



American Council on Education
Office of the President

March 20, 2007

Angela C. Arrington
IC Clearance Official
Regulatory Information Management Services
Office of Management and Budget
Potomac Center Plaza, Room 9156
550 12th Street, S.W.
Washington, D.C. 20202

Re: Integrated Postsecondary Education Data System (IPEDS) Proposal Comments

Dear Ms. Arrington:

I write on behalf of the undersigned higher education associations to comment on the January 24, 2007 *Federal Register* notice regarding the “Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System.” We will send detailed comments on the specific changes you are considering under separate cover. In this letter, however, I would like to address only the burden and cost campuses face when they complete the IPEDS survey.

The eight IPEDS surveys are a consistent, timely source of detailed information about all aspects of higher education. The Secretary’s Commission on the Future of Higher Education underscored the value of collecting appropriate and accurate information on all postsecondary institutions and the importance of making that data widely available. We strongly support that finding. However, the Commission also emphasized the need to minimize the regulatory and reporting burden imposed by the federal government since externally imposed regulations increase the cost of doing business for any enterprise and these costs are inevitably passed on to consumers.

The total burden that IPEDS imposes on higher education institutions has grown significantly in recent years and the costs associated with filling out the surveys are considerable. According to the *Federal Register* notice, the estimated average total response burden for IPEDS is currently 51 hours and is expected to rise to 58 hours in 2009-10 if the proposed changes are adopted.

These are serious underestimates. Given the heterogeneity of higher education, campus by campus estimates of IPEDS compliance burden vary widely, but no school we have consulted believes the 51-hour estimate remotely reflects the time they spend on this task. For example, one research university estimates that three FTE staff members are needed to complete IPEDS every year. In some cases, states agencies now submit much of the IPEDS information for their institutions through state and system databases and have managed to reduce the actual time required. But again, even in these cases, the government’s current estimates do not begin to capture the total time required to provide timely and accurate IPEDS data.

Moreover, the time required to complete these surveys impacts colleges differentially. For example, if the actual burden was one FTE, it could represent 3 percent of total staff time at a school with 30 professional and technical FTEs or 1 percent at a college with 100 FTEs.

In addition, when changes are made to IPEDS surveys, it is important to distinguish the time it takes to implement the new requirement and the time necessary to provide the information thereafter. Some changes require only relative simple changes in IPEDS processing programs. For example, reporting on fall enrollments of undergraduates in certain, specified CIP codes only requires programming changes, testing, review, and institutional sign-offs. Others may require major one-time changes in the way that data are collected at the institution, (e.g., collecting, maintaining, and reporting race and ethnicity). Time estimates provided for years beyond the 2006-07 IPEDS cycle require detailed knowledge and review of proposed changes in data collection and use.

To address our concerns, we ask that the Department of Education undertake a comprehensive independent study of the effort required to complete the eight IPEDS surveys in the 2006-07 IPEDS cycle. The study should document the total effort necessary at different types of institutions. Such an undertaking would provide an accurate assessment of the current data collection and reporting burden and provide a reasonable baseline analyzing impending and future IPEDS changes. We recommend that such a study be undertaken after extensive discussions with campus officials to understand the full range of campus activities necessary to complete these surveys at different types of institutions.

I wish to reiterate our support for accurate useful information about colleges and universities in general and for IPEDS in particular. However, we are concerned about the significant inaccuracies of the estimated reporting burden for this extensive set of surveys.

Again, thank you for the opportunity to comment on the proposed changes. We look forward to working with you to refine IPEDS and provide accurate estimates of the reporting burden related to this important data collection.

Sincerely,



David Ward
President

DW/mec

cc: C. Dennis Carroll
Elise Miller

Re: IPEDS Burden Letter

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On behalf of:

American Association of Colleges for Teacher Education
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of Presidents of Independent Colleges and Universities
American Association of State Colleges and Universities
American College Personnel Association
American Council on Education
American Dental Education Association
American Indian Higher Education Consortium
APPA
Association of American Colleges and Universities
Association of American Universities
Association for Biblical Higher Education
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Independent Colleges of Art & Design
Association for Institutional Research
Association of Jesuit Colleges and Universities
Association of Presbyterian Colleges and Universities
Association of Theological Schools
College and University Professional Association for Human Resources
Council for Christian Colleges and Universities
Council on Government Relations
Council of Independent Colleges
Council for Opportunity in Education
EDUCAUSE
Hispanic Association of Colleges and Universities
Lutheran Educational Conference of North America
National Association for College Admission Counseling
National Association of College and University Business Officers
National Association for Equal Opportunity in Higher Education
National Association of Independent Colleges and Universities
National Association of State Universities and Land-Grant Colleges
National Association of Student Financial Aid Administrators
National Association of Student Personnel Administrators
National Collegiate Athletic Association
The College Board
Thurgood Marshall College Fund
United Negro College Fund
Women's College Coalition