



July 1, 2022

Vanessa Gomez  
U.S. Department of Education  
400 Maryland Avenue, SW.  
Room 2C179  
Washington, DC 20202

Dear Ms. Gomez:

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