48) require institutions to disclose the completion or graduation rate for first-time, full-time degree- or certificate-seeking undergraduate students who complete or graduate within 150 percent of the normal time for completion or graduation from their program. An institution that determines that its mission includes providing substantial preparation for students to enroll in another [Title IV, HEA] eligible institution is also required to disclose the transfer-out rate for its first-time, full-time, degree- or certificate-seeking undergraduate students who did not complete or graduate from their programs, but subsequently enrolled in another eligible program within 150 percent of the normal time for completion or graduation from their program.

In regard to the comment about CIP codes, NCES collects these codes from institutions to track the types of offerings from institutions. Although an institution may not have completions for a particular program in a given year, it is still important to provide information about the different programs that are offered in a given year, and where those programs

are being offered. In addition, it allows NCES to provide data to students about programs that are available at a particular institution.

NCES also recognizes your recommendation to eliminate the reporting of financial data for FASB institutions by functional expense categories. However, institutions have been asked to report this way for many years, since at least the alignment of the FASB and GASB Finance forms in 2010-11, so there is no additional reporting burden on the institution. Additionally, NCES held [Technical Review Panel #18](#) in order to improve comparability across versions of the IPEDS Finance survey. Requiring institutions to report using functional expense categories across both FASB and GASB standards was a determination made during this TRP to increase utility of the data collected.

Finally, in August, NCES has asked its contractors to hold an IPEDS Technical Review Panel (TRP), which will allow a representative group of higher education institutions and data users to review all the proposed changes to the Outcome Measures survey including the issues brought forth in your comment (i.e., Pell awarded versus Pell received). A summary of the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

[Comment related to OM \(Comment number 87\)](#)

Document: ED-2016-ICCD-0020-0087

Name: Christine Keller

See attached letter



July 25, 2016

Kate Mullan
Acting Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW., LBJ, Room 2E-343
Washington, DC 20202-4537

Dear Ms. Mullan:

This letter is submitted on behalf of the Association of Public and Land-grant Universities (APLU) in response to the revised proposal for the Integrated Postsecondary Education Data System (IPEDS) 2016–2019 collection. APLU is a research, policy, and advocacy organization representing 236 public research universities, land-grant institutions, state university systems, and affiliated organizations. APLU is also a signatory of a separate and similar letter from the Postsecondary Data Collaborative (PostsecData).

Thank you for the detailed response to the data policy community's recommendations in our April letters. We are encouraged by the newest iteration of the proposal. The addition of the "Pell recipients" and "Non-Pell recipients who receive subsidized Stafford loans" cohorts in the Graduation Rate (GR) survey will provide data comparable to commonly used graduation rates. The proposed calculation also should manage reporting burden, as it aligns with the Higher Education Opportunity Act of 2008 disclosure requirements.

APLU appreciates the opportunity to contribute to the discussion on the proposed changes to the Outcome Measures (OM) survey as a participant in the August 23-24 Technical Review Panel. Supplementing the existing OM cohorts with four matching Pell recipient cohorts, in lieu of a fifth cohort that combines students of different enrollment and attendance patterns, could allow for a more nuanced analysis of the data and provide a more complete understanding of outcomes for all Pell recipients. While supportive of more comprehensive outcomes for Pell recipients, we are also cognizant of the additional reporting burden for institutions and the need to remain vigilant that the burden is offset by the collection of high quality and meaningful data.

APLU values the Department of Education's efforts to improve postsecondary data systems and to collect more comprehensive data on student outcomes—especially for low-income students. This revised proposal reinforces the commitment by the National Center for Education Statistics to collect better data on the outcomes of millions of low-income students and the institutions that serve them.

Thank you for the opportunity to comment on the revised IPEDS proposal. If you have any questions, I can be reached at ckeller@aplu.org or 202-478-6043.

Sincerely,

Christine M Keller
Vice President, Research & Policy Analysis
Executive Director, Student Achievement Measure

1307 New York Avenue, NW, Suite 400, Washington, DC 20005-4722 • 202.478.6040 • fax 202.478.6046 • www.aplu.org

Response

Dear Ms. Keller,

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

We thank you for your support on the proposed changes to the Graduation Rates Survey to collect the HEA, as amended, required disclosures on Pell and Stafford loan graduation rates. Thank you also for your support of and participation in the upcoming IPEDS Technical Review Panel (TRP), which will allow a representative group of higher education institutions and data users to review all the proposed changes to the Outcome Measures survey including the issues brought forth in your comment (i.e., the disaggregation of the four Outcome Measures cohort by Pell status). We appreciate your important point that institutional burden should also be weighed in when making additional data collection changes.

We thank you for taking the time to provide comment, which will be carefully discussed at the upcoming TRP. A summary of the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comment related to OM (Comment number 88)

Document: ED-2016-ICCD-0020-0088

Name: Kati Haycock

Please see comments from The Education Trust attached.



The Education Trust

Closing the gaps in opportunity and achievement, pre-k through college.

July 25, 2016

Ms. Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW
LBJ Room 2E-343
Washington, DC 20202

Dear Ms. Mullan:

We submit this letter in response to the revised proposal for the Integrated Postsecondary Education Data System (IPEDS) 2016-2019 collection (Docket Number ED-2016-ICCD-0020). This second proposal is very promising. It reflects our shared commitment to having the best data possible on Pell Grant recipients and their outcomes. We are grateful for your attention and response to our feedback and the feedback of others in the higher education community. As you move to finalize the 2016-2019 collection, we strongly urge you to implement this current proposal.

Most notably, we believe the addition of the “Pell recipients” and “non-Pell recipients who receive subsidized Stafford loans” cohorts in the Graduation Rate survey will provide more useful graduation rate information for Pell and non-Pell recipients than what was initially proposed. In addition, this modification will provide data that are aligned with current graduation rate reporting. Because colleges and universities are already required to disclose this information under the Higher Education Opportunity Act of 2008, this should not increase the reporting burden on institutions.

We also believe that the decision to remove the Pell recipient cohort as a fifth cohort and to insert a Pell recipient category as a disaggregation within the four existing cohorts in the Outcome Measures survey will provide more usable and informative data. Collecting graduation rate data for Pell recipients through the Outcome Measures survey will likely allow for a more comprehensive assessment of completion outcomes for Pell recipients beyond what is collected for first-time, full-time, and degree-seeking students in the Graduation Rate survey.

As always, we value the Department’s steadfast commitment to improving data for consumers, advocates, policymakers, and institutional leaders. This revision to the IPEDS collection is a much-needed step in the right direction and will certainly provide better data on the completion rates for low-income students—a policy goal that we hoped to achieve nearly two years ago when we took on the challenge of collecting and publishing Pell Grant recipient graduation rate data from nearly 1,150 institutions.

Thank you for the opportunity to comment on the revised IPEDS proposal and for your thoughtful consideration of our previous feedback and recommendations. The Education Trust looks forward to participating in the August 2016 Technical Review Panel focused on the Outcome Measures survey. If you have any questions, please do not hesitate to call or email Andrew Nichols at anichols@edtrust.org (202) 293-1217 x315.

Sincerely,

Kati Haycock
The Education Trust

Response

Dear Ms. Haycock,

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

Thank you for your support on the proposed changes to the Graduation Rates survey to collect the HEOA disclosed Pell and Stafford loan graduation rates. We would like to make one point of clarification in response to your comment. The addition of collecting a sub-Pell group for each of the four Outcome Measures cohorts has not been finalized in the IPEDS collection because this proposed change still needs to be discussed at the upcoming IPEDS Technical Review Panel (TRP). At this meeting, a representative group of higher education institutions and data users will review and discuss all proposed changes to the Outcome Measures survey component, including your comment about disaggregating the four cohorts by a sub-Pell group. A summary from the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM (Duplicate comment numbers 89, 90, 91)

Document: ED-2016-ICCD-0020-0089

Duplicate Documents: ED-2016-ICCD-0020-0090 and ED-2016-ICCD-0020-0091

Name: Frank Balz

Please see the attached document regarding the proposal to add Pell Grant recipient cohorts to Integrated Postsecondary Data System (IPEDS) surveys.



National Association
of Independent
Colleges and Universities

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July 25, 2016

Mr. Richard Reeves
IPEDS Program Director
National Center for Education Statistics
Potomac Center Plaza
550 12th Street S.W.
Washington, DC 20202

Dear Mr. Reeves,

On behalf of the more than 1,000 member institutions and associations of the National Association of Independent Colleges and Universities (NAICU), I write in response to a request for comments on collection activities related to the Integrated Postsecondary Education Data System [Docket ID ED-2016-ICCD-0020, as published in the June 24, 2016, Federal Register]. The following addresses the proposal to add Pell Grant recipient cohorts to the Outcomes Measure and Graduation Rates surveys.

NAICU is the national public policy association for the nation's private, non-profit colleges and universities. Our 963 member institutions include major research universities, church-related colleges, historically black colleges, art and design colleges, traditional liberal arts and science institutions, women's colleges, two-year colleges, and schools of law, medicine, engineering, business, and other professions.

NAICU recognizes the need for appropriate levels of federal data collection. Historically NAICU has supported accountability efforts that provide useful and reliable information to students and families while at the same time maintain a commitment to the vitality, integrity, and diversity of our higher education institutions.

NAICU believes the proposed additional Pell Grant reporting requirements will not provide sufficient benefit to students, families, and policy-makers seeking to determine the academic success of low-income students. We are concerned that the additional burden and complexity these components bring to an already sizable reporting responsibility will pose undue hardship on many of our smaller institutions. These additions will have a particular effect on colleges with limited staff, infrastructure, resources, or access to longitudinal data.

NAICU believes the proposed additional Pell Grant reporting requirements do not add value to the accountability landscape, and are duplicative of the information that are currently available. By statute, institutions must disclose graduation rates for Pell Grant recipients under 20 U.S.C. 1092, which gives students and families the ability to determine which institutions best serve those from low-income backgrounds. In addition, a national source for measuring the academic success of students grouped by personal and institutional characteristics already exists in surveys conducted by the National Center for Education Statistics (NCES). For example, results from NCES longitudinal studies aptly document financial aid, demographic, and attainment data for Pell recipients from the time they enter college to several years after they leave higher education.

Thank you for the opportunity to comment on this proposal. Please feel to contact our office should you have questions or comments.

Sincerely,

Frank Batz
Vice President for Research and Policy Analysis

Response

Dear Mr. Balz,

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

Thank you for your comment on the proposed change of adding a Pell Grant reporting requirement to both the Graduation Rates and Outcome Measures survey components. We would like to clarify that the proposed change of adding a Pell Grant reporting requirement is not duplicative to the NCES postsecondary sample surveys or the HEA, as amended, disclosures. Pell Grant outcomes are not available at the institutional level through the NCES postsecondary sample surveys. The HEA, as amended, disclosures for Pell and Stafford graduation rates are required to be posted on an institution's website, but were never required to be reported in a central collection. Such information can be valuable to consumers, who may turn to U.S. Department of Education college products like College Navigator, College Scorecard, FAFSA, or Financial Aid Shopping Sheet.

However, your comment about bringing undue hardship to several of your membership's smaller institutions has been taken seriously and will be a foremost consideration at the upcoming IPEDS TRP meeting as participants weigh the costs and benefits between institutional burden and gathering important institutional data that will be made publicly available.

A summary from the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM and Finance

Comment number 81

Document: ED-2016-ICCD-0020-0081

Name: Sam Stanley

Submitter's Representative: Braden J. Hosch

Organization: Stony Brook University



July 22, 2016

Kate Mullan, Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 2E103, Washington, DC 20202
(submitted electronically via regulations.gov)

Dear Ms. Mullan:

These comments respond to the June 24, 2016 Federal Register notice soliciting input on proposed changes to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) data collection.

As a part of the State University of New York System and a Carnegie highest research activity institution, Stony Brook University values the IPEDS data collection as a means not only to ensure policymakers have sound data about higher education in the United States but also as a means to understand the university's performance within the higher education landscape. To ensure these data are of high quality, useful, statistically valid, and aligned with other data collections and reporting requirements, we offer two recommendations.

First, we fully support changes proposed to the IPEDS data collection to collect outcomes of Pell grant recipients. This data collection should direct institutions to establish this group based on receipt of Pell grant on entry, so as to eliminate survivor bias, align with the graduation rate disclosure for Pell grant recipients in HEOA, and reduce burden by dovetailing with the IPEDS Student Financial Aid Survey. Further, rather than aggregate Pell grant recipients across all four cohorts in the survey (full-time first-time students, part-time first-time students, full-time non-first-time students, and part-time non-first-time students), Pell grant recipients should be broken out for each of these four cohorts. While these breakouts will add a small amount of data entry, sound interpretation of the data will require the outcomes of this disparate groups to be examined separately.

Second, we fully support proposed revision to the Finance Survey to eliminate reporting of functional expenses to break out estimated allocations for depreciation, interest, and operations and maintenance, but we strongly recommend the Finance Survey continue to collect benefits costs separate from salary costs for functional expense categories. Public and private-not-for-profit institutions have reported benefits costs by functional expense category since FY 2002-03 and data systems are already developed to generate these data. Retaining a breakout for benefits in a matrix of functional and natural expenses is particularly necessary to compare spending by function among public institutions in different states (such as instructional cost per FTE student) to account for variation among state administration of fringe benefits plans. The inclusion of post-retirement benefits in totals for each functional expense required by GASB 68 makes it more necessary to separate out these costs by function, rather than inflate apparent spending as some states “catch up” on funding obligations for pension and post-retirement health care obligations.

Thank you for your thoughtful consideration of our recommendations.

Sincerely,



Samuel L. Stanley Jr., M.D.
President

[Duplicate comment numbers 85 and 86](#)

Document: ED-2016-ICCD-0020-0085

Duplicate Document: ED-2016-ICCD-0020-0086

Name: Antoinette Flores

See attached file(s)



Ms. Kate Mullan

Acting Director of the Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW, LBJ, Room 2E-343
Washington, DC 20202-4537

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019
Docket ID# ED-2015-ICCD-0020-0068

July 25, 2016

Dear Ms. Mullan,

This comment is submitted on behalf of the Center for American Progress' postsecondary education policy team in response to the revised proposal for the Integrated Postsecondary Education Data System (IPEDS) 2016-2019 collection. CAP's postsecondary education policy program believes that robust and complete data is a crucial element of improving equity, access to high-quality programs, and completion outcomes in higher education.

Strong measures to gauge the postsecondary success of Pell recipients are an important addition to IPEDS and we applaud the Department of Education for addressing the outcomes of these students. Thank you for your detailed response to our previous comment along with other members of the Postsecondary Data Collaborative. We were particularly pleased to see changes to both the graduation rate (GR) Survey and the Outcomes Measures (OM) survey that would better measure graduation rates for Pell recipients.

Specifically, we appreciate the addition of cohorts for Pell Grant recipients and non-Pell Grant recipients who receive subsidized Stafford loans to the GR survey. Doing so ensures that first-time full-time Pell-recipient outcomes are consistent and comparable to other commonly used graduation rate information from IPEDS.

Additionally, we look forward to the results of the August 2016 technical review panel on the addition of four matching Pell recipient cohorts of varying attendance and enrollment patterns to the OM survey. As noted in our previous comment, lumping all Pell recipients into one category without concern for attendance or enrollment status would make it difficult to compare outcomes between recipients and non-recipients. Creating four

Separate categories will provide more nuanced data that are both meaningful enough to make comparisons across institutions and comparable to non-Pell recipient outcomes.

As the Department continues to improve postsecondary data systems and collect more meaningful data on student outcomes and the institutions that serve them, we would like to emphasize the importance of two additional issues that are critical to meeting these goals:

- Pell recipient outcomes at non-degree granting institutions;
- How institutions spend and report student and taxpayer money

1. Require non-degree granting institutions to report Pell outcomes

As detailed in our previous comment, in order to gain a complete understanding of Pell-recipient outcomes and how institutions serve them, we must know how outcomes differ at all institutions, including those that do not award degrees. Non-degree granting schools enroll over 400,000 Pell Grant recipients and receive over \$1.6 billion in funding from this program.¹ Pell recipients also make up 60 percent of first-time full-time students enrolled at these schools.² Those figures are too large to leave students, policymakers, and the public in the dark about how well these particular institutions serve their low-income students. We encourage serious consideration of requiring non-degree granting institutions to report outcomes in the OM survey during the August technical review panel.

2. Reporting of functional expenses should retain a breakout for benefits costs, separate from salaries and other costs

Finally, we would like to echo concerns raised by Braden Hosch, Assistant Vice President for Institutional Research, Planning & Effectiveness at Stony Brook University, about proposed changes that eliminate reporting on benefit costs from the IPEDS Finance Survey. If enacted, these changes would make it more difficult to analyze how institutions spend student and taxpayer money given to them.³ Keeping the current level of detail is important because benefits costs are increasing but can vary significantly by

¹ CAP analysis of IPEDS 2014.

² Ibid.

³ Braden Hosch, "The U.S. Dept. of Education Should Continue to Collect Benefits Costs by Functional Expense," available at <https://kelchenoneducation.wordpress.com/2016/07/06/the-u-s-dept-of-education-should-continue-to-collect-benefits-costs-by-functional-expense/>.

functional expenses.⁴ For example, benefit costs may be a significant and growing portion of salaries in the instruction category but not necessarily in the research category. Additionally, benefit costs may be growing faster in some states due to variations in spending on required retirement benefits. Removing wages from functional expenses would mask some of these important differences and potentially lead to incorrect conclusions from researchers about the extent to which higher education salaries are increasing.

The Department has also proposed removing functional breakouts of other expenses, including operations and maintenance, depreciation, and interest. If burden is a concern, the Department can still reduce institutional burden by eliminating the breakout of these additional categories, while maintaining the breakout of benefit costs.

Conclusion

Revisions to the collection of Pell recipient graduation rates would improve the collective understanding of low-income student outcomes and provide valuable information on how best to support these students. We thank you for taking up this important improvement in student-level data and the opportunity to comment on the proposed changes. For further information, please contact Antoinette Flores at aflores@americanprogress.org.

Response

Dear Dr. Stanley Jr. and Ms. Flores,

Thank you for your feedback received on July 22 and 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

Thank you for your institution's respective support of the NCES proposal to collect information on Pell Grant recipients and of the proposed changes to the Graduation Rates survey to collect the HEOA disclosed Pell and Stafford loan graduation rates. We would like to make a couple of points of clarification in response to your comments. The addition of collecting a sub-Pell group for each of the four Outcome Measures cohorts has not been finalized in the IPEDS collection because this proposed change still needs to be discussed at the upcoming IPEDS Technical Review Panel (TRP). At this meeting, a representative group of higher education institutions and data users will review and discuss all proposed changes to the Outcome Measures survey component, including the issues brought forth in your comments (i.e., Pell at entry and the disaggregation of the four Outcome Measures cohort by Pell status; and whether non-degree-granting should be required to complete Outcome Measures survey). A summary of the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters.

NCES also recognizes your recommendation to maintain the breakout of benefits expense separate from salaries and wages and total expenses on the Finance survey component. However, we will continue with our proposal to eliminate the collection of the details for the benefit expenses. You mentioned that the collection of the detailed benefit expenses will not place additional burden on institutions for the listed reasons above, namely that public and not-for-profit institutions

have been reporting this way since FY 2002-03. However, beginning with FY 2014, for-profit institutions have been asked to report the same detailed expenses - including benefits broken out by functional classifications - based on recommendations of the [IPEDS Technical Review Panel #39, Improving Finance Survey Forms for For-Profit Institutions](#).

NCES believes that many for-profit institutions lack the capacity to generate these data. We agree that the burden will be minimal for larger, well-resourced institutions but believe that smaller, under-resourced institutions will not have the same capacity for reporting. Also, in the 2015-16 data collection (preliminary data), out of the 7,277 Title IV institutions that reported IPEDS, 2,491 institutions were non-degree-granting, and it is these smaller non-degree-granting institutions that will not have a system for reporting the detail of benefit expenses.

Additionally, while benefit expenses comprise approximate 1/6 of total expenses at public GASB and private, not-for-profit FASB institutions, they make up less than 1/10 of total expenses at private, for-profit FASB institutions, which represent over 3,000 data reporters in the IPEDS collection. Because IPEDS already asks institutions to report total benefit expenses and this figure makes up a small percentage of total expenses for over 3,000 of our reporting institutions, we do not recognize a need to ask for the detail benefit expenses. Again, we thank you for the feedback.

Finally, since we are still collecting the totals for the natural classification expense categories (e.g., total benefits), the Finance data will continue to provide taxpayers and private philanthropies/endowments with sufficient information to determine institutional finances. The removal of the detail benefits information is due to discussion – during the [IPEDS Technical Review Panel #46, Improvements to the Finance Survey](#) – that cost allocations are subjective and may lead to detailed expense categories being incomparable across institutions. In order to promote the collection and use of accurate and reliable data, NCES has determined it best to remove the detail category expenses.

We thank you for taking the time to provide comment in an effort to improve the data collection.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comments related to OM and GR
Comment number 78

Document: ED-2016-ICCD-0020-0078

Name: Lindsay Ahlman

TICAS comments attached

July 20, 2016

Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 2E103, Washington, DC 20202
(submitted electronically via regulations.gov)



Re: Docket ID ED-2016-ICCD-0020

Dear Ms. Mullen,

We write in response to the June 24, 2016 Federal Register notice soliciting comments on the revised proposal for changes to the U.S. Department of Education's (the Department's) Integrated Postsecondary Education Data System (IPEDS) data collection.¹ The Institute for College Access & Success (TICAS) works to make higher education more available and affordable for people of all backgrounds. Through nonpartisan research, analysis, and advocacy, we aim to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society.

We greatly appreciate the Department's detailed response to our [April 18, 2016 comments](#) on its proposal to collect data in IPEDS on Pell Grant recipients' college outcomes by adding a single cohort of Pell Grant recipients in the Outcome Measure (OM) survey. In these previous comments, we outlined our concerns that this approach to reporting outcomes for Pell Grant recipients would blur distinctions between student groups, restricting the ability to make comparisons of Pell recipients' outcomes across colleges, as well as comparisons between Pell and non-Pell recipients.

We are encouraged by the Department's revision to its initial proposal, which adds a Pell recipient cohort to the Graduation Rate (GR) survey. While the graduation rate of Pell Grant recipients in this section would be limited to first-time full-time (FTFT) students, it would be comparable to other commonly used graduation rates, and would avoid combining outcomes for students with different enrollment and attendance patterns.

We also thank the Department for its commitment to improve reporting of Pell Grant recipient outcomes in the OM survey. Reporting completion outcomes for more than just FTFT Pell Grant recipients, as OM allows, ensures that these nationally collected data cover all undergraduates,² and aligns with shifts in the higher education community toward improving postsecondary data collection to better encompass the diversity of students' paths and experiences. We continue to recommend that the four established OM cohorts be disaggregated by Pell status, in place of adding a fifth Pell cohort that combines students of different enrollment and attendance patterns. Reporting Pell student outcomes separately for first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time students would provide fair and meaningful measures of Pell and non-Pell recipient outcomes, whereas reporting one combined cohort would not.

¹ U.S. Department of Education. June 24, 2016. *Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019*. Federal Register Notice, Docket ID: ED-2016-ICCD-0020. <https://www.regulations.gov/document?D=ED-2016-ICCD-0020-0068>

² Using an FTFT cohort would exclude 42% of entering students who receive Pell Grants. At community colleges, almost half (48%) of entering Pell Grant recipients would be excluded from a FTFT cohort. Calculations by TICAS on fall enrollment and student financial aid data for 2013-14 from the U.S. Department of Education, Integrated Postsecondary Education Data System (IPEDS). Note that students at community colleges have the largest number of students who would be excluded from a FTFT cohort, compared to other institutions types.

We appreciate the opportunity to participate in the Technical Review Panel next month to discuss including four disaggregated OM cohorts by Pell status, along with other ways to improve OM reporting such as capturing all students who ever received Pell during the measurement period, and disaggregating reported outcomes for BA-seeking and non-BA-seeking students.³

We thank the Department for its continued commitment to collecting meaningful and reliable data on Pell Grant recipient outcomes. If you have any questions, please feel free to contact me at lahlman@ticas.org or 202-854-0232.

Sincerely,



Lindsay Ahlman
Senior Policy Analyst
The Institute for College Access & Success (TICAS)

³ See our April 2016 comments for more details about these proposals. TICAS. April 18, 2016. Comments on proposed changes to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) data collection. http://ticas.org/sites/default/files/pub_files/ticas_comments_on_ipeds_pell_grad_rate_proposal.pdf.

Response

Dear Ms. Ahlman,

Thank you for your feedback received on July 20, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. The National Center for Education Statistics (NCES) appreciates your continued 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 grateful for this process and your comment.

We thank you for recognizing and supporting the changes of adding the collection of Pell and Stafford loan disclosures to the Graduation Rates survey based on the 60-day comments. We also thank you for supporting and attending the upcoming IPEDS Technical Review Panel (TRP) meeting, which will discuss the various proposed changes to the Outcome Measures survey. Your comment of disaggregating the four established Outcome Measures survey cohorts by Pell is one of the changes to be discussed at the August TRP.

A summary of the TRP will be publicly posted mid-to-late September before further final clarifications and instructions to the Outcome Measures survey can be provided to IPEDS data reporters. Thank you again for your comment.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

Comment related to changes to Finance

Comment number 74

Document: ED-2016-ICCD-0020-0074

Name: Anonymous Anonymous

Transparency is important and necessary. We need to know more about spending for colleges and universities, not less reporting of functional expenses should retain a breakout for benefits costs, separate from salaries and other costs. It allows more flexibility to report the individual items that are meaningful to taxpayers and private philanthropies/endowments. Burden to institutions to continue this reporting is minimal, since a) they report these costs now and b) the costs are actual and do not require complex allocation procedures, and c) they must maintain expense data to report total benefits costs.

Comment number 77

Document: ED-2016-ICCD-0020-0077

Name: Joseph McDonald

The National Center for Education Statistics should modify its data collection plan to retain breakouts for benefits costs in addition to salary costs for all functional expense categories. I

Response

To Whom It May Concern,

Thank you for your feedback dated July 7 and 18, 2016, 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 grateful for this process and your comment.

NCES recognizes your recommendation to maintain the breakout of benefits expense separate from salaries and wages and total expenses on the Finance survey component. However, we will continue with our proposal to eliminate the collection of the details for the benefit expenses. Beginning with FY 2014, for-profit institutions have been asked to report the same detailed expenses - including benefits broken out by functional classifications - based on recommendations of the [IPEDS Technical Review Panel #39, Improving Finance Survey Forms for For-Profit Institutions](#).

NCES believes that many for-profit institutions lack the capacity to generate these data. We agree that the burden will be minimal for larger, well-resourced institutions but believe that smaller, under-resourced institutions will not have the same capacity for reporting. Also, in the 2015-16 data collection (preliminary data), out of the 7,277 Title IV institutions that reported IPEDS, 2,491 institutions were non-degree-granting, and it is these smaller non-degree-granting institutions that will not have a system for reporting the detail of benefit expenses.

Additionally, while benefit expenses comprise approximate 1/6 of total expenses at public GASB and private, not-for-profit FASB institutions, they make up less than 1/10 of total expenses at private, for-profit FASB institutions, which represent over 3,000 data reporters in the IPEDS collection. Because IPEDS already asks institutions to report total benefit expenses and this figure makes up a small percentage of total expenses for over 3,000 of our reporting institutions, we do not recognize a need to ask for the detail benefit expenses.

Finally, since we are still collecting the totals for the natural classification expense categories (e.g., total benefits), the Finance data will continue to provide taxpayers and private philanthropies/endowments with sufficient information to determine institutional finances. The removal of the detail benefits information is due to discussion – during the [IPEDS Technical Review Panel #46, Improvements to the Finance Survey](#) – that cost allocations are subjective and may lead to detailed expense categories being incomparable across institutions. In order to promote the collection and use of accurate and reliable data, NCES has determined it best to remove the detail category expenses.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief

Comment related to error messages
Comment number 73

Document: ED-2016-ICCD-0020-0073
Name: John Nugent

Is it possible to sharpen up the algorithm that triggers an "error" or "fatal error" message for large percentage changes based on very small n's? We frequently get these messages when, for example, our number of part-time graduate students changes from 2 to 1 from one year to the next. This *is* a 100% year-over-year change, but obviously it's due to random variation as opposed to data-entry error or major shifts in policy or practice at our institution.

Response

Dear Mr. Nugent,

Thank you for your feedback posted on July 5, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

We review the errors each year to improve the utility of the system. Over time, we have tightened a number of errors so that they trigger less frequently. We focus on the errors that cause the most issues for users, and use feedback from our quality control reports and the IPEDS Help Desk to help us decide which errors to focus on during review. We plan to continue improving these errors to improve both the experience of data providers and the quality of the data.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief

Comments related to changes to Academic Libraries
Comment number 80

Document: ED-2016-ICCD-0020-0080
Name: Anonymous Anonymous

Hello-

About the definition for "Total Physical Circulation" in the Academic Libraries Survey: In the fourth sentence ("Include transactions of books and media.") do you mean "volumes" instead of "books"? For example, should serial and bound music use be included? Thank you

Response

Dear Anonymous,

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. The National Center for Education Statistics (NCES) appreciates your continued 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 grateful for this process and your comment.

Thank you for submitting your comment requesting clarification about books versus volumes in the collecting of total physical circulation. In response to your comment, NCES asks that institutions report books by item (e.g. volumes) when counting physical circulation transactions. Each volume is a physical item and usually has its own bar code (or some assigned identifying factor) to make it distinctive from another volume. Physical "volumes" include books, media (DVDs,

etc.), serials (e.g. bounded), and music scores. NCES will provide a frequently asked question (FAQ) on the Academic Libraries (AL) survey materials to provide clarification on the circulation of books and other materials for reporting physical circulation. We believe that providing the clarifications discussed above should provide improved accuracy and quality of the data being reported. Thank you again for your question and feedback.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
Administrative Data Division

**Comment related to dropouts
Comment number 84**

Document: ED-2016-ICCD-0020-0084

Name: Harold Huggins

Organization: Council for Education



July 25, 2016

To: Director of the Information Collection
Clearance Division
U.S. Secretary of Education
400 Maryland Avenue, SW
LBJ, Room 2E-343
Washington, D.C. 20202-4537

VIA ELECTRONIC SUBMISSION

RE: Integrated Postsecondary Education Data System (IPEDS) 2016-2019

Dear Director:

The Council for Education (CED) responds to Agency Notice / Docket No.: ED-2016-ICCD-0020 as published in the Federal Register / Vol. 81, No. 122/ Friday 24, 2016/ by the National Center for Education Statistics (NCES), Department of Education (ED).

The CED proposes that the NCES develop a behavior modification model that collects student dropout rates from the postsecondary colleges and universities. The model will provide clarity systematic patterns of segregation by race in violation of Title IV.

The CED refers to an analytic model in a RAND Corporation study (RM-6014-RC in May 1969). Attached herein is a copy of the study for review.

For example, the CED observed a base line behavior "tipping" trend in the dropout rate of African American student dropout rate, University of California School System.

Between 1992 to 1995, proponents to abolish affirmative action in the UC Campus of Santa Barbara distributed material as part of the academic curriculum which became an antecedent that African American students were genetically inferior to Asians and Whites.

The Western Association of Schools and Colleges, Senior Colleges, and University Commission (WASC) became the controlling source of reinforcement by ignoring complaints of a standards violation and the California State Supreme Court further limited the statute of limitations to 30 days on an academic fraud complaint.

Regents of the University of California, et al., v. Superior Court, et al., 20 Cal.4th 509, 976 P.2d 808 **824: "Because of the result that we reach, we need not, and do not, resolve other issues presented herein. For example, we pass over whether the doctrine of fraudulent concealment would be available in this case if it were not precluded by section 11130.3(a)'s 30-day statute of limitations. We do the same as for whether the earlier asserted collective commitment or promise by the Regents to approve SP-1 and SP-2 at the alleged secret serial 'meeting' of at least a quorum of the board's members, including the Governor, which was alleged to be in violation of the act's notice and open and-public-meeting requirements and to be subject to nullification and voidance on that basis, could 'taint' the board's later approval of the resolutions at the noticed and open and public meeting of July 20, 1995, which was not alleged to be in violation of the act's notice or open-and-public-meeting requirement or to be subject to nullification and voidance on that basis."

Data collected from the Office of the President shows a baseline dropout rate of African American Students, data from the California Secretary of State on campaign contributions show a significant increase in the African American student dropout rate on campuses visited by proponents to eliminate Affirmative Action. Interactive graph is available at <http://RG.CforEDU.com>

After the Regents vote to eliminate enforcement of Title IV, the outside stimuli were removed, and there was an improvement in the behavior trends in the dropout rate of African American students.

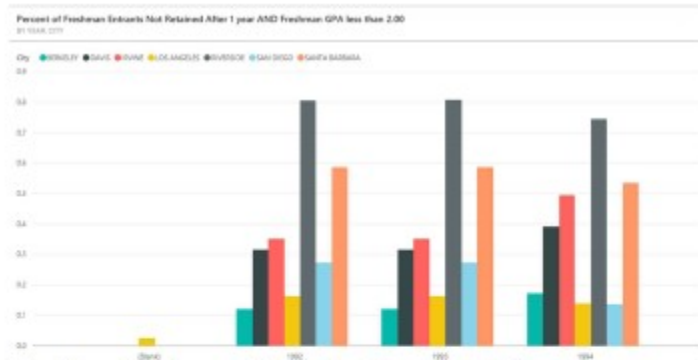


Figure 1: Dropout rates Increases with the number of Campaign contributions per campus

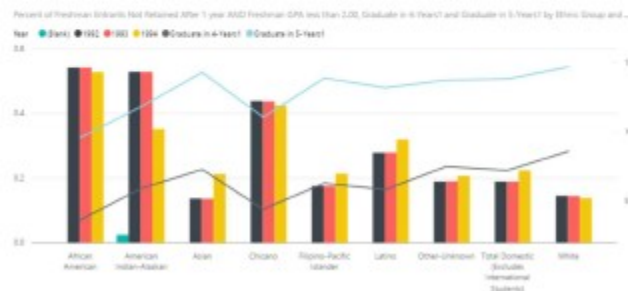
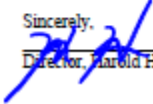


Figure 2: The Dropout rate of African American student increases disproportionately by race

CONCLUSION

For these reasons written above, the Council requests that the Director NCES develop a behavior modification model from aggregated student dropout rates by race.

Sincerely,


Director, Harold Huggins

Response

Thank you for your feedback received on July 25, 2016 responding to a 30-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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 grateful for this process and your comment.

IPEDS is an administrative level data collection, collecting data at the aggregate level from institutions. The collection proposed would not fit in to the institution level data collection. IPEDS does, however, collect a number of outcomes that may be useful in understanding trends in relation to completion and transfer patterns of students in the Graduation Rates and Outcome Measures components.

Sincerely Yours,

Richard J. Reeves
Postsecondary Branch Chief
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