



American Council on Education
Office of the President

March 26, 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 regarding the proposed changes to the Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System as published in the *Federal Register* on Wednesday, January 24, 2007.

The annual IPEDS collection is a critically important activity for the nation's colleges and universities. In a previous letter, we expressed our support for the findings of the Secretary of Education's Commission on the Future of Higher Education which highlighted the value of collecting appropriate and accurate information on all postsecondary institutions and the importance of making that data widely available. We also take seriously the emphasis that the Commission placed on the need to minimize the regulatory and reporting burden imposed by the federal government. We strongly agree with the Commission that externally imposed regulations increase the cost of doing business for any enterprise and these costs are inevitably passed on to consumers.

The proposed changes impact every component of the IPEDS collection and expand the current surveys into new reporting areas. Each proposed addition should be evaluated to determine the extent to which it provides clear, accurate and essential information about postsecondary institutions against the increased burden of changing and expanding the IPEDS data collection.

There are several recommendations within the proposal which we enthusiastically support. The elimination of reporting graduation rates for the athletic sub-cohorts recognizes the duplication in reporting currently conducted by the NCAA and institutions themselves and will reduce the overall IPEDS burden for these institutions. In addition, the elimination of the first-professional category and redefinition of master's and doctoral categories will make significant progress in clarifying our degree outcomes. We also encourage the continued use of website (URL) links to existing information in place of a redundant data collection, but caution that the overuse of URLs may require significant maintenance to ensure the links remain current.

There are, however, a number of areas in which we have concerns regarding the usefulness of the proposed data and the associated burden with collection and reporting. These areas fall under the general categories of Assessment, Enrollment/Attainment, Financial Aid and Finance.

Assessment — The proposed collection of detailed data on the various assessments and learning outcomes measures used by institutions is flawed in its execution and meaningless in its results. In addition, the focus on certain well-known assessments (Collegiate Learning Assessment, National Survey of Student Engagement) is inappropriate. The absolute number and diversity of assessments used at the more than 6,600 postsecondary institutions surveyed precludes the use of a common reporting format or any reasonable ability to compare this data across institutions. In many cases, these assessments result in multiple measures for different parts of an institution or in qualitative descriptions of results. This collection assumes that each of these assessments results in a common numerical report across the entire institution which is rarely the case. An analysis of the breadth and depth of information provided by institutions regarding their learning outcomes and assessments may be useful, but IPEDS is not the appropriate vehicle for this study. There are reports that consideration is being given to dropping this provision, and we believe that doing so is a prudent course of action. Pressing forward to require this data collection is ill-advised and would garner little in the way of reliable or valid information.

Enrollment/Attainment — Several proposed additions to the IPEDS web-based collection in the areas of enrollment and retention are problematic. The collection of enrollment data by CIP codes related to the National Science and Mathematics Access to Retain Talent (SMART) Grant program has been proposed to provide baseline data with which to conduct program projections and estimates. The proposed collection does not provide meaningful information to support this effort. The data can only be collected for students who have formally declared their major field of study which is often delayed well into their studies. In addition, this collection does not address any of the SMART Grant program requirements that extend beyond field of study such as financial need or GPA.

The collection of retention rates for Pell Grant recipients through IPEDS to determine the progress of lower-income students is redundant and imprecise at best. The National Center for Education Statistics (NCES) already conducts significant longitudinal studies to answer the question of Pell Grant effectiveness. One of the most recent and comprehensive reports from the U.S. Department of Education can be found at <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2002169>. In addition, the use of IPEDS data to compare the experience of full-time, full-year Pell Grant recipients to their income peers is not a meaningful evaluation when only one-third of Pell Grant recipients fall into the full-year, full-time cohort.

Lastly, the inquiry into how institutions verify their transfer-out data is unnecessary.

Financial Aid — The proposed collection of enrollment data for financial recipients disaggregated by dependency and living status is a complex collection with the intention of providing a picture of an institution's student demographic profile. Unfortunately, because the data are limited only to those students who receive financial aid, the resulting information will not produce a complete description of the array of students at any given institution.

Finance — The collection of instructional expenditures per FTE as calculated by the institution is a simple question that defies a simple response. Instructional expenditures per FTE vary widely by institutional type and mission. But for all types of institutions, it may be the most burdensome of any of the proposed IPEDS changes. The simplicity of the question belies the lack of common methodology for this calculation and would preclude any comparability across institutions. It is our understanding that further changes to the finance portions of the IPEDS collection system are expected in the coming year. We would recommend this proposal be postponed in order to be discussed fully in the broader context of the finance survey and any methodological changes it might entail.

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I wish to reiterate our support for accurate and useful information about colleges and universities in general, and for IPEDS in particular. However, we are concerned that this proposal does not distinguish between data that may be interesting to know versus those that add value to the further understanding of postsecondary education. It is essential that the value and importance of each of these items be weighed against the increased burden and commensurate costs.

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, appropriate and essential data on U.S. postsecondary education.

Sincerely,



David Ward
President

DW/mmm

cc: C. Dennis Carroll
Elise Miller

On behalf of:

American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
American Indian Higher Education Consortium
Association of American Universities
Association of Community College Trustees
Association of Jesuit Colleges and Universities
National Association of Independent Colleges and Universities
National Association of State Universities and Land-Grant Colleges
National Association of Student Financial Aid Administrators