

Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25

Supporting Statement Part A

OMB No. 1850-0582 v.30

Submitted by:

National Center for Education Statistics (NCES)
Institute of Education Sciences
U.S. Department of Education

February 2022
revised May 2022
revised July 2022

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Appendix A - Detailed Proposed Changes to Forms by IPEDS Survey Component

Appendix B - IPEDS 2022-23 Communications Package

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Summary

The collection, use, and reporting of education data is an integral component of the mission of the U.S. Department of Education (ED). The Integrated Postsecondary Education Data System (IPEDS) is a web-based data collection system designed to collect basic data from all postsecondary institutions in the United States and the other jurisdictions. The IPEDS data collection 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, student outcomes, revenues and expenditures, faculty salaries, and staff employed.

The IPEDS web-based data collection system was implemented in 2000-01. In 2020-21, IPEDS collected data from 6,063 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; approximately 300 non-title IV institutions elect to respond each year. Institution closures and mergers have led to a decrease in the number of institutions in the IPEDS universe over the past few years. Due to these fluctuations, combined with the addition of new institutions, NCES uses rounded estimates for the number of institutions in the respondent burden calculations for the upcoming years (estimated 6,100 Title IV institutions plus 300 non-title IV institutions for a total of 6,400 institutions estimated to submit IPEDS data during the 2022-23 through 2024-25 IPEDS data collections). IPEDS data are available to the public through the College Navigator and IPEDS Data Center websites.

IPEDS focuses on for credit education at these institutions. In 2022-23, NCES is adding a checkbox question about noncredit education; the results of responses to that question will help NCES to better understand the impact of noncredit education on Human Resources and Finance calculations such as student-to-faculty ratio and revenues/expenditures per FTE by allowing NCES to identify institutions that offer noncredit education. A voluntary data collection on noncredit education is being considered by NCES to supplement the IPEDS data collection see Appendix F).

The National Center for Education Statistics (NCES) ED seeks OMB approval under the *Paperwork Reduction Act* to continue to collect data on postsecondary institutions and make changes and clarifications to the Integrated Postsecondary Education Data System (IPEDS) for the 2022-23, 2023-24, and 2024-25 data collections. Current approval expires August 31, 2022 (OMB# 1850-0582 v.29). NCES encourages the public to review, at a minimum, all proposed changes, as well as to respond to the directed questions included in Attachment D.

Proposed Changes to the IPEDS Data Collection: 2022-23, 2023-24, 2024-25

Background

Most of the proposed changes were suggested by the IPEDS Technical Review Panel (TRP). Meetings of the IPEDS TRP are convened by RTI International, the current contractor for the IPEDS web-based data collection system. In general, the subject areas for the meetings are determined by legislation, emerging areas of concern in postsecondary education, and an ongoing goal of decreasing reporting burden while retaining the federal data necessary for use by policy makers and education analysts. Detailed summaries of each meeting are posted online (https://edsurveys.rti.org/ipeds_trp/) and comments on panel suggestions are solicited. Cumulatively, four meetings of the TRP have impacted the changes included in this clearance package, as summarized in table 1.

Other changes are proposed based on NCES review of data quality reports, changes in other parts of the government requiring alignment, database improvement needs, and feedback from institutions and other stakeholders, including the National Postsecondary Education Cooperative (NPEC) and the IPEDS Academic Libraries Joint Task Force. A summary of proposed changes to IPEDS in 2022-23 and 2023-24 are outlined in table 1 on the following page, along with information about the sources of the changes. More detailed information is available in Appendix A and in the survey forms.

In 2022-23, NCES is also adding a checkbox question about noncredit education; the results of responses to that question will help NCES to better understand the impact of noncredit education on Human Resources and Finance calculations such as student-to-faculty ratio and revenues/expenditures per FTE by allowing NCES to identify

institutions that offer noncredit education. A voluntary data collection on noncredit education is being considered by NCES to supplement the IPEDS data collection see Appendix F).

A wide range of education and training activities at postsecondary institutions occur outside of traditional credit-bearing coursework and reflect a range of educational, career, and personal offerings that can play an important role in supporting local workforce needs, preparing students for higher level coursework, and providing additional enrichment to the broader community. Noncredit activity is offered by all types of institutions but is more prevalent across some sectors or types of institutions. These institutions may view noncredit activity as an important function and part of their institutional missions. A recent study¹ by Opportunity America estimated that 3.7 million students are enrolled in noncredit programs at community colleges (the study only included community colleges). Those students, and their outcomes, are not included in any publicly available national data collection, resulting in significant gaps in what is known about the scope or scale of noncredit activity.

This also leads to some limitations in other parts of the IPEDS where noncredit activity is included to ease burden on institutions. In the Finance survey component, the lack of information on noncredit enrollment can lead to incorrect estimates for revenues per FTE and expenses per FTE since revenues and expenses for noncredit activities are included in the numerator, but noncredit enrollments are not included in the denominator. For example, some institutions have indicated to NCES that they have large numbers of noncredit students, which makes it appear that the institution has low per FTE spending. In Human resources, the student-to-faculty ratio includes only students enrolled for credit and instructional staff teaching credit courses, however, the survey component also instructional staff teaching exclusively noncredit courses.

Noncredit education constitutes a growing part of postsecondary and adult education. The general duties for the National Center for Education Statistics in The Education Sciences Reform Act of 2002 (20 USC 9543 (a)(1)(E)) include that The Statistics Center shall collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations, including collecting, acquiring, compiling (where appropriate, on a State-by-State basis), and disseminating **full and complete statistics** (disaggregated by the population characteristics described in paragraph (3)) on the condition and progress of education, at the preschool, elementary, secondary, **postsecondary, and adult levels** in the United States, including data on access to, and opportunity for, postsecondary education, including data on financial aid to postsecondary students.

NCES will continue to develop instructions, definitions, and FAQs related to noncredit education. In addition, NCES will be holding Technical Review Panel (TRP) meetings to help determine other elements that should be included as part of this optional collection and how to best implement the optional collection.

A Note about the Timing and Implementation of the Changes

NCES will implement some proposed changes in 2022-23, but larger changes are proposed for the 2023-24 data collection with a “preview” year in 2022-23 to allow institutions more time to prepare to submit the required data. New items and associated reporting instructions will be available for preview through the Survey Materials webpage at <https://surveys.nces.ed.gov/ipeds/public/survey-materials/index>.

¹ Jacoby, T. (2021). *The Indispensable Institution: Taking the Measure of Community College Workforce Education*. Opportunity America. (<https://opportunityamericaonline.org/ccstudy/>)

Table 1. Summary of Proposed Changes and Sources of Changes, by Survey Component

Part of IPEDS affected	Implementation Year	Overview of Changes	Source(s) of Changes
Institutional Characteristics (IC)/Institutional Characteristics Header (ICH) and Registration/Identification (ID)	2022-23	IC/ICH: Moved collection of Mission Statement (or URL) from the IC to the IC Header	Database alignment
		ICH: Addition of a question to help NCES understand the impact of noncredit education on Human Resources and Finance calculations such as student-to-faculty ratio and revenues/expenditures per FTE by allowing NCES to identify institutions that offer noncredit education.	TRPs on Noncredit Enrollment (March 2008, October 2020)
		ID: Change from collection of DUNS number to collection of Unique Entity Identifier (Institutional Identification)	Government Transition from DUNS Number to new Unique Entity Identifier
		IC: Minor changes to instructions and FAQs	NCES initiated based on QC review; NPEC paper on Improving the IC survey component
		IC: Addition of pre-defined context options that institutions can select.	NCES initiated based on QC review
	IC: Addition of new checkbox options in Student Services and language clarifications.	NCES initiated based on QC review; NPEC paper on Improving the IC survey component	
2023-24	ICH: Addition of screening questions to determine requirements for reporting new data on dual enrollment	TRPs on Capturing and Clarifying Dual Enrollment Data (March 2018, March 2021)	
	IC: Remove dual Enrollment option from Question 1 (Covered by dual enrollment screening question)	TRPs on Capturing and Clarifying Dual Enrollment Data (March 2018, March 2021)	
Completions (C)	2022-23	'Cross-cutting changes' on race/ethnicity and gender	NCES initiated based on QC review
12-Month Enrollment (E12)	2022-23	Separated column on Graduate Student screen to full-time and part-time	NCES initiated based on QC review
		Updates to FAQs	NCES initiated based on QC review
	'Cross-cutting changes' on race/ethnicity and gender	NCES initiated based on QC review	
2023-24	Addition of a collection of dual enrolled students by race/ethnicity and gender	TRPs on Capturing and Clarifying Dual Enrollment Data (March 2018, March 2021)	
Student Financial Aid (SFA)	2022-23	Addition of the collection of degree/certificate-seeking and non-degree/non-certificate-seeking students in Part A	TRP on Improving Student Financial Aid (June 2020)
		Updates based on changes to federal student aid policy	Federal Student Aid and Title IV changes
		Clarification for public institutions to report the lower of in-district or in-state tuition	
Outcome Measures (OM)	2022-23	Minor changes to instructions/FAQ	NCES initiated based on QC review
Graduation Rates (GR)	2022-23	'Cross-cutting changes' on race/ethnicity and gender	NCES initiated based on QC review

Table 1. Summary of Proposed Changes and Sources of Changes, by Survey Component

Part of IPEDS affected	Implementation Year	Overview of Changes	Source(s) of Changes
200% Graduation Rates (GR200)	N/A	N/A	N/A
Admissions (ADM)	2022-23	Updated categories used for admissions considerations	TRP on Modernizing the Admissions Component (June 2021)
		Additional options for admissions considerations	
		Addition of a 50 th percentile (median) test score	NCES initiated based on QC review
		'Cross-cutting changes' on race/ethnicity and gender	
Minor updates to instructions and FAQs.			
Human Resources (HR)	2022-23	Change to timeline for New Hires reporting	NCES initiated based on QC review and feedback from institutions
		'Cross-cutting changes' on race/ethnicity	NCES initiated based on QC review
Academic Libraries (AL)	N/A	N/A	N/A
Fall Enrollment (EF)	2022-23	Updates to FAQs	NCES initiated based on QC review
		'Cross-cutting changes' on race/ethnicity and gender	
Finance (F)	2022-23	Streamlined screening question on intercollegiate athletics for degree-granting GASB and FASB institutions.	NCES initiated based on QC review
Cross-cutting changes	2022-23	E12, C, EF, GR, HR: Change from 'Nonresident alien' category to 'U.S. Nonresident' category in race/ethnicity	NCES initiated based on Executive Orders related to inclusive terminology
		E12, C, EF, GR: Change to instructions on race/ethnicity and new FAQ on reporting of undocumented and DACA students in race/ethnicity categories.	NCES initiated and includes feedback from the 60-day comment period.
		E12, C, EF, GR: New gender question and associated changes to instructions and FAQs for student surveys	NCES initiated based on feedback from institutions
		E12, C, EF, GR: Use 'summer session' instead of 'summer term' to clarify reporting	NCES initiated based on QC review and feedback from institutions
	2022-23 & 2023-24	IPEDS Glossary: Addition of new glossary terms and updates to existing terms	NCES QC review; TRPs on Noncredit Enrollment (March 2008, October 2020); TRP on Modernizing the Admissions Component (June 2021); TRP on Improving the Student Financial Aid Component (June 2020)

Detailed descriptions of the proposed changes are provided in **Appendix A**.

Burden Calculations

The collection of voluntary information on the time it took institutions to submit their IPEDS data was implemented in the 2012-13 data collection. The information provided during the 2020-21 data collection was used for the burden calculations in the most recent clearance package. In 2017, NCES contracted with the American Institutes for Research (AIR) to conduct cognitive interviews with IPEDS administrators to develop better questions about how long it takes to complete IPEDS data reporting process. Based on findings from that study, NCES updated the questions it asks of institutions regarding IPEDS reporting burden. More information about this study, updated findings on reported burden, and full burden calculations based on the information collected in 2020-21 can be found in section A.12 of this document.

Section A. Justification

A.1. Purpose of this Submission

The National Center for Education Statistics (NCES) is seeking clearance for the 2022-23, 2023-24, and 2024-25 Integrated Postsecondary Education Data System (IPEDS) data collections. Current clearance covers the 2019-20 through 2021-22 collections and is due to expire on August 31, 2022. We are requesting to make changes to multiple survey components and other updates to the identification, cross-cutting terminology, and the glossary.

A.1.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. 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 approved components include:

1. Institutional Characteristics (IC);
2. Completions (C);
3. Fall Enrollment (EF);
4. 12-month Enrollment (E12);
5. Admissions (ADM);
6. Student Financial Aid (SFA);
7. Graduation Rates (GR);
8. Graduation Rates 200 (GR200);
9. Outcome Measures (OM);
10. Human Resources (HR);
11. Finance (F); and
12. Academic Libraries (AL).

A.1.b. Proposed Modifications

1. Data Collection Method. We are proposing to continue using the IPEDS web-based system of collection for all components. This collection is organized into three phases based on data availability at the institutions: Fall, Winter, and Spring.

The Fall collection components:

- Institutional Characteristics
- Completions
- 12-month Enrollment

The Winter and Spring components open simultaneously to allow respondents to submit Spring data early, if they wish to do so.

The Winter collection components:

- Student Financial Aid
- Graduation Rates
- Graduation Rates 200
- Outcome Measures
- Admissions

The Spring collection components:

- Fall Enrollment
- Finance
- Human Resources
- Academic Libraries

Institutions can 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. We are proposing considerable additions in data content over the next 3 years. The formats for reporting IPEDS data are very similar to those used for the 2001-02 through 2021-22 data collection cycles.

We anticipate that the IPEDS Technical Review Panel (TRP) may recommend consideration of additional data items; however, no items will be added to the IPEDS forms without public comment periods and review and subsequent approval by OMB. 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 two to three times a year 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 on 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;
- when comments are received, they are summarized and sent to NCES; and
- a document is posted to the website that includes a summary of comments and NCES/IPEDS' intent to respond and/or implement actions because of the comments.

A.1.c. Need for Clearance at This Time

Clearance helps ensure that IPEDS maintains a consistent set of data items to collect data from the various institutions at the needed time and with the needed detail. This is important because 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. Having the capability for assessing reliability on an ongoing 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 a series of standalone, independent survey components, enables elimination of duplication of effort, thereby reducing response burden. The web-based data collection system will continue to allow NCES to comply with the Higher

Education Act (HEA), which required the redesign of the data collection system to improve the timeliness and quality of IPEDS data by increasing the efficiency of data collection.

Additionally, clearance will update the IPEDS burden estimates, reflecting revisions resulting from institutional estimates that were submitted voluntarily during the 2018-19, 2019-20, and 2020-21 data collections.

A.1.d. Statutory Requirements for IPEDS Data

General Mandate. IPEDS, conducted by the National Center for Education Statistics, plays a major role in responding to the Center'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 HEA 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 was mandatory as of 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 that receive, are applicants for, or expect to be applicants for federal financial assistance as defined in the 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 HEA 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 (GR) survey component.

Consumer Information. Section 101 of the HEA amendments of 1965 (P.L. 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 (P.L. 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 use within NCES and other areas of ED, 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 institution to a group of “comparison” institutions, using a variety of IPEDS data variables and derived variables, and are electronically 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 institutions to use in meeting their institutional goals relative to their postsecondary “peers.”

Additional uses of IPEDS data, specific to individual survey components, include those listed below.

A.2.a. Institutional Characteristics

Institutional Characteristics (IC) 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 NPSAS.

In addition to the need for these data within NCES and ED (Title III and HEA 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 survey component are of special interest to consumers, and are made available through College Navigator, a web-based college search tool (see <https://nces.ed.gov/collegenavigator/>) and the College Scorecard (<https://collegescorecard.ed.gov/>).

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.

A.2.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, as in the following examples.

- ED and OPE use these data to respond to public inquiries regarding degrees awarded by different types of institutions, and for reference guides in preparation for budget justifications.
- The Department of Labor and Bureau of Labor Statistics (BLS) use these data in preparing the *Occupational Outlook Handbook* and in matching projections of labor supply and demand.
- State Occupational Information Coordinating Committees also use 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 and Library of Congress use these data to supply information to members of Congress to assist them in assessing the changing and developing needs of the nation with respect to manpower and postsecondary education.

- The Department of Agriculture and Office of Higher Education Programs use these data to include program data on agriculture and home economics in various reports.
- The National Science Foundation and Division of Science Resource Studies rely heavily on IPEDS Completions survey data, in conjunction with their own surveys, to study degree production, particularly in science, mathematics, and engineering.
- The U.S. Office of Personnel Management (OPM) uses these data to provide guidance to other federal agencies in its recruiting efforts.
- The Office for Civil Rights (Department of Education) uses these data in reviewing institutional compliance with antidiscrimination 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, particularly those with 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 equal opportunity employment (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 used these data in developing its institutional classification schemes.

A.2.c. Enrollment

Enrollment is probably the most basic parameter in postsecondary education because 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 enrollment data 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. ED 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 (ED) to perform functions mandated by Title VI and Title IX.

2. Residence of First-Time Students (required in even-numbered years). IPEDS 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 states can collect in their own surveys. States can then use resulting data to estimate 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 to other states. Such data are critical for postsecondary education planning at the state level.

States and 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 to address concerns that the cohort used by the GR component is not representative of an institution's entering class because the GR cohort is composed only of full-time, first-time students. The collection of a total entering class allows for a more accurate picture of incoming students, and 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 data for students enrolled over a 12-month period provides a way of looking at enrollment that is especially valuable for institutions that utilize nontraditional 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 data, 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.

A.2.d. Student Financial Aid

The Student Financial Aid component was added to IPEDS to 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 (HEOA) of 2008. These data are posted on College Navigator.

A.2.e. Graduation Rates

The GR 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 GR200 component collects consumer information on 200 percent graduation rates to meet requirements in the HEOA.

A.2.f. Finance

Finance data are needed for reporting and projecting the revenues and expenditures of a national activity representing a significant component of the gross national product (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.

ED's Title III (Institutional Aid) grant program relies on the finance data to help determine whether an applicant college or university is eligible to receive a grant. These data are needed annually. The GAO published a report, *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 the Census Bureau worked closely to ensure that one instrument satisfied the needs of both agencies. The Bureau of Economic Analysis also contributed significantly to this endeavor. OMB 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 GNP; and
- collect supplemental data that their census of governments does not collect.

The BLS and the Federal Mediation and Conciliation Service are secondary users of NCES/Census finance data. The Office for Civil Rights (OCR) has used finance data to determine states' or institutions' compliance with antidiscrimination laws. From these data, OCR was able to determine whether 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 nonfarm expenditures for structures and equipment, and to develop GNP 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.

A.2.g. Human Resources

HR 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) replaces the former EEO-6 survey and is used by the Equal Employment Opportunity Commission (EEOC) in place of its 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 them to EEOC as required in its 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 ED 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; and
- the BLS, Department of Labor, which includes salary data when developing its *Occupational Outlook Handbook*.

The House Labor and Human Resources Committee, the OCR, 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.2.h. Admissions

The Admissions survey component was broken out from the Institutional Characteristics survey component starting with the 2014-15 data collection. This change was proposed by the TRP so that all institutions would report data for the most recent Fall period. As a result, admissions data are less confusing for IPEDS data users, given that only one reporting period is represented in each data file. Additionally, the change enabled admissions data to be used for the Trend Generator, and data on College Navigator will represent the same Fall period.

A.2.i. Academic Libraries

The AL survey component was reintegrated into IPEDS as a result of TRP #35, replacing the Academic Libraries Survey (ALS), which had been a standalone, biennial data collection conducted by NCES. This change allowed for refinements and improvements in the quality of the data collected, and reduced burden for the institutions. Although fewer data elements are collected in the Academic Libraries component, compared to the prior ALS, they are now collected annually, and they align with key elements collected in other IPEDS components.

A.2.j. Outcome Measures

The OM survey component was added as the result of two TRPs (e.g., #37 and #40) and based on recommendations provided by the ED Committee on Student Success, which concluded its work in 2011. The first collection of this survey component was during the 2015-16 data collection year. This component improved the quality and availability of student success data for consumers, institutions, policymakers, and researchers. It does so by making data available for student outcomes going beyond the historical limitation of the cohort of traditional full-time, first-time students.

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

The IPEDS web-based data collection system uses 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 the following:

- *Developing 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.
- *Customizing survey components 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.
- *Allowing 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. 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. Two upload formats are available for institutions to use: fixed length and key value pair.

- *Improving timeliness of data release.* The system is designed to migrate reported/edited data to an 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.
- *Enabling institutions to provide data to their state and to NCES simultaneously.* NCES works closely with state coordinators, many of whom 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.

A.4. Efforts to Identify and Avoid Duplication

NCES devotes considerable effort to ensure 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 Association of Public and Land-grant Universities (APLU), the National Association of Independent Colleges and Universities (NAICU), the American Association of Community Colleges (AACC), the American Council on Education (ACE), the Consortium on Financing Higher Education (COFHE), the American Association of State Colleges and Universities (AASCU), regional education organizations such as the Western Interstate Commission for Higher Education (WICHE) and the Southern Regional Education Board (SREB), and others. Duplication is avoided as various federal agencies, groups within ED, 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: requesting a reduced set of data items from schools offering only certificates below the baccalaureate level, maintaining an open position on the National Postsecondary Education Cooperative for proprietary institutions and the national proprietary representative, and ensuring inclusion of proprietary school representatives at Technical Review Panels to ensure the appropriateness of data being requested and the feasibility of collecting it. In addition, IPEDS has focused outreach and training efforts for small institutions.

A.6. Frequency of Data Collection

The statutory requirements as described in A.1.d. require that IPEDS data are reported on an annual basis. If the IPEDS collection is not conducted, a number of legal requirements will not be met as a majority of the items collected by IPEDS are required by law (general information presented in A.1.d., for more detailed information see the IPEDS publication *The History and Origins of Survey Items for the Integrated Postsecondary Education Data System (2016-17 Update)* available at https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC_Paper_IPEDS_History_and_Origins_2018.pdf).

The survey components proposed for this request are those that will be collected beginning with the Fall 2022 collection and extending through the Spring 2025 collection, which will cover three full survey cycles. The survey data items are similar to those used through the 2021-22 collection, 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:

- 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.
- 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 achieves this goal by developing an R&D 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.
- Annual meetings are held with IPEDS coordinators to obtain state input on IPEDS operations, survey revisions, analysis plans, and data needs.
- 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.
- The Association of College & Research Libraries (ACRL), the American Library Association (ALA), and the Association of Research Libraries (ARL) have a joint advisory task force that reaches out to IPEDS regularly with suggestions.

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 the institutional burden page for the data collection. The statement for the 2021-22 collection appears as follows (it is updated annually to reflect approval by OMB of the new respondent burden hour estimates):

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.

Institutional Burden

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 IPEDS Reporting Burden Estimates by Institution Type and Keyholder Experience, 2021-22		
	Estimated median range	Estimated average
4-year institution		
New Keyholder	95-159 hours	127 hours
Returning Keyholder	84-140 hours	112 hours
2-year institution		
New Keyholder	74-124 hours	99 hours
Returning Keyholder	61-101 hours	81 hours
Less than 2-year institution		
New Keyholder	56-94 hours	75 hours
Returning Keyholder	39-65 hours	52 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 comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: Integrated Postsecondary Education Data System, National Center for Education Statistics, PCP, 550 12th St., SW, 4th floor, Washington, DC 20202. If you have comments or concerns regarding 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

In 2017, NCES contracted with the American Institutes for Research (AIR) to interview administrators from postsecondary institutions to better understand the time use and burden for institutions participating in IPEDS data collection. To better understand an institution's time and burden, AIR conducted two rounds of cognitive interviews with administrators from 48 postsecondary institutions. The first round of interviews was designed to gain a better understanding of respondents' time use and burden for completing the 12 IPEDS survey components. Questions in the Round 1 interviews were intended to explore respondents' understanding of the current IPEDS time use and burden question—particularly, what respondents include and exclude from their calculation when answering the question—to determine whether they are providing the information that the question was designed to extract.

Results from the Round 1 interviews and observations suggested that respondents were not consistent in how they report time use and burden related to completing IPEDS survey components. Based on these findings, a new series of time use and burden questions were drafted and tested during a second round of cognitive interviews. Round 2 interviews included questions regarding the initial collection of the data that are reported to IPEDS, the number of people involved in the data collection and reporting process, the steps making up the data collection and reporting process, and the initial purpose of the data collection.

Based on recommendations from the AIR report, NCES revised the way in which it enquires about burden to provide more clarity to respondents on what time should be included. **Burden reporting screen:**

This survey component was prepared by:

<input type="radio"/> Keyholder	<input type="radio"/> SFA Contact	<input type="radio"/> HR Contact
<input type="radio"/> Finance Contact	<input type="radio"/> Academic Library Contact	<input type="radio"/> Other

Name:

Email:

How many staff from your institutions were involved in the data collection and reporting process of this survey component?
 Number of Staff (including yourself)

How many hours did you and others from your institution only spend on each of the steps below when responding to this survey component?
Exclude the hours spent collecting data for state and other reporting purposes.

Staff member	Collecting Data Needed	Revising Data to Match IPEDS Requirements	Entering Data	Revising and Locking Data
Your office	<input type="text"/> hours	<input type="text"/> hours	<input type="text"/> hours	<input type="text"/> hours
Other offices	<input type="text"/> hours	<input type="text"/> hours	<input type="text"/> hours	<input type="text"/> hours

The new burden estimates for the IPEDS data collection take into consideration the information on reporting burden that was collected during the 2018-19 through 2020-21 IPEDS using the burden questions above.

Table 2. Response rates for IPEDS preparation time item, 2020-21

	Experienced keyholders	New keyholders
Institutional Characteristics (IC)	76.2%	82.11%
Completions (C)	72.24%	77.39%
12-month Enrollment (E12)	72.77%	77.39%
Student Financial Aid (SFA)	72.35%	78.78%
Outcome Measures (OM)	40.22%	45.77%
Graduation Rates (GR)	63.55%	69.07%
200% Graduation Rates (GR200)	58.87%	60.33%
Admissions (ADM)	23.45%	26.21%
Fall Enrollment (EF)	70.63%	76.98%
Finance (F)	77.10%	81.97%
Human Resources (HR)	73.16%	84.60%
Academic Libraries (AL)	49.88%	53.95%

NCES anticipated using the keyholder reported times to gauge whether the burden estimates from the previous clearance submission are realistic compared with what keyholders report using the new burden questions that were developed based on the AIR report. The preparation times reported by keyholders support the observation that it takes new keyholders longer to prepare and submit their IPEDS components. Table 3 shows, for each IPEDS component and for experienced vs. new keyholders, the average 2020-21 self-reported preparation hours per institution.

Table 3. Average 2020-21 self-reported preparation hours by experienced and new IPEDS keyholders, by IPEDS component

IPEDS component	Total number of respondents	Experienced keyholders			New keyholders		
		Average 2020-21 self-reported preparation hours per respondent	Estimated number of respondents	Estimated total preparation hours*	Average 2020-21 self-reported preparation hours per respondent	Estimated number of respondents	Estimated total preparation hours*
IC	6,388	5.7	4,791	27,309	7.5	1,597	11,978
C	6,173	9.8	4,630	45,374	12.7	1,543	19,596
E12	6,169	12.0	4,627	55,524	13.7	1,542	21,125
SFA	6,064	16.0	4,548	72,768	19.8	1,516	30,017
OM	3,694	15.4	2,771	42,673	18.0	923	16,614
GR	5,428	11.3	4,071	46,002	13.3	1,357	18,048
GR200	5,094	4.5	3,821	17,195	7.0	1,273	8,911
ADM**	1,989	6.2	1,492	9,250	8.7	497	4,324
EF	6,123	11.7	4,592	53,726	12.0	1,531	18,372
F	6,005	15.7	4,504	70,713	15.7	1,501	23,566
HR	6,122	14.3	4,592	65,666	16.3	1,530	24,939
AL	3,627	15.1	2,720	41,072	12.1	907	10,975

* Note: Due to rounding in the calculations, the estimated total presentation hours shown here cannot be exactly calculated from the average preparation hours per respondent, nor will adding the preparation hours in Table 3 equal exactly the total preparation hours presented in Table 16.

NCES bases total estimated data preparation hours for 2022-23 through 2024-25 IPEDS collections on these averages. Detailed estimates of response burden for each IPEDS survey component for the 2022-23 through 2024-25 data collections are provided below. In each of Tables 4-15 NCES provides the average 2020-21 self-reported burden time per institution adjusted, where noted, for each of the upcoming three data collection years 2022-23, 2023-24, and 2024-25 based on the proposed changes to data collection in that survey component. Tables are broken down by returning vs. new keyholders and by institution type. The last row of each table provides the average 2020-21 self-reported burden time per institution, aggregated for all institution types, and adjusted, where noted, for 2022-23, 2023-24, and/or 2024-25 based on the proposed changes to data collection in that component.

A.12.1 Fall Collection

Institutional Characteristics (IC). Detailed estimates for the IC survey component are presented in table 4 and include the Institutional Identification, IC Header, and Institutional Characteristics. The estimates account for both institution type and keyholder experience. The burden estimates for 2022-23 were based on self-reported preparation time for this component. NCES does not expect the burden to change in 2023-24 or 2024-25 due to addition of screening questions in IC Header, changes to checkbox items, and changes to instructions and FAQs.

In 2022-23, NCES is also adding a checkbox question about noncredit education; the results of responses to that question will help NCES to better understand the impact of noncredit education on Human Resources and Finance calculations such as student-to-faculty ratio and revenues/expenditures per FTE by allowing NCES to identify institutions that offer noncredit education. An optional data collection on noncredit education is being considered by NCES to supplement the IPEDS data collection. More information can be found earlier in Part A under ‘Proposed Changes to the IPEDS Data Collection’.

Table 4. Burden hours, Institutional Characteristics

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,898	5.9	8.7	5.9	8.7	5.9	8.7
2-year schools	1,685	5.3	6.6	5.3	6.6	5.3	6.6
<2-year schools	1,805	5.7	6.2	5.7	6.2	5.7	6.2
Total	6,388	5.7	7.5	5.7	7.5	5.7	7.5

Completions (C): Detailed estimates for the C survey component are presented in table 5. These estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. The burden estimates for 2022-23 were adjusted based on self-reported preparation time for this component. The only change to this survey component is the addition of a question to capture an overall count of students for whom gender is ‘unknown’ or ‘another gender than the provided categories (Men/Women)’ in 2022-23. NCES does not expect this to increase burden. There are also minor changes to terminology, FAQs, and wording that should not impact burden, and NCES expects the burden to decrease in 2023-24 and 2024-25 as institutions adjust to the change in CIP codes that took place during the 2020-21 data collection.

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,769	11.8	18	10.8	17	10.8	17
2-year schools	1,645	10.6	10.2	9.6	9.2	9.6	9.2
<2-year schools	1,759	6.7	6.8	5.7	5.8	5.7	5.8
Total	6,173	10.0	12.7	9.0	11.7	9.0	11.7

12-month Enrollment (E12): Detailed estimates for the E12 survey component are presented in table 6. These estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. The burden estimates for 2022-23 were adjusted based on self-reported preparation time for this component. For 2022-23, the only change to this survey component is the addition of a question to capture an overall count of students for whom gender is ‘unknown’ or ‘another gender than the provided categories (Men/Women)’ and the separation into ‘full-time’ and ‘part-time- students’ for the Graduate students column. For 2023-24, NCES is adding counts for dual enrolled students by race/ethnicity and gender. In 2024-24 NCES is adding an overall count for noncredit students. The burden reported by institutions already included major changes to the 12-Month Enrollment survey component that occurred in 2020-21 (the year used as the basis for the burden estimates), therefore NCES is maintaining the estimates to account both for improvement in reporting that would decrease burden along with new changes that will increase burden. Maintaining the estimates in 2023-24 also helps to account for preparation for 2024-25 changes.

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,768	14.3	18.9	14.3	18.9	14.3	18.9
2-year schools	1,645	12.7	12.1	12.7	12.1	12.7	12.1
<2-year schools	1,756	7.8	7	7.8	7	7.8	7
Total	6,169	12.0	13.7	12.0	13.7	12.0	13.7

A.12.2 Winter Collection

Student Financial Aid (SFA): Detailed estimates for the SFA survey component are presented in table 7. Estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There are only minor additions and wording changes, changes due to updated financial aid requirements, and additional FAQs being made at this time. NCES does not expect any burden increase due to these changes.

Table 7. Burden hours, Student Financial Aid

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,675	16.4	20.4	16.4	18.9	16.4	18.9
2-year schools	1,639	17.6	19.6	15.4	23.4	15.4	23.4
<2-year schools	1,750	14	18.9	12.5	27.6	12.5	27.6
Total	6,064	16.0	19.8	14.9	22.4	14.9	22.4

Outcome Measures (OM): Detailed estimates for the OM survey component are presented in table 8. Estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There are only minor wording/terminology changes and changes to FAQs which do not affect burden.

Table 8. Burden hours, Outcome Measures

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,413	15.3	18.6	15.3	18.6	15.3	18.6
2-year schools	1,281	15.6	16.8	15.6	16.8	15.6	16.8
Total	3,694	15.4	18.0	15.4	18.0	15.4	18.0

Graduation Rates (GR): Detailed estimates for the GR survey component are presented in table 9. Estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There are only minor wording/terminology changes and changes to FAQs which do not affect burden.

Table 9. Burden hours, Graduation Rates

Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,260	11.0	17.1	11.0	17.1	11.0	17.1
2-year schools	1,559	9.8	10.7	9.8	10.7	9.8	10.7
<2-year schools	1,609	13.2	10.4	13.2	10.4	13.2	10.4
Total	5,428	11.3	13.3	11.3	13.3	11.3	13.3

200% Graduation Rates (GR200): Detailed estimates for the GR200 survey component are presented in table 10. Estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There are no changes to this survey component.

Table 10. Burden hours, 200% Graduation Rates							
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	1,963	4.0	8.4	4.0	8.4	4.0	8.4
2-year school	1,529	4.6	3.8	4.6	3.8	4.6	3.8
<2-year schools	1,602	4.9	8.4	4.9	8.4	4.9	8.4
Total	5,094	4.5	7.0	4.5	7.0	4.5	7.0

Admissions (ADM): Detailed estimates for the ADM survey component are presented in table 11. Estimates account for both institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. The changes proposed to the Admissions survey component are to clarify existing reporting and add some additional data collection elements. While the clarifications should decrease burden, the additional collection may add to the burden time. Since the additions are being added for the 2022-23 data collection, we have accounted for this in the estimates for 2022-23 both in Table 11 and in Table 16. We expect the burden to decrease slightly over time as data providers become more familiar with the reporting.

Table 11. Burden hours, Admissions							
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	1,764	6.4	9.2	6.1	8.9	6.1	8.9
2-year schools	140	5.5	4.8	5.2	4.5	5.2	4.5
<2-year schools	85	3.8	4.0	3.5	3.7	3.5	3.7
Total	1,989	6.2	8.7	5.9	8.4	5.9	8.4

A.12.3 Spring Collection

Fall Enrollment (EF): Detailed estimates for the EF survey component are presented in table 12. Estimates account for both institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. The only change to this survey component is the addition of a question to capture an overall count of students for whom gender is 'unknown' or 'another gender than the provided categories (Men/Women)' in 2022-23. NCES does not expect this to increase burden. There are also minor changes to terminology, FAQs, and wording that should not impact burden.

Table 12. Burden hours, Fall Enrollment							
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25	
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution	
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder
4-year schools	2,761	14.1	17.3	14.1	17.3	14.1	17.3
2-year school	1,630	12	14.4	12	14.4	12	14.4
<2-year schools	1,732	7.9	7	7.9	7	7.9	7
Total	6,123	11.8	13.6	11.8	13.6	11.8	13.6

Finance (F): Detailed estimates for the F survey component are presented in table 13. These estimates account for institution type, accounting standards, and keyholder experience. There are minor changes to Finance to improve clarity and streamline reporting, including the restructuring of a screening question. This should not add burden and may decrease burden; NCES is maintaining the current estimates at this time.

Table 13. Burden hours, Finance								
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25		
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution		
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	
4-year schools	2,713	19.5	19	19.5	19	19.5	19	
2-year schools	1,608	17.3	16.6	17.3	16.6	17.3	16.6	
<2-year schools	1,684	7.9	9.4	7.9	9.4	7.9	9.4	
Total	6,005	15.7	15.7	15.7	15.7	15.7	15.7	

Human Resources (HR): Detailed estimates for the HR survey component are presented in table 14. These estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There is a minor change to the reporting period for the New Hires section, which should simplify reporting for institutions by maintaining consistency with other parts of the component. NCES has kept the burden estimates the same with this change until we can see if it has an impact on institutions.

Table 14. Burden hours, Human Resources								
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25		
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution		
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	
4-year schools	2,745	21.6	24.4	21.6	24.4	21.6	24.4	
2-year schools	1,650	12.5	12.8	12.5	12.8	12.5	12.8	
<2-year schools	1,727	4.3	6.6	4.3	6.6	4.3	6.6	
Total	6,122	14.3	16.3	14.3	16.3	14.3	16.3	

Academic Libraries (AL): Detailed estimates for the AL survey component are presented in table 15. These estimates account for institution type and keyholder experience and were adjusted to take into consideration respondent self-reported preparation time for this component. There are no changes to this component for this clearance.

Table 15. Burden hours, Academic Libraries								
Institution Type	Number of institutions (Title IV and non-Title IV)	2022-23		2023-24		2024-25		
		Estimated average burden hours per institution		Estimated average burden hours per institution		Estimated average burden hours per institution		
		Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	Experienced keyholder	New keyholder	
4-year schools	2,475	16.7	13	16.7	13	16.7	13	
2-year schools	1,152	11.6	10.3	11.6	10.3	11.6	10.3	
Total	3,627	15.1	12.1	15.1	12.1	15.1	12.1	

A.12.4 All Collections

All Survey Components. To provide better estimates of burden on an ongoing basis, NCES will continue to ask IPEDS keyholders to voluntarily report the time required to complete each survey component. NCES estimates a burden of 0.2 hour to track, record, and report this time for the following components: Institutional Characteristics, Admissions, Completions, 12-month Enrollment, Graduation Rates, Graduation Rates 200, Outcome Measures, and Fall Enrollment. NCES estimates it will take 0.4 hour for Student Financial Aid, Finance, Human Resources, and Academic Libraries, because these four components typically involve additional offices at the institution and require keyholders to get time estimates from others at the institution.

Based on the tables provided in this section, table 16 provides a summary of the estimated number of respondents, responses, and response burden hours by survey component for each of the 2022-23, 2023-24, and 2024-25 IPEDS data collections. These estimates are based on the self-reported burden times provided by institutions that responded to the burden reporting questions listed for each component during the 2020-21 IPEDS data collection.

Because the percentage of keyholders that are new is relatively stable over time for each IPEDS component, ranging between 20 and 25% across the components, to calculate the estimated average hours per institution provided in table 16, we used the 2020-21 observed percentages of new keyholders together with the totals shown in tables 4-15 that reflect for each component the average 2020-21 self-reported burden time per institution, aggregated for all institution types, and adjusted, where noted, for 2022-23, 2023-24, and/or 2024-25 based on the proposed changes to data collection in that component.

Survey component	Number of institutions (respondents)	2022-23		2023-24		2024-25	
		Average hours per institution	Total burden hours	Average hours per institution	Total burden hours	Average hours per institution	Total burden hours
IC	6,400	6.2	39,680	6.2	39,680	6.2	39,680
C	6,175	10.9	64,838	10.5	64,838	10.5	64,838
E12	6,175	12.4	76,570	12.4	76,570	12.4	76,570
SFA	6,075	17.0	103,275	17.0	103,275	17.0	103,275
OM	3,700	16.1	59,570	16.1	59,570	16.1	59,570
GR	5,450	11.8	64,310	11.8	64,310	11.8	64,310
GR200	5,100	5.1	26,010	5.1	26,010	5.1	26,010
ADM	2,000	7.0	14,000	6.7	13,400	6.7	13,400
EF	6,125	11.8	72,275	11.8	72,275	11.8	72,275
F	6,010	15.7	94,357	15.7	94,357	15.7	94,357
HR	6,130	14.8	90,724	14.8	90,724	14.8	90,724
AL	3,630	14.4	52,272	14.4	52,272	14.4	52,272
Total	62,970 responses from 6,400 respondents	—	757,881	—	757,281	—	757,281

The average estimated annual total burden hours for all IPEDS components for all participating institutions between for 2022-23 is 757,881 hours and for 2023-24 and 2024-25 is 757,281 burden hours.

The 2022-23 estimated total burden time cost to respondents is based on the estimated response burden -hours multiplied by the estimated hourly wage \$42.27 (based on a 2% increase from \$41.44 in 2021 (Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, Operations Research Analysts, on the Internet at <https://www.bls.gov/ooh/math/operations-research-analysts.htm> [visited November 9, 2021])). The hourly wage is increased by an estimated 2.0 percent cost-of-living adjustment for each subsequent year. Total estimated costs per respondent for the 2022-23 through 2024-25 data collections are shown in table 17.

Table 17. Estimates of burden hours and costs to institutions: 2022-23, 2023-24, and 2024-25

	Estimated total burden hours for all institutions	Estimated respondent hourly wage	Estimated total burden time cost per institution
2022-23	757,881	\$42.27	\$5,005.57
2023-24	757,281	\$43.12	\$5,102.18
2024-25	757,281	\$43.98	\$5,203.94

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 2022-23 to 2024-25 survey years of approximately \$36,000,000. The total annual cost for this collection will be \$12 million. On an annual basis, over the 3 survey years, the contract costs will average about \$10 million per year. Federal S&E will be approximately \$2,000,000 per year. More than 95 percent 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, institutional respondents, and data users; data collection, data review, and analysis; survey administration; imputations; file preparation, reporting, and data dissemination; TRP meetings; 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 are based on recent experience with the contractors that currently support the IPEDS operations (RTI, AIR, and others). IPEDS in-house staff costs are based on FY2022 pay schedules and on an estimated 1 percent pay increase for each of the subsequent fiscal years due to the uncertainty surrounding pay increases for federal employees.

A.15. Reasons for Change in Burden

While the changes to survey components proposed in this submission result in a modest burden time increase per institution the decrease in the number of Title IV institutions and revisions to the burden time estimates per institution based on the voluntary reporting of response burden collected from IPEDS respondents in 2018-19 through 2020-21, the overall estimated annual respondent burden time for this collection has decreased.

A.16. Publication Plans/Project Schedule

A.16.a. Schedule of Activities

Table 18. IPEDS 22-23 planned data collection schedule	
Date	Activity
Early-August 2022	Open Registration
Early September 2022	Fall Data Collection opens <ul style="list-style-type: none"> • Institutional Characteristics (2022-23 data) • Completions (2021-22 data) • 12-month enrollment (2021-22 data)
Mid-October 2022	Fall Data Collection closes
Early December 2022	Winter and Spring Data Collection opens <ul style="list-style-type: none"> • Student Financial Aid (2021-22 data) • Graduation Rates (2021-22 data) • Graduation Rates 200 (2021-22 data) • Outcome Measures (2021-22 data) • Admissions (Fall 2022 data) • Fall Enrollment (Fall 2022 data) • Finance (Fiscal Year 2021) • Human Resources (Fall 2022 data) • Academic Libraries (Fiscal Year 2021)
Mid-February 2023	Winter Data Collection closes
Mid-April 2023	Spring Data Collection closes
July 2023	Noncompliance Report due to Office of Federal Student Aid
Spring 2023	Public release of data in IPEDS Data Center of data collected in Fall 2022
Summer 2023	Public release of data in IPEDS Data Center of data collected in Winter 2022-23
Fall 2023	Public release of data in IPEDS Data Center of data collected in Spring 2023

Survey activity will include the 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, imputations are run. Following NCES approval of the imputed file, the provisional data and associated web tables 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 2022-23 communications and follow-up schedule are detailed in table 19 and detailed communications are included in Appendix B. Keyholders are able to opt out of receiving reminders.

Table 19. IPEDS 2022-23 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:	Email to keyholder	Open	Collection open
Fall	Email to keyholder	Close - 4 wks	No data entered
Winter	Email to new keyholder	Close - 4 wks	All surveys not locked
Spring	Thank you email to CEO	Close - 3 wks	All surveys locked
	Phone call to CEO/keyholder	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

A.16.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.

Use the Data: The Use the Data portal (<https://nces.ed.gov/ipeds/use-the-data>) is the primary method of disseminating IPEDS data to the postsecondary education, policy, and research communities. This portal 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 with other institutions, or they can simply create a report about a group of institutions.

Data Explorer: Search for tables, charts, publications, or other products related to postsecondary education by keywords and filters.

Data Trends: View trends on most frequently asked subject areas including Enrollment, Completions, Graduation Rates, Employees and Staff, Institutional Revenues, and Financial Aid.

Look Up an Institution: Look up information for one institution at a time. Data can be viewed in two forms: institution profile (similar to College Navigator) and reported data (institution's response to each survey question).

Data Feedback Report: Download, print, or customize an institution's Data Feedback Report, a report that graphically summarizes selected institutional data and compares the data with those of peer institutions.

Statistical Tables: Create simple descriptive statistics (e.g., total, count, average, median, standard deviation, percentiles) on selected IPEDS institutions and variables.

Summary Tables: Customize a summary table for a select subgroup of institutions on the following popular topics: tuition and fees, room and board, student financial aid, admissions, test scores, student enrollment, degree/certificate awarded, and graduation rates.

Compare Institutions: Download IPEDS data files for more than 6,000 institutions and up to 250 variables. Step-by-step process guides users through the process of selecting institutions and variables. Data files are provided in comma separated value (*.csv) format.

Survey Data: Download the Access database or complete data file for each survey; or create a custom data file across multiple surveys. IPEDS data files and data dictionaries are zipped *csv format, including read programs for easily importing data into a statistical software package (SPSS, STATA, and SAS).

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 <https://nces.ed.gov/collegenavigator/> for more information.

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.

- o *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.
- o *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

ED 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.