

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

Appendix G: Response to Public Comments Received During the 30-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

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Introduction

This attachment contains the responses to public comments on the annual mandatory collection of postsecondary data through IPEDS. The 30-day comment period for the IPEDS package closed on July 1, 2022. ED received a total of 25 unique comments (some comments were duplicated) with 60 total signatories (some comments are signed by multiple signatories; those from the duplicate comments are not included in this count), many covering multiple topics.

Comments related to the proposed collection of data on noncredit enrollment

Public response

NCES received 14 comments with a total of 23 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.

Commenters were mixed in their support of the additions.

Recommendations/Concerns

- Six comments with 13 signatories were positive about the changes but requested than NCES go further in collecting unduplicated counts by race/ethnicity and gender and collecting the same types of programs for-credit and noncredit.
- One comment, which included comments from 4 associations, expressed mixed support for the changes with a request for a delayed implementation timeline.
- Three additional comments requested a delayed implementation timeline, with one of these comments also asking for additional guidance.
- Four comments indicated that the noncredit collection would be too burdensome

ED response (also sent directly to commenters)

Good morning,

You are receiving this email because you commented on ED-2022-SCC-0026, Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25.

Based on comments received and discussions with the Office of Management and Budget, NCES has removed most changes related to noncredit education from the current clearance. NCES has maintained a question in IC Header and moved it forward one year to the 2022-23 collection, to provide more context for the calculations in Human Resources and Finance that are impacted because NCES does not collect information on noncredit students. Upon clearance of this package, all materials will be fully available at <https://www.reginfo.gov/public/>.

NCES continues to see noncredit education as an important collection for postsecondary education and will continue to explore options for collecting data on this key postsecondary issue. NCES will be sure to consider the comments provided as it explores these options.

One option under consideration is a voluntary supplement to the IPEDS data collection. There may be changes or additions to the collection as it was originally proposed. NCES will continue to develop instructions, definitions, and FAQs related to noncredit

education and will hold Technical Review Panel (TRP) meetings to help determine other elements that should be included as part of a voluntary collection and how to best implement the collection.

As mentioned earlier in the email, in 2022-23, NCES is also adding a checkbox question about noncredit education; the results of responses to that question will help NCES to better understand the impact of noncredit education on Human Resources and Finance calculations such as student-to-faculty ratio and revenues/expenditures per FTE by allowing NCES to identify institutions that offer noncredit education. However, some institutions may want to provide more information on the noncredit education offered by their institution.

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

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

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

Thank you again for taking the time to comment on the proposed IPEDS collection.

Sincerely,

Tara Lawley, PhD
Branch Chief
National Center for Education Statistics
tara.lawley@ed.gov

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

comments related to proposed gender change

Public response

NCES received 9 comments with a total of 17 signatories related to the new gender collection and the Directed Question related to potential future collection of gender in IPEDS. Comments were generally supportive, with one comment suggesting it is too burdensome and another comment disagreeing with the collection because they consider it ideological. One comment requested NCES wait one year and shared privacy concerns, one response to directed questions indicated that asking the question throughout the surveys would ease burden, and 5 comments asked for some clarifying information.

Recommendations/Concerns

- o Timeline (delay for a year)
- o Privacy
- o Clarify what should be included in another gender.
- o Clarify that the unknown being asked is to be used when institutions do not know their student's gender.
- o Concerns about the limited data received from external sources.
- o Questions about whether the institution should resurvey students.

ED response

This initial collection is intended to help NCES start 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 and is more limited in the types of questions that can be asked. Institutions can ask for more detailed information from students and aggregate the data when reporting to IPEDS. Current legislation in multiple regulations impacting IPEDS mandate the collection of 'gender' not sex.

For the timeline concern, NCES understand the concern but knows that for many institutions this is already a much later implementation than they would have liked for this information. NCES has tried to balance the timeline by allowing institutions to indicate that they are not currently able to provide the data.

For the privacy concern, NCES agrees, and that is the reason for the implementation of this at the total level. As NCES explores ways to collect better information, NCES will balance privacy concerns with the need to better understand the data.

NCES has added notes to screens and 4 additional FAQs in impacted surveys for clarification based on the recommendations/concerns above. Those notes and FAQs can be since in E12, EF, GR, C, and ADM packages as well as Appendix A.

Comment related to the Student Financial Aid survey component

Public response

NCES received 1 comment with 1 signatory related to the Student Financial Aid (SFA) survey component.

Recommendations/Concerns

- o Request that NCES ask institutions to report on first baccalaureate degree/certificate seeking (DCS) students instead of DCS and non-degree/non-certificate-seeking (NDNCS) students to better align with Pell requirements

ED response

NCES appreciates that for some institutions, the new categories will not completely solve the Pell calculation issue. However, the collection of this level of detail as opposed to the proposed disaggregations would add undue burden for most institutions and would render the other percentages unusable.

Comments related to the proposed race/ethnicity changes

Public response

NCES received 5 comments with 34 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 one commenter indicated that this was removing the noun. 2 commenters requested clarification of the nonresident change.

Recommendations/Concerns

- o Add ‘U.S.’ before nonresident to clarify that the question is not about students’ state residency.

ED response

Based on the comments received, NCES will add U.S. before Nonresident throughout the survey components, instructions, FAQs, and glossary. NCES and the National Postsecondary Education Cooperative (NPEC) will also continue to examine this important topic and carefully consider any future changes to this guidance.

Comments related to proposed addition of dual enrolled student collection

Public response

NCES received 2 comments with a total of 6 signatories related to the new collection of dual enrolled students in the 12 Month Enrollment survey component.

Recommendations/Concerns

- Both comments supported the addition of dual enrolled students to 12 Month Enrollment by r/e and gender.
- One of the comments recommended NCES further consider the placement of dual enrolled students in non-degree/certificate-seeking (i.e., some high school students enrolled are degree-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.

Comments

1.

RE: Request for Comments from the Department of Education (87 Federal Register 33140) Dear Ms. Pearson, 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 June 1, 2022.

Lumina appreciates the collaborative process the Department used to formulate the initial proposals for feedback on the 60-day notice. In the revised proposal there is laudable progress in many areas (i.e. collecting noncredit, gender, and residency data). However, this progress was marred by the Department's disheartening decision to lead into the future by deferring to those who are furthest behind.

Specifically, we believe the proposal would perpetuate racial inequities in educational opportunity by reinforcing structures that fail to capture or recognize the race or ethnicity of who enrolls in noncredit education programs. The Department suggests its decision is based on feedback from four-year systems, but a review of the submitted comments suggests only one four-year system (comment 61) and one university (comment 55) were against collecting these data. Moreover, the least-resourced segment of higher education favored collection (comment 40) while two four-year systems did not take issue (comments 8 & 47). Further, the Department's decision fails to recognize findings in the pre-read paper for Technical Review Panel 62 produced by Coffey Consulting (2019), which found that noncredit data already are reported in 38 states. All of this call's suggestions of an undue "institutional burden" into serious question.

Our greatest hope is that the Department reconsiders its ability to lead the sector into a more-just future instead of taking a path that perpetuates structures that render the lived experiences of millions of learners invisible.

Sincerely,

Christopher M. Mullin, Ph.D.

Strategy Director for Data and Measurement Lumina Foundation

2.

Regarding the updates to the Gender Collection. Additional guidance needs to be provided regarding the Another Gender and Unknown categories.

We've been discussing the changes in gender reporting and have differences of opinion on the use of "Unknown". The definition given was "Gender Unknown is when gender information is not known or not collected." Some of us feel that this means that the STUDENT does not know their gender, while others feel that this means that the INSTITUTION doesn't know the student's gender because it was not reported or not collected.

The second interpretation appears to be more consistent with IPEDS where they ask the total number of students for whom gender is unknown and the total number of students for who gender does not align with the “Men” and “Women” categories. So, for those STUDENT’s who do not know their own gender, they would be reported as OTHER, not Unknown.

3.

IPEDS proposed several changes for 2022-23. The proposed changes will result in an increased burden on the already time consuming IPEDS data collection and reporting process, which is a particular challenge for small institutions with one-person IR offices. Additionally, IPEDS will begin to collect counts of nonbinary students. Reporters will be prompted to provide the count of students who do not identify as men or women separately from the count of gender unknown in the various surveys where enrollment is disaggregated by gender. If reporters enter a zero, they will be required to clarify whether the institution currently collects data on nonbinary students. The proposed changes do consider the time intensive process for small institutions. This changes will force the IR office to shift priorities away from institutional priorities in an effort to meet federal regulations.

4.

On behalf of 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, and Advance CTE, the nation’s longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education across all 50 states and U.S. territories, we are writing in response to the Integrated Postsecondary Education Data System (IPEDS) Information Collection Request 30-day notice.

We would like to re-iterate from our response to the prior 60-day request our organizations’ strong support for the proposed collection of noncredit educational course offerings and related enrollments at institutions, which will develop a baseline set of information and serve as an important step in better understanding and improving these offerings.

In addition, we would like to make the following recommendations.

Align instruction/program categories across for-credit and noncredit questions: We request that the response options for questions on the types and categories offered through for-credit and noncredit education be aligned so that the same response options are available for both questions. Many of the response options proposed for the noncredit question can also be found in for-credit education. Aligning these questions and response options will better demonstrate the breadth of for-credit and noncredit offerings and their comparability. The recommended response options for both questions are listed below:

- Occupational, may lead to a certificate, degree, or other recognized postsecondary credential
- Academic, may lead to a certificate, degree, or diploma
- Workforce Education
- Contract Training/Customized Training
- Remedial Education
- Recreational/Avocational/Leisure/Personal Enrichment
- Adult Basic Education
- Adult High School Diploma or Equivalent
- English as a Second Language
- Continuing Professional Education

Disaggregate noncredit education data: We recommend that noncredit data be disaggregated by race/ethnicity and gender identity to ensure the equity implications of noncredit participation are fully understood in the context of the wider postsecondary ecosystem. In addition, we recommend that noncredit data collection be expanded in future reporting to include not only enrollment but also completion and other important outcomes indicators.

Reinstate the student employment question: We request that the proposed question on student employment opportunities offered by institutions be reinstated. This question asked about student employment opportunities such as service learning, apprenticeships, assistanceships, cooperative education and internships offered through for-credit and noncredit education. We believe this information is critical to understanding learners' opportunities to engage in work-based learning activities that prepare them for careers.

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,

Kimberly A. Green, Executive Director, Advance CTE
LeAnn Wilson, Executive Director, ACTE

5.

Provide clear guidance telling colleges to NOT ASK STUDENTS to select how they want their binary gender to be reported if they have chosen Unknown or Other. Instead, determine a NON-INVASIVE protocol for reassigning these students for reporting such as randomly assigning gender nonconforming students to ratios that reflect the known population of students. In short, allow for the gender spectrum in service of the safety of students that do not fit into the gender binary.

6.

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 through IPEDS to better describe postsecondary institutions and their students.

We are pleased to see the responsiveness to suggestions from the field on many of the proposed IPEDS collections. We will limit our comments in this to a few items in particular that AACC is concerned with.

AACC enthusiastically supports the addition of non-credit students to IPEDS reporting. Non-credit students represent an essential element of community college education and training. The absence of a national count of non-credit students leads to significant underappreciation, even misunderstanding of the role and contributions of community colleges. This situation impacts potential students, policymakers, the private sector and the general public.

The current absence of comprehensive data on non-credit students in fact prevents an assessment of what would be gained by capturing these data; however, it is clear that non-credit activity comprises a sizeable minority, and on some campuses a majority, of enrolled students. AACC estimates—very roughly—that, for every two credit students enrolled at a community college, another non-credit student is also enrolled. It is simply unacceptable to exclude these students from institutional counts and the overall picture of that college. The federal government collects some data that is of little utility; this data would be of prime importance in accounting for overall community college contributions.

Non-credit students are often enrolled in programs that lead to good-paying jobs. Many of these programs are part of career ladders or stackable credential courses that result in solid careers. Indeed, a recent study by Opportunity America Found that 65% of the non-credit programs offered at community colleges were in five fields: health care, business, information technology, and advanced manufacturing or skilled trades. These courses are hardly an ancillary, “discretionary” part of the college’s activity— they are central to its mission. We would note, too, that non-credit, often certificate programs at other types of institutions are high-profile, and costly, and provide significant professional growth. Their students should be reflected in IPEDS.

The TRP has worked thoughtfully to ensure that new reporting requirements for non-credit students are manageable within colleges’ current resource levels. It is because of the complexity of gathering data on these students that more ambitious collection activity, such as student demographic characteristics are being eschewed. AACC appreciates the challenge with reporting unduplicated headcount for non-credit enrollment, and if duplicated headcount is provided as an option, we encourage NCES to limit the number of collection cycles unduplicated headcount is allowed. The TRP addressing this topic and the resulting, pending IPEDS collection proposal forged an appropriate middle ground.

AACC continues to strongly endorse the collection of separate data on dual enrolled students in higher education. Dual enrolment 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 enrolment by race/ethnicity and gender. AACC encourages NCES to continue to examine changing the inclusion of dual enrolled students in the non-degree/certificate-seeking category to more accurately reflect the role of dual enrollment activities for attainment of credentials.

We support the amended language on how to treat nonresident students in the race/ethnicity categories throughout IPEDS surveys. We also support the suggested changes in the language for collection of nonbinary genders and encourages NCES to continue to explore ways to maintain student privacy while recognizing the importance of not stigmatizing students.

Sincerely,

Kent A. Phillippe

Vice President, Research & Student Success American Association of Community Colleges

7.

On behalf of the undersigned organizations, we write to offer our comments on the proposed changes to the Integrated Postsecondary Education Data System (IPEDS) offered by the Department of Education (Department), as detailed in Docket ID ED- 2022-SCC-0026.

We were encouraged by the Department’s responsiveness to institutions’ feedback in the previous comment period, as well as the careful attention given to striking an appropriate balance between an increased understanding of institutional characteristics and the burden changes in this area may impose. In particular, we welcome the addition to the Institutional Characteristics survey form of a checkbox indicating whether institutions have Comprehensive Transition and Postsecondary (CTP) Programs for students with intellectual disabilities. Making it easier for students and families to identify institutions with CTP programs will allow for greater access to these important programs.

Beyond the provision for CTP programs, our comments will focus on three areas of particular salience to our membership: the proposed changes to the reporting of gender; guidance on categorizing non-resident students; and the expansion of enrollment counts to include enrollment in non-credit activity.

Changes to gender options

We support the Department's efforts to expand options for reporting gender across multiple IPEDS survey components. Many institutions already collect more detailed information about students' gender identities than IPEDS currently allows for. Adding "another gender" and "gender unknown" to the survey forms may require some modifications to institutional systems, but we believe these would not be unduly burdensome for these institutions.

For institutions that currently only collect two gender categories (i.e., "male" and "female"), this expansion will be difficult to implement on a short timeframe. Any changes to IPEDS reporting should ensure that institutions are able to collect the necessary data from students to complete the surveys accurately. Providing a one-year implementation period would allow institutions to modify their systems to meet the new requirement and accurately collect gender information for currently enrolled students.

Further, we urge the Department to take appropriate precautions against divulging students' gender identities. Disaggregating data by gender could make it easier to identify nonbinary, transgender, and other students in the "another gender" category through IPEDS data. It is important that the Department consider how to responsibly protect students in reporting this data in any final changes.

Guidance on nonresident students

We support updating the existing language in the survey to eliminate outdated terminology such as "alien." We urge the Department to offer careful guidance on which groups of students should be categorized as nonresident. Adding the designation of "U.S. Nonresident" aligns with existing institutional categorizations of students, distinguishes these students from U.S. citizens who reside in a different state, and provides clarity as to these students' status. Combined with what should be careful changes such as these, this will also serve a mutual federal and institutional interest in appropriately identifying institutions serving populations that would qualify them for additional federal assistance under Titles III and V of the Higher Education Act.

As with the proposed changes to the gender categories, we have heard concerns from institutions regarding the importance of privacy protections in collecting this data. Given varying state policies on undocumented students, we would strongly urge the Department to use caution in reporting small numbers of students. While unlikely, the possibility remains that disaggregation among a small sample size could reveal sensitive information about these students.

Including non-credit enrollment activity

There is a diversity of opinion within the higher education community as to the merits of this proposal. Some of our member institutions, including community colleges and those for which non-credit activity is an important part of the institutional mission, would stand to benefit from this addition. Adding unduplicated non-credit enrollment to IPEDS would allow those institutions to more accurately report educational expenses, which already include expenses related to non-credit activity.

However, there is serious concern among all institutions about the burden this requirement would impose. Institutions with significant non-credit activity have expressed the view that while the requirement would be burdensome, the benefits arising from the resulting data would make it worthwhile. For other institutions, particularly large institutions

and systems and smaller institutions at which non-credit activity is minimal, there would be no discernable benefit for the requirement, while being exceedingly costly to comply with.

Adding to this challenge, institutions would be forced to make changes to their data infrastructure on an accelerated timeframe. While the Department does not plan to begin collecting data on dual enrolled and noncredit students until the 2023-24 data collection, institutions will have to implement collection procedures for the data immediately in order to capture data for reporting in the 2023-24 collection's 12-Month Enrollment survey component, which collects unduplicated student enrollment for the period of July 1, 2022 to June 30, 2023.

Beyond the burden challenges, there is uniform agreement among our members that even though the Department revised the 12-Month Enrollment survey form to clarify that institutions may report duplicated headcounts, this change does not alleviate the enormous effort many institutions will have to make to integrate non-credit enrollment data from across campus into the datasets used for IPEDS reporting. Similarly, the reporting of duplicated headcounts on an institution-by-institution basis will make the collected data unreliable and unable to be used for comparison purposes, negating any value that may derive from this effort.

Our members raised further questions about the definition of non-credit enrollment activity, which extends beyond the examples included in the survey package. For example, institutions are unclear on whether they will be required to report students enrolled in life-long learning initiatives, extension programs, or courses that might not match the existing categories of noncredit education.

For these reasons, we strongly urge the Department to consider delaying implementation, offering additional guidance on non-credit activity, and creating separate survey packages for institutions for which non-credit activity is an important part of the mission to address concerns with burden at institutions for which the value of the additional information does not outweigh the costs it would impose.

We appreciate the Department's attention to our comments on the proposed changes to the IPEDS surveys. We look forward to working with the Department and other stakeholders to ensure that any changes made will serve the needs of students, borrowers, educators and institutions.

Sincerely,
Ted Mitchell President

On behalf of:

American Association of State Colleges and Universities
American Council on Education
Association of Public and Land-grant Universities
National Association of Independent Colleges and Universities

8.

This letter is in reference to the Integrated Post-Secondary Education Data System's Information Collection Request (ICR) 30-day notice, agency/docket number ED-2022-SCC-0026 and document number 2022-11712, submitted 6/1/2022 with comments due 7/1/2022. The Non-degree Credentials Research Network based at George Washington University, consisting of approximately 300 researcher and stakeholder members whose work deals with non-degree credentials of all types, submits this comment *in support of* the proposed information collection request. We believe that the proposed new data fields to be collected 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.

While we strongly support the ICR in the aggregate, we do specifically request an alignment of the language used to describe different types of non-degree and degree programs. Please see Appendix A of the package submitted to OMB, page 6, in which the following questions are proposed:

- Which of the following types of for-credit instruction/programs are offered by your institution?
- Which of the following categories of noncredit education are offered by your institution?

We believe that the same responses should be available to respondents for both questions, preferably incorporating all response options currently offered on either question onto both questions. We believe that this will help analysts and researchers to compare the availability of credit-bearing and non-credit programs. We note that many of the options NCES has proposed for non-credit only can also be found in the universe of for-credit offerings, including remedial courses, continuing education, and contract training. Thus, we propose that the following be added as a term of clearance:

OMB directs NCES to give institutions the following choices for describing both their for-credit instruction/programs and noncredit education offerings:

- *Occupational, may lead to a certificate, degree, or other recognized postsecondary credential*
- *Academic, may lead to a certificate, degree, or diploma*
- *Workforce Education*
- *Contract Training/Customized Training*
- *Remedial Education*
- *Recreational/Avocational/Leisure/Personal Enrichment*
- *Adult Basic Education*
- *Adult High School Diploma or Equivalent*
- *English as a Second Language*
- *Continuing Professional Education*

We also request that institutions that double-count certain degree and non-degree enrollments provide an estimate of the number of students who are double-counted, rather than merely checking a box to indicate that double-counting exists (as is currently proposed; see Appendix A, Part D: "Institutions should attempt to provide an unduplicated headcount; however, NCES recognizes the challenges with reporting an unduplicated count. If your institution is currently unable to provide an unduplicated headcount, please provide a duplicated headcount. Institutions will be asked to indicate whether the headcount is duplicated or unduplicated"). Thus, we propose the following term of clearance:

OMB directs NCES to ask for the number of enrollments (estimated or actual) that are duplicated instead of asking whether their headcount is duplicated or unduplicated.

Finally, we note with concern that the National Center for Education Statistics is not proposing to collect race and ethnicity data on non-credit enrollments in the next wave of data collection. We believe that such data is essential for research and policy evaluation on inequality in higher education. Knowing whether non-credit enrollment is more or less likely to contain racial minorities would be invaluable information for guiding policy decisions on whether and how to financially support non-credit enrollment. Therefore, we propose the following term of clearance:

OMB directs NCES to require that higher education institutions report detailed enrollment data in non-credit programs by race and ethnicity. If not feasible to include this data collection in the next wave of IPEDS questionnaires, NCES should develop a plan for collecting data on noncredit enrollment by race and ethnicity at the earliest possible opportunity.

Again, we strongly support this ICR. We would be pleased to consult with IES about future improvements to IPEDS whenever our insights could be helpful.

Regards,

The NCRN team at George Washington University

Kyle Albert

Andrew Reamer

Holly Zanville

Co-signed by the following NCRN members:

Michelle Van Noy (individual signer, affiliation: Rutgers University)

Workcred, an affiliate of the American National Standards Institute Association for Career and Technical Education

Jane Oates (individual signer, affiliation: Working Nation)

Chris van der Westhuyzen (individual signer, affiliation: University of California, Davis)

Advance CTE

Sarah Cashdollar (individual signer, affiliation: Illinois Workforce and Education Research Collaborative)

Territorium

9.

The Center for Academic Innovation (Academic Innovation) at the University of Michigan (U-M) works to further the mission of U-M by partnering with academic units to expand access to quality education while reshaping learning experiences to be more personalized, engaged, and lifelong. Academic Innovation manages a portfolio of online learning experiences offered through both external portals such as Coursera, edX, and FutureLearn, and an internally developed platform, Michigan Online Global Classroom. While this portfolio includes online and hybrid degree programs and certain credit-pathway opportunities, a significant portion of the overall portfolio is composed of noncredit learning experiences such as Massive Open Online Courses (MOOCs).

We are grateful for this opportunity to submit comments in response to the notice of proposed revisions to information collection, titled *Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25*, which was posted in the Federal Register on June 1, 2022.

A. Overview

We agree that the proposed additions of dual enrollment and noncredit enrollment information can prove valuable to advancing education research and policy. The Department asks how it might “enhance the quality, utility, and clarity of the information to be collected,” which we hope to address with this Comment.

With regard to noncredit enrollment reporting, specifically, we have concerns over the implementation timeline and believe the proposed definitions may generate substantial confusion as institutions attempt to identify qualifying experiences and enrolled learners.

B. Noncredit Activities at U-M: “Learners,” “Students,” and Third-Party Platforms

Each year, U-M provides hundreds of open online learning experiences to millions of learners who are not otherwise affiliated with traditional academic programs offered by U-M schools and colleges. Learners may register through a variety of U-M processes or those existing with a third party (e.g., Coursera, edX, and FutureLearn) depending on the experience involved. Generally, these learners pay no tuition or fees unless seeking a certificate of completion.

In the vast majority of cases, learners do register and make payments (when applicable) through one of these third-party vendors. U-M does not serve as the “owner” of learner data in such cases despite having control over the curriculum and content for the noncredit course or program involved. Such data does not enter any central database maintained by U-M and the learners themselves are not considered “students” despite their participation in experiences with materials created by U-M instructors.

As noted, learners may also engage in similar noncredit activities (e.g., MOOCs), offered via an in-house learning platform where U-M would have direct access to and control over registration data. The collection of personal information is kept to a minimum, however, and data that are collected are still not included within a centrally maintained database. Likewise, these learners are still not considered “students” for other intents and purposes (e.g., they would not receive student services and benefits and are not asked to pay associated fees).

Finally, U-M has been a pioneering institution in offering what are called “Teach-Outs” on topics of public interest that bring together subject matter experts, including U-M faculty, as part of organized learning experiences that are completely free, easily accessible (i.e., they may not require registration to engage), and are open to the public. These can be offered through various third-party portals or over social media platforms as well as U-M controlled platforms. They can also be offered as cross-platform experiences. Other short-form content, which may be more or less formal in terms of curriculum, registration, and course components, are also available to learners, with such activities expected to grow in the coming years. The degree to which U-M would have access to learner data for Teach-Outs and other short-form content varies considerably depending on the platform used.

C. Concerns with Proposed Noncredit Definitions and Reporting Directions

On page 51 of the 12 Month Enrollment Package (ED-2022-SCC-0026-0003, attachment 7), the criteria for noncredit education for which enrollment should be reported includes the following—with a note, however, that not all criteria must be satisfied:

- Noncredit education should consist of formalized instructional activity, typically packaged as a course or sequence of educational activities.
- Noncredit education typically has an identified time period for instructional activity (i.e., start and end dates), documented learning objectives (e.g., skills, competencies, or proficiencies to be learned or developed), and a planned curriculum (e.g., course units, modules).
- Students go through a formalized enrollment process (e.g., application, sign-up, rostered course) even if the process is different than for-credit enrollment.
- There are institutional administrative elements that establish and manage noncredit education (e.g., division, dean, program manager).

When attempting to apply these guidelines, we are not confident in determining whether enrollments associated with some or perhaps all of the experiences described in Section B of this Comment would be considered reportable. On the one hand, all of these experiences are “open” and therefore lack formal application processes with admissions criteria, which might suggest that participating learners should not be counted; while on the other, many of the remaining descriptions (e.g., arrangement in courses or series, planned curriculum, learning objectives, start-and-end dates, etc.) could apply, suggesting these types of experiences are covered within the scope of noncredit education.

Due to this ambiguity, we believe the application of these guidelines will be inconsistent from one institution to the next and result in inaccurate or potentially misleading results. As comments submitted during a previous public comment window have also suggested, one could even interpret these guidelines to include faculty and staff training and professional development, which may not be at all what NCES is looking for with this data collection request. Ultimately, we believe many institutions will want to avoid adding burden unnecessarily and adopt a more narrow reading. Such institutions may even consider changing their noncredit experiences to avoid employing too many of the criteria, which could negatively impact the quality of these offerings, to avoid having to take on the additional collection and reporting burden. Meanwhile, other institutions may wish to report as many enrollments as possible as a way to highlight the popularity of their programs. Ultimately, reporting based on a universal understanding and application of the criteria would be unlikely given the diversity of noncredit activities and the discretion afforded to institutions when interpreting these guidelines.

If the Department wishes to encourage apples-to-apples comparisons, we suggest that NCES revise this language to create more limited and explicit criteria. For example, NCES might consider limiting criteria to include only activities where an enrollment or registration process specifically occurs at the institution (i.e., exempting courses and programs offered through partnerships with MOOC aggregators such as Coursera) or to include only experiences with a formal application and admissions process. These suggestions may also help ensure institutions would actually have access to relevant learner information and can cross-reference enrollments with for-credit datasets.

With any reading of these guidelines, however, accurately identifying all potentially covered noncredit activities across U-M's nineteen largely independent schools and colleges—let alone obtaining details about noncredit students or learners participating in those experiences—would require substantial updates to data infrastructure and significant time and effort to build awareness (as is outlined in Section D, below). We believe the burden estimates and suggested implementation timeline, where tracking this noncredit activity would need to somehow begin in just a couple of months, are unrealistic for large, complex institutions. We therefore request at least one additional year to begin implementing these IPEDS changes if they are approved.

Alternatively, we believe it may be beneficial to instead employ a voluntary pilot program approach where institutions opting to report noncredit enrollments would be given the opportunity to also detail their assumptions and any challenges encountered. This exercise may inform new, more precise definitions and guidelines to share with institutions, resulting in more consistent approaches that could enhance the quality, utility, and clarity of the information being requested.

D. Concerns with Data Collection and Reporting

In each of the examples listed in Section B of this Comment, participation in the learning experience would not depend in any way on a learner's ability to meet certain admission criteria or provide personal information similar to what would be requested in a formal application to a for-credit program at U-M. Currently enrolled U-M students, along with U-M alumni, faculty, and staff, could be among the participants but are treated no differently with regard to data collection and processing. While more information about U-M affiliated learners would theoretically be obtainable, our current practice is to not link registration in these activities with student or employee files. This practice was established to prioritize data privacy and security principles. For participants with no U-M affiliation, the opportunities for data collection or access would vary by the nature of the experience and applicable contractual arrangements with vendors hosting our learning experiences on their platforms.

Assuming all relevant activities could be identified, it is not clear whether that data could be centrally maintained and what unique identifiers might be applied that could be used consistently across each noncredit learning environment to avoid producing duplicated headcounts. Such a system would also need to track noncredit enrollments alongside for-credit student counts to ensure any students with both for-credit and noncredit designations could be reported in the for-credit rather than noncredit enrollment section, per the instructions in the 12 Month Enrollment Package. Names and emails used may differ based on the activity selected, further complicating these efforts, and it ultimately seems unlikely that data could be accurately produced without significant cost and burden (e.g., investing in the unique tools, creating unique course codes, determining census dates, training staff, and updating procedures to ensure consistency).

Regarding the proposed request to track these experiences as "clock hour" or "other"—with a requirement to provide more information when choosing the latter—we are unsure what the expectations are for this request given that numerous different approaches would be used across potentially hundreds of unique qualifying activities. Additionally, we believe it is likely that many qualifying experiences would not employ any formal method to estimate effort. We therefore request that this requirement either be removed or some combination of "multiple calculation methods used," "not applicable," or "unknown" options be added.

Additionally, determining when “enrollment” occurs may also prove to be a challenge. Would institutions have flexibility in determining a reasonable census date to count registrants as having enrolled? Must a learner complete an assignment or have otherwise demonstrated academic engagement prior to being considered enrolled? Without further direction, it is likely that learners who sign up but never actually engage with an experience would be counted regardless of what NCES may have actually intended. Once again, institutions may also apply different interpretations to their reporting, leading to data that is not very usable for institutional comparisons and not viewed as particularly helpful to future policymaking efforts.

Finally, we have concerns regarding how the Part D noncredit reporting section might be expanded in future years. The supplemental materials provided note that race/ethnicity and gender information could later be requested for consistency with Higher Education Emergency Relief Fund reporting criteria, which would already result in significant changes to Part D as currently outlined. Adding these or other collection categories (e.g., other 12-month enrollment requirements¹) would subject what may be millions of learners at our institution alone to sharing sensitive personal information not otherwise necessary for or relevant to the learning experiences they have signed up for. We agree that collecting demographic information may be valuable for research and policymaking purposes, but we ask that NCES weigh those benefits against data sharing concerns learners may have and also consider how such requests may add burden to registration processes for both learners and institutions.

E. Applicability of Federal Rules and Accreditor Expectations

If the definition of a “student” were expanded for IPEDS purposes, this could raise new questions regarding the applicability of Title IV provisions and other federal requirements, such as those in the Family Educational Rights and Privacy Act (FERPA) and its implementing regulations. For example:

- Would MOOC learners who participate in experiences that may not be considered “distance education” now be countable as “correspondence students,” potentially jeopardizing an institution’s eligibility for Title IV funding?²
- How might a lack of prior credentials such as a high-school diploma be viewed under these same eligibility requirements with regard to noncredit education?
- Will learners become students for accreditation purposes with access to internal and external complaint procedures?
- Must noncredit programs meet the same expectations for quality and rigor as for-credit online degree and certificate programs, including expectations codified in quality frameworks used by national accreditors?
- Would a noncredit learner who has not otherwise been “in attendance” at the institution now receive FERPA protections if the institution is required to maintain education records relating to the learner exclusively for IPEDS purposes?

While much of the existing regulatory framework for distance learning distinguishes between noncredit and for-credit or Title IV-eligible and non-eligible programs, there are also regulations that apply to the institution itself rather than individual programs or activities. We believe that it is therefore important to first determine how the inclusion of noncredit enrollments would be viewed by the Department and other enforcement agencies when interpreting applicable laws and regulations and to consider whether updates may be needed prior to requiring institutions to provide this information.

F. Summary and Recommendations

While we believe the inclusion of noncredit enrollments could prove beneficial to future research and policymaking efforts, we also believe that the language used in the current proposal could also have wide-ranging consequences for institutions and may create considerable confusion leading to flawed data reporting. In particular, we request clarification as to:

1. Whether there are certain parameters around which individuals (as opposed to activities) should be counted as enrolled in noncredit education when considering the unique data relationships that may exist between noncredit learners and the institutions offering these experiences; and
2. Whether expanded data collection with regard to noncredit activities and enrollments could have broader compliance implications with regard to federal, state, and accreditor requirements that apply to “students” and “enrollments” but may not have been intended for noncredit learning environments.

Additionally, we ask the Department to consider asking NCES to limit the scope of its noncredit reporting criteria to ensure all institutions are reporting the same data, and to either:

1. Delay implementation of any noncredit enrollment reporting changes for at least one additional year so that institutions can update data collection systems and reporting procedures; or
2. Make the noncredit enrollment reporting requirement voluntary for an initial pilot period of at least one year and update guidelines and definitions using results and feedback.

Academic Innovation appreciates this opportunity to comment on these complex issues. Please direct any correspondence pertaining to this comment to:

James DeVaney
Academic Innovation
Harlan Hatcher Graduate Library
913 South University Avenue
Ann Arbor, MI 48109

Sincerely,

James DeVaney

Associate Vice Provost
University of Michigan

10.

I support OIRA's approval of the National Center for Education Statistics (NCES) ICR for the Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25 (OMB Control #1850-0582) with a term of clearance that directs the NCES to provide a report to OIRA in 180 days regarding 1) the desirability and feasibility of requiring IHEs to provide data on noncredit enrollments by race/ethnicity and gender and 2) in light of these findings, specific steps that NCES will take in the design of IPEDS 2023-2024 and 2024-25.

On p. 9 of Appendix E of the ICR, NCES notes that it will "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." While I appreciate NCES's declaration of general intent, in light of the high value of these data in furthering President Biden's equity agenda, I encourage OIRA to provide NCES with specific and workable guidance for examining its options and acting on the results of that examination.

Thank you for the opportunity to provide comments.

11.

I write once more to urge that 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). As an individual with deep institutional experience in gathering and reporting data, I can state confidently that

the proposal to add two new questions asking for institutions to count students enrolled in noncredit education and to disaggregate those data by gender and race/ethnicity will not rise to the level of an undue burden.

After I wrote in late April about the imperative for collecting noncredit data, there has been some pushback—arising chiefly from 4-year institutions—about the perceived effort involved in answering these two simple questions. My direct work with a range of institutions and organizations (4-year, 2-year, and SHEEO agencies) disputes the notion of undue burden. In fact, every institution engaged in noncredit education already knows its enrollment in these programs and collects gender and race/ethnicity demographics on noncredit students. I wish to remind staff and others that are tasked with making sense of all previous comments that only a very small sliver of comments are opposed. Sound institutional management practice would dictate that institutions already have 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. 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,
[signed]

Richard A. Voorhees, Principal
Voorhees Group LLC

12.

Dear OMB and ED staff,

At the University of Alaska Fairbanks, we have a long tradition of providing noncredit instruction that disseminates knowledge about cutting-edge research, Alaska Native knowledge systems and workforce training to communities throughout Alaska.

Recently we expanded our offerings and now reach noncredit learners throughout the world with our edX partnership. Our noncredit programs emphasize the North and its diverse peoples and cultures using a variety of offerings and modalities with instruction by our Community campuses and learning centers as well as our main campus in Fairbanks, Alaska. We appreciate the intent behind the drive to report noncredit instruction but have several concerns and recommendations. We specifically recommend that any change to reporting be delayed until the 2024-2025 year at the earliest to allow for development of data collection processes for noncredit enrollment data and having deliberate discussions to meaningfully and tightly define noncredit categories.

Implementing changes to IPEDS reporting will create an undue burden on many institutions, including UAF. The landscape of noncredit offering is complex with no clear definitions and consensus on what falls within the definitions for reporting purposes. Noncredit offerings are widely distributed and handled through multiple systems to facilitate ease of individual operations. Currently, data for noncredit activity are not collected within the enterprise student information system used for credit-enrolled students, making it difficult to track students enrolled in both for- credit and noncredit activities. The significantly increased effort, time, and resource commitment required to structure and collect data for noncredit reporting will reduce our ability to provide essential noncredit activities that our community members and stakeholders rely on, especially in rural locations.

Lastly, we recognize the value of including race and ethnicity data to enable improved assessment of inequalities in higher education, however providing demographic data is often voluntary for noncredit activities, so including this in reporting may be inaccurate and requiring it may deter noncredit learners from participation. Noncredit courses that are delivered through third-party platforms, such as edX and Canvas Catalog, may not collect demographic data. For these reasons, we recommend not requiring institutions to report noncredit activity by race/ethnicity and gender categories.

With warm regards,

Jenn Pedersen and Chantelle McGinness

13.

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25 (Docket ED-2022-SCC-0026)

We the undersigned 29 organizations write to express our strong support for the U.S. Department of Education's updated guidance in the Federal Register detailing revised 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).

We are very heartened by the updated guidance by the Department, which will allow institutions to report aggregate demographic information on their "domestic" or "eligible non-citizen" students, including 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." By reporting the demographics of these students, 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.

Likewise, we also appreciate and commend NCES for not only replacing 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," but for your decision to add "U.S." ("U.S. nonresident") on collection pages to reduce confusion with terms related to state residency.

Finally, as we noted previously, the questions posed in Appendix D, especially regarding the removal of the nonresident category, merit thoughtful analysis—we stand ready to support and engage in such discussions. We thank you for the actions taken to date and for those yet to come. If you have any questions, 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:

Aliento 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.

14.

In an AIR presentation I attended, one of the changes discussed was changing non-resident alien to non-resident. I think this is confusing based on the tuition residency that is in both IPEDS and our schools. One option is to say "International/nonresident alien." I'm sure there are others such as Non-citizen/non-resident alien. Please consider some different wording. Thanks.

15.

Please allow an "other gender" category at the very least to accommodate students who don't fall into the "man" and "woman" categories.

16.

Thank you for taking the critical step toward recognizing binary designations for gender are increasingly inaccurate. However, it appears that reporting must still feed back into binary selection. This is at best inaccurate and random, and at worst harmful to students who may be asked to identify as "Other" or "Unknown" only to be redirected back to a binary selection.

This essentially pulls the rug out from under the student, presenting a false concern with more inclusive language only to reiterate an unflinching binary categorization.

It would be best to not realign a non-binary gender selection back to a binary at all, but if it must be done for any temporary amount of time the please release the guidance that students should not be subject to making this decision. Otherwise it appears as if the college is asking "but what gender are you really?" and erases the student's identity.

17.

Northwest Missouri State University would like to request that the non-credit activity collection is postponed from the 2023-24 cycle to the 2024-25 cycle. By having this in the 2023-2024 collection of 12-month enrollment, it means we have to start tracking July 2022 since the 12-month enrollment survey looks backward for one year. This would mean data collection would start 1 day after open comments close. By placing apply the change in the 2024-25 cycle we would have one year to prepare our campus on how to collect the data.

18.

Re: 1. Directed question on gender collection in student surveys

- a. My institution (a 4-year public) does collect another gender other than Men/Women.
- b. My institution could report all the existing screens in the student surveys by "gender unknown" and "another gender than provided categories." Doing so would decrease institutional burden, because we would not need to recode or impute values for individuals with known gender that is not Man/Woman.

I am supportive of the proposed changes, and in particular the proposition in part b of this question. I would like to encourage NCES to consider making similar changes to the HR collection.

Re: 2. Directed question on nonresident category collection

- a. My institution does not have challenges in this area.
- b. My institution could report mostly complete r/e data US citizens, permanent residents, and other eligible noncitizens. It could report r/e for some international students. It could probably report complete or mostly complete data for unknown citizenship students (although we do not have very many such students).
- c. Currently, we do not know r/e for about 60% of our international students. We are considering resurveying all students (domestic and international) to improve our r/e collection and completeness, and that would likely reduce that 60% somewhat. Were NCES to adopt this change, we would likely give some thought to other ways we could improve the completeness of our data among international students specifically.
- d. I am supportive of the proposed changes. Not reporting the r/e of international students causes an underrepresentation of the diversity of our campuses, and erases the racial and ethnic identity of these students. I would encourage NCES to continue to collect a count of international students, separately from the r/e questions, in order to maintain some degree of continuity in the historical data.

19.

The proposed addition of non-credit headcounts in itself is not problematic, but the time frame is. This data is scheduled to be a part of the 2023-24 12E reporting, which will ask for enrollments from July 1, 2022 to June 30, 2023. This reporting time frame is less than a month away.

We do not currently collect demographic information on our non-credit students. Their data is housed in a different data system, and we will need to build the coding and reporting infrastructure to gather and maintain demographic data. We also currently do not code our non-credit courses by clock hour, and will need to adjust that coding as well. We would appreciate it if the department would delay this new reporting for non-credit enrollment until the 2024-25 12E cycle.

20.

Collecting noncredit enrollment counts would impose substantial burden on institutions, particularly for four-year state systems and smaller independent colleges.

21.

I am very concerned about the upcoming reporting of noncredit enrollment data. This seems like a reach beyond the scope of IPEDS and will place quite a burden on schools. Most noncredit enrollment is likely not covered by federal financial aid; therefore schools should not be accountable to the feds for this data. Further, many schools do not track this kind of enrollment like they do for for-credit enrollment - this will create a huge burden to get data aligned with IPEDS standards.

22.

I have been an IPEDS keyholder at a women's college that is gender diverse for over 5 years. I see a number of challenges with the proposed changes to the reporting by sex to IPEDs.

1. There is a difference between sex and gender. IPEDs would ideally be collecting both. Sex tends to be biologically based and what is recognized in most jurisdictions for identification as legally defined as male or female. This is what is collected on the US census and globally on most legal documents. IPEDS uses the term gender, but it really collects legal sex. Because IPEDS uses the term Gender there are reasonable requests to add more options. Is there a utility to continue collecting sex, I am not sure.

Gender is defined as a more expansive identity and refers to an individual's sense of who they are. One can identify as a man or women, but also in a growing combination of each (gender fluid, gender queer, etc.), neither man or women (non- binary, agender) or gender queer identities. It might be more meaningful for IPEDS to collect this information rather than legal sex if there is only one option but I am not sure this is what Congress

is asking for. If IPEDS were to collect gender in addition to legal sex, it would need to include guidance for the growing list of identities which will likely for practical (and size reasons at many institutions) have to be reported as “another gender”.

2. Not all institutions systematically collect gender identity, although all institutions collect legal sex. This suggests that gender identity should be a separate and optional reporting item unless Congress wants this information to be a required collection.
3. I do see great value for understanding the success of gender non-conforming students with regard to graduation and retention.
4. I am unsure how the collection of gender identity impacts same-sex institutions who have students who would be reported in categories that are not aligned with their title IX exemptions. It is possible for gender transitions to lead to different reporting of student's gender but not sex at birth (unless they get a legal correction), which also creates a similar issue). There will be many more non-binary students than students changing from female to male and male to female in my experience collecting these data. I am not sure what non-binary means in terms of title IX for athletics and other binary based reporting that rely on IPEDS data to test for compliance with gender equity.

In conclusion, I would hope gender identity is a separate collection. I am concerned that we have confused sex and gender in this discussion about changing the reporting options. This will have negative impact on the comparability of data between institutions if we add new categories to the legal sex collection that IPEDS currently is doing. The addition of new categories will change the collection from legal sex to gender identify and institutions will need to prepare for these changes as a new data collection requirement.

23.

As a Director of Institutional Research at a private institution in Indiana, I am concerned about the proposed changes to the 12-month enrollment survey; specifically in relation to the questions pertaining to reporting race/ethnicity and gender of non-credit and dual enrollment. For non-credit in particular, many institutions try to limit the data we collect for these students as they cannot receive financial aid and usually only take 1-2 courses; as such, we currently do not collect their race/ethnicity or gender. For dual enrollment, we also try to balance the privacy of minor students by only collecting data that is absolutely necessary for facilitating enrollment. I strongly urge the committee to reconsider requiring reporting of race/ethnicity and gender for these populations as it would negatively impact access to these courses. We have a significant number of Hispanic/Latino adult learners interested in noncredit courses who would not enroll if we were to ask them about their citizenship, especially when they pay out-of-pocket.

I also disagree with the recommendation to change the Student Financial Aid Survey Part A & B, instructions that ask for a new value of 'Degree/certificate seeking'. As an institution with a very large second baccalaureate degree population, this still does nothing to address the fact that our Pell grant recipient percentage (overall for undergraduates) is vastly misleading due to the large number of non-Pell eligible undergraduate students who enroll at our school. The new reported value should read 'Of those in Group 1, those who are first baccalaureate degree/certificate seeking' to align with Title IV requirements for Pell grant.

24.

While I appreciate any forward movement on acknowledging gender identity through NCES data collection, I am concerned about the harm that would continue by requiring colleges to allocate individuals to a binary category and the impact on data validity by having students largely randomly distributed across the data which will impact measuring any equity gaps between men and women. Additionally, there is likely a need for more guidance on the categorization of trans men and trans women specifically; If only the binary options are retained for capturing enrollment/achievement data, I would like to see guidance indicating that trans men be reported with men and trans women reported with

women. Lastly, also pertaining to trans men and trans women, since we are able to allocate those individuals to a binary category (hopefully respecting their identities), would that mean we do not include them in the count of 'Another gender'? This would likely result in significantly lower reported numbers in these fields, perhaps underrepresenting the size of the trans/non-binary population; different colleges could also take different approaches without clearer guidance, with some reporting trans men/women as 'another gender' (with additional discrepancies in which binary category they are reported in) and others not reporting trans men/women as 'another gender' because they are reported in alignment with their gender identity/presentation. Thank you.

25.

Removing the term "alien" removes the noun, that is the thing in question. Leaving only adjectives "resident" or "nonresident" obscures what is being asked: the person's actual status. All students are presumably residents. Adding genders beyond male/female is either unnecessarily intrusive to those born inter-sex or is presenting as objective fact the subjective impressions of people. Either way, it is not scientific but rather an ideological approach to the issue.