

# Integrated Postsecondary Education Data System (IPEDS) 2024-25 through 2026-27

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

**OMB No. 1850-0582 v.33**

***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 60-day comment period for the IPEDS package closed on May 3, 2024. ED received a total of 748 comments (though six comments were duplicated and one comment was submitted to other 60-day notice by mistake) from 883 total signatories (some comments are signed by multiple signatories; those from the duplicate comment are not included in this count), many covering multiple topics.

Due to the large volume of comments, the comments (except of one that was submitted to ED-2024-SCC-0039 by mistake) are not listed in this document and are available on Regulations.gov (<https://www.regulations.gov/docket/ED-2024-SCC-0040>; Browse All Comments).

Submitter category*	Submissions	Signatories**
<b>Total</b>	748	883
Institution of Higher Education; State Higher Education Office	405	401
Association/Organization; Civil Rights; National or State Advocacy Organization; Community Organization	47	158
Individual; Student; Teacher; Education consultant	50	66
Federal agency	49	57
Other; None selected	197	201

\* Categories are self-reported. Based on email addresses, many reporters misreported their affiliation, especially in the Federal agency category.

Note: 'Other; None selected' category includes anonymous submitters.

# Comments related to retirement of IPEDS Academic Libraries (AL) survey component

## Public comment

NCES received 717 comments with a total of 820 signatories related to the retirement of IPEDS Academic Libraries (AL) survey component starting the 2025-26 data collection. Out of these, 701 comments advocated for retaining AL, citing its reliability in comparing libraries across institutions; its importance to the teaching, learning, and research functions; and its role in the planning, assessment, and evaluation of postsecondary institutions and the nation's postsecondary library infrastructure. Some feedback from commenters suggested restructuring the survey to address issues with data clarity and detail, as well as expanding it to include such library functions as library instruction. On the other hand, 16 comments supported removing AL, citing concerns about data accuracy, limited use, and the burden of data submission, particularly for smaller academic libraries.

## ED response

Thank you for your feedback regarding the proposed retirement of AL survey component. NCES acknowledges the importance of academic libraries to postsecondary institutions and values the input received. NCES recognizes the importance of academic libraries; however, demands are continuously being made for more data from IPEDS (for example, see other comments requesting data on students with disabilities, another gender, health and mental health, first generation students, etc.). To stay within its own budgetary constraints and staffing limitations given the continuous growth of data elements, NCES must prioritize the data it collects.

NCES's budget constraints and staffing limitations are not new. As pointed out in the 2022 review of NCES by the National Academies of Sciences, Engineering, and Medicine (NASEM 2022), the division that manages the IPEDS data collection lost 9 employees between FY 15 and FY21; and these staff have not been replaced. The real dollars for NCES statistics, and for the IPEDS program, have steadily decreased since FY09 (Elchert & Pierson, 2020).

In addition, NCES must consider the reporting burden on institutions. IPEDS reporting is mandatory for all institutions that are eligible for Title IV federal student aid, and reporting noncompliance can lead to institutional fines (20 USC 1094, Section 487(a)(17)).

Recognizing that NCES must make hard choices about which data collections can be maintained, the NASEM review recommended that "NCES should conduct a top-to-bottom review of its data-acquisition activities, to prioritize topics most relevant to understanding contemporary education, and to discontinue activities that are disproportionately costly and burdensome relative to their value" (NASEM 2022, p. 64-65).

In light of this recommendation, the need to minimize the burden on institutions, and NCES's fiscal and staffing constraints, NCES reached its decision to retire the AL components from the IPEDS data collection based on the following considerations.

- 1. Limited usage of academic library data.** While AL data are used by many in the library community, they are the least used data in the IPEDS collection according to web analytics: the AL survey component file was downloaded less than 100 times between September 2023 and mid-March 2024 (this period encompasses the most recent release of these data). In addition, the responses to this clearance show that the need for this collection is the ability for institutions to benchmark themselves using IPEDS data. The ability to benchmark is a side benefit of IPEDS but is not the main purpose for the collection, which is to collect data necessary for policymakers to make decisions, meet legislative requirements, and provide consumer information for students.
- 2. The AL reporting imposes increased burden for IPEDS.** Some commenters also mentioned that they do not consider the reporting burdensome; however, burden estimates and requirements to avoid excessive burden are required by the Paperwork Reduction Act (PRA; P.L. 96-511) are applicable for all surveys collected by federal agencies (including optional surveys) – and the Academic Libraries component contributes to the overall IPEDS burden estimate. In addition, the IPEDS data reporters responsible for collecting and submitting data to NCES are not the academic librarians. Institutions can be fined for not reporting to IPEDS (20 USC 1094, Section 487(a)(17)), and the ultimate burden lies on the IPEDS data reporters to verify the data reported. In addition, while there were fewer comments from institutions that find the AL component burdensome, several small institutions indicated that they consider the AL component burdensome.
- 3. Requirements for collection.** Most data elements collected by IPEDS are legislatively mandated or have been developed to respond to needs of policy makers. While the Education Sciences Reform Act (ESRA; P.L. 107-279) mandates NCES to collect data on "the existence and use of school libraries," which was mentioned by multiple commenters. However, ESRA does not require IPEDS to collect data on academic library circulations, staffing, finances, or other topics. (Note that ESRA

uses the label “school libraries” and does not refer to academic libraries). The data on libraries to be maintained in IPEDS meets the mandate of ESRA.

- a. **Retention of basic academic library data.** The retirement of the AL survey component does not mean that all elements related to academic libraries are to be removed from IPEDS. NCES will maintain questions about academic libraries (e.g., about resources or services provided by the institution and staff counts for the Standard Occupational Categories (SOC) classifications, including *Librarians and Media Collections Specialist* 25-4020 and *Library Technicians* 25-4030). This is in line with what IPEDS collects for other institutional resources and services.

The AL survey component is the only survey in IPEDS dedicated to an individual institutional resource or service. Representatives from other student resource offices and student service offices at institutions, much like academic libraries, have budget and staffing limitations and have asked NCES to collect additional information for the purpose of benchmarking with other institutions. Some of these requests were included in a report developed for the National Postsecondary Education Cooperative (NPEC) (Miller & Clery 2019). These other resources and services at institutions have not had the privilege of a federal data collection and must rely on nonfederal surveys to allow for benchmarking. The academic library community has the nonfederal [ACRL Academic Library Trends and Statistics survey](#). Some commenters pointed out that access to the ACRL data are not currently free to libraries; however, while IPEDS data are free for libraries to use the Government no longer has the budget to absorb the cost to collect and disseminate the academic libraries data.

4. **Data quality issues.** Finally, some commenters mentioned that they question the accuracy of the AL data reported to IPEDS. NCES has similar concerns: several data quality checks have revealed instances of duplicate data reported for institutions that share library resources. These instances not only compromise the accuracy of the data, but they also undermine its meaningfulness for analyses conducted on the entire universe of institutions reporting to IPEDS. In particular, data on circulations, especially digital circulations, are challenging to collect in a meaningful way. The challenges to check and ensure the quality of these specific data components have also supported the conclusion that the retirement of the AL survey component is warranted.

It is also worth noting that NCES has tried to collaborate with another agency to continue the survey and that the retirement of the AL components has not occurred suddenly or without notice. Beginning in 2021, NCES started to communicate its plans to retire the AL survey component with the 2025-26 data collection to the Academic Libraries Task Force (which includes the Association of College and Research Libraries (ACRL), American Library Association (ALA), and Association of Research Libraries (ARL)) and has reached out to the Institute of Museum and Library Services (IMLS) in the hopes that IMLS could assume responsibility for the survey, especially as IMLS has more knowledge of library statistics. However, even though discussions were initiated with IMLS, IMLS could only take on the survey were NCES to fund it. None of the budget and staffing limitations that led to the initial decision to propose retiring the AL components have changed since 2021, and both NCES and IMLS must operate within their budgets, prioritizing data collections as mentioned previously.

In summary, the decision to retire the AL survey component was not taken lightly, nor were cuts to other important NCES data collections including the Baccalaureate and Beyond Longitudinal Study (B&B), School Survey on Crime and Safety (SSOCS), Fast Response Survey System (FRSS), the National Survey of Postsecondary Faculty (NSOPF), one grade of the Trends in International Mathematics and Science Study (TIMSS), Progress in International Reading Literacy Study (PIRLS), and International Computer and Information Literacy Study (ICILS). NCES recognizes the value of the AL survey component, which is why it has maintained this collection for as long as it has despite ever-increasing competing demands and resource constraints.

Thank you again for sharing your comments on the use and importance of the AL data. We appreciate your understanding as we strive to balance these considerations.

## References:

National Academies of Sciences, Engineering, and Medicine. (2022). *A Vision and Roadmap for Education Statistics*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26392>.

Miller, A. & Clery, S. (2019). *Updating and Aligning the IPEDS Institutional Characteristics Survey Component*. Washington, DC: National Postsecondary Education Cooperative. [https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC\\_Paper\\_Updating\\_Aligning\\_IPEDS\\_Institutional\\_Characteristics\\_Survey\\_Component.pdf](https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC_Paper_Updating_Aligning_IPEDS_Institutional_Characteristics_Survey_Component.pdf).

Elchert, D. & Pierson, S. (2020, June). National Center for Education Statistics Faces Program Cuts. *AMSTAT News*. <https://magazine.amstat.org/blog/2020/06/01/nces-faces-program-cuts/>

## Associated comments

ED-2024-SCC-0040-00:

04, 07, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 269, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 598, 599, 600, 601, 602, 603, 605, 606, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 633, 634, 636, 638, 639, 640, 642, 643, 644, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 658, 659, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 696, 697, 698, 700, 701, 702, 703, 704, 705, 707, 708, 709, 710, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 724, 725, 726, 727, 728, 729, 731, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751.

## Comments related to Gender Unknown or Another Gender than Provided Categories question

### Public response

NCES received two comments with a total of two signatories related to the Gender Unknown or Another Gender than Provided Categories question.

### Recommendations/Concerns

- One comment suggested to reconsider the way the counts for “another gender” are reported, allowing institutions to only leave the reporting fields blank for any counts of less than 5 students.
- Other comment suggested to revise the proposed option to “No, my institution does not collect data on another gender” to avoid possible misinterpretation.

### ED response

Thank you for your insightful comments regarding the reporting of “other gender.” We appreciate your concern for accurately representing the students’ identities while maintaining confidentiality and privacy standards.

To clarify, in certain IPEDS survey components like Fall Enrollment and 12-month Enrollment, we collect data on total numbers of students identifying as “another gender” in the supplemental section of the Gender Unknown or Another Gender than Provided Categories question. However, in other sections of the survey components where the data is collected by race/ethnicity and full-time/part-time status, reporting is done using a binary gender category (Men/Women); this does not represent a change from historical reporting requirements. In the Admission survey component, we gather data on Another Gender by number of applicants, admits, and enrolled full-time and part-time, though this will change with the addition of counts by race/ethnicity in 2025-26, when the collection will mirror the other student collections with a supplemental section for another gender. Total number of enrolled is calculated by aggregating full-time and part-time counts.

We recognize the challenges posed by the “all or nothing” approach to reporting the data, particularly when dealing with small counts that may compromise anonymity. We are committed to exploring options to enhance the representation of diverse identities while upholding privacy standards. Your feedback is invaluable as we strive to improve methodologies and ensure inclusive data reporting practices across all survey components.

Regarding the comment related to the proposed third option, we have provided clarifying guidance above the answer options on the survey screen as well as instructions in the relevant survey forms. Institutions should indicate ‘Yes’ when they are able to report another gender and enter ‘0’ if no students identified as another gender.

We appreciate your feedback and thank you again for your engagement and support of IPEDS.

### Associated comments

ED-2024-SCC-0040-00:

06, 632.

## Comments related to the introduction of the Cost (CST) survey component

### Public response

NCES received 13 comments with 41 signatories related to the introduction of the new Cost (CST) survey component.

### Recommendations/Concerns

- Nine comments expressed support for the reorganization of the data collection to remove the data elements from the Institutional Characteristics (IC) and Student Financial Aid (SFA) survey component into the new CST survey.
- Four comments opposed the addition, indicating the unnecessary burden to institutions and suggesting postponing the change until 2025-26.

### ED response

Thank you for your valuable feedback regarding the addition of the new Cost survey component. We appreciate the opportunity to clarify its purpose and implementation.

The addition of CST survey does not introduce new data elements, apart from 2 elements (#9 and #10) that were added to IPEDS as a result of Department of Education collection and reporting requirements that stem from the FAFSA Simplification Act. The purpose of the creation of CST was the reorganization of existing data elements from the IC and SFA survey components to better align reporting and reduce confusion about the student categories and aid types.

The purpose of streamlining the data collection process into one survey component is to alleviate the burden on institutions by placing related data elements into a single survey component and reducing the uncertainty about where to make changes, improve the timeliness of the fall data release by moving the release of cost data to the Winter, and allow for improvements in creating the HEA mandated college cost lists that take into account corrections made by institutions. This reorganization enhances data coherence and ease of data editing and should decrease burden for institutions.

In the longer term, this will allow NCES to address the potential for improvements to the collection of data on cost of attendance and the net price of attendance and improve the collection of data in the SFA survey component.

We hope this clarification addresses any concerns regarding the addition of the new CST survey component.

Thank you again for your engagement and support of IPEDS.

### Associated comments

ED-2024-SCC-0040-00:

04, 05, 45, 198, 421, 500, 630, 633, 641, 660, 723, 733, 737.

## Comments related to a binary gender category

### Public response

NCES received three comments with three signatories on adding in a third gender category and/or allowing institutions to report all new categories without allocating them into the binary gender category (Men/Women).

### ED response

Thank you for your suggestions regarding the inclusion of a third gender category and the possibility of reporting all gender categories across relevant survey components without the need for binary allocation (Men/Women). We acknowledge the importance of inclusivity and representation in our data collection. However, as an administrative data collection that gathers data from institutions rather than individuals, IPEDS must carefully consider institutional burden and potential privacy concerns. While institutions may collect more detailed information from students, the disaggregation of another gender by race/ethnicity would require additional privacy protections that are not currently in IPEDS.

As NCES explores ways to collect more comprehensive information, we remain committed to balancing privacy concerns with the need to better understanding of different student populations.

### Associated comments

ED-2024-SCC-0040-00:

04, 21, 635.

## Comments related to the students with disabilities data collection efforts

### Public response

NCES received three comments from several organizations representing a total of 26 signatories regarding the data collection efforts for students with disabilities in IPEDS.

### Recommendations/Concerns

- The Association on Higher Education and Disability (AHEAD) shared several recommendations, including capturing information on accommodation requests and eligibility, as well as providing detailed data on disability categories.
- The National Center for Learning Disabilities (NCLD) suggests adding data on outcomes like graduation rates and degree completions for students with disabilities.
- Postsecondary Data Collaborative advocates for consideration of enrollment and outcomes data for students with disabilities through research and stakeholder engagement.

### ED response

Thank you for your insightful recommendations. NCES recognizes the significance of enhancing data collection efforts regarding students with disabilities within IPEDS.

The IPEDS National Postsecondary Education Cooperative (NPEC) has commissioned a research paper to examine ways in which we might enhance data collection for students with disabilities. The purpose of this research is to help NCES identify potential ways to collect more detailed information while also considering the challenges that institutions may have in reporting these data. The paper will provide insights into the feasibility of collecting data on students with disabilities and disabilities services and addressing concerns about definitions, availability of data at the institutional level, limitations of student reported disability status, and student privacy concerns (including limitations related to HIPAA). It is also important that NCES ensures that any additions to the collection are valid and reliable. NCES looks forward using this research to find appropriate and feasible ways to address the availability of data necessary to support the needs of students with disabilities.

Thank you again for your recommendations.

### Associated comments

ED-2022-SCC-0026-00:

410, 682, 723.

## Comments related to the Admissions survey component

### Public response

NCES received five comments with 48 signatories related to the changes that will be implemented for the 2025-26 IPEDS Admissions (ADM) survey component.

### Recommendations/Concerns

- Three comments provided support for the changes to the ADM survey component, highlighting the benefits of expanding Part C to collect disaggregated counts of applicants, admits, and enrolled students by race/ethnicity and full-time/part-time enrollment status. There was also some support for adding Part E to collect data on Waitlist, Early Decision, and Early Action (if applicable).
- Three recommendations for making additional changes to the 2025-26 ADM survey component to enhance effectiveness were offered. The recommendations include (1) collecting the number of students enrolled through early decision and early action programs, (2) disaggregating the number of students that applied, were admitted, and enrolled through early action and early decision programs by race/ethnicity, and (3) improving the definition of “Considers legacy status” in Part B.
- One comment proposes revisions to eliminate disaggregation of applicants, admits, and enrolled by first-time and part-time statuses in Part C, as well as eliminating the collection of waitlist rank categorical questions and detailed waitlist counts.
- One concern is raised regarding the expansion of data on applicants, admits, and enrolled counts by race/ethnicity, suggesting it may be misleading due to a court ruling prohibiting institutions from considering an applicant’s race or ethnicity in admissions decisions.

### ED response

Thank you for your feedback regarding the changes being implemented for the 2025-26 IPEDS ADM survey component. We appreciate the support for the expansion of Part C and addition of Part E. We have noted the suggestions for revision and concerns.

NCES started the process for updating and modernizing the ADM survey component in 2018, prompted by a paper commissioned by the National Postsecondary Education Cooperative (NPEC) aimed at improving the survey component. NCES then held a Technical Review Panel (TRP) in June of 2021 to review and comment on the recommendations from the NPEC commissioned paper.

Based on the recommendations from both the NPEC and the TRP, NCES implemented changes to the response scale for admissions considerations and added three new admissions considerations in 2022-23: legacy status, work experience, and personal statement or essay. As other recommendations required more time for implementation, NCES initially planned to propose ADM changes for the 2026-27 data collection to meet the 3-year OMB approval requirement due in 2025-26. However, following discussions within the Department, NCES decided to prioritize the implementation of ADM changes on a shortened timeline. As a result, the ADM changes are proposed for the 2025-26, allowing data reporters a year to prepare their reporting systems by providing preview materials during the 2024-25 data collection, thus, improving the quality of the data collection.

Please note admission considerations data are not collected and will not be collected by race/ethnicity or gender. The proposed disaggregation by race/ethnicity affects the collection of the number of students that applied, were admitted, and that enrolled and align with existing data collection practices for student enrollment counts. The race/ethnicity categories will be consistent with the agency-wide standards and the Office of Management and Budget’s Statistical Policy Directive 15 (SPD-15). At this time NCES plans to implement the new standards starting with the 2027-28 data collection; any changes to this will be communicated to institutions.

To make the data collection processes as comprehensive and informative as possible to meet the needs of various stakeholders while being mindful of feasibility of accurate data reporting and institutional reporting burden, NCES revised the language around admission considerations, including guidance about reporting legacy status, for clarity. These changes can be viewed in the materials submitted as outlined in the Change Memo.

NCES has also made changes to the Early Action, Early Decision, and Waitlist options based on feedback from the 60-day comment period. These changes can also be viewed in the materials submitted as outlined in the Change Memo. The changes include the addition of enrolled students for Early Action and Early Decision and the removal of detailed options for Waitlists.

NCES did not change the disaggregation of enrollment by full- and part-time. We will look at this more closely but as this is a longstanding collection, we need to ensure we make a thorough evaluation of the impact before making any change.

Thank you again for your input. We are grateful for your engagement and collaboration.

#### [Associated comments](#)

ED-2022-SCC-0026-00:

607, 706, 723, 732, 733.

## Comments related to the collection of more disaggregated data for student and faculty demographics

NCES received one comment with one signatory related to the collection of more information on LGBTQIA+ friendly postsecondary institutions which protect DEI and MSI-related focuses. The comment also suggested to collect more data on student and faculty ethnicity demographics, recommending not to aggregate Asian and Pacific Islanders categories together.

### Public response

Thank you for your comment. NCES understands the importance of collecting disaggregated data, but must still consider feasibility, small cell sizes, and privacy concerns. NCES data collections, including IPEDS, adhere to the Office of Management and Budget (OMB) guidance regarding the collection of race and ethnicity data. On March 29, 2024, OMB posted [revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity](#) that intend to improve the collection of race and ethnicity data collections across the Federal government. These revisions will impact the collection of race and ethnicity categories in IPEDS. NCES plans to engage with institutions and others to determine the best way to collect data in IPEDS and other data collections in the coming months.

Regarding LGBTQIA+ friendly colleges and universities data, NCES does not collect data to identify institutions that would fall into this category. IPEDS is an institution level survey and does not ask institutions to report on students' sexual identity or require institutions to collect gender identity beyond the binary men/women categories. While we are working on enhancing data collection to provide more nuanced understanding of the inclusivity and transparency in higher education, we are mindful of privacy concerns due to data disaggregation and potential small cell sizes and the limits of an institution level (vs. student level) survey.

Thank you again for your comment. We remain committed to exploring options to enhance the representation of diverse higher education institutions and their students while upholding privacy standards. Your feedback is invaluable as we strive to improve methodologies and ensure inclusive data reporting practices across all survey components.

### Recommendations/Concerns

#### ED response

#### Associated comments

ED-2022-SCC-0026-00:

502.

## Comments related to collection of data on physical health, mental health, and well-being services and programs

### Public response

NCES received one comment with one signatory related to lack of publicly available data about student access to counseling and health services at postsecondary education.

The American College Health Association (ACHA) recommended a set of questions, related to student access to counseling, mental health care, and well-being programs on campuses, to be added to IPEDS collection.

### Recommendations/Concerns

ACHA urged IPEDS to include the set of questions related to students' access to healthcare services as well as mental health counseling to fill the "information gap in the national picture of health at postsecondary institutions as well as the impact these services have on student success."

#### ED response

Thank you for your comment. We appreciate your feedback and recognize the significance of enhancing data collection efforts regarding students' access to counseling, mental health care, and well-being programs at higher education institutions. We are committed to exploring ways to improve the data collection, while being mindful of accurate data reporting, institutional reporting burden, and protecting student privacy as well as NCES staffing and budgetary limitations.

## Associated comments

ED-2022-SCC-0026-00:

711.

## Comments related to minor changes/clarifications for Student Financial Aid survey component

### Public response

NCES received one comment with one signatory related to the clarification of instructions in Section 2 of the Student Financial Aid survey component.

### Recommendations/Concerns

The comment highlighted the confusion surrounding whether institutions need to report disbursed payments for Department of Veteran Affairs' Post-9/11 GI Bill books, supplies, and housing, in addition to tuition and fees. It was noted that institutions often lack information on payments for books, supplies, and housing as these are paid directly to students.

### ED response

Thank you for your comment regarding the instructions on reporting Department of Veteran Affairs' Post-9/11 GI Bill tuition and fees, books, supplies, and housing benefits disbursed, as outlined in Section 2 of the SFA survey component.

To clarify, the VA School Certifying Official and other authorized personnel at the institution have access to students' benefit payment history and reports through the U.S. Department of Veteran Affairs' Enrollment Management (EM) System. This information is available under the benefit tab in the student's profile. For additional information, see the Enrollment Manager FAQs, School Certifying Official Handbook, and the Enrollment Manager's User Guide on the Department of Veterans Affairs' School Administrator Resource webpage at <https://www.va.gov/school-administrators/>.

Thank you again for your comment.

## Associated comments

ED-2024-SCC-0040-00:

645.

## Comments related to the impacts of the FAFSA Simplification Act

### Public response

NCES received two comments with a total of 25 signatories regarding the misalignment of the Cost of Attendance (COA) measure with the requirements of the FAFSA Simplification Act.

### Recommendations/Concerns

Concerns were also raised about the lack of guidance on how the changes to federal student aid legislation could impact IPEDS reporting, particularly regarding the sharing of applicant income information from the FAFSA, now considered Federal Tax Information (FTI) subject to Internal Revenue Code (IRC) data-sharing rules.

### ED response

Thank you for sharing your concerns about the misalignment of COA measures in IPEDS with the legislative changes and the addition of FTI to the ISIR and data sharing rules from IRC. We understand the importance of clarity in this matter and are committed to enabling institutions to fulfill their reporting requirements to IPEDS. We will work with our ED colleagues to provide guidance on reporting income information to IPEDS. This collaboration is in progress within the Department and we will provide updates when available.

Thank you once again for sharing your recommendations and concerns. Your input is valued as we work to address these issues and ensure accurate data reporting.

## Associated comments

ED-2024-SCC-0040-00:

699, 723.



## Comments related to Office of Management and Budget (OMB)'s Statistical Policy Directive No. 15

### Public response

NCES received two comments with a total of 30 signatories related to the revised guidance to OMB's Statistical Policy Directive No. 15 (SPD 15).

### Recommendations/Concerns

The members and partners of the Postsecondary Data Collaborative recommended engaging stakeholders on the adoption and implementation of the OMB's SPD 15.

### ED response

Thank you for recommending early and frequent stakeholder engagement in the process of updating race and ethnicity reporting in IPEDS survey components to align with the revised guidance to OMB's SPD 15. The Department of Education is collaborating with internal and external partners to develop final guidance for adopting and implementing these changes across the agency. This ensures proper timing and provides clear direction for implementation.

In addition, the IPEDS National Postsecondary Education Cooperative (NPEC) has commissioned a research paper on implementation of race/ethnicity changes. The paper will provide insights into ways to adopt and implement the changes for IPEDS collection ensuring consistency and accuracy in IPEDS reporting with the OMB statistical standards.

NCES has added a communication to institutions to our planned communications (see Change memo and Appendix B) to ensure institutions are aware of the upcoming changes, and we will provide more detailed information once we have received final guidance.

Thank you again for sharing your recommendations.

### Associated comments

ED-2024-SCC-0040-00:

723, 733.

## Comments related to Outcome Measures survey component

### Public response

NCES received one comment with one signatory related to the Outcome Measures survey component.

Aspen Institute provided several recommendations for the Outcome Measures survey component.

### Recommendations/Concerns

- Report adjusted cohort and completion data after four year and not just eight years to collect information for more recent outcomes.
- Report outcome measures data by program of study to allow for information to identify transfer rates and post-transfer outcomes at the program level.

### ED response

Thank you for your comment. We appreciate your feedback on improving our data collection of student outcomes. The National Postsecondary Education Cooperative (NPEC) has commissioned a research report on improving the utility of OM data. We will carefully consider these suggestions along with that report to identify improvements. Once we identify improvements, we will need to engage with institutional reporters to ensure the feasibility of any additional collection. Our goal is to enhance the data collection while minimizing any additional burden on institutional reporters and maintaining student privacy.

Thank you again for your valuable input.

### Associated comments

ED-2022-SCC-0026-00:

695.



## Comments related to transfer-in data collected in 12-month Enrollment survey component

### Public response

NCES received one comment with one signatory related to the 12-month Enrollment survey component.

Aspen Institute recommended a change on how transfer-in data are collected in 12-month Enrollment survey component.

### Recommendations/Concerns

- Disaggregate transfer-in data by students who transferred in from a community college or associate degree program versus those who transferred in from a bachelor's program.

### ED response

Thank you for your recommendation. We appreciate your feedback on improving our data collection of transfer-in students. The National Postsecondary Cooperative (NPEC) commissioned a research report (Assessing the Capacity of IPEDS to Collect Transfer Student Data, [https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC\\_Paper\\_IPEDS\\_Transfer\\_Students\\_Data\\_2018.pdf](https://nces.ed.gov/ipeds/pdf/NPEC/data/NPEC_Paper_IPEDS_Transfer_Students_Data_2018.pdf)) on transfer students that was used as background for a 2023 Technical Review Panel (TRP # 69 Beyond First-time Students: Capturing Non-first-time Student Enrollment and Transfer Outcomes in IPEDS, <https://ipedstrp.rti.org/>) to discuss data collection related to transfer-in students. We will carefully consider this suggestion along with the findings from the research report and TRP suggestions and engage with institutional reporters to ensure the feasibility of any additional collection. Our goal is to enhance the data collection while minimizing any additional burden on institutional reporters.

Thank you again for your valuable input.

### Associated comments

ED-2022-SCC-0026-00:

695.

## Comments related to Graduation Rates survey component

### Public response

NCES received one comment with one signatory related to the Graduation Rates survey component.

Aspen Institute provided several recommendations for the Graduation Rates survey component.

### Recommendations/Concerns

- Report transfer-out counts and rates by the sector/level of the students' destinations (i.e., another associate-degree granting institution or a four-year institution).
- Predominantly bachelor's degree-granting institutions: report the 2,4, and 6-year graduation/completion rates for entering cohorts of upward transfer (i.e., from an associate degree-granting institution) and lateral transfer (i.e., from a bachelor's degree-granting institution)
- Associate-degree granting institutions (associate/associate dominant/associate mixed): report 2- (100%), 3- (150%), and 4-year (200%) graduation rates.

### ED response

Thank you for your comment. We appreciate your feedback on improving the data collected in the Graduation Rates survey component. The National Postsecondary Education Cooperative (NPEC) has commissioned a research report on improving the utility of GR and OM data. We will carefully consider these suggestions along with that report to identify improvements. Once we identify improvements, we will need to engage with institutional reporters to ensure the feasibility of any additional collection. Our goal is to enhance the data collection while minimizing any additional burden on institutional reporters and maintaining student privacy.

Thank you again for your valuable input.

### Associated comments

ED-2022-SCC-0026-00:

## Comments related to Student Financial Aid survey component

### Public response

NCES received one comment with one signatory related to the Student Financial Aid survey component.

Aspen Institute provided several recommendations for the Student Financial Aid survey component.

### Recommendations/Concerns

- Report financial aid types for all undergraduates as currently reported for first-time, full-time undergraduates.
- Report the number of students by income level and average net price by income level for all undergraduate students, as opposed to just first-time, full-time students.
- Split the highest income band in the income level reporting (instead of \$110,000 or more, add \$110,001-150,000 and a \$150,001 or more).
- Report the average net price and the student count by income level for full-time, first-time degree/certificate-seeking undergraduate students paying the out-of-state tuition rate at public institutions.

### ED response

Thank you for your comment. We appreciate your feedback on improving the data collected in the Student Financial Aid survey component. NCES has proposed that institutions report the same financial aid types for all undergraduates as have been reported for first-time, full-time undergraduate students starting with the 2025-26 data collection.

For the number of students and average net price by income level, this was added due the requirements in the Higher Education Opportunities Act (HEOA, 2008), which required this be collected and defined the income levels that were to be collected. If NCES were to add additional collection by income level, it would impact reporting burden and needs further consideration and engagement with data providers. In addition, as some other commenters mentioned, there is still a lack of clarity about the use of Federal Tax Information (FTI). While NCES expects more clarity around the use of FTI soon, this is not the time to add more collection of data from institutions as they struggle to work with the changes to FAFSA, including the uses of FTI. In addition, institutions have increased reporting requirements due to the new Financial Value Transparency and Gainful Employment regulations. NCES is closely monitoring these reporting requirements, the burden these requirements place on institutions, and potentially duplicative reporting.

As we continue to consider the collection of data on costs, we will carefully consider your suggestions, as well as the feedback we received for the directed questions in Appendix D. We will also need to consult with institutional reporters to ensure the feasibility and accuracy of any additional data collection. Our goal is to enhance the data collection while minimizing any additional burden on institutional reporters.

Thank you again for your valuable input.

### Associated comments

ED-2022-SCC-0026-00:

## Comments related to appreciation for IPEDS data and its utility

### Public response

NCES received 3 comments with a total of 3 signatories regarding the value of IPEDS data.

### Recommendations/Concerns

- One comment from the Bureau of Economic Analysis (BEA) expressed strong support for the NCES' continued efforts to collect data using IPEDS as these data are crucial to key components of BEA's economic statistics.
- Two comments shared that the data elements are clearly defined, and the data are available for public use, including researchers, policy makers, and institutional leaders.

### ED response

Thank you for your comments expressing appreciation for IPEDS data and its value in conjunction with other data collected and for public use. We are grateful for your recognition of the importance of IPEDS data in broader contexts.

Thank you once again for your kind words. Your input is inspiring our ongoing efforts, and we sincerely appreciate your support.

### Associated comments

ED-2024-SCC-0040-00:

04, 633, a comment submitted to ED-2024-SCC-0039 (available in the Comments section).

## Comments related to the directed questions in Appendix D

### Public response

NCES received eight comments with a total of 31 signatories regarding the directed questions presented in Appendix D.

### Recommendations/Concerns

- One comment suggested that expanding the collection to include new student categories, such as graduate and undergraduate students and all full-time degree/certificate-seeking students, might be duplicative effort due to the forthcoming Gainful Employment and Financial Value Transparency collections, starting in October 2024, which gather similar information in a more detailed and actionable format for the public.
- One comment indicated that adding new student categories is feasible “without too much of a burden,” and suggested to continue to preload data using the Fall cohort. They recommended that if the cohort changes to the academic year, institutions should report the number of students in the cohort.
- Three comments expressed concerns about the added reporting burden, especially for institutions with special focus or mission, and recommended to keep the fall census date while continuing to preload data for academic reporters to ensure data consistency, accuracy, and quality.
- Three comments supported collecting financial aid data on additional student categories to improve understanding of the cost of attendance and access to and receipt of financial aid.

### ED response

Thank you for your thoughtful comments. We appreciate the thorough description of the benefits and concerns associated with expanding SFA data collection. Your insights regarding institutions’ ability and timing to report additional data are helpful.

Additionally, your discussion of other collections that gather overlapping information is noted. NCES has been monitoring the additions that are being implemented with Financial Value Transparency and Gainful Employment and will continue to explore options to enhance SFA data collection while considering other collections as well as the feedback received.

Thank you once again for your invaluable feedback. Your input helps us improve data collection processes and ensure the accuracy and relevance of the collected data.

### Associated comments

ED-2024-SCC-0040-00:

604, 632, 637, 657, 660, 723, 730, 737.

## Comments

The comment below was submitted to Docket: ED-2024-SCC-0039, US Department of Education Pre-Authorized Debit Account Brochure and Application by mistake.

### Document: ED-2024-SCC-0039-0004

Received: April 12, 2024

Posted: April 15, 2024

Category: Federal Agency

#### Submitter Information

Organization: Bureau of Economic Analysis

#### General Comment

BEA’s 2024 Letter of Support for National Center for Education Statistics’ Integrated Postsecondary Education Data System (IPEDS) (OMB Number:1850-0582)

Good morning Mr. Manager,

On behalf of Dr. Dennis Fixler (BEA's Chief Economist), I am forwarding you a signed letter of support for the National Center for Education Statistics' Integrated Postsecondary Education Data System (IPEDS) (OMB Number: 1850-0582).

Please consider this BEA's formal response to the federal register notice of March 4, 2024. If there are any questions, please let me know.

Best Regards,  
Jasmine Reed

Executive Administrative Assistant II

April 10, 2024

Manager of the Strategic Collections and Clearance  
Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW, LBJ, Room 6W203  
Washington, DC 20202-8240

RE: *Federal Register* notice of March 4, 2024, for the National Center for Education  
Statistics' Integrated Postsecondary Education Data System (IPEDS)  
(OMB Number: 1850-0582)

Dear Manager:

The Bureau of Economic Analysis (BEA) strongly supports the National Center for Education Statistics' continued efforts to collect data using the Integrated Postsecondary Education Data System (IPEDS). The data collected on this survey are crucial to key components of BEA's economic statistics.

IPEDS data are used in the national income and product accounts (NIPAs) and territorial economic accounts to help estimate personal consumption expenditures (PCE). Additionally, IPEDS data are used to estimate output for private education in the benchmark input-output accounts. Finally, there are also indirect benefits from the IPEDS data used by the U.S. Census Bureau in the preparation of its Annual Survey of Government Finances (ASGF) as BEA uses the ASGF data to estimate components of state and local government spending in the NIPAs. The attachment shows the IPEDS data codes used by BEA.

Please keep BEA informed about any modifications to the form. We are particularly interested in any modifications proposed during the form's approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, at 301-278-9618 or by e-mail at [Tiffany.Burrell@bea.gov](mailto:Tiffany.Burrell@bea.gov). Should you need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

**Dennis Fixler** Digitally signed by Dennis Fixler  
Date: 2024.04.11 12:48:16 -04'00'

Dennis J. Fixler  
Chief Economist

Attachment