

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

Appendix E: Response to Public Comments Received During the 60-day Comment Period and NCEES Responses

OMB No. 1850-0582 v.30

Submitted by:

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

May 2022

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Introduction

This attachment contains the responses to public comments on the annual mandatory collection of postsecondary data through IPEDS. The 60-day comment period for the IPEDS package closed on April 26, 2022. ED received a total of 64 comments (though one comment was duplicated) from 229 total signatories (some comments are signed by multiple signatories; those from the duplicate comment are not included in this count), many covering multiple topics.

Submitter category*	Submissions	Signatories**
Total	63 (does not include duplicate comment)	229 (does not include signatories of duplicated comment)
Institution of Higher Education; State Higher Education Office	24	41
Association/Organization; Civil Rights; National or State Advocacy Organization; Community Organization	15	150
Individual; Student; Teacher; Education consultant	7	7
Federal agency	2	15
Other; None selected	15	16

* Categories are self-reported.

Comments related to proposed gender change

Public response

NCES received 42 comments with a total of 112 signatories related to the new gender collection and the Directed Question related to potential future collection of gender in IPEDS. Some comments were focused on gender whereas other comments included gender within a broader comment covering other areas of IPEDS.

All comments supported the addition of more detailed collection on gender beyond the binary men/women categories.

Recommendations/Concerns

- o Most of the comments also suggested that NCES change the terminology to remove the term ‘other’.
- o Two of the comments mentioned that their institutions do not currently collect data on nonbinary genders, and they would not be able to report in 2022-23.
- o Some comments encouraged NCES to add the new gender options throughout the IPEDS survey components.
- o One comment suggested that NCES should mandate the collection of these data as well as the format of the question, much like was done in the past for revisions to race/ethnicity data collection. The concern was that if NCES does not mandate that institutions ask a question that includes non-binary genders many institutions will continue current practice of collecting binary genders and data users will not be able to interpret the meaning of low numbers of non-binary individuals (e.g., does zero mean no non-binary individuals or does zero mean the institution did not collect the data?).

ED response

In selecting the term ‘Gender other’ to operationalize the genders that do not fit the binary men and women categories, the intention was not to stigmatize or other students with diverse gender experiences, but to ensure that we did not use a term that could potentially exclude gender experiences. We also chose a term that would allow institutions flexibility in their collection of data on diverse gender experiences. Because the collection of gender is not currently directed by OMB and the Department in the same way as race/ethnicity data are directed, NCES cannot mandate that institution’s collect gender data in a particular way.

NCES acknowledges that ‘Gender other’ may be stigmatizing and changes to the proposed collection have been made to use ‘Another gender’ in place of ‘Gender Other’. In addition, NCES is proposing an addition that will allow institutions time to implement necessary changes and to clarify what data re reported. Please see the revised documents, including Part A, Appendix A, Appendix D, and the survey packages for 12-Month Enrollment, Fall Enrollment, Completions, and Graduation Rates.

NCES will continue to explore ways to better collect data on gender in IPEDS. As an administrative data collection that collects from the institution and not the individual, IPEDS must carefully consider institutional burden and potential privacy concerns.

Associated comments

ED-2022-SCC-0026-00:

08; 10; 11; 12; 13; 14; 15; 16; 17; 18; 19; 20; 21; 22; 23; 24; 25; 26; 27; 28; 29; 30; 31; 32; 34; 35; 38; 39; 40; 41; 42; 43; 45; 47; 48; 51; 52; 53; 55; 59; 62; 63

Comments related to the Student Financial Aid survey component

Public response

NCES received 5 comments with 5 signatories related to the Student Financial Aid (SFA) survey component.

Two comments expressed support for the proposed collection of financial aid data on non-degree-seeking learners that would provide improved insights into how learners are leveraging postsecondary education systems and financing options to meet their unique needs. No comments opposed the addition.

Recommendations/Concerns

- One comment requested that IPEDS consider changing largest program to largest Title IV program for program reporters.
- One comment recommended that SFA data be disaggregated by race/ethnicity and gender identity.
- One comment recommended that NCES consider modifying Group 1 to first-bachelor or lower degree seeking students.
- Two comments recommended that NCES include information about parent and private student loans and average cumulative loan burdens for graduating students at different degree levels.
- One comment recommended that NCES allow institutions to report room and board costs for students living at home more accurately.

ED response

NCES appreciates the support of the upcoming changes to the SFA survey component. NCES is considering numerous other changes to the SFA survey component that will be proposed in a separate clearance. Those changes will likely include the change to the largest program to be the largest Title IV program as well as more consistent data for the student types. However, currently NCES does not plan to collect data by r/e and gender identity, due to concerns about institutional burden and student privacy. Nor will IPEDS collect data by first-bachelor or lower. As second-bachelor students are included in the 'all undergraduates' category, the Pell percentage at the institution should already include second-bachelor's students.

The SFA survey component currently collects data on other loans (including private loans) to students but not loans to parents. The recommendations of the Technical Review Panel (TRP) on Improving the Student Financial Aid component did not support collecting data on parent loans. In addition, Parent PLUS loan data are currently available through the College Scorecard.

While the TRP agreed that data on cumulative debt are important, it did not support the addition of cumulative debt to IPEDS. Cumulative debt information is available in the College Scorecard and collected by the Office of Federal Student Aid (FSA), and FSA has developed tools to help students track their cumulative debt throughout their time in postsecondary education. While there are some limitations to each of these options, addition of cumulative debt to the IPEDS collection at this time would lead to duplicative federal reporting. Panelists at the TRP were particularly concerned about the burden on small institutions if cumulative debt were to be added to the IPEDS collection. While many institutions may report this information to the Common Data Set (CDS), CDS reporting is not federally mandated and there are many institutions that report to IPEDS that do not report the CDS. The proposed additions, while important, would present additional burden on institutions that is not currently supported by NCES's discussions with stakeholders. NCES will continue to work with FSA to determine whether there are ways that we can work together to improve the data on topics such as cumulative loan debt.

Finally, NCES and the National Postsecondary Education Cooperative (NPEC) are commissioning a paper to look at the potential to create a student pricing survey that could better collect data on issues such as room and board costs, along with other issues related to pricing. That work should start soon, but any recommendations from the paper or a subsequent TRP would be included in proposals for future data collections.

Associated comments

ED-2022-SCC-0026-00:

Comments related to the proposed race/ethnicity changes

Public response

NCES received 9 comments with 64 signatories on the proposed expansion of the guidance on DACA and undocumented students, the nonresident terminology, and the Directed Question on citizenship and race/ethnicity.

Most comments supported the removal of the ‘alien’ terminology. While commenters expressed support for guidance on reporting DACA and undocumented students, they did not support the extension of the existing guidance related to DACA and undocumented students.

Recommendations/Concerns

- o One comment suggested NCES add ‘U.S’ before nonresident to clarify that the question is not about students at state collected that are not from the state.
- o Multiple comments suggested that NCES include DACA and undocumented students throughout the race/ethnicity categories, as this ensures that institutions do not have to identify these students (which could create risk for students) and that r/e for these students is key in understanding institutional demographics.
- o Multiple comments recommended that NCES should define resident students (the group for which race and ethnicity are reported) as those who completed high school or a GED equivalency within the U.S. and were not on an F-1 visa at the time of high school graduation.
- o Responses to directed questions recommended that NCES carefully consider any changes to future changes related to citizenship and race/ethnicity.

ED response

Based on the comments received, NCES will make several changes to the proposal for collecting data on race/ethnicity.

First, NCES will remove the ‘alien’ terminology but add ‘U.S’ nonresident on collection pages to ensure that institutions understand that ‘nonresident’ is not related to state residency.

Second, NCES will amend the guidance on how to report DACA and undocumented students through the IPEDS survey components in the instructions and FAQs related to race/ethnicity reporting. Please see the revised documents, including Appendix A, Appendix D, and the survey packages for 12-Month Enrollment, Fall Enrollment, Completions, and Graduation Rates.

Finally, NCES and the National Postsecondary Education Cooperative (NPEC) will continue to examine this important topic and carefully consider any future changes to this guidance.

Associated comments

ED-2022-SCC-0026-00:

43; 46; 49; 50; 55; 56; 59; 60; 62

Comments related to the collection of data on students with disabilities

Public response

NCES received 6 comments with 31 signatories on the collection of data on students with disabilities.

The comments suggested multiple additions to IPEDS related to students with disabilities.

Recommendations/Concerns

- All comments recommended that disabilities be added as a core demographic element across all surveys and for all undergraduates, graduate students, faculty, and staff.
- Two comments recommended partnering with the disability community to develop strategies for developing questions and collecting and utilizing data.
- Two comments recommended that NCES encourage institutions to publish information explaining their documentation requirements for students with disabilities to secure accommodations on their college campus.
- One comment recommended IPEDS include data on comprehensive transition and postsecondary (CTP) in IPEDS

ED response

As noted by the commenters, IPEDS currently collects only the percentage of undergraduate students enrolled during a fall term who are formally registered as students with disabilities with the institution's office of disability services (or the equivalent office). In addition, NCES collects (on the institutional identification page) and makes available to public via the College Navigator website a link to the institution's website that is mandated to provide information on student activities, services offered for individuals with disabilities, career and placement services, and policies related to the transfer of credit from other institutions. These collections are required by the Higher Education Opportunity Act of 2008 (P.L. 110-315). Finally, NCES allows institutions to provide more information about their disabilities services in a context box tied to the question on the percentage of students enrolled.

Collecting data beyond what is required in the statute is valuable and, as outlined, necessary to identify and address inequities at higher education institutions and help to meet the needs of all students and staff. However, it is vital to ensure that the data collected adhere to data privacy laws and regulations. Some institutions may have a small number of students or staff with disabilities resulting in small cell sizes, and thus, data privacy issues may occur.

NCES is also committed to making sure that the data collected are accurate and, at the same time, not overly burdensome for institutional data reporters. Some institutions with limited staff and IT capacity may not be able to collect and report accurate data without the official records or students reporting the disability. Also, students with disabilities may not always feel comfortable with disclosing this information to their institutions.

NCES does collect valid national estimates of postsecondary students with disabilities through its sample survey program. For example, the National Postsecondary Student Aid Study (NPSAS) asks whether students have a disability. While not institution level data, these national estimates provide valuable information on students with disabilities.

NCES has added a checkbox item for institutions where they can indicate if they have 'Comprehensive transition and postsecondary program for students with intellectual disabilities' in the Institutional Characteristics survey component. As NCES examines the potential to add more information about students with disabilities to future collections, it will partner with the disability community as well as the institutions that provide data to IPEDS. NCES holds Technical Review Panels to discuss potential changes and determine whether institutions can report additional data items and the associated burden, as well as potential privacy concerns.

Associated comments

ED-2022-SCC-0026-00:

09; 37; 40; 59; 65; 66

Comments related to the proposed collection of data on noncredit enrollment

Public response

NCES received 11 comments with a total of 26 signatories related to the proposed changes to the IC Header and E12 survey components to collect information related noncredit education offerings and enrollment, respectively, and the Directed Question related to the potential future collection of disaggregated noncredit enrollment counts by race/ethnicity and gender.

Most comments were in support of including noncredit offerings and enrollment in IPEDS, as IPEDS currently does not collect any information on this topic. A few comments were concerned about the burden imposed on institutions by having to report noncredit enrollment counts.

Recommendations/Concerns

- Two commenters suggested that the definition of noncredit education should be revised to clarify if certain activities would be included under the definition and therefore reported (e.g., employee professional development, summer camps, cooperative extension).
- Three commenters suggested revising the currently proposed “Continuing Education/Professional Education” option on IC Header Question 5 to avoid confusion and overlap with noncredit terminology.
- Three commenters pointed out that the “Developmental Education” (which is an option on IC Header proposed Question #5) may also be offered for credit and perhaps should not be removed from the current IC-H Question #1 (educational offerings).
- One commenter pointed out the inconsistent use of the terms “Developmental Education” and “Remedial Education” throughout the E12 survey materials.
- Four commenters suggest the expansion of noncredit topics into other IPEDS survey components, including Completions, Human Resources, Outcome Measures, and Student Financial Aid.
- Two commenters strongly recommended the inclusion of noncredit enrollment counts disaggregated by race/ethnicity, whereas two other commenters suggested that including such data would not be possible with current data systems and would be duplicative with HEERF reporting.
- One commenter suggested the additional disaggregation of noncredit enrollment by age categories.
- Two commenters suggested that producing an “unduplicated” headcount for noncredit enrollment would require substantial effort.
- Three commenters suggested that collecting noncredit enrollment counts would impose substantial burden on institutions (e.g., integrating disparate data systems), particularly for four-year state systems and smaller independent colleges.

ED response

Building upon the currently proposed FAQ #1 and FAQ #2 for Part D Noncredit education, NCES will provide additional examples of what to include and exclude from noncredit education reporting in the survey component instructions.

For the currently proposed Question #5 on the IC Header survey component, NCES will change the “Continuing Education/Professional Education” to “Continuing Professional Education” alone, so as not to conflate “Continuing Education” terminology with noncredit education terminology. The term “Continuing Professional Education” already exists in the IPEDS Glossary, defined as “Programs and courses designed specifically for individuals who have completed a degree in a professional field (such as law, medicine, dentistry, education, or social work) to obtain additional training in their particular field of study.”

NCES will remove “developmental education” terminology and adopt the “remedial education” terminology as a noncredit education offering on the proposed Question #5 on the IC Header survey component. NCES proposed a refined definition for “remedial education” beginning in the 2022–23 collection year, which reads: as “Remedial education: Courses or programs designed to develop the reading, writing, and/or math skills of students who are determined—typically by a standardized test—to be academically underprepared for college-level, credit-bearing courses.” In addition,

NCES will add “remedial education” back to Question #1 on IC Header and clarify that these educational offerings reflect for-credit options, as remedial education may be offered both for-credit and not-for-credit.

While NCES understands the higher education community’s interest in how noncredit education is staffed and financed as well as the educational and workforce outcomes of student enrolled in noncredit education, at this time there are no immediate plans to expand data collection beyond IC Header and E12 survey components.

NCES will also examine the feedback from the Directed Question related to HEERF reporting requirements to understand the feasibility of collecting noncredit enrollments by race/ethnicity and gender, however, there is no immediate plan to add race/ethnicity and gender breakdowns. These and other student subgroups may be explored for future collection.

Institutions are encouraged to report unduplicated headcount enrollment, which is consistent with how for-credit enrollment is currently reported. However, if institutions are not able to report unduplicated headcount noncredit enrollment, they should report duplicated headcount enrollment and indicate that this value is duplicated (i.e., not mutually exclusive and students may be “double counted” across noncredit education participation). NCES will add a radio button option for data reporters to indicate if they are reporting duplicated or unduplicated headcount enrollment in Part D.

NCES recognizes the upfront work required to prepare data systems to report new information to IPEDS. At this time, IPEDS intends to implement Part D – Noncredit education in the E12 survey component for the 2023–24 collection year for all institutions that offer noncredit education, as indicated on the IC Header survey component. This first data collection will inform next steps on future data collection activity related to noncredit education.

[Associated comments](#)

ED-2022-SCC-0026-00:

08; 33; 43; 53; 55; 57; 59; 61; 62; 64; 67

Comments related to the Admissions survey component

Public response

NCES received 3 comments with 17 signatories on the proposed changes to the Admissions survey component and the associated Directed Question.

Recommendations/Concerns

- o Comments supported the additions proposed to Admissions, including the additional admissions considerations and median percentile.
- o There was mixed support for the 10th and 90th percentiles, with some comments supporting the change and others indicating they were not useful due to changes in test requirements at institutions.
- o There were some suggestion that NCES should also consider additional questions about institutional admissions practices, including questions on institutional recruitment practices, whether or not institutions consider first-generation status in their admission processes, whether or not institutions use demonstrated interest in their admissions decisions, whether and how they use information on criminal justice involvement, and whether they offer early decision or early action admission deadlines for applicants.

ED response

NCES will move forward with all changes proposed during the 60-day comment period based on feedback from commenters, however, NCES will not add the 10th and 90th percentiles at this time based on the comments received.

NCES will also continue to consider changes to the Admissions component for future collections, including the suggestions made in the comments.

Associated comments

ED-2022-SCC-0026-00:

43; 44; 59

Comments related to the collection of data on student health services

Public response

NCES received 1 comment with 1 signatory on the proposed changes to the Admissions survey component and the associated Directed Question.

Recommendations/Concerns

- Recommended the addition of the following questions to the IPEDS data collection:
 - Does your institution provide students with access to health care, including through contractual arrangements with off-campus and/or external providers?
 - Does your institution have a student health services center on campus?
 - Does your institution provide students with access to mental health counseling, including contractual arrangements with off-campus and/or external providers?
 - Does your institution offer mental health counseling services on campus?
 - Does your institution offer health/well-being prevention education?

ED response

NCES does not have plans to add questions about health care to IPEDS at this time, however, NCES will work with the National Postsecondary Education Cooperative (NPEC) to discuss whether this collection should be added to the IPEDS. If recommended by NPEC, NCES would then likely hold a Technical Review Panel (TRP) to ensure that the questions are appropriate to IPEDS and that institutions are able to respond to the questions without excessive burden.

Associated comment

ED-2022-SCC-0026-0036

Comments related to proposed addition of dual enrolled student collection

Public response

NCES received 3 comments with a total of 49 signatories related to the new collection of dual enrolled students in the 12 Month Enrollment survey component.

Recommendations/Concerns

- All 3 comments and 49 signatories supported the addition of dual enrolled students to 12 Month Enrollment by race/ethnicity and gender.
- One comment with 1 signatory recommended NCES further consider the placement of dual enrolled students in non-degree/certificate-seeking.

ED response

NCES is happy to receive favorable feedback on the addition of dual enrolled students by race/ethnicity and gender. NCES believes that this information will be vital in better understanding postsecondary opportunities. While NCES does not plan to change the inclusion of dual enrolled students in the non-degree/certificate-seeking category at this time, NCES will continue to examine this issue and use the data that will be collected to further improve collection of data on dual enrolled students.

Associated comments

ED-2022-SCC-0026-00:

40; 54; 62

Comments related to student success measures

Public response

NCES received 3 comments with a total of 18 signatories related to IPEDS measures of student success.

Recommendations/Concerns

- I request that the Graduation Rates and Graduation Rates 200 surveys be modified to allow institutions that offer multiple degree levels to report on multiple timeframes for 100%, 150%, and 200% of normal time to completion.
- Two comments with 17 signatories recommended NCES expand Outcome Measures to non-degree-granting institutions.
- One comment with 15 signatories recommended NCES disaggregate Outcome Measures by race/ethnicity and gender.
- One comment with 15 signatories recommended NCES streamline GR and GR200 along with OM

ED response

NCES does not have any plans to change student success measures in the current clearance. For expanding OM to non-degree-granting institutions, NCES would need to carefully consider the additional burden on these institutions that are often less resourced.

NCES is currently working with the National Postsecondary Education Cooperative (NPEC) to see if there are ways to improve the collection of data on student success.

Associated comments

ED-2022-SCC-0026-00:

06; 40; 59

Comments (in numerical order)

Docket: ED-2022-SCC-0026

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

Comments On: ED-2022-SCC-0026-0001

Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25

Comments are listed in order by comment number.

Document: ED-2022-SCC-0026-0004

Received: February 25, 2022

Posted: February 25, 2022

Category: Institution of Higher Education

Submitter Information

Organization: Apollo Career Center

General Comment

Request for Special Consideration of IPEDS definition of Full-Time at a Clock Hour Postsecondary School and the ways the current definition skews data:

I am a Financial Aid Specialist at a Clock Hour School, and wanted to bring to your attention the issues that the IPEDS definition of "Full-Time" causes many Career Centers that operate on Clock Hours.

IPEDS defines Full-Time as 24 hours/week (but does not give any consideration to how many weeks a program lasts, nor does it give any consideration to whether a program is Title IV eligible or not). What this means is that our State Tested Nurse Aid program (which is only 3 weeks long for a total of 76 Clock Hours) is our LARGEST Full-Time program. The reason for this being the largest is because we can filter through many more students in a 3-week program throughout the year versus our Title IV programs that last an average of 11 months.

I am requesting that IPEDS gives consideration to updating your rules for Clock Hour programs to incorporate a minimum number of weeks that a program must last in order to be considered Full-time.

Due to having to report a 76 Clock Hour program that only costs \$700 in total as our largest program, this absolutely skews the data that is then reported on the College Navigator, the Net Price Calculator, and now also incorporated into the Loan Entrance Counseling. I have to say that a program that is NOT eligible for Pell or Loans and only costs \$700 being shown within the Loan Entrance Counseling session (which is required for all students that are borrowing Title IV loans) is very frustrating to me. This low cost 3-week program is NOT representative of our programs that can receive Financial Aid. Our Title IV Loan eligible programs average around \$9,000 for Tuition & Fees....but attached is a snapshot of what a student completing Entrance Counseling at our school will see:

Loan Entrance Counseling COA - skewed

Estimated Cost of Attendance Per Year	\$1,622
Your estimated cost of attendance includes the following direct and indirect costs.	
Direct Costs ⓘ	
Tuition and Fees	\$700
Indirect Costs ⓘ	
Housing and Meals	\$711
Books and Supplies	\$65
Transportation/Misc.	\$146
Estimated Cost of School per Year	\$1,622
Expected Years to Complete	x 1 years
<hr/>	
Total Estimated Cost of Attendance	
\$1,622	

Document: [ED-2022-SCC-0026-0005](#)

Received: March 01, 2022

Posted: March 02, 2022

Category: Private/Non-Profit Institution of Higher Education

Submitter Information

Name: Brooke Kile

General Comment

SFA Survey - The proposed changes reflect the addition of "degree/certificate-seeking (DCS) and non-degree/non-certificate seeking (NDNCS) students" as a way to "simplify the calculation and provide a better [Pell grant recipient] percentage on College Navigator". Our institution has a very large population of second-bachelor degree students which is not accounted for in the SFA survey and results in a much lower percentage of Pell grant recipients at the overall undergraduate level than what is experienced by our first bachelor degree seeking students.

I encourage NCES to consider modifying Group 1, instead of those who are degree seeking or non degree seeking, as first-bachelor or lower degree seeking students.

Document: [ED-2022-SCC-0026-0006](#)

Received: March 02, 2022

Posted: March 03, 2022

Category: Institution of Higher Education

Submitter Information

Name: Lisa Smith

General Comment

I would like to request a new change for future IPEDS Graduation Rates and Graduation Rates 200. My institution is a community college that historically offered associate degrees as the highest level of completion; this year, we have been approved to offer two bachelor of applied science programs. Associate degree completers are still our largest population

of graduates. Now that our highest level of degree awarded is the bachelor's, our IPEDS Graduation Rates 150% of normal time to completion timeframe has been extended from 3 years to 6 years. We have heavily used the completion rate for 150% (3 years) time to completion in state and internal reporting for years, and it is a valuable rate for us and our fellow state community colleges. With this extended timeframe on which we must report, the cohort on which we are reporting is too old to be meaningful for decision-making. Other community colleges in my state have expressed this same difficulty. I request that the Graduation Rates and Graduation Rates 200 surveys be modified to allow institutions that offer multiple degree levels to report on multiple timeframes for 100%, 150%, and 200% of normal time to completion.

Document: [ED-2022-SCC-0026-0007](#)

Received: March 05, 2022

Posted: March 07, 2022

Category: Other

Submitter Information

Name: Mark Kantrowitz

General Comment

IPEDS does not currently include information about parent loans and private student loans. But, without this data, various U.S. Department of Education tools, such as College Navigator and College Scorecard, provide consumers with an incomplete picture of college affordability. IPEDS also does not provide information about average debt at graduation including these loans. The median debt figures are just for federal student loans, not parent or private loans. Also, the use of median figures does not provide a complete picture of the distribution of debt at graduation (10th, 25th, 50th, 75th and 90th percentiles would be help, as would the mean). Colleges have demonstrated an ability to collect this information, as it is included in the Common Data Set (CDS). Therefore, the U.S. Department of Education should consider adding information about private and parent loans to IPEDS.

Document: [ED-2022-SCC-0026-0008](#)

Received: March 13, 2022

Posted: March 14, 2022

Category: Other

Comment on FR Doc # 2022-04043

Submitter Information

Name: Eric Atchison

General Comment

See attached file.

Attachments



Mach 13, 2022

OMB ID: ED-2022-04043 (IPEDS 2022-23 Through 2024-25 Proposed Changes)

To whom it may concern:

Thank you for the opportunity to review the proposed changes to the Integrated Postsecondary Education System prepared by the National Center for Education Statistics. As the nation's only census of postsecondary institutions approved to offer Title IV federal student aid, this data collection and its forthcoming evolution should provide additional context and levels of detail related to shifts in the postsecondary environment. I applaud the work of NCES staff and the numerous contributors who developed each potential change.

I have attached to this letter a series of numbered comments responding to specific proposed changes or modification. Should you have any question or wish to discuss my comments further, please do not hesitate to contact me at eatchison@asusystem.edu.

Sincerely,

Eric S. Atchison
Vice President for Strategic Research
Arkansas State University System

Enclosure: Comments related to OMB ID: ED-2022-04043 (IPEDS 2022-23 Through 2024-25 Proposed Changes)



Comments related to OMB ID: ED-2022-04043 (IPEDS 2022-23 Through 2024-25 Proposed Changes)

Institutional Characteristics

Addition of new checkbox options in Student Services and language clarifications.

1. Please provide a definition of "Promise program".

12-Month Enrollment

Part C – Unduplicated count of dual enrolled students:

2. Remove reference to teacher preparation certificate program in the Reporting Reminders as this does not pertain to dual enrolled students:

"Even though Teacher Preparation certificate programs may require a bachelor's degree for admission, they are considered subbaccalaureate undergraduate programs, and students in these programs are undergraduate students"

Part D – Noncredit education:

3. Ensure unduplicated counts of noncredit enrollment is reported using similar reference to "unduplicated" language as in the Part D header and subheader as Part A (highlights added):

Part A - **Unduplicated** Count for Full-time Undergraduate Students
12-month **Unduplicated** Count by Race/Ethnicity and Gender - **Full-time Undergraduate Students**

FAQ:

4. Recommend including additional detail for assigning an enrollment status for students who enroll initially in the summer, do not enroll at any institution in the fall, and return to the institution in the spring. For example, "In the 2021-22 E12, report them as first-time and at whatever status (full-time vs. part-time) they are enrolled in Fall (or Spring if they did not enroll during Fall)."

Cross-Cutting

Gender – Student Surveys (E12, C, EF, GR)

5. While I recognize the importance of this data collection change, this change will create an entirely new reporting category for our state-wide and system-wide data systems which have already completed the majority of the Academic Year 2022 data collections. As of this writing, these data systems do not have the gender other (non-binary) reporting options and will not be



able to provide this detail in the 2022-2023 Completions and 12-Month Enrollment surveys. I recommend this cross-cutting item either be:

- (1) optional for 2022-2023 reporting and mandatory in 2023-2024, or
- (2) rescheduled to begin in the 2023-2024 reporting year, with 2022-2023 acting as a preview year.

SFA/GR/OM/EF/F/HR:

General Comment on Scheduling:

6. It appears the winter collection surveys are labelled as Spring Collection (p.12) and spring collection surveys are labelled as Winter Collection (p. 20). Please clarify if this is correct as this would produce an immense amount of burden to prioritize data collection and reporting to fit this revised schedule.

Document: ED-2022-SCC-0026-0009

Received: March 21, 2022

Posted: March 22, 2022

Category: Institution of Higher Education

Submitter Information

Name: Anonymous Anonymous

General Comment

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

- Absolutely! To make sure our delivery of post-secondary education is efficacious and inclusive, it is imperative that the government/Department collect data regarding a variety of aspects of said education. Accurate data collection is ESSENTIAL to the maintenance of good practices, as well as to making beneficial changes in current practices. Without data, we will flounder - and a floundering higher education system would not be beneficial for the future of our children or our country..

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

(a) The current IPEDS data gives an incomplete picture of people with disabilities at colleges and universities. IPEDS collects data on "undergraduates formally registered as students with disabilities," which primarily includes students who are already registered with disability services (generally, in order to receive accommodations). However, not all disabled undergraduate students formally register as having a disability. In fact, various forms of disability are widespread among college students - and relatively few of these students end up "making it official" by registering their disabilities with university services. Thus, collected data has not been representative of real-life student situations. Students with disabilities may choose not to officially register themselves for a variety of reasons, including thinking their disability isn't "bad" enough, not wanting to go through the giant hassle that is the registration process, and much more. Additionally, official registration involves a great deal of energy, time, stress, required consultation with medical professionals and school officials, and much more. This is a huge burden to place on the shoulder of disabled students. We cannot continue to place the onus of responsibility - for registration, for reporting educational conditions to the government, and so much more - on the shoulders of students who are already frequently marginalized, stigmatized, and overwhelmed due to dealing with their disability experiences. If it does not include students who are NOT officially registered with disability services, IPEDS data will end up being under-representative, and will misrepresent the realities of students today.

(b) Additionally, IPEDS does not collect disability data from graduate students, faculty, or staff - which seems like a large oversight. Data about these "categories" of people could provide very valuable insights.

(c) Expanded IPEDS disability data is necessary to identify and address inequities at higher education institutions. People with disabilities are a huge minority group in our country. Students with disabilities have unique needs, and you all are in a position to help. Please ask more questions, collect more data, and help our students flourish! Also, if there are questions about what questions to ask and what data to collect, please consult the disability community. Including disabled representatives in the processes of question formation and data collection is the first step towards getting more, better, and more useful information.

(d) In sum, IPEDS could improve disability data collection by:

- Expanding data collection on disability accommodations to include students NOT registered with disability services.
- Expanding data collection on disability accommodations to include graduate students, faculty, and staff.
- Adding disability questions as a core demographic element and collecting this information from all undergraduates, graduate students, faculty, and staff.
- Partnering with the disability community to develop strategies for developing questions, and collecting and utilizing data.

Thank you for your time and the important work you do!

Document: ED-2022-SCC-0026-0010

Received: April 01, 2022

Posted: April 04, 2022

Submitter Information

Name: Anonymous Anonymous

General Comment

I am pleased to see that NCES is recognizing the nuances of gender identity, but I strongly urge the use of less stigmatizing language than "gender other." Perhaps "students with another gender identity" would appropriate and respect the dignity of our nonbinary students.

Document: ED-2022-SCC-0026-0011

Received: April 01, 2022

Posted: April 04, 2022

Category: Community Organization

Submitter Information

Name: Lien Vu

General Comment

This is a great step in the right direction! I greatly appreciate NCES recognizing that gender is not binary, but a little more work can be done to have all questions be inclusive of nonbinary students. Another easy change is to use less stigmatizing language than "gender other" (such as "nonbinary students" or "students with another gender identity"). Being called "other" in any capacity is marginalizing and undermines your very effort to promote inclusivity.

Document: ED-2022-SCC-0026-0012

Received: April 01, 2022

Posted: April 04, 2022

Category: Federal Agency

Submitter Information

Name: Jay Garvey

General Comment

I appreciate revisions to IPEDS recognizing that gender is not a binary. Such a change will have important implications for policy, administrative initiatives, and longitudinal data collection/analysis. However, "gender other" is a harmful phrase that further stigmatizes nonbinary students by literally "othering" people. Current data practices in higher education instead promote phrases like "students with another gender identity" or "nonbinary students" (see <https://muse.jhu.edu/article/733633/summary> and <https://eric.ed.gov/?id=EJ1083988> for more information). I encourage more affirming (and less stigmatizing) gender language with these proposed IPEDS revisions.

Document: ED-2022-SCC-0026-0013

Received: April 01, 2022

Posted: April 04, 2022

Category: Other

Submitter Information

Name: Anonymous Anonymous

General Comment

I appreciate NCES efforts to recognize non-binary genders. However, the forms should include inclusive language rather than "gender other." Language like non-binary or gender-nonconforming is less stigmatizing.

Document: ED-2022-SCC-0026-0014

Received: April 01, 2022

Posted: April 04, 2022

Category: Four-Year Public Institution of Higher Education

Submitter Information

Name: Morgan Seamont

General Comment

I learned today of your progress in recognizing multiple genders beyond the binary. I applaud that effort but would highly encourage you to use more inclusive language than "gender other." More inclusive language and options could be added to respect and get an accurate representation of gender for this important data collection point.

Document: ED-2022-SCC-0026-0015

Received: April 01, 2022

Posted: April 04, 2022

Category: Four-Year Public Institution of Higher Education

Submitter Information

Name: Nic Francisco

General Comment

It's great that NCES/IPEDS will be collecting gender data beyond the binary categories of Man/Woman. This is really important for capturing more accurate data. That being said, it would be great if the additional category were less "othering." This could be as simple as changing to option language to "non-binary."

Document: ED-2022-SCC-0026-0016

Received: April 01, 2022

Posted: April 04, 2022

Category: Civil Rights

Submitter Information

Name: Anonymous Anonymous

General Comment

As the director of a campus LGBTQ+ center, I am thrilled NCES is recognizing gender is not a binary for the first time. However, using the harmful language of 'gender other' should be changed to 'students with another gender identity' or 'nonbinary.' Moreover, all questions must include nonbinary students. This population is growing at a significant rate at many institutions and needs to be included to truly represent who college students are today.

Document: ED-2022-SCC-0026-0017

Received: April 02, 2022

Posted: April 04, 2022

Category: Other

Submitter Information

Name: Leann Fenneberg

General Comment

I am really excited to see the proposed IPEDS data reporting being more inclusive of all gender identities. Thank you! With that said, I urge you to avoid the term "gender other" which can clearly be "other-ing" for people who are not on the gender binary.

Could you consider language such as nonbinary students? Or students who identify with another gender identity? Thank you for considering this important act of promoting inclusion.

Document: ED-2022-SCC-0026-0018

Received: April 04, 2022

Posted: April 06, 2022

Category: Other

Submitter Information

Name: Danielle Officer

General Comment

I appreciate NCES recognizing that gender is not a binary, but that they need to go further and have all questions be inclusive of nonbinary students. I encourage you to use less stigmatizing language than “gender other” (such as “nonbinary students” or “students with another gender identity”).

Document: ED-2022-SCC-0026-0019

Received: April 04, 2022

Posted: April 06, 2022

Category: Student

Submitter Information

Name: Katy Collins

General Comment

I appreciate NCES recognizing that gender is not a binary, but they need to go further and have all questions be inclusive of nonbinary students. Additionally, they could use less stigmatizing language than “gender other” (such as “nonbinary students” or “students with another gender identity”).

Document: ED-2022-SCC-0026-0020

Received: April 04, 2022

Posted: April 06, 2022

Category: Civil Rights

Submitter Information

Name: Christina Chala

General Comment

I want to say how much I appreciate NCES recognizing that gender is not a binary! But I also need to share that NCES needs to go further and have all questions be inclusive of nonbinary students. And NCES needs to use less stigmatizing language than “gender other.” Some suggested alternatives: “nonbinary students” or “students with another gender identity.” I am a university representative on a university wide LGBTQI+ Council, and this is very important to the work that we do to create a safe and inclusive learning environment for our students. Thank you!

Document: ED-2022-SCC-0026-0021

Received: April 04, 2022

Posted: April 06, 2022

Submitter Information

Name: Anonymous Anonymous

General Comment

Although I appreciate the recognition of non-binary folks, I believe the organization needs to go further and have all questions be inclusive of non-binary students. Additionally, using the term "gender other" is not appropriate. Consider shifting language to "nonbinary" or "student with another gender identity".

Document: ED-2022-SCC-0026-0022

Received: April 04, 2022

Posted: April 06, 2022

Category: Teacher

Submitter Information

Name: Anonymous Anonymous

General Comment

I appreciate NCES recognizing that gender is not binary, but you need to go further and have all questions be inclusive of nonbinary students. Studying LGBTQ+ students it is important to them that they are recognized for who they are.

Document: ED-2022-SCC-0026-0023

Received: April 04, 2022

Posted: April 06, 2022

Category: Teacher

Submitter Information

Name: Anonymous Anonymous

General Comment

I appreciate NCES recognizing that gender is not binary, but you need to go further and have all questions be inclusive of nonbinary students. Studying LGBTQ+ students it is important to them that they are recognized for who they are.

Document: ED-2022-SCC-0026-0024

Received: April 04, 2022

Posted: April 06, 2022

Category: Teacher

Submitter Information

Name: Anonymous Anonymous

General Comment

I appreciate NCES recognizing that gender is not binary, but you need to go further and have all questions be inclusive of nonbinary students. I study LGBTQ+ students and by being inclusive you help them to be recognized and seen. Gender other is not the answer and is not appropriate language.

Document: ED-2022-SCC-0026-0025

Received: April 04, 2022

Posted: April 06, 2022

Category: Institution of Higher Education

Submitter Information

Name: Andrew Eppig

General Comment

I strongly support the NCES changing its gender question to include non-binary students. This is a long-needed change to better support non-binary students. If possible, I would encourage NCES to change the "Gender other" category to two categories ("Gender non-binary" and "Gender different identity") to reduce stigma/othering and to allow for more specific reporting.

Document: ED-2022-SCC-0026-0026

Received: April 04, 2022

Posted: April 06, 2022

Category: Private/Non-Profit Institution of Higher Education

Submitter Information

Name: Kayla Lisenby

General Comment

While I appreciate the expansion of the gender data fields to include identities beyond man and woman, the phrasing 'Gender other' is stigmatizing and, quite literally othering, for the nonbinary, genderqueer, genderfluid, and additional diverse gender experiences that may select this marker. 'Nonbinary, genderqueer, or additional gender not listed' would be a more affirming use of language to support these students and gather this critical data.

Document: ED-2022-SCC-0026-0027

Received: April 05, 2022

Posted: April 06, 2022

Category: Individual

Submitter Information

Name: Nicholas Tapia-Fuselier

General Comment

I appreciate NCES recognizing that gender is not a binary, but NCES must have all questions be inclusive of nonbinary students. That inclusion would necessitate avoiding stigmatizing language such as "gender other." Items like "nonbinary students" or "students with another gender identity" would be much more appropriate and inclusive.

Document: ED-2022-SCC-0026-0028

Received: April 05, 2022

Status: Posted

Category: Student

Submitter Information

Name: Crystal Garcia

General Comment

Recognizing gender exists outside of the binary is a good step for NCES, however "gender other" is dehumanizing and reinforces stigmas for nonbinary students. I encourage NCES to use less stigmatizing language such as "gender nonbinary," "nonbinary students," or "students with another gender identity."

Document: ED-2022-SCC-0026-0029

Received: April 05, 2022

Posted: April 06, 2022

Category: Institution of Higher Education

Submitter Information

Name: Lynn Vidler

General Comment

I appreciate NCES recognizing that gender is not a binary, but you need to go further and have all questions be inclusive of nonbinary students.

Please use less stigmatizing language than "gender other" (such as "nonbinary students" or "students with another gender identity").

Document: ED-2022-SCC-0026-0030

Received: April 06, 2022

Posted: April 07, 2022

Submitter Information

Name: Staff Member

General Comment

While I think this provides for some great progress as it relates to recording the actual gender identities of our students, it would be great to see the assessment go further in aligning itself with the ways in which our students identify and the labels used. Minimally, we should move away from the othering language of using "other genders."

Document: ED-2022-SCC-0026-0031

Received: April 06, 2022

Posted: April 07, 2022

Category: Four-Year Public Institution of Higher Education

Submitter Information

Name: Sara Bliss

General Comment

Thank you for expanding the IPEDS gender category options to include students who identify outside of the gender binary. This will not be a burden for our institution whatsoever and will facilitate much needed updates in our data collection systems. I encourage you to please consider updating the proposed language from 'gender other' to language that is more inclusive such as 'non-binary' or 'students with another gender identity.' Based on a recent representative surveys at our large public R1 institution, we know that many of our students identify outside of the gender binary and that being referred to as 'other' has harmful effects on their well-being and our ability to support them throughout their college experience. I also encourage you to consider updating all other IPEDS questions/data fields to include affirming (not 'other') response options outside for students, faculty, and staff who identify outside of the gender binary. Thank you for your consideration of and attention to this important issue.

Document: ED-2022-SCC-0026-0032

Received: April 08, 2022

Posted: April 11, 2022

Category: Institution of Higher Education

Submitter Information

Name: Laura Driscoll

General Comment

I appreciate that NCES is recognizing that gender is not a binary, however please consider using less stigmatizing language as "gender other". I would suggest "nonbinary students" or "students with another gender identity"

Document: ED-2022-SCC-0026-0033

Received: April 10, 2022

Posted: April 11, 2022

Submitter Information

Name: Richard Romano

General Comment

I am a researcher who uses IPEDS in my work on higher education finance issues. A retired community college faculty/administrator, I am now an affiliated faculty member at the Cornell Higher Education Research Institute at Cornell

University and a research associate in the economics department at Binghamton University (SUNY). My brief comments are in reference to the language found in Appendix A concerning noncredit education.

In the last few years I have been writing about noncredit enrollments at the community college level, and thus I welcome your initiative to collect data on this important part of the community college mission. I believe that some of my research has been used to inform your decision to start collecting this new data. Information on the variables obtained will help us understand the role that noncredit courses play in training the modern workforce and in developing productive citizens. In addition, it is an important first step toward correcting an error within the IPEDS data which makes the per FTE figures used for research and benchmarking inaccurate.

Table 1- ICH 5, p. 6. You list developmental education but don't use the word remedial. In other places you use only the word remedial. These 2 terms may not be interchangeable. Decide if this is what you want or change all to--- developmental/remedial education.

Table 3, Part D- noncredit education, p. 10. I am worried about double counting here. Some remedial and ESL courses do not count toward a degree but are reported to IPEDS. They are offered for institutional credit and can be counted for financial aid purposes. Do you want the total of noncredit, non-degree enrollments or only those that are not currently reported to IPEDS?

Land Grant universities generate a lot of noncredit activity particularly through cooperative extension. This activity is often reported to the university and the state as noncredit enrollment. Do you want these reported to IPEDS? If not, give direction on this point. From my limited research, it appears that the revenues and expenditures from this activity are not in university budgets and thus not reported to IPEDS. In this case, in my opinion, noncredit enrollments/hours should not be reported.

Thank you again for your attention to this important addition to IPEDS. I look forward to using the results of your efforts.

Document: ED-2022-SCC-0026-0034

Received: April 11, 2022

Posted: April 12, 2022

Category: Association/Organization

Submitter Information

Organization: Campus Pride

General Comment

April 22, 2022

U.S. Department of Education Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25

On behalf of Campus Pride, the leading national nonprofit organization working to create a safer college environment for LGBTQ+ students, we would like to offer the following comments on NCES' proposed student survey question that asks, "Gender other (i.e., gender information is known but does not fall into either of the mutually exclusive binary categories provided [Men/Women])."

We feel that this change is critically important because more and more students are identifying as nonbinary. For example, the number of students identifying as trans or nonbinary on the American College Health Association's National College Health Assessment (NCHA) has nearly tripled in the last five years, with most of this increase because of the growth in respondents identifying as nonbinary. Other national surveys of college students, such as the Multi-Institutional Study of Leadership (MISL), the National Survey of Student Engagement (NSSE), the Student Experience in the Research University (SERU), and Cooperative Institutional Research Program (CIRP) Freshman Survey, also ask gender identity and have seen a significant increase in students indicating that they are nonbinary.

A growing number of institutions are collecting data on the gender identity of their students, especially with Common App now including an optional question on gender. The NCES change enables the colleges that currently collect data on gender identity to be able to share this information and it signals to other institutions that they should be collecting the data.

While we endorse the inclusivity offered by the addition of the category "gender other," we encourage you to change the name of the category to "nonbinary gender identity" or "another gender identity" to avoid the stigmatizing effect of referring to a group as "other."

Collecting cross-cutting data on the number of students who identify beyond a gender binary is an important change, but it is only a first step. NCES needs to include a nonbinary category in all IPEDS data tables, as the NCHA does in its reports. The importance of documenting the academic performance of students who identify as nonbinary is significant and should outweigh any additional institutional reporting burden.

Thank you for reading and considering our comments.

Sincerely,

Shane Windmeyer, Executive Director, Campus Pride
Genny Beemyn, Coordinator, Campus Pride Trans Policy Clearinghouse

Attachments



April 22, 2022

U.S. Department of Education Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25

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Collecting cross-cutting data on the number of students who identify beyond a gender binary is an important change, but it is only a first step. NCES needs to include a nonbinary category in all IPEDS data tables, as the NCHA does in its reports. The importance of documenting the academic performance of students who identify as nonbinary is significant and should outweigh any additional institutional reporting burden.

Thank you for reading and considering our comments.

Sincerely,
Shane Windmeyer, Executive Director, Campus Pride
Genny Beemyn, Coordinator, Campus Pride Trans Policy Clearinghouse

Document: ED-2022-SCC-0026-0035

Received: April 12, 2022

Posted: April 13, 2022

Category: Four-Year Public Institution of Higher Education

Submitter Information

Government Agency Type: State

Government Agency: SUNY - Binghamton University

General Comment

As an Assistant Director of a college LGBTQ+ Resource Center, I greatly appreciate the expansion of the gender data fields to be more inclusive of today's college students. However, the phrasing 'Gender other' is stigmatizing and, quite literally othering, for the nonbinary, genderqueer, genderfluid, and additional diverse gender experiences that may select this marker. 'Nonbinary, genderqueer, or additional gender not listed' would be a more affirming use of language to support these students and gather this critical data.

Document: ED-2022-SCC-0026-0036

Received: April 13, 2022

Posted: April 14, 2022

Category: Institution of Higher Education

Submitter Information

Organization: American College Health Association

General Comment

ACHA recommends adding the following questions to the IPEDS, with our reasoning in the following paragraphs:

- Does your institution provide students with access to health care, including through contractual arrangements with off-campus and/or external providers?
- Does your institution have a student health services center on campus?
- Does your institution provide students with access to mental health counseling, including contractual arrangements with off-campus and/or external providers?
- Does your institution offer mental health counseling services on campus?
- Does your institution offer health/well-being prevention education?
- If yes,
 - Does your health/well-being prevention education align with a holistic framework?
 - Is your health/well-being prevention education offered campus-wide?

IPEDS serves as the primary source for information on US colleges, universities, and technical and vocational institutions. As colleges have taken on a greater and more important role in helping ensure the health and well-being of its students, it is important that IPEDS include questions related to students' access to health care services and mental health counseling.

Introducing such a line of questions in data collection efforts would accomplish two goals: 1) providing the public with useful, comparable information regarding campus health and well-being services, and 2) allowing institutions to better assess their impact on fostering student well-being.

To decide which institution provides any given student the best chance of success, it is important to provide a wide degree of information from which to make such a decision. As students evaluate their various needs and wants, having information regarding an institution's available health and well-being services could serve as important factors, particularly for students with disabilities and/or other health and well-being needs. Including questions about such in IPEDS fits with the goal of providing important data to students and parents.

Additionally, including questions related to health and well-being services can help colleges make an honest assessment and review of their services to help inform the allocation of time and resources to help improve their students' health and

well-being. In this way, including questions related to student health and well-being can lead to improvements of student populations' academic performance, physical well-being, and mental health.

Now more than ever, we must work on supporting all aspects of our college students' health. Currently, the college student population in the United States faces a wide array of adverse factors that can impact their academic performance and health. Recent data collected by the nationally recognized Healthy Minds Survey finds that nearly half of all college students (47%) are struggling with clinically-significant anxiety or depression, but only 40 percent of those students have had any mental health counseling or therapy in the past year. Furthermore, research from the Hope Center for College, Community, and Justice shows that one in three students experience anxiety, and one in three experience depression. These mental health concerns are urgent and require our attention.

Access to physical and mental health care can often be difficult for students. Increasing rates of mental health concerns, crises, and diagnoses have demonstrated that students often cannot access the resources and treatment they need. Additionally, disparities in access to health care further exasperate the situation. For example, underrepresented students, especially Black, Latinx, and LGBTQ students, face much greater barriers to accessing mental health resources and treatment. The conglomeration of all these factors impact our students and therefore require institutions to adapt and provide the necessary care to maintain the health and well-being of the student population.

For more detailed input and comments please see enclosed letter under the attachment sections.

Attachments



To: US Department of Education
From: James Wilkinson, CEO
Date: April 13, 2022
Docket: ED-2022-SCC-0026
Re: Integrated Postsecondary Education Data System (IPEDS) Comment

To Whom It May Concern:

The American College Health Association (ACHA) extends its gratitude to the US Department of Education for seeking input relating to updating the Integrated Postsecondary Education Data System (IPEDS). To begin, please let me provide some background information on our organization. Since 1920, ACHA has served as the voice for college student health and wellness. Through advocacy, research, and education, ACHA stands at the forefront of issues that impact the health and wellness of college students.

ACHA membership includes:

- **685 institutional members** that represent the diversity of the higher education community – four-year public and private universities, community colleges, minority-serving institutions, faith-based institutions, and schools in all US states and territories.
- **8,402 individual health and wellness and higher education professionals** – physicians, physician assistants, administrators, nurses, nurse practitioners, mental health professionals, health educators, dietitians and nutritionists, pharmacists, faculty and other staff, and student affairs professionals, as well as students dedicated to health promotion on their campuses.
- **Sustaining members** – corporations and nonprofit organizations that are interested in being more connected with the college health field.

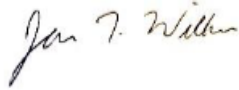
With more than 20 million students attending US colleges and universities, higher education not only has a responsibility to provide health care for a diverse population, but it also has the unique opportunity to enhance health of individuals and communities. ACHA is uniquely poised to bring this perspective to the Department of Education. To that end, ACHA recommends adding the following questions to the IPEDS, with our reasoning in the following paragraphs:

- **Does your institution provide students with access to health care, including through contractual arrangements with off-campus and/or external providers?**
- **Does your institution have a student health services center on campus?**
- **Does your institution provide students with access to mental health counseling, including contractual arrangements with off-campus and/or external providers?**
- **Does your institution offer mental health counseling services on campus?**
- **Does your institution offer health/well-being prevention education?**
 - **If yes,**
 - **Does your health/well-being prevention education align with a holistic framework?**
 - **Is your health/well-being prevention education offered campus-wide?**

IPEDS serves as the primary source for information on US colleges, universities, and technical and

ACHA stands ready to continue to work with the Department on this and other matters for the continuous improvement of the health and wellbeing of our college campuses and communities.

Sincerely,



James Wilkinson, MA CAE (he / him / his)
CEO

American College Health Association
jwilkinson@acha.org (410) 859-1500

Document: ED-2022-SCC-0026-0037

Received: April 18, 2022

Posted: April 19, 2022

Submitter Information

Name: Bonnielin Swenor

General Comment

The current IPEDS data gives an incomplete picture of people with disabilities at colleges and universities. IPEDS collects data on "undergraduates formally registered as students with disabilities", which primarily includes students registered with disability services to receive accommodations. However, not all disabled undergraduate students formally register as having a disability, and IPEDS does not collect disability data from graduate students, faculty, or staff.

Expanded IPEDS disability data is necessary to identify and address disability inequities in higher education. IPEDS could improve disability data collection by:

- (1) Expanding data collection on disability accommodations to include graduate students, faculty, and staff;
- (2) Adding disability questions as a core demographic element and collecting this information from undergraduates, graduate students, faculty, and staff; and (3) Partnering with the disability community to develop strategies for collecting and utilizing these data.

Document: ED-2022-SCC-0026-0038

Received: April 20, 2022

Posted: April 21, 2022

Submitter Information

Name: kate jerman

General Comment

As someone for whom NCES data is very important and who wishes, almost daily, that the data were more inclusive, I applaud this change. I appreciate NCES recognizing that gender is not a binary, but this needs to go further and have all questions be inclusive of nonbinary students.

I also encourage NCES to use less stigmatizing language than "gender other". Alternatives could include "nonbinary students" or "students with another gender identity"). These changes are significant improvements to the way NCES currently collects data and I encourage their adoption as fast as possible.

Document: ED-2022-SCC-0026-0039

Received: April 21, 2022

Posted: April 25, 2022

Category: Institution of Higher Education

Submitter Information

Name: Cortney Johnson

General Comment

I appreciate NCES recognizing that gender is not a binary, but that you need to go further and have all questions be inclusive of nonbinary students.

Please use less stigmatizing language for students who may not identify with the options you give, “gender other” is not acceptable. You could use “nonbinary students” or “students with another gender identity”.

Document: ED-2022-SCC-0026-0040

Received: April 22, 2022

Posted: April 25, 2022

Category: Association/Organization

Submitter Information

Organization: Advance CTE & ACTE

General Comment

On behalf of Advance CTE, the nation’s longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories and the Association for Career and Technical Education (ACTE), the nation’s largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, we are writing in response to proposed changes to future planned data collections as part of the Integrated Postsecondary Education Data System (IPEDS).

As you are aware, IPEDS is a key source of information about program enrollments, completion, equity and other important aspects of the nation’s postsecondary education system. These data provide critical insights into how our collective postsecondary education investments impact learners and, equally as vital, this information can help families and students themselves navigate complex systems to make choices that best meet their unique needs.

To help in meeting these important goals, our organizations were strongly encouraged by the proposed changes related to noncredit education, student employment, dual enrollment and financial aid data on non-degree-seeking learners. We have provided full comments in the attached PDF.

In addition, our organizations have broader recommendations for future IPEDS data collections that we believe will help educators and policymakers better leverage data for change, including disaggregation across survey components by race/ethnicity, gender identity and disability status as well as requiring Outcome Measures for non-degree-granting institutions.

Please see our full response in the attached PDF. We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE’s Research Director, Catherine Imperatore (cimperatore@acteonline.org), or Advance CTE’s Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,
LeAnn Wilson
Executive Director
ACTE

Kimberly A. Green
Executive Director



April 22, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20024

***In re: Agency Information Collection Activities; Comment Request; Integrated
Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25
(ED-2022-SCC-0026-0001)***

Dear Stephanie Valentine,

On behalf of Advance CTE, the nation's longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories and the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, we are writing in response to proposed changes to future planned data collections as part of the Integrated Postsecondary Education Data System (IPEDS).

As you are aware, IPEDS is a key source of information about program enrollments, completion, equity and other important aspects of the nation's postsecondary education system. These data provide critical insights into how our collective postsecondary education investments impact learners and, equally as vital, this information can help families and students themselves navigate complex systems to make choices that best meet their unique needs.

To help in meeting these important goals, our organizations were strongly encouraged by the following proposed changes:

Noncredit education: For far too long our understanding of noncredit course offerings has been limited by the lack of comprehensive and standardized data regarding these efforts, which often include CTE and other career-oriented coursework. The newly proposed collection of noncredit educational course offerings and related enrollments at institutions will develop a baseline set of information and serve as an important step in better understanding and improving these offerings.

In response to the Department's directed question about disaggregation of noncredit education data, we recommend that these data be disaggregated by race/ethnicity as well as by gender

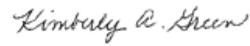
that prepare youth and adults for careers, it is vitally important that we expand our understanding of how non-degree-granting institutions, such as area technical centers, are serving learners.

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Research Director, Catherine Imperatore (cimperatore@acteonline.org), or Advance CTE's Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,



LeAnn Wilson
Executive Director
ACTE



Kimberly A. Green
Executive Director
Advance CTE

Document: ED-2022-SCC-0026-0041

Received: April 22, 2022

Posted: April 25, 2022

Category: Education Consultant

Submitter Information

Name: Richard Voorhees

General Comment

I salute efforts at the National Center for Education Statistics to begin to collect noncredit enrollment data through one or more of the mandatory surveys that are part of the Integrated Postsecondary Education Data System (IPEDS).

Attachments



April 22, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer,
Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBJ, Room 6W208B
Washington, DC 20202-8240

OMB ID: ED-2022-04043 (IPEDS 2022-23 Through 2024-25 Proposed Changes)

Dear Ms. Valentine,

I salute efforts at the National Center for Education Statistics to begin to collect noncredit enrollment data through one or more of the mandatory surveys that are part of the Integrated Postsecondary Education Data System (IPEDS).

Following a career in higher education, I founded Voorhees Group LLC, a consultancy that seeks to assist higher education institutions and organizations to create actionable data and informed decisions to meet evolving challenges. I also am past president of the Association for Institutional Research, a 4,000+ membership organization whose mission includes leveraging data, analytics, information, and evidence to make decisions and take actions that benefit students and institutions and improve higher education. In 2019, I was awarded the Sidney Suslow award for significant scholarly contributions higher education.

One such contribution, of which I was the lead author, is the first nationwide profile of noncredit education entitled, *The Hidden College: Noncredit Education in the United States*.¹ That monograph intended to document institutional efforts to provide education opportunities in workforce development, remedial or developmental education, and other offerings that occur largely "off the books" and out of view of educational leaders and policymakers. The intervening years have witnessed similar efforts to capture the range of noncredit education. However—and as certainly was the case with the *Hidden College*—we currently have, at best, a fragmented picture of noncredit education because of low institutional response rates to private surveys. A

¹ <https://www.voorheesgroup.org/voorheesgroup-pubs/Hidden%20College.pdf>

serious federal effort to understand these data has been lacking to date. The mandatory nature of IPEDS will go a long way to filling out that picture.

The proposal that IPEDS add two new questions asking for institutions to count students enrolled in noncredit education and to disaggregate those data by gender and race/ethnicity is both reasonable and do-able. My direct work with higher education institutions suggests this reporting will not constitute an overly burdensome requirement since these data are already known internally. The recent Higher Education Emergency Relief Fund (HEERF) data collection process demonstrates institutional capability to collect these data.

My experience is that asking these two questions at this point will increase the dialog within institutions as they seek to conceptualize and document their total contributions to workforce development, literacy, and other offerings that engage a wider swath of learners than is now captured by current IPEDS surveys solely focused on just the credit side. This is a rare opportunity for institutions and systems of higher education to document holistically how they serve all learners and to share the same with the public.

After these two rather rudimentary questions become part of the IPEDS universe and as more is learned about other missing elements in higher education accountability, it is very likely that significant questions about noncredit education will arise. Future data collection might become more refined and perhaps elaborate. For now, however, it is important not to let these future questions obscure the focus on collecting simple data on unduplicated headcount for noncredit enrollment disaggregated by gender and race/ethnicity. This journey must begin now with simple and transparent steps.

I close by congratulating NCES staff and members of the Technical Review Panel for their commonsense approach to helping higher education understand the vital role of noncredit education in the United States. Your efforts are most appreciated!

Respectfully,

A handwritten signature in blue ink that reads "Richard A. Voorhees".

Richard A. Voorhees, Ph.D.
Principal, Voorhees Group LLC

Document: ED-2022-SCC-0026-0042

Received: April 22, 2022

Posted: April 25, 2022

Category: Private/Non-Profit Institution of Higher Education

Submitter Information

Name: Anonymous Anonymous

General Comment

Although I welcome the inclusivity of adding an additional gender category, it will be highly burdensome for our institution to implement this reporting accurately in the 2022-2023 reporting year. Our current collection and data processing of sex/gender data is not designed to support this survey change. Updating our systems to collect this additional data, resurvey our existing population, and feed the information through our data and reporting flows requires a significant investment of time and coordination across multiple university offices. To get such instruments in place over the summer would require a serious scramble, and would likely result in poor data quality this first year anyway. Therefore, we would greatly prefer this change to wait (or be optional) until the 2023-2024 or 2024-2025 reporting cycles.

Document: ED-2022-SCC-0026-0043

Received: April 22, 2022

Posted: April 25, 2022

Submitter Information

Organization: Lumina Foundation

General Comment

Please see the attached letter for comments.

Attachments



April 22, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer,
Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBI, Room 6W2088
Washington, DC 20202-8240

RE: Request for Comments from the Department of Education (87 Federal Register 10777)

Dear Ms. Valentine,

I am pleased to respond to the Department of Education's Request for Comments on the *Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25*. A call for comments was published in the *Federal Register* on February 22, 2022.

I serve as the strategy director for data and measurement at Lumina Foundation, an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school available to all. In that role, I focus on ensuring that data and data analysis help us better understand issues that affect student learning and educational attainment.

In sum, Lumina supports the changes proposed. We also appreciate the collaborative process the Department used to formulate those proposals. I want to thank the members of the Department for engaging in thoughtful, open dialogue with subject matter experts, institutional leaders, and interested parties. Their willingness to learn was genuine, and it is reflected in the quality of the product: a critical package of proposed changes to our nation's postsecondary data infrastructure.

The purpose of this letter is twofold: first, to comment on proposed changes in the collection of data on noncredit students; second, to respond directly to the questions presented in Appendix D. This input is informed by the expertise of researchers, associations, organizations, and foundation partners. It also reflects my own experience—as a member of NCSIP's National Postsecondary Education Cooperative and NCSIP's Interagency Working Group on Expanded Measures of Enrollment and Attainment, and in senior leadership roles for two postsecondary governing boards and two national associations.

Proposed Changes Related to Noncredit Data

Noncredit education, often called the "Hidden College," has long been a critical function of higher education, particularly in community colleges. The proposed data collection would finally recognize this critical function, affirming and validating the efforts of those who work every day on the front lines of colleges and universities. No longer will their contributions be hidden. The proposed collection of noncredit headcount enrollments will help us better understand how our nation's education system responds to local workforce, pre-academic and community needs. However, it must be noted that many survey items discussed in Technical Review Panel 62 are not addressed in this OMB package. We look forward to continued efforts to resolve the related issues focused on financing, human resources, and completion surveys.

would also support the federal government's [Federal Data Strategy](#). Conscious Design Principles to Ensure Relevance, Harness Existing Data, Anticipate Future Uses and Demonstrate Responsiveness.

Nonresident Students, Gender, and Admission Survey

The OMB package would retain a "nonresident alien" field alongside the race/ethnicity categories. Lumina does not support such an approach. The inclusion of a nonresident alien field creates confusion while erasing the identities of some students. My conversations with institutional research professionals suggest race/ethnicity data are collected—only to be removed when reporting to IPEDS. In addition to shortchanging students, this unnecessarily burdens institutions, which must reclassify students.

One institution shared data with me to reinforce this point. Its statistical portrait showed 59 percent of the institution's enrolled students identified as students of color. However, when identities were reclassified for IPEDS, the proportion fell to 53 percent. Such differences—which the proposals would solidify as required practice—have direct, negative effects on those students of color whose identities would be erased and the colleges and universities that educate them, as noted in comments from The President's Alliance on Higher Education and Immigration and the Postsecondary Education Data Collaborative.

The OMB package proposes changes to the collection of gender data that allow the inclusion of students for whom gender identity is unknown. Recognizing the unresolved issues surrounding the collection of sexual orientation and gender identity data at the federal level, Lumina supports these changes. We believe the proposed approach allows students to represent their true selves without imposing an undue burden on institutions.

Finally, we support the proposed addition of two percentile bands to the Admission Survey, as that would offer more information with minimal effort. This change would present a clearer picture of the distribution of admitted students, which would benefit the field.

Lumina appreciates the opportunity to comment on an earlier version of the survey, to engage in conversations with staff, and the public outreach. We submit this letter to support the evolution of IPEDS. In many ways, IPEDS is a model data-collection effort. It provides valuable information for researchers, policymakers, and the public—information that is crucial to the effort to make opportunities for learning beyond high school available to all.

Sincerely,

Christopher M. Mullin, Ph.D.
Strategy Director for Data and Measurement
Lumina Foundation
30 S. Meridian St., Suite 700
Indianapolis, IN 46204

After two technical review panels 11 years apart and informed by years of conversation with the field, the Department proposes two changes to IPEDS: one to the Institutional Characteristics survey, and the second to the 12-month Enrollment survey.

Institutional Characteristics

First, in Part C of the Institutional Characteristics survey, the data-collection proposal will allow institutions to identify the types of noncredit they offer.

The Institutional Characteristics header screen presented on Pages 20-25 could be edited slightly to add clarity and improve continuity between Question 1 of Part A and Question 5 of Part D.

- Question 1 of Part A, focused on Educational Offerings, implies that the choices reflect credit-bearing instruction/programs. Making this explicit would increase the accuracy of responses.
- Question 5 of Part D, focused on noncredit education, presents institutions with a range of options to select. To enhance consistency and clarity, the "Continuing Education/Professional Education" option could either mirror the language used in Question 1 of Part A ("Continuing professional [postbaccalaureate only]") and maintain consistency with the definition presented in the IPEDS Glossary (p.13) or be removed altogether.

12-Month Enrollment

In Part D of the 12-month enrollment survey, the Department proposes to collect a single count of noncredit students. This proposal, which represents a significant improvement over current practice, is one that Lumina fully supports. However, when compared to the changes proposed for dual enrollment, it seems minimal—particularly after 14 years of consideration.

Appendix D: Direct Questions

In Appendix D of the OMB package, the Department solicited feedback on four topics: adding race/ethnicity data to the collection of noncredit student enrollments; classification of undocumented students; reporting on gender, and changes to the admissions survey.

Race/Ethnicity for Noncredit Students

As stated in our comments to the Department regarding Technical Review Panel 62, Lumina fully supports collecting demographic detail for noncredit headcount enrollment that is consistent with existing credit headcount enrollment and proposed changes for dual enrollment. Disaggregating the data would help unmask the pervasive inequities in our systems as identified by the [Advisory Committee for Equitable Policymaking Processes](#).

Question 1a asks if institutions will have data on race/ethnicity and gender to report on noncredit enrollment. The evidence suggests many do. For example, the pre-read paper for the technical review panel produced by [Coffey Consulting](#) (2019) found noncredit data were reported in 38 states. In cases where noncredit data are not collected, third-party entities can help fill this gap. For instance, [Ed2Go](#), which offers online courses in partnership with more than 2,000 institutions and 100 workforce agencies, could modify its login screen to capture the demographic detail required in the proposed changes. This would go a long way toward providing any missing demographic data to institutional partners.

Question 1b asks whether reporting would be simplified if IPEDS were to collect noncredit information. Again, the answer is yes. Once an institution collects demographic enrollment data, that data can be used for a variety of reporting purposes besides IPEDS. For example, the Department of Labor's "[Participant Individual Record Layout](#)" data-collection instrument requires gender and race/ethnicity data to be reported for participants in workforce programs—many of which are offered by postsecondary institutions as noncredit courses. As such, the collection of headcounts by race/ethnicity and gender would simplify reporting for a range of federal programs. Moving toward aligned data systems

Document: ED-2022-SCC-0026-0044

Received: April 22, 2022

Posted: April 25, 2022

Category: Institution of Higher Education

Submitter Information

Name: Anonymous Anonymous

General Comment

RE "Test scores percentile collection in Admissions survey component" - with so many institutions either going test-optional or removing this requirement altogether, this SAT and ACT scores are becoming less and less relevant. For those students who choose to report their scores, most likely it will skew to the higher scores, thus invalidating this measure. Adding 10th and 90th percentiles just adds to our reporting burden. I suggest removing this section completely. If it will stay, then add a field indicating how many students (percent of admitted students) the scores represent.

Document: ED-2022-SCC-0026-0045

Received: April 22, 2022

Posted: April 25, 2022

Category: Institution of Higher Education

Submitter Information

Name: Anonymous Anonymous

General Comment

Gender question being proposed:

RE "Of the total students reported, how many students did you allocate to a binary gender category (Men/Women) because their gender was unknown or other than the provided categories?" - why ask another question? It would be more efficient to expand the gender categories.

Document: ED-2022-SCC-0026-0046

Received: April 25, 2022

Posted: April 25, 2022

Category: Other

Submitter Information

Name: Ty McNamee

General Comment

I feel as though this change is unnecessary and harmful. Undocumented students do have racial/ethnic identities, just as we all do. It is harmful because it could skew data as to how many students of color are being served at an institution. It also seems like a way for the government to track and punish undocumented students and their families, further creating fear for these people.

Document: ED-2022-SCC-0026-0047

Received: April 25, 2022

Posted: April 26, 2022

Category: Four-Year Public Institution of Higher Education

Comment on FR Doc # 2022-04043

Submitter Information

Organization: University of California System

General Comment

Please see attached letter.

Attachments

UNIVERSITY OF CALIFORNIA

April 25, 2022
Page 2

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SANTA BARBARA • SANTA CRUZ

OFFICE OF THE VICE PRESIDENT - GRADUATE AND UNDERGRADUATE AFFAIRS
AND VICE PROVOST - EQUITY, DIVERSITY AND INCLUSION

OFFICE OF THE PRESIDENT
1111 Franklin Street
Oakland, California 94607-5200

April 25, 2022

Stephanie Valentine
PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW
LBJ. Room 6W208B
Washington, DC 20202-8240

Re: Docket ID Number [ED-2022-SCC-0026], Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25

Dear Ms. Valentine:

On behalf of the University of California (UC), thank you for the opportunity to comment on the U.S. Department of Education (ED) proposed information collection request for the Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25.

The University of California benefits the nation through world-class educational opportunities, groundbreaking research, top-rated health care, a firm commitment to public service, and agricultural expertise. The UC system consists of 10 campuses, six academic health centers, three national laboratories, and a statewide agriculture and natural resources division. UC is also involved in the management of three national laboratories on behalf of the U.S. Department of Energy. The University is home to more than 285,000 students, 227,000 faculty, staff, and other academics, and more than 2 million living alumni.

UC is offering comments on two components of your proposed information collection changes: undocumented students and nonbinary students. I will begin with undocumented students. Undocumented students can be found across the 10 campuses and making profound contributions to the UC community and across California. UC's unwavering support of undocumented students is evidenced by our legal filing in federal court that challenged the executive order that attempted to rescind the Deferred Action for Childhood Arrivals (DACA) in 2017. In 2020, the U.S. Supreme Court ruled in favor of UC and struck down the federal government's attempt to end the program.

California is also home to over 2 million undocumented immigrants — more than any other state, with the largest percentages hailing from Latin America and Asia. According to 2017 data from the Education Trust-West, California preschool and K-12 schools enroll about 250,000 undocumented children ages 3-17. As a result, many of these students will matriculate to California's esteemed public higher education institutions, where a majority will graduate with a

bachelor's degree. With this perspective in mind, we respectfully request that the Department of Education require that all undocumented students, both those with DACA and those without, be reported in IPEDS within their race and ethnicity. The Department of Education guidance, as written, inaccurately groups DACA recipients with international students (who do not have their race and ethnicity reported) and non-DACA undocumented students as "race and ethnicity unknown." UC believes recognizing and serving our undocumented students is fundamental to our mission as an institution of higher education rooted in access and equity.

UC is home to five Hispanic Serving Institutions (HSI) with the remaining four undergraduate institutions being recognized as Emerging HSIs. UC also has two Asian American Native American Pacific Islander Serving Institutions (AANAPISI)-designated campuses with several more eligible that will eventually be applying for designation. UC is very proud that as a research-intensive public university, it is able to balance its goals for access and equity. It is critically important that UC be able to consider the race and ethnicity of its undocumented (including DACA) students in applying for the discretionary HSI and AANAPISI grant programs because academic support services designed for persistence and completion of degrees do not segregate based on a student's immigration status. Finally, UC applauds the decision to discontinue use of the term "alien" in reference to undocumented students.

Second, UC expresses support for the proposal to include an additional question on the number of students whose gender does not conform to the binary male or female categories. This is a step in the right direction of eventually allowing institutions to report their official enrollment and completion data based on a more expanded set of gender identity categories that more closely match the reality of how students identify. While UC appreciates the National Center for Education Statistics (NCES) recognizing that gender is not a binary, we believe they need to go further and have the actual data collection questions be inclusive of nonbinary students. More than 3,000 UC students identify as a nonbinary gender, and our public reporting reflects this gender diversity. UC looks forward to when the federally reported data matches how institutions represent their students. Similar to the discontinuation of the term "alien," NCES should use less stigmatizing language than "gender other" to identify nonbinary students. UC suggests "nonbinary students" or "students with another gender identity."

Thank you for considering the University of California's comments. If you have any questions regarding these comments, please contact Chris Harrington, associate vice president for federal governmental relations, at Chris.Harrington@ucd.edu or 202-997-3150.

Sincerely,

Yvette Gullatt
Vice President for Graduate and Undergraduate Affairs and
Vice Provost for Equity, Diversity and Inclusion

cc: Senior Vice President Colburn, External Relations and Communications
Associate Vice President Harrington, Federal Governmental Relations

Document: ED-2022-SCC-0026-0048

Received: April 25, 2022

Posted: April 26, 2022

Category: Institution of Higher Education

Submitter Information

Name: Andy Cofino

General Comment

I greatly appreciate that NCES is finally recognizing nonbinary people (in alignment with many state and federal laws/policies), but the language of "gender other" is inaccurate and stigmatizing. Instead, to be consistent with law, "nonbinary" would be appropriate. Or you can say: "students with another gender identity." This would allow for consistency with law, more accuracy, and language that does not further marginalize an already highly marginalized student population.

Attachments

Screenshot

Gender collection in student surveys

2. In the current package, NCES is proposing a separate collection of "gender unknown" and "gender other than provided categories (Men/Women)" in the student surveys that are currently collected by gender (C, E12, EF, GR). NCES has taken this approach because collecting all screens currently collected by gender by these additional categories would lead to a major increase in burden for institutions. This approach will help NCES to better understand the number of students that do not currently fit within the provided categories and the types of institutions most impacted by this type of change.
 - a. Does your institution currently collect gender other than Men/Women? If so, please indicate your institution type (e.g., 4-year public, 2-year non-degree-granting, etc.).
 - b. Could your institution report all the existing screens in the student surveys by the categories "gender unknown" and "gender other than provided categories (Men/Women)" if it were to be required? If so, would it increase or decrease institutional burden?

Gender question being proposed:

Of the total students reported, how many students did you allocate to a binary gender category (Men/Women) because their gender was unknown or other than the provided categories?

	Number of students	
	Undergraduate students	Graduate students
Grand total [Preload]		
Gender unknown (i.e., gender information is not known or not collected).	<input type="text"/>	<input type="text"/>
Gender other (i.e., gender information is known but does not fall into either of the mutually exclusive binary categories provided [Men/Women]).	<input type="text"/>	<input type="text"/>
Total of Gender unknown + Gender other [Calculated value]		
Total of Students for whom gender is known and falls into one of the mutually exclusive binary categories provided [Men/Women] [Calculated value]		

Document: ED-2022-SCC-0026-0049

Received: April 25, 2022

Posted: April 26, 2022

Category: State Advocacy Organization

Submitter Information

Name: Elizabeth Brand

General Comment

The proposed changes to IPEDS reporting regarding making undocumented students as "race/ethnicity unknown" or "non resident" is more than a bad idea. Not only will it skew racial counts needed for institutions to qualify for federal funding as MSIs, but it also opens the door for some of the most marginalized students to be targeted should a governing body decide to do so. These changes must not occur.

Document: ED-2022-SCC-0026-0050

Received: April 25, 2022

Posted: April 26, 2022

Category: Other

Submitter Information

Name: Anonymous Anonymous

General Comment

-The definition of race/ethnicity in IPEDS should be updated. Race and ethnicity have nothing to do with citizenship. As such, the race/ethnicity glossary definition should remove this language: "The designations are used to categorize U.S. citizens, residents aliens, and other eligible noncitizens." Race/ethnicity should be applied to all students, regardless of citizenship or immigration status. It should not be limited only to those who are authorized to be in the US. This will do two things: 1. It will accurately quantify how many BIPOC students an institution has, which will more accurately determine which schools are minority-serving institutions. 2. It will not 'out' anyone based on their immigration status or lack of legal status.

-In addition, the proposal to classify the race/ethnicity of undocumented students that don't have DACA as 'race/ethnicity unknown' should be removed. This proposed guidance (FAQ #20) combines race/ethnicity with immigration status when they are two separate things. I propose that you remove this FAQ completely. In addition, many institutions do not know when a student is undocumented - asking them to categorize a student as undocumented puts them in a position to ask about immigration status when it is unnecessary - especially in states like Washington, where the AG's office has advised institutions to not ask immigration status questions when possible.

Document: ED-2022-SCC-0026-0051

Received: April 25, 2022

Posted: April 26, 2022

Category: Institution of Higher Education

Submitter Information

Government Agency Type: State

Government Agency: University of Maryland President's Commission on LGBTQ+ Issues

General Comment

On behalf of the University of Maryland's President's Commission on LGBTQ+ Issues I am providing the attached letter of support for expanding gender reporting fields to more accurately collect data on trans and non-binary students in higher education.

Attachments

The President's Commission on LGBTQ+ Issues at the University of Maryland College Park respectfully submits this formal comment on The Integrated Postsecondary Education Data System and recommends that non-binary identities be represented and included in aggregate federal reporting. Since 2017, the U.S. has issued X-marker driver's licenses, and since 2021, the federal government has issued passports with the X gender marker, substantiating that the X marker is a legal sex option in federal data collection and document systems. This X option has allowed individuals who do not identify with a specific sex and who do not have identities that fall within a male/female binary to more accurately share their identities.

In June 2017, the first jurisdiction in the U.S. began issuing X-marker driver's licenses. Since that time, 20 states and DC now issue X-marker driver's licenses and government IDs ("Identity Document Laws and Policies"). The federal government also began issuing X-marker passports in October 2021. Effective October 1, 2019, Maryland state law was amended to clarify that the X marker must be a legal sex option, describing it as the "applicant's sex" and describing the "X" as "unspecified or other," meaning it could dually serve the purpose of allowing someone to not specify a sex, but also recognizing that other identities do not fit into a M/F binary. (<https://legiscan.com/MD/text/SB196/2019>)

The University of Maryland College Park has been collecting data for individuals who identify as non-binary since 2017; however, we are unable to report these data to the Integrated Postsecondary Education Data System (IPEDS) because the system has not adopted a non-binary gender reporting option. The reliance on binary reporting systems of sex/gender as solely male or female further contributes to the erasure of non-binary students and continues to obfuscate their experience in higher education, serving as a potential non-discriminatory barrier to the access and completion of post-secondary education. This is particularly consequential when the number of people who identify as transgender, non-binary, or gender diverse is larger with each subsequent generation of youth (>3% of Generation Z according to recent CDC data). Governmental and national reporting systems, including IPEDS, determine who is made visible in the U.S. Department of Education's data, and consequently decides who is able to receive financial support and resources.

The reporting of non-binary gender is also necessary to help enforce Title IX's prohibition on discrimination on the basis of sex, which includes discrimination based on sexual orientation and gender identity. We believe that this forced exclusion of non-binary identity in government and national data sources is a violation of civil and international human rights.

We are proud of the various steps that the University of Maryland and the federal government have taken to further the inclusion of non-binary gender identities. Simultaneously, we find that the exclusion of non-binary data from federal reporting impacts the lived experiences of such students and further limits understanding, resources, and advocacy to support their access and persistence in systems of education. Thus, we are hopeful that there will be continued action by the federal government toward achieving more inclusive and equitable data reporting practices and policies, and that the IPEDS will consider updates to their reporting to include non-binary gender.

The members of the President's Commission on LGBTQ+ Issues at the University of Maryland College Park stand with other universities in support of federal data collection including individuals who identify as non-binary, a category not currently supported by IPEDS. The recommendations that we make for the inclusion of non-binary data in federal reporting are rooted in a desire to express our support for non-binary individuals and to expand the range—and value—of social identities the U.S. Department of Education currently surveys.

"Identity Document Laws and Policies." Movement Advancement Project, 2022.
<https://www.lgbtmap.org/equality-maps/identity-document-laws>

Sincerely,

Dr. Jessica Fish (she/her), Co-Chair of the UMD President's Commission on LGBTQ+ Issues, Assistant Professor, School of Public Health

Ron Padrón (he/him), Co-Chair of the UMD President's Commission on LGBTQ+ Issues, Director of Undergraduate Operations, College of Information Studies

Alice Donlan (she/her), Analyst, Teaching and Learning Transformation Center

Allison Dickinson (she/her), Communications Officer, Diversity and Inclusion

Typhanye Dyer (she/her), Associate Professor, School of Public Health

Dr. Michelle Farrell (they/them), Staff Psychologist

Joey Haavik (he/him/they/them), Graduate Coordinator for LGBTQ+ Involvement

Ramsey Jabaji (he/him), Director, Global Engineering Leadership

Micaylah Jones (she/her), Graduate Assistant, UMD President's Commission on LGBTQ+ Issues

Yvette I. Lerma Jones (she/her), Program Manager, Multicultural Involvement and Community Advocacy Office

Dr. Adriene Lim (she/her), Dean of University Libraries

Zak Mellen (he/him), Assistant Manager, Department of Residential Facilities Service Center

Ben Parks (he/him), Associate Director for Student Affairs, College Park Scholars

Naomi Patton (she/her), Faculty Specialist, College of Education

Christopher Pérez (he/him), Director, Office of Graduate Diversity and Inclusion

Alyssa Ryan (she/her), Assistant Director, Immersive Media Design

Lindsey Sittler (they/them), Senior Advisor, Education Abroad

Shantala Thompson (they/them/she/her), Program Manager, LGBTQ+ Equity Center

Document: ED-2022-SCC-0026-0052

Received: April 25, 2022

Posted: April 26, 2022

Category: National Advocacy Organization

Submitter Information

Organization: Campus Pride & 36 Other National/Regional Orgs

General Comment

Campus Pride and the 36 undersigned organizations urge the National Center for Education Statistics (NCES) to incorporate nonbinary students into all categories of IPEDS.

While we appreciate that NCES is proposing to add a single question to IPEDS that asks colleges about the number of students at their institutions who identify as other than female or male, this change is not enough. Nonbinary students need to be included in all gender breakdowns so that their experiences, which are often very different from female and male students, can be recognized and fully accounted for in order to ensure a safe, inclusive learning environment. The value of nonbinary inclusion should outweigh any added reporting burden on colleges.

We feel that this change is especially important because more and more students are identifying as nonbinary. For example, the number of students identifying as trans or nonbinary on the American College Health Association's National College Health Assessment (NCHA) has nearly tripled in the last five years, with most of this increase because of the growth in respondents identifying as nonbinary. Other national surveys of college students, such as the Multi-Institutional Study of Leadership (MISL), the National Survey of Student Engagement (NSSE), the Student Experience in the Research University (SERU), and Cooperative Institutional Research Program (CIRP) Freshman Survey, also ask gender identity and have seen a significant increase in students indicating that they are nonbinary.

The Common Application, the Coalition Application, and the Universal College Application, which together manage the admissions applications for more than 1,200 colleges and universities, all enable students to identify their gender identity

and include a “nonbinary” option. In addition, “nonbinary” is a category for “legal sex” in 24 states, where individuals can have an “x” as their gender marker on their driver’s license and/or birth certificate. Thus, colleges have a significant number of students who are indicating that they are nonbinary and who are not accounted for by the current IPEDS reporting process.

We recommend that, at a minimum, NCES add a “nonbinary gender identity” category to all tables. As some colleges have more detailed gender identity information on their students, NCES should consider including these additional gender options: agender, gender fluid, genderqueer, questioning, trans man, and trans woman. These options would allow for a more comprehensive understanding of students across gender identities.

Expecting all colleges to collect and report data on their nonbinary students will require institutions to acknowledge this population, provide more accurate information, and recognize that gender is not a binary. Hopefully this change would lead colleges to provide more support to nonbinary students and work to eliminate institutional gender binaries, such as by offering gender-inclusive restroom and housing options and having forms that allow for more than M/F as gender choices. In short, obtaining and releasing data on nonbinary students would be an important step in ending the invisibility and marginalization of this group in higher education.

We thank NCES for considering the inclusion of nonbinary students in all IPEDS categories as part of its efforts to more accurately represent student populations. If you would like to discuss this proposal with us, please contact Dr. Genny Beemyn, the coordinator of Campus Pride’s Trans Policy Clearinghouse, directly at tpc@campuspride.org or by contacting Campus Pride at 704-277-6710. Thank you.

Sincerely,

ACPA-College Student Educators International
Advocates for Youth
American Association of Colleges and Universities
American Association of Collegiate Registrars and Admissions Officers
American Association of State Colleges and Universities
Association of College and University Housing Officers-International
Athlete Ally
Campus Pride
Center for LGBTQ Economic Advancement & Research (CLEAR)
CenterLink: The Community of LGBT Centers
Common App
Consortium of Higher Education LGBT Resource Professionals
Equality Federation
FORGE, Inc.
GLSEN
interACT: Advocates for Intersex Youth
Mazzoni Center
Modern Military Association of America
Movement Advancement Project
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Association for Equal Opportunity in Higher Education (NAFEO)
National Black Justice Coalition
National Center for Transgender Equality
National LGBT Cancer Network
National LGBTQ+ Bar Association
National Women's Law Center
Oasis Legal Services
Oklahomans for Equality
PFLAG National
Phoenix Pride
PowerOn, a program of LGBT Technology Institute
Resource Center
TransAthlete.com
Transgender Resource Center of New Mexico
URGE: Unite for Reproductive & Gender Equity

Attachments



April 25, 2022

National Center for Education Statistics
Institute of Education Sciences
Potomac Center Plaza
550 12th Street, SW
Washington, D.C. 20202, USA

Dear NCES,

Campus Pride and the (#) undersigned organizations urge the National Center for Education Statistics (NCES) to incorporate nonbinary students into all categories of the Integrated Postsecondary Education Data System (IPEDS).

While we appreciate that NCES is proposing to add a single question to IPEDS that asks colleges about the number of students at their institutions who identify as other than female or male, this change is not enough. Nonbinary students need to be included in all gender breakdowns so that their experiences, which are often very different from female and male students, can be recognized and fully accounted for in order to ensure a safe, inclusive learning environment. The value of nonbinary inclusion should outweigh any added reporting burden on colleges.

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Movement Advancement Project
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
National Association for Equal Opportunity in Higher Education (NAFEO)
National Black Justice Coalition
National Center for Transgender Equality
National LGBT Cancer Network
National LGBTQ+ Bar Association
National Women's Law Center
Oasis Legal Services
Oklahomans for Equality
PFLAG National
Phoenix Pride
PowerOn, a program of LGBT Technology Institute
Resource Center
TransAthlete.com
Transgender Resource Center of New Mexico
URGE: Unite for Reproductive & Gender Equity
Woodhull Freedom Foundation

Multi-Institutional Study of Leadership (MISL), the National Survey of Student Engagement (NSSE), the Student Experience in the Research University (SERU), and Cooperative Institutional Research Program (CIRP) Freshman Survey, also ask gender identity and have seen a significant increase in students indicating that they are nonbinary.

The Common Application, the Coalition Application, and the Universal College Application, which together manage the admissions applications for more than 1,200 colleges and universities, all enable students to identify their gender identity and include a "nonbinary" option. In addition, "nonbinary" is a category for "legal sex" in 24 states, where individuals can have an "x" as their gender marker on their driver's license and/or birth certificate. Thus, colleges have a significant number of students who are indicating that they are nonbinary and who are not accounted for by the current IPEDS reporting process.

We recommend that, at a minimum, NCES add a "nonbinary gender identity" category to all tables. As some colleges have more detailed gender identity information on their students, NCES should consider including these additional gender options: agender, gender fluid, genderqueer, questioning, trans man, and trans woman. These options would allow for a more comprehensive understanding of students across gender identities.

Expecting all colleges to collect and report data on their nonbinary students will require institutions to acknowledge this population, provide more accurate information, and recognize that gender is not a binary. Hopefully this change would lead colleges to provide more support to nonbinary students and work to eliminate institutional gender binaries, such as by offering gender-inclusive restroom and housing options and having forms that allow for more than M/F as gender choices. In short, obtaining and releasing data on nonbinary students would be an important step in ending the invisibility and marginalization of this group in higher education.

We thank NCES for considering the inclusion of nonbinary students in all IPEDS categories as part of its efforts to more accurately represent student populations. If you would like to discuss this proposal with us, please contact Dr. Genny Beemyn, the coordinator of Campus Pride's Trans Policy Clearinghouse, directly at tpc@campuspride.org or by contacting Campus Pride at 704-277-6710. Thank you.

Document: ED-2022-SCC-0026-0053

Received: April 25, 2022

Posted: April 26, 2022

Submitter Information

Name: Mark D'Amico

General Comment

Please see comments in the attached letter.

Attachments



April 25, 2022

Ms. Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer,
Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBJ, Room 6W208B
Washington, DC 20202-8240

RE: Request for Comments from the Department of Education (87 Federal Register 10777)

Dear Ms. Valentine,

We appreciate the opportunity to respond to the Department of Education's Request for Comments on the Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25. A call for comments was published in the Federal Register on February 22, 2022.

As two of the few scholars who have spent more than a decade studying noncredit community college education, we would like to express our strong support for adding noncredit instructional activity to the IPEDS Institutional Characteristics as well as the 12-Month Enrollment Report in 2023-2024. In addition, one of us had an opportunity to participate in the Technical Review Panel #62, which resulted in productive discussion of the benefits of and appropriate mechanisms for noncredit data collection. We are thankful for the transparency and opportunities to provide feedback. Please note that we do not speak for our respective universities, but rather as scholars on noncredit community college education.

We view the proposed data collection as a very good start in capturing noncredit enrollment data in hopes that the data infrastructure can and will expand over time to accomplish many goals:

- Capture a more complete mission of higher education, community colleges in particular,
• Establish consistent definitions of noncredit functions collected across institutions/states,
• Make data available to generate accurate per-FTE calculations for higher education finance and human resource measures,
• Encourage institutions/states to capture more accurate noncredit data, which may one day ease processes for articulating noncredit to credit education, and
• Provide an early infrastructure to expand future IPEDS data collection to measure outcomes over time.

We would like to provide just a few insights into the proposed data collection. First, we are in support, overall, of including noncredit types listed in the Institutional Characteristics-Header ("ICH: Addition of screening question to determine requirements for reporting new data on noncredit"). With just one

exception, the categories are consistent with a data-driven typology established and employed in our own noncredit work. There is one exception, however. The proposed category "Containing Education/Professional Education" could cause confusion. For example, there are community colleges that might use the term, "Containing Education," for all of their noncredit functions. In addition, "Professional Education" may be indistinguishable from "Workforce Education" by those completing the survey. Therefore, we suggest one of two potential solutions: either eliminate "Containing Education/Professional Education" as an option in ICH, or edit the listing to read "Professional Education" with careful distinction between the related types. Our hope is that future enrollment might be collected by noncredit type, therefore, starting with a clear list of functions in 2023-2024 is critical to future IPEDS development.

Second, we strongly support the collection of headcount data in the 12-Month Enrollment Survey. We also feel that the question in the proposed survey template about whether noncredit instructional activity is measured by clock hours or other mechanisms is critically important at this stage. Our work with states shows that many states do indeed collect contact hours as a measure of noncredit intensity, and ultimately these data will be important to future analyses that convert noncredit contact hours to FTEs.

Third, we support the inclusion of a question about whether to collect enrollment data on race and sex for the 2024-2025 enrollment survey in hopes that those data will be included in future survey administrations. We are also in favor of an option to report disaggregated student enrollment figures for students who identify as "gender non-binary," and encourage inclusive language.

Fourth, student financial aid is not currently included in the proposed noncredit data collection, and we support considering including it for the 2024-2025 survey or including a question to institutions about whether this item would be feasible for the 2024-2025 survey. There have been national discussions about the idea of allowing Pell funds to be used for short-term training programs (as short as 150 hours), which could include many noncredit education offerings. In addition, multiple states have provided state funding (or are considering providing state funding) to support students enrolled in noncredit programs. One of us has been engaged in a project with the Lumina Foundation, partnering with a state community college system to examine an initiative that offers financial aid to students enrolled in noncredit workforce programs. The inclusion of financial aid to noncredit students in future IPEDS surveys would contribute invaluable to national discussions about funding mechanisms for noncredit education and the relationship between financial aid and noncredit student enrollment.

Finally, as collaborators on a research project funded by the National Center for Science and Engineering Statistics (NCSES) that involves work with three states to inform the creation of consistent noncredit definitions leading toward a taxonomy for noncredit data, we are hopeful that our efforts can support the direction of IPEDS noncredit data collection in the future. Thank you for current, important steps to proceed with noncredit data collection and for the opportunity to offer our insights.

Sincerely,

[Signature]

Mark D'Amico, Ph.D.
Professor of Higher Education
The University of North Carolina at Charlotte

[Signature]

Di Xu, Ph.D.
Associate Professor of Education
University of California, Irvine

Document: ED-2022-SCC-0026-0054

Received: April 25, 2022

Posted: April 26, 2022

Submitter Information

Organization: College in High School Alliance

General Comment

See attached file(s)

Attachments



April 25, 2022

The Honorable Miguel Cardona
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Secretary Cardona,

The College in High School Alliance (CHSA) Steering Committee, comprising **Achieving the Dream, Advance CTE, Bard College, JFF, KnowledgeWorks, the Middle College National Consortium, and the National Alliance of Concurrent Enrollment Partnerships (NACEP)** write in support of the proposed addition of new dual enrollment data collection under Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25, as proposed in ED-2022-SCC-0026.

As the attached letter signed by 46 national organizations, state organizations, state agencies, colleges, foundations, corporations, and school districts will attest, there is significant national interest and value in expanding IPEDS to include high quality dual enrollment data.

We urge the US Department of Education to adopt the proposed data elements.

Please do not hesitate to contact me if you wish to speak further.

Sincerely,

Alex Perry
Coordinator
College in High School Alliance
(202) 431-7221
alex.perry@flpadvisors.com



August 5, 2021

Amy Barner
IPEDS Technical Review Panel
Task Leader at RTI International
701 13th St NW #750
Washington, DC 20005

Dear Ms. Barner,

On behalf of the undersigned members of the [College in High School Alliance](#), we write to support the expansion of data collection on dual enrollment in IPEDS and the requests of panelists as part of the recently released *Report and Suggestions from IPEDS Technical Review Panel #63: Capturing and Clarifying Dual Enrollment Data (Part II)*.

Dual enrollment [provides significant benefits](#) to students, including increased rates of college access and success. As a cornerstone of establishing the policy environment necessary to support increased college access and success for students through dual enrollment, more national data collecting on these issues is vital.

[National and state research studies](#) have consistently shown that these programs improve rates of college access and completion, particularly for low income students, students of color, first generation college students, and other populations of students who are under-represented in higher education. Students with disabilities may also find considerable value in participating in dual enrollment opportunities.

However, existing national and state data also point to [consistent equity gaps](#) across multiple student demographics. The first step to closing these gaps is understanding which populations of students are underserved and where, in order to begin to develop targeted policy solutions to improve their access and success.

Policy cannot be deployed to address equity gaps in dual enrollment access and success until those gaps are properly understood and tracked. Disaggregated data regarding access and completion of dual enrollment programs is critical for equity goals to be meaningful and for specific policy solutions to be targeted towards student populations in need.

The imperative to collect and deploy dual enrollment data on access and success has never been greater, given declining postsecondary enrollments and the need to accelerate student learning to

address the impacts of the COVID-19 pandemic. Dual enrollment is an effective tool to address many of these challenges, but only when it is thoughtfully targeted at the students with the greatest need.

Unfortunately, available national data on dual enrollment participation is lacking, which makes the need for improved data collection and reporting on dual enrollment through IPEDS even more important.

What national data we do have is currently:

- **Old** - Much of the Institute of Education Sciences' national dual enrollment data is drawn from the [High School Longitudinal Study of 2009](#) (HLS:09), which is now over a decade old and does not reflect the significant changes to dual enrollment access in the last ten years.
- **Inconsistent** - Though dual enrollment participation has been a required data element for the US Department of Education's Office for Civil Rights biannual [Civil Rights Data Collection](#) (CRDC) since school year 2015-2016, there are a number of important discrepancies between data contained within CRDC and existing state-level reporting for a number of states.
- **Too General** - The [National Student Clearinghouse's](#) enrollment reports track students under 18 who are enrolled in college nationally, which is largely considered a proxy for dual enrollment participation. While this data is very useful for understanding national enrollment trends by institution type, it is not disaggregated by student demographics.
- **Lacking Success Data** - National data on dual enrollment is largely limited to looking at questions around who is accessing dual enrollment opportunities, rather than reflecting whether those students are succeeding in the classes that they have access to.

For these reasons, we strongly support the suggestions to increase data collection of dual enrollment access and success through IPEDS, as a critical lever to continuing to deepen our understanding of this expanding model. We strongly encourage that the panel's discussions be incorporated into a robust set of recommendations for expanding dual enrollment data collection in IPEDS, and that the suggested follow up discussions on questions around finance and human resources take place in a timely manner.

IPEDS has an important role to play in helping the community of dual enrollment practitioners, policymakers and advocates understand more about this important group of programs. We encourage you to seize the moment and help us fill gaps in our national understanding of dual enrollment access and success.

For additional information or to ask questions about any information presented in this comment letter, please reach out to Alex Perry, Coordinator of the College in High School Alliance at alex.perry@flpadvisors.com or (202) 431-7221.

Sincerely,

- A+ Schools, PA
- Achieving the Dream
- Advance CTE
- Advance Illinois

- Alliance for Excellent Education
- American Association of Collegiate Registrars and Admissions
- Association for Career and Technical Education
- Bard College
- Be Foundation
- The Bridge of Southern New Mexico
- Capital Region BOCES, NY
- Career Ladders Project
- Center of Excellence in Leadership of Learning (CELL), University of Indianapolis
- Community College Research Center at Teachers College, Columbia University
- Complete College America
- Delaware Department of Education
- East Central College, MO
- EdAllies
- Educate Texas
- Education Reform Now
- Education Reform Now, New York
- The Education Trust–West
- Education Systems Center (EdSystems) at Northern Illinois University
- Higher Learning Advocates
- Grayson College, TX
- Highland Community College, IL
- IBM
- Illinois P-20 Network
- Illinois Alliance of Concurrent Enrollment Partnerships (ILACEP)
- Indiana Commission for Higher Education
- JFF
- JackBeNimble, Special Ed Accountability Project
- KnowledgeWorks
- Lamar State College Port Arthur, TX
- Michigan College Access Network
- Middle College National Consortium
- National Association for College Admission Counseling (NACAC)
- National Alliance of Concurrent Enrollment Partnerships (NACEP)
- National Education Equity Lab
- Norwalk ACTS, CT
- Oakton Community College, IL
- Richard and Susan Smith Family Foundation
- Santa Barbara City College, CA
- Stand for Children
- Undergraduate Studies Collaborative for Early Enrollment (USCEE)
- University of Maine System
- University of Pittsburgh, PA

Document: ED-2022-SCC-0026-0055

Received: April 25, 2022

Posted: April 26, 2022

Category: Four-Year Public Institution of Higher Education

Submitter Information

Government Agency Type: State

Government Agency: Stony Brook University

General Comment

Thank you for the opportunity to comment on the Department of Education's request for comments on proposed changes to the Integrated Postsecondary Education Data System (IPEDS) 2022–23 Through 2024–25. Our comments are provided in the attached pdf.

Sincerely,

Braden J. Hosch

Associate Vice President for Institutional Research, Planning & Effectiveness

Stony Brook University

Attachments



Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBJ, Room 6W208B
Washington, DC 20202-8240

RE: Request for Comments from the Department of Education (FR Doc # 2022-04043)

Thank you for the opportunity to comment on the Department of Education's request for comments on proposed changes to the Integrated Postsecondary Education Data System (IPEDS) 2022–23 Through 2024–25.

Noncredit education

A requirement for all institutions to report non-credit enrollment as described in the proposal will increase burden on institutions and higher costs for information systems that will be passed along to students. On our campus and on most campuses, non-credit activities are decentralized, defined by the unit delivering them, and not centrally captured. From an ad hoc collection of summary data from various units engaged in non-credit instructional activities on our campus (a Carnegie Doctoral, VHU Research Activity institution), we estimated over 6,500 non-credit activities in 2020-21 with over 66,000 registrations; at present, we do not have the capacity to deduplicate these. By comparison, our 12-month unduplicated headcount reported to IPEDS in 2020-21 was just over 34,000. The requirement to report noncredit education enrollments as described will entail building a centralized tracking system, integrating it with our enterprise system to resolve identities, and assigning and tracking clock hours. Further the definition is insufficient. As written it can easily include employee professional development, summer camps for middle school students, and a range of other activities. While we appreciate the policy need for community colleges and other entities to have their non-credit activities recognized, requiring all institutions to capture and provide data of this sort is overly burdensome and falls outside the legislative mandate of IPEDS. If this proposal is maintained, we strongly encourage the Department to make it optional to report the data.

Changes to Nonresident Alien label

We applaud the Department's change of this awkward label. The removal of the word "alien" is long overdue. That said, public institutions across the country use the word "Nonresident" to refer to tuition residency. Changing this existing category that effectively represents international students to "Nonresident" will prompt confusion across multiple board rooms, campuses, and other venues. We recommend using the phrase "U.S. Nonresident." This change accomplishes the goal for inclusivity, better describes what is represented by the data, and avoids confusion with an existing higher education term for tuition residency.



Clarifications to reporting Undocumented and DACA

The proposed language amplifies and clarifies guidance already in the FAQ for enrollment surveys. That said, the inclusion of DACA recipients with the "Nonresident" category will damage the utility of these data, which are widely used as a proxy for international students. DACA recipients are students who graduate from U.S. high schools and by and large have grown up in the United States. Grouping them with students coming to the U.S. on F-1 visas will make it impossible for data users to understand how international students are using the U.S. higher education system. It would be far preferable to leave DACA with other undocumented individuals in the Race/Ethnicity Unknown category, if the current schema is retained.

That said, the current schema of inflecting race/ethnicity with citizenship status should change. This reporting requirement erases the racial and ethnic identities for non-U.S. citizens and fails to describe the diversity of the student and employee population. It would be far preferable to add reporting burden and report race/ethnicity by three categories of citizenship status (US citizen and permanent resident, undocumented U.S. resident, international resident) than to continue to erase the racial and ethnic identities of these individuals.

Collection of Non-Binary Gender Categories

The collection of non-binary gender categories is long overdue. However, for the data to be both meaningful and comprehensive, NCES should mandate the collection of these data as well as the format of the question, much like was done for revisions to race/ethnicity data collection in 2010. If the Department does not mandate that institutions ask a question that includes non-binary genders, then many institutions will simply continue current practice, and data users will not be able to interpret the meaning of low numbers of non-binary individuals (does zero mean no non-binary individuals or does zero mean the institution did not collect the data?). Second, for there to be some uniformity in what is collected, the format of the question should be prescribed to institutions.

Thank you again for the opportunity to offer comments for these proposed sub-regulatory changes. We hope that due consideration of the issues raised and some revision of the proposals can be made prior to the implementation of any changes to data collections.

Sincerely,

Braden J. Hosch
Associate Vice President for Institutional Research, Planning & Effectiveness
Stony Brook University

Document: ED-2022-SCC-0026-0056

Received: April 26, 2022

Posted: April 27, 2022

Category: Federal Agency

Submitter Information

Name: Phillip Connor

General Comment

While we are in favor, and indeed recommend, the removal of the term “alien” from the label used for “non-resident alien”, we disagree with the proposed guidance on student groups considered part of the non-resident and resident categories.

The attached analysis indicates that higher education institutions do need guidance on how to better report undocumented students using IPEDS. Comparisons to augmented 2019 American Community Survey (ACS) data suggests that the reporting of undocumented students through IPEDS is not consistently applied by all schools.

However, in order to limit disruptions in annual trends for race and ethnicity, the Department of Education should consider an alternative approach to defining residents (the group for which race and ethnicity is reported) as those who have completed high school or a high school equivalency within the U.S. and were not on an F-1 visa at time of high school graduation. This would permit the inclusion of most undocumented and DACA students studying in higher education institutions to be considered residents, a considerably large population and one that has spent most of their educational experience within the U.S. The data analysis below demonstrates this is the best path forward in keeping data trends as consistent as possible.

Attachments

DATA COMMENT ON DEPARTMENT OF EDUCATION’S PROPOSED GUIDANCE TO OMB FOR REPORTING RACE AND ETHNICITY OF HIGHER EDUCATION STUDENTS - (Docket ED-2022-SCC-0026)

Prepared by:

Dr. Phillip Connor, Senior Demographer at FWD.us

Signatories, including data scientists, academics, and immigration experts:

Adina Appelbaum, Program Director, Capital Area Immigrants’ Rights (CAIR) Coalition

Dr. Rebecca M. Callahan, University of Vermont

Kristie De Peña, Vice President of Policy, Niskanen Center

Dr. Miriam Feldblum, Executive Director, Presidents’ Alliance on Higher Education and Immigration

Cezanne Hayden-Dyer

Jessie Hernández-Reyes, Higher Education Policy Analyst, The Education Trust

Douglas Massey, Princeton University

Reyna Montoya

Adriel Daniel Orozco, Staff Attorney, North Carolina Justice Center

Julie J. Park, Associate Professor, University of Maryland, College Park

Carley Tucker, Golden Door Scholars

Lorena Tule-Romain, Co-founder and COO, as a representative of ImmSchools

Oscar Romero

Date: April 26, 2022

Background

The Department of Education has proposed [clarification](#) to the Office of Management and Budget (OMB) for approval on how race and ethnicity is reported by higher education institutions to the [National Center for Education Statistics](#) (NCES) using the [Integrated Postsecondary Education Data System](#) (IPEDS).

The proposed clarification is concerning the inclusion of undocumented students, including those with Deferred Action for Childhood Arrivals (DACA). A new FAQ is proposed for the 2022-2023 through 2024-2025 data collection cycles:

[In which race/ethnicity category do I report undocumented students?](#)

Because the race and ethnicity designations are reported only for U.S. citizens and the ‘nonresident’ category is a legal status for students with specific types of visas, undocumented students would not be reported under any of these statuses. Instead, they should be reported as ‘Race/ethnicity unknown.’ Please visit the race/ethnicity FAQ for more information. However, Deferred Action for Childhood Arrivals (DACA) students are a particular group of undocumented students that have been authorized by the Department of Homeland Security to be lawfully present in the U.S. for the duration of their DACA, and as such, this status would allow them to be reported under the ‘nonresident’ category.

Data analysis summary

While we are in favor, and indeed recommend, the removal of the term “alien” from the label used for “non-resident alien”¹, we disagree with the proposed guidance on student groups considered part of the non-resident and resident categories.

The analysis below indicates that higher education institutions **do need** guidance on how to better report undocumented students using IPEDS. Comparisons to augmented 2019 American Community Survey (ACS) data² suggests that the reporting of undocumented students through IPEDS is not consistently applied by all schools.

However, in order to limit disruptions in annual trends for race and ethnicity, the Department of Education should consider an alternative approach to defining residents (the group for which race and ethnicity is reported) as those who have completed high school or a high school equivalency within the U.S. and were not on an F-1 visa at time of high school graduation. This would permit the inclusion of most undocumented and DACA students studying in higher education institutions to be considered residents, a considerably large population and one that has spent most of their educational experience within the U.S. The data analysis below demonstrates this is the best path forward in keeping data trends as consistent as possible.

¹ Aligned with this proposed guidance from OMB, the term “nonresident” will be used instead of “nonresident alien” in this comment.

² The data comparison in this memo uses the NCES [Table 305.10 - Total fall enrollment in degree-granting postsecondary institutions, by level of enrollment, sex, attendance status, and race/ethnicity or nonresident alien status of student: Selected years, 1976 through 2019](#). This NCES table provides the best comparison to existing ACS data as it includes most degree-granting postsecondary institutions, without differentiation for full-time and part-time studies. The augmented portion of the ACS data is the assignment of immigration status. FWD.us methodology for immigrant status assignment can be found [here](#). The methodology is very similar to that employed by [Pew Research Center](#). According to the ACS, a total of 21,810,000 people with at least a high school diploma or equivalency were in school attending a higher education institution in 2019. This total is about two million more than indicated by NCES in 2019. This is not surprising since some students indicating school enrollment in the ACS may attend schools not required to report data using the IPEDS system. The difference in total number of students published by NCES and suggested by ACS may also contribute to differences in race and ethnicity breakdown.

Undocumented and DACA students have likely been placed in both resident and nonresident categories

In 2019, residents made up 95.0% of the total fall enrollment of higher education students reported by NCES, with 5.0% belonging to the nonresident category.

Using [Open Doors](#) data for the number of enrolled international students not in Optional Practical Training (OPT), approximately 4.3% of the total higher education student population are international students. If higher education institutions were following the *current* IPEDS guidance to include nonimmigrants (temporary, legal immigrants such as those with an H-4 visa) and international students together in the nonresident category³, data analysis of augmented 2019 ACS data in conjunction with Open Doors data indicates that this would amount to 4.6% of fall enrollment in 2019, lower than the 5% published by NCES for 2019.

Separately, augmented 2019 ACS data analysis indicates undocumented students made up approximately 1.5% of the higher education student population in 2019, with an additional 0.5% being DACA students. Since the reported nonresident category in NCES is 5.0% (higher than the 4.6% that it ought to be under current rules, yet not as high as 6.6% for all non-U.S. citizen and non-U.S. permanent residents), it is safe to assume that some higher education institutions are placing undocumented and DACA students in both the nonresident and resident categories.

We agree then that there is good reason for a clarification of which category - resident or nonresident - undocumented and DACA students should be placed. For the maintenance of race and ethnicity trends presented below, we propose that most undocumented and DACA students be considered residents.

³ From the Fall Enrollment IPEDS guidance to higher education institutions: "Nonresident alien - A person who is not a citizen or national of the United States and who is in this country on a visa or temporary basis and does not have the right to remain indefinitely. NOTE - Nonresidents aliens are to be reported separately, in the boxes provided, rather than included in any of the seven racial/ethnic categories. Other eligible (for financial aid purposes) non-citizens who are not citizens or nationals of the United States and who have been admitted as legal immigrants for the purpose of obtaining permanent resident status (and who hold either an alien registration card (Form I-551 or I-151), a Temporary Resident Card (Form I-688), or an Arrival-Departure Record (Form I-94) with a notation that conveys legal immigrant status such as Section 207 Refugee, Section 208 Asylee, Conditional Entrant Parolee or Cuban-Haitian) are to be reported in the appropriate racial/ethnic categories along with United States citizens."

Conclusion

This high-level data analysis demonstrates that many higher education institutions are already considering undocumented and DACA students as residents. To keep race and ethnicity statistical trends as consistent as possible, the Department of Education should consider an adjustment to their proposal to the OMB and consider those who have graduated from a U.S. high school or obtained a high school equivalency in the U.S. to be a resident. This change would permit most undocumented and DACA students to be considered residents for the purposes of reporting race and ethnicity.

Furthermore, immigration statuses of individuals in higher education institutions are constantly shifting, especially given that DACA recipients need to renew their status every two years. It is likely that most institutions, for reasons of both privacy and data management challenges, do not track changes of immigration status. Consequently, the articulation of the data proposal to the OMB may not be feasible for most schools. Also for these reasons, the more reliable classification of residency status, and thus reporting on race and ethnicity, should be the student's location of high school graduation.

Finally, beyond the data implications, advocates and the higher education community foresee additional consequences based on the new IPEDS guidance, including the erasure of undocumented students on campus and the ability of institutions to adequately serve their diverse student bodies. We share these concerns outlined in the public comment by the Presidents' Alliance on Higher Education and Immigration.

If desired, we welcome the opportunity to go more in-depth into this statistical assessment. NCES or IPEDS staff may contact Phillip Connor at phillip@fwd.us for more information.

Race and ethnicity trends will remain more stable if undocumented and DACA students are considered residents

The proposed guidance for undocumented and DACA students to not be considered residents would have considerable impact on the reported race and ethnicity breakdown of higher education students. Without reporting the proposed unknown race and ethnicity category, the White share would rise by about a percentage point, while the Hispanic share would be considerably lower. When reporting an unknown race and ethnicity category, the Hispanic share would decrease even further, dropping to about two percentage points from what was reported in NCES for 2019.

RACE AND ETHNICITY BREAKDOWN OF HIGHER EDUCATION STUDENTS, 2019

Race and ethnicity	NCES published %	ACS % (proposed definition to OMB WITHOUT unknown category)	ACS % (proposed definition to OMB WITH unknown category)	ACS % (undocumented and DACA students as residents)
*White	54.3	55.4	54.3	54.5
*Non-White	45.7	44.6	45.7	45.5
*Black	13.3	14.3	14.0	14.3
Hispanic	20.3	18.6	18.2	19.2
*Asian/Pacific Islander Asian	7.4	7.4	7.3	7.8
*American Indian/Alaska Native	0.7	0.6	0.6	0.6
*Two or more races	4.1	3.7	3.6	3.7
Unknown race and ethnicity	-	-	1.5	-
TOTAL	100.0	100.0	100.0	100.0

Sources: NCES 2019; Augmented ACS 2019 data, assigning immigration status according to this [methodology](#). Note: For all groups, nonresidents (international students and legal temporary immigrants) not included. Totals may not equal to 100% due to rounding. *Racial groups are non-Hispanic.

However, if undocumented and DACA students were included as residents, the White share in 2019 would be about the same as reported by NCES for 2019. Similarly, the non-White share in 2019 would be closer to that published by NCES, and the Hispanic share would also better approximate that published by NCES in 2019.

Document: ED-2022-SCC-0026-0057

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Name: Michelle Van Noy

General Comment

I have uploaded a letter indicating my support for the addition of measures of noncredit activity.

Attachments



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School of Management and Labor Relations
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April 25, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer,
Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBJ, Room 6W208B
Washington, DC 20202-8240

OMB ID: ED-2022-04043 (IPEDS 2022-23 Through 2024-25 Proposed Changes)

Dear Ms. Valentine,

I am writing in response to the Department of Education's Request for Comments on the Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25, as published in the Federal Register on February 22, 2022.

I would like to express my strong support for adding measures of noncredit educational activity to IPEDS. As someone who has spent nearly two decades studying community colleges and most of my career examining the link between education and the workplace, I believe these measures are essential to providing a complete picture of educational activity that has long been unrecognized by existing measures but is essential to the educational pathways of countless students nationally.

The two proposed measures in the upcoming data collection on institutional characteristics and 12-month enrollment will go a long way to beginning to provide a complete picture of the educational activity. I would offer one minor suggestion to the institutional characteristics measure to revise the category of "continuing education/professional development" to be "professional development" and to include in this category training that is provided to those in professions that require on-going professional development, typically for those with a bachelor's degree or more. Otherwise, it may be potentially confused with the category "workforce education". Overall, I fully support the addition of these two measures.

While measuring noncredit activity is a new effort for institutions, I have seen many colleges I work with in recent years move to developing more robust and comprehensive data tracking systems for noncredit activity. There will be a learning curve to implement these new measures, but I believe colleges are ready and able to handle this requirement.

Along with other national researchers of noncredit education, I am leading a research project funded by the National Center for Science and Engineering Statistics that is identifying how

states measure and collect noncredit activity in community colleges. We are currently working with three states (Iowa, Louisiana, and Virginia) with the goal of developing a taxonomy for noncredit measurement. We hope that this effort may be informative to this current effort with adding these measures to IPEDS. Our team is eager to share our work and support this effort in whatever way possible.

Thank you for the opportunity to offer comments on this important development in the US educational data infrastructure.

Sincerely,

Michelle Van Noy, Ph.D.
Director, Education and Employment Research Center
School of Management and Labor Relations
Rutgers, The State University of New Jersey

Document: ED-2022-SCC-0026-0058

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Name: Phillip Connor

General Comment

While we are in favor, and indeed recommend, the removal of the term “alien” from the label used for “non-resident alien”, we disagree with the proposed guidance on student groups considered part of the non-resident and resident categories.

The attached analysis indicates that higher education institutions do need guidance on how to better report undocumented students using IPEDS. Comparisons to augmented 2019 American Community Survey (ACS) data suggests that the reporting of undocumented students through IPEDS is not consistently applied by all schools.

However, in order to limit disruptions in annual trends for race and ethnicity, the Department of Education should consider an alternative approach to defining residents (the group for which race and ethnicity is reported) as those who have completed high school or a high school equivalency within the U.S. and were not on an F-1 visa at time of high school graduation. This would permit the inclusion of most undocumented and DACA students studying in higher education institutions to be considered residents, a considerably large population and one that has spent most of their educational experience within the U.S. The data attached analysis demonstrates this is the best path forward in keeping data trends as consistent as possible.

Attachments

IPEDS Data Comment 04262022

DATA COMMENT ON DEPARTMENT OF EDUCATION'S PROPOSED GUIDANCE TO OMB FOR REPORTING RACE AND ETHNICITY OF HIGHER EDUCATION STUDENTS - (Docket ED-2022-SUC-0026)

Prepared by:

Dr. Phillip Connor, Senior Demographer at FWD.us

Signatories, including data scientists, academics, and immigration experts:

Adina Appelbaum, Program Director, Capital Area Immigrants' Rights (CAIR) Coalition

Dr. Rebecca M. Callahan, University of Vermont

Kristie De Peña, Vice President of Policy, Niskanen Center

Dr. Miriam Feldblum, Executive Director, Presidents' Alliance on Higher Education and Immigration

Cezanne Hayden-Dyer

Jessie Hernández-Reyes, Higher Education Policy Analyst, The Education Trust

Douglas Massey, Princeton University

Reyna Montoya

Adriel Daniel Orozco, Staff Attorney, North Carolina Justice Center

Julie J. Park, Associate Professor, University of Maryland, College Park

Carley Tucker, Golden Door Scholars

Lorena Tule-Romain, Co-founder and COO, as a representative of ImmSchools

Oscar Romero

Date: April 26, 2022

Background

The Department of Education has proposed [clarification](#) to the Office of Management and Budget (OMB) for approval on how race and ethnicity is reported by higher education institutions to the [National Center for Education Statistics](#) (NCES) using the [Integrated Postsecondary Education Data System](#) (IPEDS).

The proposed clarification is concerning the inclusion of undocumented students, including those with Deferred Action for Childhood Arrivals (DACA). A new FAQ is proposed for the 2022-2023 through 2024-2025 data collection cycles:

[In which race/ethnicity category do I report undocumented students?](#)

Because the race and ethnicity designations are reported only for U.S. citizens and the "nonresident" category is a legal status for students with specific types of visas, undocumented students could not be reported under any of these statuses. Instead, they should be reported as "Race/ethnicity unknown." Please visit the race/ethnicity FAQ for more information. However, Deferred Action for Childhood Arrivals (DACA) students are a particular group of undocumented students that have been authorized by the Department of Homeland Security to be lawfully present in the U.S. for the duration of their DACA, and as such, this status would allow them to be reported under the "nonresident" category.

Data analysis summary

While we are in favor, and indeed recommend, the removal of the term “alien” from the label used for “non-resident alien”, we disagree with the proposed guidance on student groups considered part of the non-resident and resident categories.

The analysis below indicates that higher education institutions do need guidance on how to better report undocumented students using IPEDS. Comparisons to augmented 2019 American Community Survey (ACS) data¹ suggests that the reporting of undocumented students through IPEDS is not consistently applied by all schools.

However, in order to limit disruptions in annual trends for race and ethnicity, the Department of Education should consider an alternative approach to defining residents (the group for which race and ethnicity is reported) as those who have completed high school or a high school equivalency within the U.S. and were not on an F-1 visa at time of high school graduation. This would permit the inclusion of most undocumented and DACA students studying in higher education institutions to be considered residents, a considerably large population and one that has spent most of their educational experience within the U.S. The data analysis below demonstrates this is the best path forward in keeping data trends as consistent as possible.

¹ Aligned with this proposed guidance from OMB, the term “nonresident” will be used instead of “nonresident alien” in this comment.
² The data comparison in this memo uses the NCES Table 308.10 - Total fall enrollment in degree-granting postsecondary institutions, by level of enrollment, sex, attendance status, and race/ethnicity or nonresident alien status of student: Selected years, 1976 through 2019. This NCES table provides the best comparison to existing ACS data as it includes most degree-granting postsecondary institutions, without differentiation for full-time and part-time studies. The augmented portion of the ACS data is the assignment of immigration status. FWD.us methodology for immigrant status assignment can be found [here](#). The methodology is very similar to that employed by [Pew Research Center](#).

According to the ACS, a total of 21,810,000 people with at least a high school diploma or equivalency were in school attending a higher education institution in 2019. This total is about two million more than indicated by NCES in 2019. This is not surprising since some students indicating school enrollment in the ACS may attend schools not required to report data using the IPEDS system. The difference in total number of students published by NCES and suggested by ACS may also contribute to differences in race and ethnicity breakdown.

Undocumented and DACA students have likely been placed in both resident and nonresident categories

In 2019, residents made up 95.0% of the total fall enrollment of higher education students reported by NCES, with 5.0% belonging to the nonresident category.

Using [Open Doors](#) data for the number of enrolled international students not in Optional Practical Training (OPT), approximately 4.3% of the total higher education student population are international students. If higher education institutions were following the *current* IPEDS guidance to include nonimmigrants (temporary, legal immigrants such as those with an H-4 visa) and international students together in the nonresident category³, data analysis of augmented 2019 ACS data in conjunction with Open Doors data indicates that this would amount to 4.6% of fall enrollment in 2019, lower than the 5% published by NCES for 2019.

Separately, augmented 2019 ACS data analysis indicates undocumented students made up approximately 1.5% of the higher education student population in 2019, with an additional 0.5% being DACA students. Since the reported nonresident category in NCES is 5.0% (higher than the 4.6% that it ought to be under current rules, yet not as high as 6.6% for all non-U.S. citizen and non-U.S. permanent residents), it is safe to assume that some higher education institutions are placing undocumented and DACA students in both the nonresident and resident categories.

We agree then that there is good reason for a clarification of which category - resident or nonresident - undocumented and DACA students should be placed. For the maintenance of race and ethnicity trends presented below, we propose that most undocumented and DACA students be considered residents.

³ From the Fall Enrollment IPEDS guidance to higher education institutions: "Nonresident alien - A person who is not a citizen or national of the United States and who is in this country on a visa or temporary basis and does not have the right to remain indefinitely. NOTE - Nonresidents aliens are to be reported separately, in the boxes provided, rather than included in any of the seven racial/ethnic categories. Other eligible (for financial aid purposes) non-citizens who are not citizens or nationals of the United States and who have been admitted as legal immigrants for the purpose of obtaining permanent resident status (and who hold either an alien registration card (Form I-551 or I-151), a Temporary Resident Card (Form I688), or an Arrival-Departure Record (Form I-94) with a notation that conveys legal immigrant status such as Section 207 Refugee, Section 208 Asylee, Conditional Entrant Parolee or Cuban-Italian) are to be reported in the appropriate racial/ethnic categories along with United States citizens."

Race and ethnicity trends will remain more stable if undocumented and DACA students are considered residents

The proposed guidance for undocumented and DACA students to not be considered residents would have considerable impact on the reported race and ethnicity breakdown of higher education students. Without reporting the proposed unknown race and ethnicity category, the White share would rise by about a percentage point, while the Hispanic share would be considerably lower. When reporting an unknown race and ethnicity category, the Hispanic share would decrease even further, dropping to about two percentage points from what was reported in NCES for 2019.

RACE AND ETHNICITY BREAKDOWN OF HIGHER EDUCATION STUDENTS, 2019

Race and ethnicity	NCES published %	ACS % (proposed definition to OMB WITHOUT unknown category)	ACS % (proposed definition to OMB WITH unknown category)	ACS % (undocumented and DACA students as residents)
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TOTAL	100.0	100.0	100.0	100.0

Sources: NCES 2019; Augmented ACS 2019 data, assigning immigration status according to this [methodology](#). Note: For all groups, nonresidents (international students and legal temporary immigrants) not included. Totals may not equal to 100% due to rounding. *Racial groups are non-Hispanic.

However, if undocumented and DACA students were included as residents, the White share in 2019 would be about the same as reported by NCES for 2019. Similarly, the non-White share in 2019 would be closer to that published by NCES, and the Hispanic share would also better approximate that published by NCES in 2019.

Conclusion

This high-level data analysis demonstrates that many higher education institutions are already considering undocumented and DACA students as residents. To keep race and ethnicity statistical trends as consistent as possible, the Department of Education should consider an adjustment to their proposal to the OMB and consider those who have graduated from a U.S. high school or obtained a high school equivalency in the U.S. to be a resident. This change would permit most undocumented and DACA students to be considered residents for the purposes of reporting race and ethnicity.

Furthermore, immigration statuses of individuals in higher education institutions are constantly shifting, especially given that DACA recipients need to renew their status every two years. It is likely that most institutions, for reasons of both privacy and data management challenges, do not track changes of immigration status. Consequently, the articulation of the data proposal to the OMB may not be feasible for most schools. Also for these reasons, the more reliable classification of residency status, and thus reporting on race and ethnicity, should be the student's location of high school graduation.

Finally, beyond the data implications, advocates and the higher education community foresee additional consequences based on the new IPEDS guidance, including the erasure of undocumented students on campus and the ability of institutions to adequately serve their diverse student bodies. We share these concerns outlined in the public comment by the Presidents' Alliance on Higher Education and Immigration.

If desired, we welcome the opportunity to go more in-depth into this statistical assessment. NCES or IPEDS staff may contact Phillip Connor at phillip@fwd.us for more information.

Document: ED-2022-SCC-0026-0059

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: Institute for Higher Education Policy

General Comment

See Attached

Attachments

IPEDS Support Letter for Submission

nuances of student financial aid, and the addition of data collect on students by disability status. Finally, PostsecData supports several of ED’s other proposed changes, including revising terminology used for nonresident students, clarifying information for student enrollment classification for institutional reporting, and several other small changes and clarifications outlined in more detail below.

1. Incorporate measures of noncredit offerings and noncredit enrollment and disaggregate measures of noncredit enrollment by race/ethnicity and gender.

To promote informed decision-making, data collections should aim to count all students and all outcomes. Grounded in this principle, PostsecData strongly supports the proposed inclusion of IPEDS survey questions related to noncredit course offerings and enrollment because these new data will build a more complete picture of today’s postsecondary system. For too long, noncredit enrollees have remained invisible in IPEDS, and as a result, missing from postsecondary analyses. The addition of measures of the types of noncredit education offered and noncredit course enrollment more fully captures the diverse education courses and programs institutions offer, sheds light on student engagement with noncredit coursework, and is an important first step in understanding the broader implications of noncredit courses for institutions. Further, ED should consider additional reporting in future IPEDS cycles to illuminate not just enrollment in noncredit education, but completion and other student outcomes for noncredit programs, as well as additions to the Human Resources and Finance surveys.

Noncredit courses include many types of instruction, and these reporting updates will detail whether institutions offer noncredit workforce education, contract-based customized training, developmental education, personal enrichment courses, adult basic education (ABE), adult High School diplomas or equivalents, English as a second language (ESL), and continuing and professional education opportunities. In many cases, these programs serve an important educational and skill development pathway for students and require dedicated institutional resources and support. However, available data on levels and rates of participation in noncredit education remains limited, and the addition of these fields to the IPEDS survey will provide critical information to better understand the prevalence of and participation in these courses.

In response to ED’s directed question about whether to disaggregate noncredit enrollments by race/ethnicity and gender, PostsecData strongly recommends including this disaggregation. In accordance with President Biden’s Executive Order 13985, the “lack of data [disaggregation] has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort.” Similarly, the [Advisory Committee for Equitable Policymaking Processes](#) calls for data disaggregation to avoid masking the inequities that are pervasive in our systems. PostsecData strongly agrees with this assessment of the pivotal nature of disaggregated data in informing decision-making, and strongly recommends disaggregating

April 26, 2022

Stephanie Valentine,
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division, Office
of Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20024

Dear Stephanie Valentine:

Re: ED-2022-SCC-0026

This letter is submitted on behalf of the 15 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. We recognize the Integrated Postsecondary Education Data System (IPEDS) is a critical source for postsecondary education data that the higher education community needs to understand and analyze postsecondary enrollment, degree completion, institutional finance and staffing, and equity.

The proposed changes, refinements, and clarifications to the IPEDS data collections are needed to reflect the full spectrum of postsecondary opportunities, ensure consistent reporting across institutions, and streamline data use. These updates will provide essential information to students and their families, institutional leaders, researchers, and policymakers to help inform higher education decision-making, target interventions and investments, and strengthen student success.

In this letter, PostsecData seeks to highlight our support for many of these changes and provide recommendations and considerations for implementation and other continued improvements. Our primary recommendations include:

1. Incorporate measures of noncredit offerings and noncredit enrollment and disaggregate measures of noncredit enrollment by race/ethnicity and gender.
2. Adjust reporting guidelines on classification of undocumented students and Deferred Action for Childhood Arrival (DACA) students to accurately reflect student demographics.
3. Consider more inclusive approaches to reporting based on students' gender.
4. Add median standardized test scores (ACT and SAT scores) and include other admission considerations in Admissions (ADM) survey.

PostsecData also encourages ED to consider additional changes, such as further disaggregation of Outcome Measures and 12-month Enrollment Surveys, and updates to better measure the

nuances of student financial aid, and the addition of data collect on students by disability status. Finally, PostsecData supports several of ED's other proposed changes, including revising terminology used for nonresident students, clarifying information for student enrollment classification for institutional reporting, and several other small changes and clarifications outlined in more detail below.

1. Incorporate measures of noncredit offerings and noncredit enrollment and disaggregate measures of noncredit enrollment by race/ethnicity and gender.

To promote informed decision-making, data collections should aim to count all students and all outcomes. Grounded in this principle, PostsecData strongly supports the proposed inclusion of IPEDS survey questions related to noncredit course offerings and enrollment because these new data will build a more complete picture of today's postsecondary system. For too long, noncredit enrollees have remained invisible in IPEDS, and as a result, missing from postsecondary analyses. The addition of measures of the types of noncredit education offered and noncredit course enrollment more fully captures the diverse education courses and programs institutions offer, sheds light on student engagement with noncredit coursework, and is an important first step in understanding the broader implications of noncredit courses for institutions. Further, ED should consider additional reporting in future IPEDS cycles to illuminate not just enrollment in noncredit education, but completion and other student outcomes for noncredit programs, as well as additions to the Human Resources and Finance surveys.

Noncredit courses include many types of instruction, and these reporting updates will detail whether institutions offer noncredit workforce education, contract-based customized training, developmental education, personal enrichment courses, adult basic education (ABE), adult High School diplomas or equivalents, English as a second language (ESL), and continuing and professional education opportunities. In many cases, these programs serve an important educational and skill development pathway for students and require dedicated institutional resources and support. However, available data on levels and rates of participation in noncredit education remains limited, and the addition of these fields to the IPEDS survey will provide critical information to better understand the prevalence of and participation in these courses.

In response to ED's directed question about whether to disaggregate noncredit enrollments by race/ethnicity and gender, PostsecData strongly recommends including this disaggregation. In accordance with President Biden's Executive Order 13985, the "lack of data [disaggregation] has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort." Similarly, the [Advisory Committee for Equitable Policymaking Processes](#) calls for data disaggregation to avoid masking the inequities that are pervasive in our systems. PostsecData strongly agrees with this assessment of the pivotal nature of disaggregated data in informing decision-making, and strongly recommends disaggregating

these IPEDS data elements to better understand the equity implications of noncredit participation.

2. Adjust reporting guidelines on classification of undocumented students and Deferred Action for Childhood Arrival (DACA) students to accurately reflect student demographics.

Proposed changes to several IPEDS surveys would require institutions to classify undocumented students' race/ethnicity as unknown and consider DACA students as nonresidents. While we appreciate the clarification and effort to promote consistency across institutional reporting, the proposed approach raises several concerns. These changes obscure information about the self-identified race/ethnicity of undocumented students and DACA recipients, and inaccurately group DACA recipients with international students. Failing to accurately count DACA and undocumented students' race/ethnicity accurately could also jeopardize institutional eligibility for Minority Serving Institution (MSIs) designations, further limiting institutions' ability to pursue supplemental resources that are intended to be available to these schools.

While the 'nonresident' category is helpful for understanding international enrollment and should be maintained, it should only be used for students who enter the U.S. specifically for postsecondary education and who generally return to their home country after their studies are complete. By definition, DACA recipients meet neither of these criteria. DACA eligibility is restricted to those brought to the U.S. as children and recipients could not be considered as arriving to attend postsecondary education. The program also provides eligibility for work permits, meaning recipients are not expected to leave the country after finishing or leaving school. Further, students "who have been admitted as legal immigrants for the purposes of obtaining permanent resident status" are currently classified using the race/ethnicity categories they self-report to their school. DACA recipients should be treated similarly in IPEDS reporting.

Classifying undocumented students as unknown race/ethnicity limits our understanding of the actual demographics served collectively by higher education and by particular institutions. Institutions are [required to ask students](#) to self-identify their race/ethnicity information, regardless of immigration status, and re-classifying these students as race unknown does a disservice to the field's understanding of race and ethnicity's relationship to access, completion, and other critical components of postsecondary education.

Instead, ED should provide guidance to institutions to classify both undocumented students and DACA students with the race/ethnicity category that they report to the institution, while retaining the use of the nonresident category for international students. More specifically, ED should define domestic students (the group for which race and ethnicity are reported) as those who completed high school or a GED equivalency within the U.S. and were not on an F-1 visa at the time of high school graduation to permit the inclusion of most undocumented and DACA recipient students. Doing so will generate accurate and comprehensive

information needed to examine enrollment, persistence, and other student success metrics across race/ethnicity lines, while improving consistency in how these students are classified across institutions.

PostsecData also recommends ED consider forming a working group or hosting a Technical Review Panel (TRP) to best determine how to collect additional reporting from institutions to measure enrollment and completion of DACA and undocumented students. This working group or TRP should prioritize the need to understand the higher education experiences of this group while also taking appropriate precautions to protect student privacy and employ data minimization practices.

3. Consider more inclusive approaches to reporting based on students' gender.

PostsecData strongly supports the addition of information on 'Gender Unknown' and 'Gender Other than Provided Categories (Men/Women)'. These additional categories signal an effort to ensure students' gender identities can be more accurately reported, and they reflect institutions' stated interest in moving beyond the limitations imposed by the current use of binary gender categories. However, we urge ED to reconsider the approach to reporting on these populations.

The proposed survey would still require institutions to include students in one of two categories (men or women) to complete survey questions about race/ethnicity and age, even if they know this information is inaccurate or do not have information on students' genders. In other words, in order to get an accurate count of students in each race/ethnicity and age group category, institutions must count students as either men or women. The proposed changes include the addition of a new question asking institutions to separately identify counts of students whose gender is unknown or who do not identify as men or women but does not provide any additional information on how institutions classify those students in earlier questions. The proposed changes acknowledge that the existing categories for gender are insufficient but does not go far enough to improve accuracy and consistency in data reporting.

Institutions currently use [varying approaches in reporting data](#) for students who do not identify as men or women or whose gender is unknown, creating inconsistencies in the data reporting across schools and the proposed revisions do not fully address these inconsistencies. While the proposed changes ask institutions to identify the counts of students for whom gender is not known or not listed, it does not offer an opportunity to correct counts for men and women, meaning it is not clear in which binary gender category these students are assigned for other reporting purposes.

PostsecData recommends that IPEDS incorporate these new proposed categories in all cases where gender is currently used, to avoid requiring institutions to classify students with gender categories that do not align with students' actual identities. At a minimum, institutions should be required to provide data on enrollment counts across all four gender

categories as a supplement to current reporting, so that is clear where students whose gender is not known or not listed are classified in other reporting.

Further, the use of the term “other” in describing students may exacerbate marginalization, and ED should consider carefully whether another term might be more appropriate, or whether this category might simply be described as “Gender Not Listed.” Finally, ED should explore expanding additional gender categories that align with other students’ gender identities, while protecting student privacy and adhering to other field best practices.

4. Add median standardized test scores (ACT and SAT scores) and include other admission considerations in Admissions (ADM) survey.

PostsecData supports the addition of reporting fields for median test scores. Median test scores are easily understood and this inclusion, in addition to the 25th and 75th percentiles already collected, will provide clearer data about the admissions practices of institutions, and can be used by prospective students and to inform research and policy. PostsecData also applauds the inclusion of IPEDS questions about other considerations that institutions use in the admissions process, including work experience, personal statements/essays, and [legacy status](#). The proposed changes to admissions considerations will help students by improving transparency in admission processes and inform efforts to promote equity in college access. ED should also consider additional questions about institutional admissions practices, including questions on institutional [recruitment practices](#), whether or not institutions consider first-generation status in their admission processes, whether or not institutions use [demonstrated interest](#) in their admissions decisions, whether and how they use information on [criminal justice involvement](#), and whether they offer [early decision or early action](#) admission deadlines for applicants.

The undersigned PostsecData partners also would like to share feedback on several additional changes ED should consider for the upcoming IPEDS collection cycles beyond what’s included in the current proposal, including:

1. **Updates to the Outcome Measures and Graduation Rates surveys.** ED should add disaggregates to the Outcome Measures survey across students’ race/ethnicity, gender and age, and require Outcome Measures [for all institutions](#), including those who are not degree-granting. ED should also explore ways to streamline [Graduation Rate and Outcome Measures surveys](#), such as adding race/ethnicity disaggregation to the Outcome Measures survey. Doing so will maximize the available information while streamlining requirements on institutions and could reduce the reporting burden.
2. **Alignment of 12-month Enrollment and Fall Enrollment surveys.** ED should add disaggregates to the 12-month Enrollment survey to reflect students’ gender, race/ethnicity, age, state of residence, first-time or transfer status, enrollment intensity, degree seeking status, major field of study, and participation in distance education. While the Fall Enrollment survey includes many of these disaggregations, this survey misses

student outcomes data and other student success and persistence metrics based on enrollment status.

3. **Count degree/certificate-seeking (DCS) and non-degree/non-certificate-seeking (NDNCS) to streamline calculations of the percentage of students receiving aid:** PostsecData supports the proposed addition of counts for degree/certificate-seeking (DCS) and non-degree-seeking (NDNCS) to the Student Financial Aid (FSA) survey component to ease calculations of the share of students who are receiving Pell grants or other types of financial aid.
4. **Clarify student enrollment classification for Outcome Measures (OM) survey:** PostsecData supports the clarification to categorize students based on their fall enrollment when reporting student enrollment status. This clarification clearly explains how institutions should report student classifications and ensures cohesive procedures, improving data reliability and consistency.

PostsecData is excited to see the proposed changes to IPEDS, which would make reported data more useful and impactful for students and the field of postsecondary education. We appreciate ED’s proactive and deliberate efforts to modernize this critical postsecondary data system to meet the needs of today’s students, institutions, policymakers, and data-users. Ensuring IPEDS collects robust institutional characteristics, enrollment, completion, outcome measures and financial information is integral to successfully using data to inform policymaking at the federal, state, and institution levels and to promoting the use of consumer information in college-going decisions. We hope that ED will consider our proposed solutions and recommendations to further enhance the quality of postsecondary data available in IPEDS.

We look forward to continuing to work with ED to promote and improve IPEDS and appreciate your thoughtful and detailed approach to these improvements. If you have any questions, please contact Amanda Janice Roberson, Director of Research and Policy at the Institute for Higher Education (ajroberson@ihep.org).

Sincerely,

ACT
Achieve Atlanta
Association for Career and Technical Education
Braven
Corporation for a Skilled Workforce
National Center for Learning Disabilities
National College Attainment Network
Nexus Research and Policy Center
Institute for Higher Education Policy
Public Insight Data Corporation
South Asian Fund for Education Scholarship and Training Inc

students who do not start in the Fall and leads to an incomplete picture of student enrollment at institutions whose students do not primarily start in the Fall semester, including many community colleges and for-profit institutions. To continue to reduce burden on institutions, PostsecData recommends exploring ways to consolidate the Fall Enrollment and 12-month Enrollment surveys while preserving the critical information, especially demographic disaggregates, contained in each.

3. **Updates to the Student Financial Aid survey.** ED should work to improve several measures [related to student financial aid](#), including allowing institutions to more accurately report room and board costs for students living at home, requiring reporting on cumulative loan burdens for graduating students at different degree levels, and information about students’ use of private loans.
4. **Consider disaggregating data by disability status wherever data is disaggregated by race, ethnicity, or gender.** PostsecData recommends that IPEDS require institutions to submit data on individuals with disabilities enrolled at institutions of higher education and that such data is disaggregated in any place where it is disaggregated by race, ethnicity, or gender. Under the Americans with Disabilities Act, a person with a disability is a member of a protected class. Collection of data on outcomes in higher education pertaining to students with disabilities should be viewed no differently than data collection on other protected classes under the law, including race, ethnicity, age, and gender. Collecting similar data on the outcomes of students with disabilities at institutions of higher education would aid the development of equitable and accessible initiatives and increase data transparency on individuals with disabilities.

PostsecData also supports several other proposed changes, clarifications, and survey additions, including:

1. **Cross-cutting changes to terminology used for nonresident students:** PostsecData strongly supports the proposed changes to classification terminology in race/ethnicity measurements, from ‘nonresident alien’ to ‘nonresident.’ Revising the terminology from ‘nonresident alien’ to ‘nonresident’ humanizes international students included in this category, and there is no additional cost or burden for any stakeholders in doing so. This change is in line with recommendations made by the [Advisory Committee for Equitable Policymaking Processes](#), which emphasized the importance of using clear, specific, and respectful language.
2. **Count part-time graduate student enrollment:** PostsecData supports the proposed addition of enrollment counts for part-time graduate students in the 12-month enrollment survey. Current reporting requirements only include graduate students who are enrolled full-time, which likely dramatically underestimates total enrollment in graduate education. The proposed graduate part-time column will allow for increased accuracy in classification and reporting of student enrollment data, and in measuring full time-equivalent enrollment for graduate students. Institutions can use this data to assess

The Education Trust
The Institute for College Access & Success (TICAS)
uAspire
UnidosUS

Document: ED-2022-SCC-0026-0060

Received: April 26, 2022

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Submitter Information

Organization: Presidents' Alliance on Higher Education and Immigration

General Comment

Please see attached comment signed by 29 organizations

Attachments

2022-04-19 NPRM Comment re IPEDS_Final.docx

Delivered electronically

April 26, 2022

PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW
LBJ Building,
Room 6W208B
Washington, DC 20202-8240

Re: Department of Education Proposed Changes to the Integrated Postsecondary Education Data System (Docket ED-2022-SCC-0026)

We the undersigned 29 organizations write to submit this comment in response to the Department of Education's notice in the federal register detailing proposed changes to how institutions of higher education report data to the National Center for Education Statistics (NCES) through the Integrated Postsecondary Education Data System (IPEDS) (Docket ID number ED-2022-SCC-0026).

In Appendix A of the proposed guidance, it is proposed that institutions should report undocumented students with DACA under the "nonresident" category and undocumented students without DACA under "race/ethnicity unknown."¹ The gist of both these directives would be that neither DACA nor other undocumented college or university students would have their race/ethnicity reported by their institutions. While we are appreciative that IPEDS is seeking to provide clarification to institutions on how to report undocumented students, we find the proposed guidance highly concerning and suggest in this comment letter alternative guidance.

The sections below outline the concerns we have identified and the alternative recommendations we would suggest. To note, NCES replaces the term "nonresident alien" with "nonresident" in order to be more inclusive and align with the current administration's recommendation to drop the term "alien," which we appreciate and commend.

In Appendix D, NCES poses a set of questions for institutions to consider. Should the "nonresident" category be removed from the collection of racial and ethnic data altogether? NCES asks if institutions have any challenges or concerns with determining which students are "nonresident" for IPEDS reporting purposes and also asks if NCES was to remove the "nonresident" category if our institutions could report total student counts for all of the following citizenship options: US citizen/national; Permanent resident or other eligible non-citizens; Foreign/International student with student visa; and Unknown, which would include undocumented students.² As discussed in this comment letter, we recommend reporting undocumented students, who are Americans in all ways but formal legal status, with other domestic immigrant students with respect to their self-reported race and ethnicity. The questions posed in Appendix D, especially with regard to removing the nonresident category

altogether, merit thoughtful analysis, and below we recommend the issues that a Technical Review Panel should address in considering those questions.

SUMMARY OF CONCERNS

I. **The guidance runs counter to this administration's laudable commitments to civil rights, racial justice, and equity, issues of profound importance to the signatories.** Although this does not appear to have been NCES's intent, the proposed guidance would direct institutions not to report race or ethnicity for a significant part of their student populations, resulting in a significant undercounting of students of color. Such a directive runs counter to long-standing federal policies that have recognized the importance of accurate reporting of race and ethnicity to achieve important civil rights goals. The current "starting point" for all Federal agencies' race and ethnicity data collection standards should be the Office of Management and Budget's ("OMB") 1997 "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity" ("1997 Standards").³

These same standards were endorsed by the Obama Administration's OMB as well as an interagency working group ("Working Group") established in 2014. Although the Working Group released a 2016 report recommending limited changes to the 1997 Standards,⁴ those recommendations have not been adopted and the report referenced the 1997 Standards favorably. In fact, to emphasize its acceptance of the 1997 Standards, in 2015, the Obama Administration's OMB republished the original 1997 Federal Register Notice announcing the 1997 Standards. Not only did that Notice establish the Federal Government's current policies regarding race and ethnicity reporting, but it included a 1995 analysis examining the pros and cons of required federal reporting on race and ethnicity, and which categories should be utilized. One of the key issues that the 1995 report looked at was "whether the Federal government should collect racial and ethnic data".⁵ As set forth in that report:⁶

The United States government has long collected statistics on race and ethnicity. Such data have been used to study changes in the social, demographic, health, and economic characteristics of various groups in our population. Federal data collections, through censuses, surveys, and administrative records, have provided a historical record of the Nation's population diversity and its changing social

¹ See 62 FR 58782, "Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity" (Oct. 30, 1997), available at <https://www.federalregister.gov/documents/1997/10/30/02-28653/revisions-to-the-standards-for-the-classification-of-federal-data-on-race-and-ethnicity>; see also U.S. Department of Health and Human Services, "Explanation of Data Standards for Race, Ethnicity, Sex, Primary Language, and Disability" (May 18, 2021), available at <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=3&lvlid=54> ("The starting point for the race and ethnicity data collection standards is OMB's current government-wide standard, issued in 1997 after a comprehensive public engagement process and extensive field testing.").
² See U.S. Office of Management and Budget, "Interim Report to the Office of Management and Budget: Review of Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity" (2016), available at https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/briefing-room/presidential-actions/related-omb-material/r_e_fwg_interim_report_022417.pdf (explaining that the Working Group adopted 1997 Standards' guiding principles for its review).
³ U.S. Office of Management and Budget, "Standards for the Classification of Federal Data on Race and Ethnicity" Federal Register, Appendix 2 at § 1.2 (Jul. 9, 1997), available at https://obamawhitehouse.archives.gov/omb/fedreg_directive_15/ (citing the 1995 report and accompanying analysis, "Report to the Office of Management and Budget on the Review of Statistical Policy Directive No. 15").

¹ U.S. Department of Education, "Appendix A - IPEDS 2022-23 through 2024-25 Detailed Proposed Changes," Document ED-2022-SCC-0026-0003 (Feb. 25, 2022), available at <https://www.regulations.gov/document/ED-2022-SCC-0026-0003>.

² U.S. Department of Education, "Appendix D - IPEDS 2022-23 through 2024-25 Directed Questions," Document ED-2022-SCC-0026-0003 (Feb. 25, 2022), available at <https://www.regulations.gov/document/ED-2022-SCC-0026-0003>.

attitudes and policy concerns. Since the 1960s, data on race and ethnicity have been used extensively in civil rights monitoring and enforcement covering areas such as employment, voting rights, housing and mortgage lending, health care services, and educational opportunities. These legislatively-based priorities created the need among Federal agencies for compatible, nonduplicative data for the specific population groups that historically had suffered discrimination and differential treatment on the basis of their race or ethnicity.

The report further notes that the view of those who favor[ed] continued collection of racial and ethnic data can be summed up by the words of the writer who said, "...the measurable gains made in advancing a civil rights agenda to bring all Americans into the economic, political, and social mainstream would have been extremely difficult, if not impossible, if we did not have adequate information on racial and ethnic groups."⁶ It remains federal policy that race and ethnicity are collected and accurately reported. It is important to institutions of higher education that an accurate picture of their student population demographics is collected and that historically underrepresented and underserved populations are not ignored in such data. At a fundamental level, data accuracy has been key to civil rights monitoring as well as equity in many core areas of institutional practice. The department should not issue guidance that undermines these principles.

II. The guidance would exacerbate data discrepancies. The guidance is at odds with current practice at many institutions and would engender data discrepancies. According to the Presidents' Alliance analysis in partnership with New American Economy, there are over 427,000 undocumented students enrolled in postsecondary education, or about two percent of all postsecondary students.⁷ About 181,000 either hold DACA or would be eligible for DACA.⁸ Until now, there has been little guidance to institutions on how best to report undocumented immigrant students who grew up and were educated in the United States (what we would refer to as "domestic students") via IPEDS. Thus, current reporting of undocumented students is not consistently applied by all institutions of higher education. Some institutions consider these students "residents," others as "nonresidents," and still others do not currently track undocumented students on their campus.

A. Guidance is needed. As a general matter, we believe guidance is needed to establish some consistency in this key element of demographic reporting, and we endorse the department's decision to do so. However, the draft guidance assumes that all institutions currently disaggregate undocumented students (with and without DACA) and lawful permanent residents (LPRs) from other populations, distinguishing citizen students from others in their IPEDS data collection. As noted above, this assumption is not accurate. A number of institutions logically group LPRs and other domestic immigrant students (including undocumented students) with U.S. citizens when reporting ethnicity for IPEDS, reserving the "nonresident" category for students on non-immigrant visas, student or otherwise. Instituting the draft guidance would disrupt the continuity of data

⁶ U.S. Office of Management and Budget, "Standards for the Classification of Federal Data on Race and Ethnicity" Federal Register (Aug. 28, 1997), available at https://obamawhitehouse.archives.gov/omb/fedreg_race-ethnicity (Detailed discussion of the 1997 report's six core issues).

⁷ "Undocumented Students in Higher Education: How Many Students are in U.S. Colleges and Universities, and Who Are They?" Presidents' Alliance on Higher Education and Immigration and New American Economy (Mar. 2021), available at <https://www.highereducationportal.org/research/undocumented-students-in-higher-education-uptd-ed-march-2021/>.

⁸ *Id.*

necessarily have to track, disaggregate, and report the number of undocumented students on their campuses with and without DACA. This practice could have unintended effects on the privacy and security of undocumented students, even unintentionally. In contrast, if institutions are able to count and include all enrolled students *except* for those on non-immigrant student visas (who are carefully tracked through SEVIS, or the Student and Exchange Visitor Program), the privacy of undocumented students is better preserved. As demonstrated in the prior administration's failed attempt to require the U.S. Census Bureau to report a count of undocumented people for political purposes, even data collection that is on its face apolitical can be distorted against the populations it was meant to help.¹⁴ The laws and policies protecting the privacy and security of census data are much stronger and more effective than can be reasonably expected across campuses. We do not recommend the Department of Education direct institutions to try to distinguish between DACA or undocumented students, classify DACA recipients with "nonresidents," or track undocumented students separately.

IV. The guidance undermines efforts to serve a diverse student body

A. Institutions need an accurate count to serve their students. Tracking the race and ethnicity of their student body helps institutions adequately address the needs of specific demographic groups on their campuses. Splintering the count of minority student groups only serves to mask how those groups are faring, which subsequently affects the allocation of funds, the services provided, and the perception of these student groups as a whole.

Institutions have a responsibility to all students to maximize a student's access to higher education and nurture their ability to succeed once they are enrolled. This guidance would obscure and segregate undocumented students from their peers and school administration, making it that much more difficult for institutions to meet their educational and moral obligations to students of color, low-income students, undocumented students, and otherwise marginalized students.¹⁵ Any action that increases or ignores barriers to educational success for undocumented students and students of color is a detriment to the whole campus.

B. As noted in Section I, above, the guidance contradicts other administrative guidance and directives to recognize race and ethnicity, and support a diverse student body. Secretary of Education Miguel Cardona and other administration officials have appropriately pointed out the importance of recognizing and supporting a diverse student body, including recognizing publicly that undocumented students are "the fabric of this country."¹⁶

C. The guidance will create inconsistency among the Department of Education's K-12 and higher education policies. The Department's Civil Rights

¹⁴ President Donald J. Trump to Secretary of Commerce, *Memoandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census*, White House (Jul. 21, 2020), available at <https://trumpwhitehouse.archives.gov/presidential-actions/memoandum-excluding-illegal-aliens-apportionment-base-following-2020-census/>.

¹⁵ See *supra* note 3. Such results also contradict one of the 1997 Standards' Guiding Principles, which instructs that any changes in reporting categories should prioritize "[r]espect for individual dignity," (Guiding Principle No. 2).

¹⁶ Lois Elman, "Cardona Vows to Support Undocumented Educators and Students," *Diverse Issues in Higher Education* (Apr. 21, 2021), available at <https://www.diverseeducation.com/latest-news/article/15108793/cardona-vows-to-support-undocumented-ed-educators-and-students>.

for such undocumented students (and their institutions), placing DACA recipients in the "nonresident" category with international students and all other undocumented students under "race/ethnicity unknown" when they were previously counted with the rest of the domestic student body.

B. The draft guidance increases the administrative burden for campuses. While few institutions currently track their undocumented students, even those that do often do not distinguish among their enrolled undocumented student populations in terms of their DACA status. This is evidenced by the fact that institutions often report their undocumented students as part of their domestic student population (U.S. citizens and LPRs), and reserve the "nonresident" category for international or foreign students with a non-immigrant visa. For those institutions that do not disaggregate their undocumented domestic students from the student body, the proposed guidance would increase the administrative burden on institutions, and render it more difficult for institutions to comply with the guidance in good faith. Such administrative burden conflicts with one of the 1997 Standards' established principles ("Guiding Principles"), which provides that reporting standards should give consideration "to needs at the State and local government levels, . . . as well as to general societal needs for these data."¹⁹

III. Recategorizing undocumented students may skew data on race and ethnicity and harm the privacy of undocumented students.

A. Recategorizing undocumented students into categories where their race and ethnicity are no longer recorded may result in a substantial undercounting of students of color. The undocumented student population in higher education is overwhelmingly non-white (87%)—of the estimated 427,000 undocumented students in higher education, half (49%) are Hispanic, 24% are Asian and 13% are Black.²⁰ DACA and DACA-eligible students are 93% non-white, 70% of which are Hispanic.²¹ Removing DACA and undocumented students from the general race and ethnicity estimates for the student body would likely increase the overall share of white students reported on campus by a full percentage point, while the share of reported Hispanic students would likely drop by nearly two percent or more according to an analysis by FWD.us.²²

This skewed dataset could in turn have implications for institutions of higher education that are seeking status as a minority-serving institution ("MSI") or Hispanic-serving institution ("HSI"). Such designations create opportunities for institutions to access funding to specifically support their minority students. Directing institutions to report the demographics of their students in a way that obscures the race and ethnicity of their domestic undocumented students could cause them to lose access to critical funding. Both Title III and Title V provide funding based on race/ethnicity. For example, Title V awards funding to institutions where 25% of the student population identifies as Hispanic.²³ The new IPEDS reporting policies may undercut racial and ethnic categories comprising Title III and Title V eligibility causing some institutions to no longer qualify for Title III and Title V (to the great detriment of their students).

B. The guidance could harm the privacy and security of undocumented students. To comply with the guidance to categorize DACA students as "nonresident" and other undocumented students as "race/ethnicity unknown," institutions would

¹⁹ *Supra* at note 3 (Guiding Principle No. 6) (emphasis added).

²⁰ "Undocumented Students in Higher Education," 2021.

²¹ *Id.*

²² FWD.us, Comment to U.S. Department of Education's Proposed Changes to the IPEDS 2022-23 through 2024-25, Docket ED-2022-SCC-0026, April 26, 2022.

²³ 20 U.S.C.A. § 1101a.

Data Collection ("CRDC") program seeks to collect accurate data on race and ethnicity to better enforce civil rights violations.²⁴ The Department's Office for Civil Rights' mission "is to ensure equal access to education and to promote educational excellence through vigorous enforcement of civil rights in our nation's schools."²⁵ OCR's mission does not differentiate between K-12 schools and postsecondary institutions. Accordingly, having a different policy for universities is not only inconsistent, but it will obstruct the Department's efforts to enforce the civil rights of undocumented and DACA students.

RECOMMENDATIONS

- I. The Department of Education should allow institutions to report aggregate demographic information on their "domestic" students, defined as all students who completed high school or equivalency within the United States and were not on an F-1 visa at the time of high school graduation. This category would include all U.S. citizens, permanent residents, and other noncitizen immigrant students. This category would thus include most undocumented and DACA recipient students rather than classifying them into "race/ethnicity unknown" or "nonresident" respectively. By reporting the demographics of these students as one domestic group, undocumented students and DACA recipients will thus be classified in their respective race and ethnicity categories, generating the accurate and comprehensive information needed to measure enrollment, persistence, and other student success metrics across race/ethnicity lines.**
- A. USICS states in the DACA FAQs that "[i]ndividuals granted deferred action are not precluded by federal law from establishing domicile in the U.S."²⁶ To align with USCIS and other statements from the Department of Education affirming undocumented students as Americans in waiting,²⁷ we encourage the Department of Education to promulgate guidance that encourages institutions of higher education to classify these students as "domestic" students.**
- B. We do not recommend that the Department of Education direct institutions to try to distinguish between DACA or undocumented students or track them specifically through IPEDS, but rather simply include them in the aggregate count of "domestic" students.**
- II. The Department of Education should reserve the category of "nonresident" for reporting students on F-1 or J-1 visas who enter the United States specifically to**

²⁴ See U.S. Department of Education, Civil Rights Data Collection FAQs (last updated Apr. 14, 2021), available at <https://www2.ed.gov/about/offices/list/ocr/frontpage/faq/crdc.html>. The purpose of the CRDC is to "collect[] a variety of information including student enrollment and educational programs and services, most of which is disaggregated by race/ethnicity, sex, limited English proficiency, and disability. The CRDC is a longstanding and important aspect of the ED Office for Civil Rights (OCR) overall strategy for administering and enforcing the civil rights statutes for which it is responsible."

²⁵ U.S. Department of Education, Office for Civil Rights (last updated Jan. 5, 2022), available at <https://www2.ed.gov/about/offices/list/ocr/aboutocr.html>.

²⁶ "Consideration of Deferred Action for Childhood Arrivals (DACA): Frequently Asked Questions," U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security (last reviewed/updated Aug. 31, 2022), available at <https://www.uscis.gov/humanitarian/consideration-of-deferred-action-for-childhood-arrivals-daca/frequently-asked-questions>.

²⁷ See *supra* note 16. ("Your stories have strongly influenced me . . . I'm going to take these stories with me . . . I'm going to do everything in my power to support you and support students like you. They are the fabric of this country. It's such an asset when we give all of our students an opportunity to thrive.") (quoting Sec. Cardona).

pursue their education and are expected to return to their home country after their studies are complete.

III. The Department of Education should promulgate guidance to institutions on best practices for campus data collection regarding undocumented students, including appropriate precautions to protect student privacy and data minimization practices.

- A. In addition to the alternative guidance that we recommend regarding how institutions should report the race and ethnicity of undocumented students with other domestic students, we encourage the Department to issue clear guidance on how FERPA protects undocumented students' personally identifiable information (and so should not be disclosed in the instance of a FOIA request), how to handle requests for such protected information, etc. The Department should create a working group or other mechanism to follow up with higher education and immigration groups on these practices and receive feedback for the needed guidance above.

IV. The question in Appendix D of whether institutions should report race and ethnicity for international students merits further consideration. While the U.S. categories of race and ethnicity have meaning and significance for the lived experiences of domestic students in the United States, including domestic immigrant students, international students coming to the United States specifically for their post-secondary education do not have the same context for self-identifying their race and ethnicity per U.S. categories.²¹ Indeed, international students arrive on U.S. campuses from over 200 countries. Eliminating the nonresident category and reporting international students in race/ethnicity categories would have significant data continuity issues. Such a count would subsequently increase the proportion of Asian students on many campuses, decreasing the proportion of other racial and ethnic populations and increasing the overall proportion of students of color.²² Thus eliminating the nonresident category could have unintended consequences.

While it is important for campuses to recognize that the complex interplay of race and immigration status applies to both domestic immigrant students and international students,²³ eliminating the nonresident category for IPEDS race and ethnicity reporting requires deeper discussion and careful consideration. We recommend the creation of a Technical Review Panel or more substantive working group. We stand ready to provide technical assistance and expertise to a TRP or working group.

²¹ Bryce Loo, "International Students and Experiences with Race in the United States," *World Education News and Reviews* (March 26, 2019), available at <https://wenr.wes.org/2019/03/international-students-and-experiences-with-race-in-the-united-states/>;

Elizabeth Buckner et al., "Diversity without Race: How University Internationalization Strategies Discus International Students," *Journal of International Students* 11(1), no. 1 (2021): 32-49, <https://oied.org/index.php/jis/article/view/3842/1472>.

²² In 2021, the top three countries of origin for international students were China, India, and South Korea, constituting over 50% of all international students in the United States. See *Open Doors 2021 Report on International Educational Exchange*, Open Doors (Nov. 15, 2021), available at <https://opendoorsdata.org/annual-release/international-students/#download-data>.

²³ Rajika Bhandari and Jill Welch, "Immigration and Racial Equity for Immigrant and International Students," Higher Ed Immigration Portal (Feb. 15, 2022), available at https://www.higheredimmigrationportal.org/effective_practice/immigration-and-racial-equity-for-immigrant-and-international-students/.

The Department of Education has an important opportunity to provide clarification to institutions on how to report undocumented students and continue to advance the equity and racial justice goals of this administration. We thank you for the actions taken to date and those yet to come. If you have any questions about the concerns or recommendations shared in this letter, or other issues regarding IPEDS reporting, and the impact on immigrant and international students, please feel free to contact Miriam Feldblum, Executive Director, Presidents' Alliance on Higher Education and Immigration (miriam@presidentsalliance.org).

Thank you,



Miriam Feldblum
Executive Director
Presidents' Alliance on Higher Education and Immigration

CC: Tara Lawley, Postsecondary Branch Chief, IPEDS Program Director, National Center for Education Statistics

On behalf of:

Alianto Education Fund
American Association of Collegiate Registrars and Admissions Officers
American Immigration Council
Capital Area Immigrants' Rights (CAIR) Coalition
Clearinghouse on Women's Issues
Feminist Majority Foundation
FWD.us
Hispanic Federation
Immigrants Rising
ImmSchools
Institute for Higher Education Policy (IHEP)
Japanese American Citizens League
League of United Latin American Citizens (LULAC)
National College Attainment Network
National Immigration Forum
National Skills Coalition
Niskanen Center
North Carolina Justice Center
Presidents' Alliance on Higher Education and Immigration
RAICES
ROC United
Teach For America
The Education Trust
The Institute for College Access & Success (TICAS)
UnidosUS
Welcoming America
World Education Services
World Education, Inc.

Document: ED-2022-SCC-0026-0061

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: California State University

General Comment

Thank you for the opportunity to comment on the Integrated Postsecondary Education Data System (IPEDS) collection for 2022-23 through 2024-25. Comments from California State University are provided in the attached pdf.

Attachments

IPEDS Comment_CaliforniaStateUniversity

April 26th, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division
Office of Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education

RE: Comment on Integrated Postsecondary Education Data System (IPEDS) 2022-2025 Collection Package (Docket: ED-2022-SCC-0026)

We submit the following comments in response to the referenced 60-day Notice and request for comment on the proposed changes to the Integrated Postsecondary Education Data System (IPEDS) 2022-2025 collection.

Our comments are focused on the expansion of the IPEDS 12-month enrollment survey to include an unduplicated count of noncredit enrollment and the related Directed Question #1. This change imposes substantial additional burden for many of our campuses, requiring major changes to operations. Through our colleges of professional and continuing education, California State University (CSU) serves over 50,000 students through courses and activities that span most of the categories proposed in this new collection. This change to IPEDS would require integrating this information across these various programs and associated databases and collecting and maintaining more personally identifiable information on students and program participants solely for the purposes of generating an unduplicated headcount for IPEDS. Producing these counts will require fundamental changes to how programs are operated, requiring new business processes, data collection, systems integration, and data security and associated risk mitigation efforts that are not currently in place or budgeted for the coming academic year.

The proposed timeline for collecting noncredit headcount does not provide sufficient lead time for implementing this change, given that the reporting period for 12-month enrollment reported in Fall 2023 would begin in Summer 2022, coinciding with the finalization of this Information Collection Request for IPEDS. The associated effort will likely draw down existing capacity for core operations in our

CSU Campuses
Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay

Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

colleges of continuing education and other units. We would also question the utility of such a headcount measure in providing useful information about these activities, given the wide range of duration and intensity across these activities and across various institution types.

Given our scale, we expect that it may take several years to produce an accurate unduplicated count across all of the activity categories in the guidance. However, if NCES moves forward with this addition to the collection, we would request that mandatory reporting of noncredit enrollment be delayed until at least the 2024-25 collection to allow some lead time for institutions like ours to begin to make the changes that would facilitate reasonable count of noncredit enrollment.

In response to Directed Question #1, most of our campuses report that they do not currently collect or store the race/ethnicity information required to produce disaggregated counts for noncredit enrollment. CSU Budget and business officers previously noted their concerns in with the HEERF APR collection in August 2021 during the 60-day notice, pointing to challenges and burden of reporting extensive disaggregated information required under HEERF, estimated to be in the hundreds of hours for each campus, as well as with the breadth of enrollment reporting required. This was before ED's subsequent modification of the form in October 2021 to include the requirement to report on the group of "students not otherwise categorized in IPEDS," which only became available to the field in the last several months, as one of many new reporting elements under HEERF. These additional requirements to track and report on students outside of the IPEDS universe only intensify those concerns. We support leveraging existing collections and constructs developed for the IPEDS enrollment surveys entirely for HEERF. We would not support addition of a grouping such as "students not otherwise categorized in IPEDS" or details about students receiving support under HEERF in IPEDS.

Thank you for the opportunity to comment on the proposed changes to IPEDS.

Sincerely,



[Edward Sullivan \(Apr 26, 2022 10:56 PDT\)](#)

Edward Sullivan, Ph.D.
Assistant Vice Chancellor, Institutional Research & Analyses
California State University, Office of the Chancellor

Document: ED-2022-SCC-0026-0062

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: American Association of Community Colleges

General Comment

See attached file(s)

Attachments

AACC_Comments_for_ED-2022-SCC-0026-0001

April 26, 2022

Stephanie Valentine PRA Coordinator,
Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer, Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW LBJ, Room 6W208B Washington, DC 20202-8240

RE: Request for Comments from the Department of Education (ED-2022-SCC-0026-0001)

Dear Ms. Valentine

I am writing on behalf of the American Association of Community Colleges (AACC) and the more than 1,000 community colleges it represents. AACC strongly supports making quality institution level data available to all stakeholders and interested parties. As a result, we applaud the Department's current effort to improve the collection of data to better describe postsecondary institutions and their students.

AACC has long advocated for the collection of more information on students pursuing education and training outside traditional credit bearing coursework, and we enthusiastically endorse the collection of noncredit enrollments. However, there is no avoiding the fact that for many colleges this will result in substantially increased costs, particularly if institutions have not previously collected unique student identifiers for noncredit students. Nevertheless, we believe the benefits of collecting these data outweigh the institutional burden it entails, given the extremely high number of students enrolled in non-credit programs at community colleges and their importance to the community college mission. Furthermore, for years NCES has collected finance and staffing data that include noncredit activities, without having the ability to link that to the students served. The current proposal will improve that.

In response to Directed question #1 (in Appendix D), we believe that data on the race/ethnicity and gender of noncredit students is important; however, since many of our colleges do not currently have these data, we are extremely concerned the burden this may create. We note that, since the HEERF reporting is a time-limited reporting requirement, and likely will not generate a one-to-one relation to the proposed IPEDS data collection for noncredit students, it does not provide a sufficient rationale for inclusion of this disaggregated data.

AACC strongly endorses the collection of separate data on dual enrolled students in higher education. Dual enrollment has increased dramatically in recent years, and this new data collection will provide critical insight into how many students are earning postsecondary

educational credits while still enrolled in high school. Equitable access to dual enrollment is an important policy consideration, and we endorse the collection of dual enrollment by race/ethnicity and gender.

We are, however, concerned that embedded in the collection dual enrollment data is the assumption that dual enrolled students are nondegree/certificate seeking students (The current and proposed instructions state, "Note: High school students enrolled in creditable courses prior to high school graduation are considered nondegree/non-certificate-seeking students."). In some cases, dual enrollment students may be enrolled in programs that are intended to provide both a postsecondary credential and high school diploma. As such, they are in fact credential seeking students who earn credentials reported in the completions survey. We encourage NCES to review the exclusion of dual enrollment students from degree seeking classification.

Institutions currently document whether they provide "Remedial Services" on the IC survey. On the proposed changes to the Institutional Characteristics (IC) survey there is an assumption that "remedial services" are all noncredit: "Remove Remedial services option from Question 4 (Starting in 2023-24 covered by noncredit education screening question)." While the inclusion of "Developmental Education" as one of the options in ICH question # 5 provides some relevant information, it does not fully answer the question of whether colleges are offering developmental education services if they are offering these services in a credit-based modality. However, given the continued evolution of the delivery of development education services, it is unclear the value of this item for consumer information or analytical purposes.

The proposed IC question 2b, "What types of student employment opportunities are offered by your institution?" is unclear, as the employment opportunity is not necessarily "offered" by the institution but made available to the student by the institution—a subtle but important distinction. Perhaps better wording would be "What types of student employment opportunities are available to students at your institution?"

AACC supports the move to collect better gender data on IPEDS and believes that this proposal is sensitive to both the institutional burden considerations as well as reporting data that are more sensitive to the ways that individuals self-identify.

In response to Guided question #4 (in appendix D) on the Nonresident category collection. Collecting data by race and ethnicity for all students (regardless of citizen status) is an important goal. However, disaggregated race ethnicity for all four categories would significantly increase institutional burden, and for many categories lead to small cell sizes and subsequent privacy restrictions or suppression. This needs to be considered as final policies are developed. It is also unclear where DACA students would be reported as part of the four

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categories based on the proposed changes to IPEDS. Understanding how well community colleges are serving the diverse communities in which they are located is for AACC an important federal data collection priority. Therefore, AACC is concerned about any changes that would reduce this information. Consequently, the proposed categories in appendix d, or the revised clarification for DACA students in the proposed changes, need further consideration to understand their impact on historical data trends and federal, state, and local policy.

Please Feel to contact me with any questions.

Sincerely,

Kent Phillippe

Kent A. Phillippe
Vice President, Research & Student Success
American Association of Community Colleges

PH: 202-416-4505
Email: kphillippe@aacc.nche.edu

Document: ED-2022-SCC-0026-0063

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: Office of Institutional Research, Planning, and Assessment, University of Maryland - College Park

General Comment

On behalf of the Office of Institutional Research, Planning, and Assessment at the University of Maryland, I am writing in support of the proposal to add a separate collection of "gender unknown" and "gender other than provided categories (Men/Women)." This proposal takes an important step towards creating both a more inclusive environment for students on campus and more inclusive and accurate reporting about our students.

Our community members have advocated for more inclusive, gender-affirming policies. For example, students helped design and implement Pronouns Pronouncement Day on campus and supported efforts to add more gender-neutral

bathrooms on campus. At the petition of our students, the University of Maryland Senate approved formal Policies and Procedures Governing Preferred/Primary Names and Sex/Gender Markers in University Databases in 2017. This policy calls for the inclusion of additional gender and gender identity markers in University records, not just the binary male/female markers currently used in federal reporting.

Policies like this impact students' well-being. A recent statement of evidence from the Society for Research in Child Development, co-authored by Dr. Jessica Fish, an Assistant Professor at the University of Maryland, shows that gender-affirming policies can improve students' mental health. This proposed change in IPEDS reporting is one such policy.

Our office is pleased to support this step toward an important revision to IPEDS reporting guidelines.

Sincerely,

Michelle Appel
Director, Assessment and Decision Support
Office of Institutional Research, Planning, and Assessment
University of Maryland
College Park, MD 20742

[Document: ED-2022-SCC-0026-0064](#)

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: National Association of Independent Colleges and Universities

General Comment

Please note the attached PDF with comment from the National Association of Independent Colleges and Universities (NAICU). We appreciate the opportunity to provide feedback.

Attachments

NAICU IPEDS Comment April 2022

April 26, 2022

Ms. Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division
Office of Chief Data Officer
Office of Planning, Evaluation and Policy Development

Dear Ms. Valentine,

On behalf of the member institutions and associations of the National Association of Independent Colleges and Universities (NAICU), I write in response to a request for comments regarding proposed changes to the Integrated Postsecondary Education Data System (IPEDS), 2022-23 through 2024-25 (*Docket ID ED-2022-SCC-0026, as published on February 25, 2022, Federal Register*). The following addresses suggested changes to IPEDS, and in particular data to be collected in the 12-month Enrollment (E12) survey.

NAICU is the national public policy association for the nation's 1,700+ private, nonprofit colleges and universities. Reflecting the diversity of private, nonprofit higher education in the U.S., our member institutions include major research universities, faith-based colleges, Historically Black Colleges and Universities, Minority-Serving Institutions and Tribal Colleges and Universities, art and design colleges, traditional liberal arts and science institutions, women's colleges, work colleges, two-year colleges and schools of law, medicine, engineering, business and other professions.

We are hearing from many institutions that the collection and reporting of data for students enrolled in noncredit education will be problematic. Noncredit education encompasses many types of instruction – continuing, executive, technical, workshop, and others – provided to many types of students across many units of campus. For many institutions, data for and about these students – unlike information collected on credit-seeking individuals – are maintained separately, making a collection time-consuming and possibly inconsistent. Of particular concern is the requirement of an unduplicated count, which could involve a substantial effort to collect and compare student data typically not stored in a central location.

In addition, we cannot overstate concerns about the strain this addition will place on institutions, as this proposal may have underestimated the effect on colleges for which noncredit instruction is not prevalent nor central to their mission. We feel that the projected burden cited in supplemental materials may be too modest, particularly when it comes to colleges with (a) limited staff, infrastructure, resources, or access to certain data, and/or (b) disparate programs for which there is no consistent method or requirement for collecting and reporting noncredit matriculation. In short, because noncredit activity does not serve an important function universally across our sector and others, capturing detailed head counts will pose a substantial challenge.



Finally, we feel the benefits of collecting noncredit student data may prove minimal considering the lack of data uniformity and, therefore, potential for unreliable reporting, comparison, and analysis.

We ask that you consider whether these data align with the primary purpose of the E12 survey, which seemingly is to collect basic enrollment information and context for the portion of the population seeking to obtain a postsecondary degree, diploma, certificate, or other formal award. This collection seems beyond that scope. We feel this disconnect and the aforementioned concerns about misapplication, demand, and burden merits your reconsideration.

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

Sincerely,



Jason Ramirez,
Director of Research and Policy Analysis
National Association of Independent Colleges and Universities

Document: ED-2022-SCC-0026-0065

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Organization: National Center for Learning Disabilities

General Comment

See attached PDF

Attachments

IPEDS Comment Letter_NCLD



April 26, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation, and Policy Development
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Re: Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25 (ED-2022-SCC-0026)

Dear Stephanie Valentine:

On behalf of the National Center for Learning Disabilities (NCLD), which represents the 1 in 5 individuals with learning and attention issues, which are brain-based difficulties that include challenges with reading, writing, math, organization, concentration, listening comprehension, social skills, motor skills or a combination of these. For 40 years, NCLD has been at the forefront of the field of learning disabilities, working side-by-side with parents, educators, and policy leaders to ensure that students with learning and attention issues have access to equal educational opportunities. I am writing in response to the U.S. Department of Education's (ED) request for comments on the Integrated Postsecondary Data System (IPEDS) 2022-23 through 2024-25. We appreciate the opportunity to comment and wish to express our strong support for the IPEDS and provide input on data to be collected in the future.

Learning disabilities (LD) are lifelong, yet there are systemic challenges that persist for individuals with LD in adulthood. In general, college students with disabilities and their families face incredible hurdles during the transition to postsecondary education, including a lack of access to quality information available to them about their post-secondary school options, an institution's disability services, and the outcomes of students with disabilities in college. This data scarcity also does not enable institutions and policymakers to closely examine how well colleges serve students with disabilities. But what we do know, from other datasets, is that students with disabilities persist through postsecondary institutions at lower rates than students without disabilities: data from the 2011 National Longitudinal Transition Study-2 showed that the postsecondary completion rate of young adults with disabilities (38.4%) was lower than that of their peers in the general population (51.2%). This is a clear indication of the need to improve IPEDS data collection and transparency in order to improve these outcomes. Therefore, NCLD strongly recommends that IPEDS require institutions to submit key data that is critical to the decision-making and success of students with disabilities in college.

Responses to the directed questions:

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

The National Center for Learning Disabilities
1220 L Street NW, Suite 100 - Box #168, Washington, DC 20005
Web: www.nclcd.org - Email: policy@nclcd.org

Category of Disability (Data Element 203), if the participant currently or formerly had an Individualized Education Program (Data Element 939) or Section 504 plan (Data Element 940). Collecting similar data on the outcomes of students with disabilities at institutions of higher education would serve similar purposes and increase data transparency on individuals with disabilities.

NCLD was pleased to see the recent updates to College Scorecard so that it is a useful tool for students and other stakeholders to gauge and compare institutional metrics. According to ED, the data "also shine a spotlight on accessible colleges that are serving their students well, including by closing gaps in the completion rates among students of color compared to their white students." Similarly, students with disabilities should be able to see how many students with disabilities enroll in that institution, and completion rates and median post-college earnings for students with disabilities compared to their peers.

Recommendation 2: Encourage institutions to publish information explaining their documentation requirements for students with disabilities to secure accommodations on their college campus.

For students with disabilities who seek to enroll in postsecondary education, there is incomplete information about the services offered by IHEs. College Navigator allows, but does not require, every IHE to provide information on the disability services offered at the institution. In 2016, NCLD examined nearly 400 institutions on College Navigator (including private, public, and for-profit institutions as well as community colleges) and only 6 of the institutions provided any information regarding disability services. While the data and information provided through College Navigator has the potential to support and improve rates of transition for all young adults from high school into the postsecondary setting, this information falls far short of being sufficient to ensure a smooth transition for students with disabilities into their postsecondary education programs.

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

In order to be eligible for reasonable accommodations under the Americans with Disabilities Act, students with disabilities in postsecondary settings must formally disclose their disability to the institution's Disability Services office (or similarly named office or division that students can access). The proposed data to be collected should already be housed within this office.

To mitigate privacy concerns, institutions currently report if at least 3 percent of students were registered for disability services. An institution shall not be required to submit information if the number of students would reveal personally identifiable information about an individual student. However, other NCES data shows that 19.4 percent of undergraduate students have reported having a disability. NCLD recognizes that this statistic was derived from a student survey as opposed to institutional reporting and many students with a disability may choose not to disclose, thus underestimating the number of students with disabilities enrolled in an institution. To mitigate this, ED could issue guidance that postsecondary institutions should encourage students to formally register with their disability services office even if they do not plan to request accommodations. The aforementioned recommendation to make information

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1220 L Street NW, Suite 100 - Box #168, Washington, DC 20005
Web: www.nclcd.org - Email: policy@nclcd.org

Yes, this collection is necessary to the proper functions of the Department of Education. A key function of ED is ensuring that students with disabilities receive equitable educational opportunities and that their civil rights under the law are upheld. Given how little information there is about students with disabilities in postsecondary education settings, ED should take on a role in improving the collection and dissemination of such information so that it is available to students and families as consumers, institutions, and policymakers.

Moreover, in ED's recently released Equity plan, "prioritizing access to and completion of an education beyond high school" is the first listed priority. ED cites in its plan that "postsecondary attainment continues to be inequitably available for traditionally underserved populations" and students with disabilities are an underserved population who face barriers to earning a postsecondary degree or certificate. Improved data collection will help to better identify these barriers so that they can be sufficiently addressed.

(4) How might the Department enhance the quality, utility, and clarity of the information to be collected

Recommendation 1: Improve data utility and quality by disaggregating all IPEDS data by disability status wherever data is disaggregated by race, ethnicity, or gender.

NCLD recommends that IPEDS requires institutions to submit data on individuals with disabilities enrolled at institutions of higher education and that such data is disaggregated in any place where it is disaggregated by race, ethnicity, or gender. Under the Americans with Disabilities Act (ADA), a person with a disability is a member of a protected class. Collection of data on outcomes in higher education pertaining to students with disabilities should be viewed no differently than data collection on other protected classes under the law, including race, ethnicity, age, and gender. ED should add disaggregate information to the Outcome Measures survey across students' race/ethnicity, gender and age, and disability status—requiring Outcome Measures for all institutions, including those who are not degree-granting. ED should also explore ways to streamline Graduation Rate and Outcome Measures surveys, such as adding disaggregation, including by disability status, to the Outcome Measures survey. Doing so will maximize the available information while streamlining requirements on institutions and could reduce the reporting burden. Additionally, we recommend that IPEDS allow institutions, to the extent possible, to disaggregate disability status by the student's type of disability as reported by the student, as an optional measure. Outcomes may be significantly different between students with different forms of disability, including especially between students with physical disabilities, students with mental health disabilities, students with learning disabilities, and students with intellectual and developmental disabilities. Including an option for the institution to indicate the student's type of disability may allow policymakers and institutions to determine if there are differences in outcomes related to type of disability and express this data to stakeholders.

For adults with disabilities who participate in workforce development programs, programs report data (performance reporting elements) that provide an opportunity to better document the populations that programs are serving so that the programs can offer customized strategies. There are ten required disability-related elements that programs are required to document, such as if the individual is an Individual with a Disability (Data Element 202),

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Web: www.nclcd.org - Email: policy@nclcd.org

about institutions' disability services more available and accessible through College Navigator could help with this.

NCLD appreciates the opportunity to provide comments. As an organization that works on behalf of students with disabilities and their families, we believe these recommendations are critical to ensuring that young adults with disabilities have sufficient information to make informed decisions about their futures. Furthermore, disaggregated data on students with disabilities, including outcomes, will enable institutions to improve their own policies and practices to increase educational equity. If we can provide additional information, please contact me at lkubatzky@nclcd.org.

Sincerely,

Lindsay Kubatzky
Director of Policy and Advocacy
National Center for Learning Disabilities

Received: April 26, 2022

Posted: April 27, 2022

Submitter Information

Government Agency: Coalition of 11 disability rights organizations (see organizations listed on the letter)

General Comment

See attached PDF

Attachments

IPEDS Comment Letter from Disability Organizations

April 26, 2022

Stephanie Valentine
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division, Office of Chief Data Officer, Office of Planning, Evaluation, and Policy Development
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Re: Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25 (ED-2022-SCC-0026)

Dear Stephanie Valentine:

The 11 undersigned organizations are writing in response to the U.S. Department of Education's (ED) request for comments on the Integrated Postsecondary Data System (IPEDS) 2022-23 through 2024-25. We appreciate the opportunity to comment and wish to express our strong support for the IPEDS and provide input on data to be collected in the future.

There are systemic challenges that persist for individuals with disabilities in adulthood. In general, college students with disabilities and their families face incredible hurdles during the transition to postsecondary education, including a lack of access to quality information available to them about their post-secondary school options, an institution's disability services, and the outcomes of students with disabilities in college. This data scarcity also does not enable institutions and policymakers to closely examine how well colleges serve students with disabilities. But what we do know, from other datasets, is that students with disabilities persist through postsecondary institutions at lower rates than students without disabilities: data from the [2011 National Longitudinal Transition Study-2](#) showed that the postsecondary completion rate of young adults with disabilities (38.4%) was lower than that of their peers in the general population (51.2%). This is a clear indication of the need to improve IPEDS data collection and transparency in order to improve these outcomes. Therefore, we strongly recommend that IPEDS require institutions to submit key data that is critical to the decision-making and success of students with disabilities in college.

Responses to the directed questions:

(1) *Is this collection necessary to the proper functions of the Department;*

Yes, this collection is necessary to the proper functions of the Department of Education. A key function of ED is ensuring that students with disabilities receive equitable educational opportunities and that their civil rights under the law are upheld. Given how little information there is about students with disabilities in postsecondary education settings, ED should take on a role in improving the collection and dissemination of such information so that it is available to students and families as consumers, institutions, and policymakers.

Moreover, in ED's recently released Equity plan, "prioritizing access to and completion of an education beyond high school" is the first listed priority. ED cites in its plan that "postsecondary

attainment continues to be inequitably available for traditionally underserved populations" and students with disabilities are an underserved population who face barriers to earning a postsecondary degree or certificate. Improved data collection will help to better identify these barriers so that they can be sufficiently addressed.

(4) *How might the Department enhance the quality, utility, and clarity of the information to be collected*

Recommendation 1: Improve data utility and quality by disaggregating all IPEDS data by disability status wherever data is disaggregated by race, ethnicity, or gender.

We recommend that IPEDS requires institutions to submit data on individuals with disabilities enrolled at institutions of higher education and that such data is disaggregated in any place where it is disaggregated by race, ethnicity, or gender. Under the Americans with Disabilities Act (ADA), a person with a disability is a member of a protected class. Collection of data on outcomes in higher education pertaining to students with disabilities should be viewed no differently than data collection on other protected classes under the law, including race, ethnicity, age, and gender. ED should add disaggregate information to the Outcome Measures survey across students' race/ethnicity, gender and age, and disability status—requiring Outcome Measures for all institutions, including those who are not degree-granting. ED should also explore ways to streamline Graduation Rate and Outcome Measures surveys, such as adding disaggregation, including by disability status, to the Outcome Measures survey. Doing so will maximize the available information while streamlining requirements on institutions and could reduce the reporting burden. Additionally, we recommend that IPEDS allow institutions, to the extent possible, to disaggregate disability status by the student's type of disability as reported by the student, as an optional measure. Outcomes may be significantly different between students with different forms of disability, including especially between students with physical disabilities, students with mental health disabilities, students with learning disabilities, and students with intellectual and developmental disabilities. Including an option for the institution to indicate the student's type of disability may allow policymakers and institutions to determine if there are differences in outcomes related to type of disability and express this data to stakeholders.

For adults with disabilities who participate in workforce development programs, programs report data (performance reporting elements) that provide an opportunity to better document the populations that programs are serving so that the programs can offer customized strategies. There are ten required disability-related elements that programs are required to document, such as if the individual is an Individual with a Disability (Data Element 202), Category of Disability (Data Element 203), if the participant currently or formerly had an Individualized Education Program (Data Element 939) or Section 504 plan (Data Element 940). Collecting similar data on the outcomes of students with disabilities at institutions of higher education would serve similar purposes and increase data transparency on individuals with disabilities.

We were pleased to see the recent updates to College Scorecard so that it is a useful tool for students and other stakeholders to gauge and compare institutional metrics. [According to ED](#), the data "also shine a spotlight on accessible colleges that are serving their students well, including by closing gaps in the completion rates among students of color compared to their

white students." Similarly, students with disabilities should be able to see how many students with disabilities enroll in that institution, and completion rates and median post-college earnings for students with disabilities compared to their peers.

Recommendation 2: Include data on comprehensive transition and postsecondary (CTP) in IPEDS

The Higher Education Opportunities Act expanded access to Title IV Federal Student aid creating a new category of Title IV-eligible higher education program, called a Comprehensive Transition and Postsecondary Program allowing financially eligible students with intellectual disability to access three forms of federal student aid (Federal Pell Grants, Federal Supplemental Educational Opportunity Grants, and Federal Work-Study funds). In 2020, this program was defined in the NCES Classification of Instruction Programs (CIP Code 30.0001) and defined as "A comprehensive transition and postsecondary (CTP) program that provides students with intellectual disabilities with academic enrichment, socialization, independent living skills, self-advocacy skills, and integrated work experiences and career skills that lead to gainful employment."

In the US, in the 2019–2020 academic year, 114 approved Comprehensive Transition Programs existed, and federal student aid was offered to 628 students with ID at 88 colleges and universities. The IPEDS data would be enhanced by providing institutions of higher education the ability to indicate if they are approved as Comprehensive Transition Programs to offer eligible students with intellectual disability access to Federal Student Aid.

Recommendation 3: Encourage institutions to publish information explaining their documentation requirements for students with disabilities to secure accommodations on their college campus in College Navigator.

For students with disabilities who seek to enroll in postsecondary education, there is incomplete information about the services offered by IHEs. College Navigator allows, but does not require, every IHE to provide information on the disability services offered at the institution. In 2016, the National Center for Learning Disabilities examined nearly 400 institutions on College Navigator (including private, public, and for-profit institutions as well as community colleges) and only 6 of the institutions provided any information regarding disability services. While the data and information provided through College Navigator has the potential to support and improve rates of transition for all young adults from high school into the postsecondary setting, this information falls far short of being sufficient to ensure a smooth transition for students with disabilities into their postsecondary education programs.

Recommendation 4: Include Inclusive Higher Education Programs in College Navigator.

Over 100-million-dollar investment has been made over the past decade from the Department of Education to create new postsecondary education options for students with intellectual disability via the Transition Postsecondary Programs for Students with Intellectual Disabilities (TPSIDs). As of July 2021, these efforts [have led to](#) the creation or expansion of higher education programs at 119 college or university campuses in 34 states in the US enrolling over 4500 students with ID (Grigal, Dukes, & Walker 2021). Additional development efforts have led to 312 colleges and universities now enrolling over 6000 students with intellectual disability. However, there is no indication of these program options in the College Navigator, making it more difficult for families and students to identify and pursue these critical and innovative

options. The IPEDS collection should consider how and where these data could be gathered and shared with college-going stakeholders.

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

In order to be eligible for reasonable accommodations under the Americans with Disabilities Act, students with disabilities in postsecondary settings must formally disclose their disability to the institution's Disability Services office (or similarly named office or division that students can access). The proposed data to be collected should already be housed within this office.

To mitigate privacy concerns, institutions currently report if at least 3 percent of students were registered for disability services. An institution shall not be required to submit information if the number of students would reveal personally identifiable information about an individual student. However, other [NCES data](#) shows that 19.4 percent of undergraduate students have reported having a disability. We recognize that this statistic was derived from a student survey as opposed to institutional reporting and many students with a disability may choose not to disclose, thus underestimating the number of students with disabilities enrolled in an institution. To mitigate this, ED could issue guidance that postsecondary institutions should encourage students to formally register with their disability services office even if they do not plan to request accommodations. The aforementioned recommendation to make information about institutions' disability services more available and accessible through College Navigator could help with this.

We appreciate the opportunity to provide comments. As a group of organizations that works to uphold the rights of individuals with disabilities, we believe these recommendations are critical to ensuring that young adults with disabilities have sufficient information to make informed decisions about their futures. Furthermore, disaggregated data on students with disabilities, including outcomes, will enable institutions to improve their own policies and practices to increase educational equity. If you have any questions, please contact Lindsay Kubatzky, Director of Policy & Advocacy at the National Center for Learning Disabilities, at lkubatzky@ncld.org.

Sincerely,

Association of University Centers on Disabilities
Autistic Self Advocacy Network
Autism Society
Center for Learner Equity
Council of Parent Attorneys and Advocates
National Center for Learning Disabilities
National Disabled Law Students Association
National Down Syndrome Congress
Think College National Coordinating Center
Think College Inclusive Higher Education Network
The Advocacy Institute

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Submitter Information

Organization: Program on Skills, Credentials, and Workforce Policy at George Washington University

General Comment

The Program on Skills, Credentials, and Workforce Policy at George Washington University, which manages the Non-degree Credentials Research Network consisting of approximately 260 researcher and stakeholder members, submits this comment *in support of* the proposed information collection request (ICR) for the Integrated Postsecondary Education Data System (Regulations.gov docket ED-2022-SCC-0026). We believe that the proposed new data fields will be generally valuable for our members' work and advance research on public policy issues related to non-degree credentials. In particular, we are pleased by the addition of measures of non-credit educational attainment. We also strongly support the addition of data breaking down enrollments by race and ethnicity, and efforts to incorporate non-credit attainment into other IPEDS data collections, including its surveys on completions, human resources, and finances.

We do, however, suggest that IES consider refining the term "continuing education" in the list of types of non-credit educational offerings that institutions can choose from. "Continuing education" could encompass such a wide variety of programs (including for-credit/degree programs) that there may be confusion on the part of institutions responding to the survey. If possible, we would also encourage IES to consider collecting more data on the ages of enrolled students. Given that noncredit education is commonly pursued by older learners, having a sense of which institutions are serving younger noncredit learners and younger learners' patterns of noncredit enrollment would be tremendously helpful for generating knowledge on the returns to noncredit education for individuals who have yet to enter the workforce or are still very early in their careers. Better data on age would also help us to evaluate the impact of state policies that encourage postsecondary enrollment for older adults, for example by providing free or discounted tuition to residents over a certain age. We do

understand the concerns that IES may have about whether this would impose a burden on reporting institutions; however, we believe it would be worthwhile to at least pilot collecting this data to evaluate hard data on the potential burden involved.

Again, we strongly support this ICR; many of our comments above are only intended to help IES think about ways to make IPEDS even more useful to the research community. We would be pleased to consult with IES about future improvements to IEPDS whenever our insights could be helpful.

