

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

Appendix F: Response to Public Comments Received During the 30-day Comment Period and NCES Responses

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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 June 24, 2024. ED received a total of 586 comments (one of which is blank: 103028) from 591 total signatories (some comments are signed by multiple signatories), one comment covering multiple topics.

Due to the large volume of comments, the comments 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**
Total	586	591
Institution of Higher Education; State Higher Education Office	63	63
Association/Organization; Civil Rights; National or State Advocacy Organization; Community Organization	6	11
Individual; Student; Teacher; Education consultant	421	421
Federal agency		
Other; None selected	96	96

* Categories are self-reported.

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

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

Public comment

NCES received 581 comments with a total of 585 signatories related to the retirement of IPEDS Academic Libraries (AL) survey component starting the 2025-26 data collection. Out of these, 578 comments advocated for retaining AL, citing its reliability in comparing libraries across institutions; its unique longitudinal nature for trend analysis; its importance to the teaching, learning, and research functions; and its role in the planning, assessment, and evaluation of postsecondary institutions and the nations postsecondary library infrastructure. Some feedback suggested restructuring the survey to differentiate between university and community college libraries, simplifying statistics to enhance usefulness and reduce reporting burden for small institutions, and expanding the survey to include details on common library services. One commenter appreciated NCES' detailed response providing context for the retirement decision. Two commenters supported retiring AL, citing the specificity of a single-unit survey component and the need to prioritize core postsecondary education purposes given limited resources.

ED response

Thank you for your feedback regarding the retirement of AL survey component. NCES recognizes the significance of academic libraries to postsecondary institutions and values the input received. As outlined in our initial response, NCES is constrained by budgetary limitations and staffing challenges, as highlighted by the National Academies of Sciences, Engineering, and Medicine (NASEM) review, as well as by the recently published report by the American Statistical Association and George Mason University, and other financial analyses.

The decision to retire the AL survey component was not taken lightly and was not undertaken just to save money – NCES has been continuing this survey component despite already not having the budget or the staffing to do so in order to support the library community as long as possible. That said, staff cannot continue to manage their survey within their work hours, and the budget has, as mentioned previously, decreased in inflation-adjusted dollars while demands on IPEDS have increased. NCES must ensure that our data collection efforts remain sustainable and effective across all mandated areas, manage the reporting burden on institutions, and prioritize our human and monetary resources appropriately. For further details on the factors influencing this decision, please refer to our previous response. It is important to clarify that while academic library data are valuable, as are many other data from cancelled collections, this decision reflects our need to operate within our allocated resources.

We appreciate your understanding of these challenges as we strive to uphold the integrity and effectiveness of our data collection efforts.

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>.

American Statistical Association, & George Mason University. (2024). *The nation's data at risk: Meeting America's information needs for the 21st century*. Alexandria, VA: American Statistical Association. <https://www.amstat.org/policy-and-advocacy/the-nation's-data-at-risk-meeting-american's-information-needs-for-the-21st-century>.

Associated comments

ED-2024-SCC-0040-00:

013245, 110958, 042813, 044947, 054402, 062135, 011444, 011757, 020643, 020740, 023817, 085115, 091803, 092226, 100230, 110522, 113629, 121947, 010142, 010347, 010457, 010508, 010727, 010903, 011320, 011754, 011758, 012000, 012105, 012130, 012235, 012717, 013032, 013153, 013200, 013203, 013245, 013507, 013645, 013856, 014045, 014152, 014223, 014313, 014337, 014349, 014614, 014826, 014843, 014910, 014922, 015249, 015524, 015558, 015846, 015918, 020153, 021028, 021034, 021243, 021443, 022052, 022054, 022423, 022907, 023208, 023404, 023843, 023905, 024143, 024446, 024557, 024634, 024853, 024855, 025254, 025519, 025755, 025806, 025952, 030017, 030247, 030310, 030427, 030750, 030812, 031102, 031917, 032118, 032542, 032624, 033018, 033023, 033828, 034331, 035043, 035126, 035607, 035901, 040354, 040633, 040844, 041013, 041037, 041721, 042326, 042442, 042656, 043040, 043305, 043345, 043357, 044112, 044749, 045048, 045507, 050039, 050731, 050924, 051037, 051458, 051524, 051620, 052355, 052849, 052943, 053623, 053911, 054431, 055144, 055216, 055835, 060139, 061836, 062219, 062900, 065249, 065801, 071414, 072522, 073900, 075636, 080111, 083344, 083641, 084619, 085710, 091009, 091740, 093415,

093703, 093949, 094011, 094943, 095325, 101503, 102343, 103147, 103435, 104146, 105025, 105038, 105743, 113403, 113434, 113531, 113533, 113633, 113637, 113652, 113744, 113845, 113905, 113935, 114010, 114013, 114019, 114028, 114107, 114217, 114224, 114409, 114446, 114509, 114529, 114552, 114556, 114644, 114656, 114712, 114736, 114905, 114914, 114922, 114953, 115014, 115126, 115232, 115311, 115445, 115457, 115509, 115512, 115520, 115337, 115558, 115600, 115720, 120009, 120031, 120122, 120130, 120206, 120231, 120304, 120345, 120532, 120603, 120730, 120735, 120837, 120942, 121212, 121326, 121702, 121918, 122144, 122228, 122239, 122502, 122523, 122558, 122624, 122644, 122911, 122953, 123158, 123651, 123733, 124107, 124123, 124132, 124153, 124221, 124242, 124440, 124535, 124539, 124656, 124721, 124730, 124908, 124935, 124956, 125229, 125239, 125416, 125556, 125719, 125825, 011143, 012614, 012636, 013455, 015504, 022823, 030327, 030727, 030911, 031445, 034032, 044344, 045140, 045147, 050820, 052403, 053340, 055708, 062124, 063643, 065007, 065620, 073003, 073337, 080255, 081449, 084813, 090548, 091252, 093321, 094914, 095423, 095545, 100131, 102808, 105141, 110101, 112448, 113530, 114248, 115417, 115611, 115851, 120615, 120928, 121220, 121407, 121509, 123358, 124201, 124709, 125104, 012633, 030145, 034154, 080932, 083358, 091735, 092809, 094943, 100829, 105929, 110054, 111954, 121045, 121203, 123759, 053810, 013834, 025349, 033319, 041616, 042933, 070357, 073000, 083315, 095501, 101959, 105518, 110417, 111201, 113314, 115530, 122742, 045412, 052304, 054328, 055633, 073236, 084551, 102659, 120436, 013718, 091012, 104756, 033912, 042527, 052520, 062015, 062140, 065900, 071707, 072604, 072724, 073445, 075734, 081039, 081203, 082942, 084600, 092304, 094801, 100423, 011350, 021156, 024159, 025925, 033505, 044136, 045941, 080708, 084713, 085157, 091916, 093151, 093729, 094856, 095109, 095754, 100112, 100717, 101447, 102129, 102909, 103020, 103532, 103957, 104436, 104549, 112106, 113514, 114522, 121716, 125023, 011350, 042517, 070436, 114255, 010253, 010329, 010620, 010659, 010909, 010957, 011146, 011218, 012003, 012257, 012403, 012552, 012629, 012748(1), 012748, 013126, 015434, 020654, 021649, 022030, 022308, 022630, 022804, 022941, 022949, 023014, 023119, 023516, 023736, 024308, 024549, 024750, 025106, 025559, 025721, 025953, 030332, 031904, 032643, 033423, 034304, 034625, 035438, 041812, 042240, 045236, 045909, 050102, 050224, 050256, 050917, 051215, 053326, 053548, 053839, 055105, 060334, 062139, 062704, 062924, 074411, 075527, 080046, 080415, 080600, 084228, 084431, 084601, 085348, 091247, 091603, 091631, 100032, 100201, 100356, 100529, 100616, 100714, 100725, 100800, 100852, 100927, 101141, 101227, 101346, 101555, 101615, 101622, 101700, 101705, 101824, 101856, 102039, 102104, 102302, 102328, 102446, 102516, 102531, 102544, 102640, 102723, 102746, 102923, 102951, 102958, 103123, 103125, 103131, 103401, 103417, 103526, 103601, 103647, 103837, 103907, 103909, 104243, 104329, 104336, 104358, 104443, 104610, 104643, 104702, 104735, 104903, 105054, 105256, 105322, 105346, 105554, 105620(1), 105620, 105747, 110022, 110029, 110659, 110958, 111108, 111130, 111211, 111352, 111431, 111519, 111822, 112455, 112650, 112653, 113050, 113634, 113658, 113733, 113829, 113853, 113935, 114010, 114128, 114341, 114843, 115535, 115631, 120506, 121119, 122236, 122311, 122839, 123145, 124209, 124250, 124330, 124352, 124650.

Comments related to collecting all institutional characteristics by age brackets

Public response

NCES received one comment with two signatories related to the collection of all institutional characteristics, including graduation rates, by age brackets and race/ethnicity to better understand educational outcomes among diverse student populations, including adult learners.

Recommendations/Concerns

- The Education Trust recommended disaggregating graduation rates by age brackets and race/ethnicity within IPEDS to enhance the granularity of data collection in order to better reflect the demographic realities of students.

ED response

Thank you for your comment. We appreciate your feedback on enhancing the quality, utility, and clarity of data collected through IPEDS. The National Postsecondary Education Cooperative (NPEC) has commissioned a research report on improving the utility of Graduation Rates (GR) and Outcome Measures (OM) data. We will carefully consider these suggestions along with the report to identify potential enhancements. As we move forward, we will engage with institutional reporters to ensure that any additional data collection is feasible. 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-2024-SCC-0040-00:

Comments related to collecting data on student-parents

Public response

NCES received one comment with two signatories related to collecting data on enrollment and outcomes for student-parents to develop equitable and successful data initiatives that enhance data transparency.

Recommendations/Concerns

- The Education Trust recommended expanding data categories within IPEDS to include fields dedicated to student-parents. They suggested collecting data on the number and ages of dependents, types of caregiving responsibilities, and their impact on academic progress to better understand the experiences and outcomes of student-parents.

ED response

Thank you for your comment. We appreciate your feedback and recognize the importance of enhancing data collection efforts regarding student-parents. We are committed to exploring ways to address the nation's data needs, including the collection of enrollment and outcome data for student-parents; however, we must prioritize the collection of legislatively mandated data while ensuring accurate reporting, minimizing institutional reporting burden, and protecting student privacy.

Thank you again for your valuable input.

Associated comments

ED-2024-SCC-0040-00:

EdTrust.

Comments related to collecting data on first generation students

Public response

NCES received one comment with one signatory related to collecting graduation rate data on full-time, first-time degree-seeking students who IPEDS defines as first generation.

Recommendations/Concerns

- U.S. News & World Report strongly encourages IPEDS to collect data on 150% of normal time to program completion for the full-time, first-time degree-seeking students, similar to current practices for Pell-awarded students.

ED response

Thank you for your comment. We appreciate your feedback on collecting graduation rates data for first generation students. The National Postsecondary Education Cooperative (NPEC) has commissioned research reports on improving the utility of Graduation Rates (GR) and Outcome Measures (OM) data, as well as the feasibility of collecting data for first generation students. We will carefully consider these suggestions along with the reports to identify improvements. Once we identify improvements, we will engage with institutional reporters to ensure that any additional data collection is feasible and considers institutional reporting burden and student privacy concerns. Our goal is to enhance the data collection while minimizing additional burden on institutional reporters.

Thank you again for your valuable input.

Associated comments

ED-2024-SCC-0040-00:

110502.

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

Public response

NCES received one comments with one signatory related to the introduction of the new Cost (CST) survey component. The commenter shared that their institution does not have final Cost of Attendance (COA) figures until April and suggested that reporting these data in Spring rather than Winter would be preferable.

Recommendations/Concerns

- The recommendation is to reopen the Cost (CST) survey component in Spring instead of Winter to ensure more accurate reporting of COA figures.

ED response

Thank you for your valuable feedback regarding the new Cost survey component. We appreciate the opportunity to clarify the rationale behind streamlining the component while ensuring timely collection of COA estimates and Average Net Price (ANP) calculations.

The purpose of consolidating data into a single survey component is to reduce institutional burden by centralizing related data elements. This approach improves data coherence, facilitates easier data revisions, and enhances the timeliness of fall data releases by moving cost data reporting to Winter. It also supports the creation of HEA mandated college cost lists that accurately reflect revisions made by institutions.

The timing of the collection of these data has not changed from previous collections. NCES cannot delay the collection of COA figures to Spring as this timeline would not allow NCES to meet the mandatory July 1 deadline for creating the HEA mandated College Affordability Lists. In addition, it would impact the timeliness of data releases and updates to College Navigator, thereby reducing usefulness of these data for data users and students.

Thank you again for your engagement with and support of IPEDS.

Associated comments

ED-2024-SCC-0040-00:

111535.

Comments related to the Admissions (ADM) survey component

Public response

NCES received one comment with one signatory related to the changes planned for the 2025-26 IPEDS Admissions (ADM) survey component.

Recommendations/Concerns

- The comment addresses the distinction between the terms “considers” and “was used in the admission decision” in the survey.

ED response

Thank you for your feedback regarding the changes being implemented for the 2025-26 IPEDS ADM survey component. We appreciate the opportunity to clarify the collection of test scores in Part A (Admissions Considerations) and Part D (Test Scores).

Part A collects information on institutional selection process, including whether institutions require submitted tests for admission consideration, consider tests if submitted (i.e., test optional), or do not consider them even if submitted (i.e., test blind). Part D collects data on test scores for the number of students and percentage of enrolled students for whom these scores were used in the admission decision. This section is relevant for institutions that either require or consider test scores for admission. The intent is to provide data that is useful to students and data users – that is, to only include scores that were used in the admission decision.

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

Associated comments

ED-2024-SCC-0040-00:

055212.