



Stephanie Valentine,  
PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division, Office  
of Chief Data Officer, Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20024

July 1, 2022

To Whom It May Concern:

Re: ED-2022-SCC-0026

This letter is submitted on behalf of the 17 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. PostsecData recognizes the Integrated Postsecondary Education Data System (IPEDS) as an essential source for postsecondary education data that the higher education community needs to understand and analyze postsecondary enrollment, degree completion, institutional finance and staffing, and equity. We appreciate the Department of Education (ED)'s commitment to publishing and improving IPEDS. The proposed updates will provide essential information to students and their families, institutional leaders, researchers, and policymakers to help inform higher education decision-making, target interventions and investments, and strengthen student success.

PostsecData appreciates ED's adoption of key recommendations from our [previous letter](#), including revisions to new guidance on how to report race/ethnicity information for undocumented students and students with Deferred Action for Childhood Arrival (DACA) status, and the revision of the gender classification terminology to 'Another Gender.'

In addition to these changes, PostsecData recommends ED incorporate several additional revisions for upcoming IPEDS administration. These recommendations include revising data collections to avoid requiring institutions to classify students with gender categories that are inaccurate or incomplete, and disaggregating measures of student enrollment in noncredit education. PostsecData also encourages ED to consider additional changes, such as further disaggregation of Outcome Measures and 12-month Enrollment Surveys, updates to better measure the nuances of student financial aid, the addition of data collect on students by disability status, and changes to add clarity and consistency in reporting around institutional finances. These recommendations, detailed below, are specific and tangible ways that ED can make its data more useful and impactful for students and the field of postsecondary education.

PostsecData strongly supports the following revisions to the proposed data collections and thanks ED for incorporating these changes:

- **Updated guidance on race/ethnicity classifications for undocumented students and DACA recipients.** PostsecData is pleased to see the revised terminology and updated guidelines for institutions to classify undocumented and Deferred Action for Childhood Arrival (DACA) students' race/ethnicity. This new guidance will ensure DACA recipients and undocumented students are accurately and consistently counted with the race/ethnicity they report to their institution, which aids in the ability to accurately understand student demographics at particular institutions and in postsecondary education as a whole. Further, this change ensures institutions who serve historically underrepresented groups retain eligibility for Minority Serving Institution (MSIs) designations.
- **Revised gender classification terminology ('Gender Other' to 'Another Gender').** PostsecData is also pleased to see proposed changes revising the category terminology from 'Gender Other' to 'Another Gender.' This terminology allows for the collection of data on the number of students who do not identify as men or women, while avoiding using language that could further stigmatize non-binary or gender non-conforming students.

In addition, PostsecData recommends ED make the following changes to future IPEDS reporting cycles:

- **Revise data collections to avoid requiring institutions to classify students with gender categories that are inaccurate or incomplete.** ED should continue to explore the best way to expand gender categories used in IPEDS surveys to best align with students' gender identities, while protecting student privacy and adhering to other field best practices. ED's proposed changes include the addition of a separate question that asks institutions to identify the number of students belonging to another gender; however, several IPEDS survey elements, such as Fall Enrollments and Graduation Rates, are collected through cross-tabulations of gender and other demographic characteristics, such as race/ethnicity or age. In these cases, in order to generate accurate totals for students in each race/ethnicity or age group, institutions must classify students in one of two gender categories, even if the student has identified themselves as "another gender."

Ideally, ED should develop survey items that do not require institutions to report inaccurate gender information for these students. For example, ED could use, at a minimum, three gender categories in all survey elements where gender is required. This approach would align with the new gender classification and avoid requiring institutions to classify students with gender categories that do not align with students' actual identities. However, if ED chooses not to roll out the three-category gender categorization to all IPEDS survey elements this year, they should use this first year of data to assess the new classification scheme and consider improvements and full-scale rollout in future years. Also, to address inconsistencies

between the three-category gender classification and the binary gender classification in different parts of IPEDS, ED should allow institutions to clarify how many “another gender” students are included in each binary category.

- **Disaggregate measures of student enrollment in noncredit education.** To promote informed decision-making, data collections should aim to count all students and all outcomes. To this end, PostsecData applauds the proposed inclusion of IPEDS survey questions related to noncredit course offerings and enrollment because these new data will build a more complete picture of today’s postsecondary system. Further, ED should consider additional reporting in future IPEDS cycles to illuminate not just enrollment in noncredit education, but completion and other student outcomes for noncredit programs, as well as additions to the Human Resources and Finance surveys.

In addition, PostsecData strongly supports data disaggregation by race/ethnicity and gender in noncredit enrollment. In accordance with President Biden’s Executive Order 13985, the “lack of data [disaggregation] has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort.” Similarly, the [Advisory Committee for Equitable Policymaking Processes](#) calls for data disaggregation to avoid masking the inequities that are pervasive in our systems. PostsecData strongly agrees with this assessment of the pivotal nature of disaggregated data in informing decision-making, and strongly recommends disaggregating these IPEDS data elements to better understand the equity implications of noncredit participation.

The evidence suggests that many institutions will have data on race/ethnicity and gender needed to report disaggregated numbers on noncredit enrollment. For example, in a 2019 paper by Coffey Consulting, institutions in 38 states reported noncredit data to their states, suggesting that schools in the majority of states would already have the data needed to report these figures. If needed, ED could use a phased implementation that requires noncredit reporting in this first year of implementation and offers a one-year waiver for disaggregated reporting for institutions that need an additional year to compile the necessary race/ethnicity and gender data.

The undersigned PostsecData partners also would like to share several additional areas where ED should consider improving upcoming IPEDS collection cycles. In some cases, a technical review panel or other formal feedback process may be necessary. ED should:

- Disaggregate the Outcome Measures survey across students' race/ethnicity, gender, and age, and require Outcome Measures for all institutions, including those who are not degree-granting.
- Align 12-month Enrollment and Fall Enrollment surveys, to reduce burden on institutions while preserving the critical information, especially demographic disaggregates, contained in each.
- Update the Student Financial Aid survey, including allowing institutions to accurately report room and board costs for students living at home, requiring reporting on cumulative loan burdens for graduating students at different degree levels, and including information about students' use of private loans.
- Disaggregate data by disability status wherever data is disaggregated by race, ethnicity, or gender.
- Revisit IPEDS Finance surveys to ensure consistent, reliable, and comprehensible data is available on institutional revenue and expenditure patterns.

PostsecData is excited to see the proposed changes to IPEDS, which will ensure available data are useful, impactful, and more inclusive for students and the field of postsecondary education. We appreciate the Department of Education for developing, maintaining, and incorporating the recommendations in the new proposed changes. Ensuring IPEDS collects robust institutional characteristics, enrollment, completion, outcome measures and financial information is integral to successfully using data to inform policymaking at the federal, state, and institution levels and to promoting the use of consumer information in college-going decisions. We are appreciative our proposed solutions were incorporated to further enhance the quality of postsecondary data available in IPEDS.

We look forward to continuing to work with ED to promote and improve IPEDS and appreciate your thoughtful and detailed approach to these improvements. If you have any questions, please contact Mamie Voight, President at the Institute for Higher Education (<mailto:mvoight@ihep.org>).

Sincerely,

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