



May 3, 2024

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, D.C. 20202

Re: Proposed Changes to IPEDS 2024-25 and 2026-27 Information Collection  
Docket ID: ED-2024-SCC-0040

Dear Stephanie Valentine,

This letter is submitted on behalf of the 24 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) regarding proposed changes to the Integrated Postsecondary Education Data System (IPEDS). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to advance student success and educational equity. IPEDS is an essential source for understanding and analyzing admissions and enrollment, costs, degree completion, institutional finance and staffing, and equity in postsecondary education. As champions and stewards for high-quality postsecondary data, we commend the U.S. Department of Education (ED) and the National Center for Education Statistics (NCES) for their ongoing commitment to continuously improve IPEDS to better serve the needs of students and the higher education community.

PostsecData supports the proposed changes to many of the IPEDS survey components, including:

- **Consolidation of information from the Student Financial Aid survey and Institutional Characteristics survey into a new Cost survey**

PostsecData supports the creation of a Cost survey component with the 2024-25 iteration of IPEDS. Doing so will simplify the reporting process for institutions by combining financial measures currently reported in different surveys into one where Cost of Attendance (COA) and Average Net Price can be more easily calculated, reported, and accessed. This process will improve the experience for data users like researchers and policymakers seeking information on students' costs and allow for future refinement of research questions regarding college affordability.

- **Disaggregation of the Admissions survey by race and ethnicity, admit decisions, and other student categories**

Adding new race and ethnicity reporting categories, new student categories such as transfer-in students, and new admit decision disaggregations for first-time students will enable critical research on equity in college admissions and inform institutional, state, and federal policies and practices to increase college access for diverse student populations.

These changes to IPEDS will increase data transparency by providing essential information to students and families, institutional leaders, researchers, and policymakers to inform decision-making, target interventions and investments, and promote equity and student success.

PostsecData also supports proposed changes aimed at streamlining survey components. These include combining form elements, adding new screening questions, clarifying reporting on gender, and updating answers to frequently asked questions (FAQs). These improvements will make the surveys easier for institutions to complete and reduce reporting errors while making the IPEDS data tools more accessible and comprehensive for institutions, researchers, policymakers, and the media.

Additionally, PostsecData offers the following recommendations and considerations for implementing these changes and further improvements. Our primary recommendations include:

- 1. Collect data on additional student categories in the Student Financial Aid survey.**

In response to Directed Question A, PostsecData strongly supports and encourages NCES to collect financial aid data on additional student categories, such as undergraduate students enrolled part-time, non-first-time undergraduates, and graduate students. Doing so will provide a better understanding of access to, and receipt of, aid for a wider representation of enrolled students. This information is critical to understanding both how students utilize different types of aid available to them, and how that financial aid may impact their longer-term outcomes.

There are three key benefits of this change: **(1) increased transparency on aid availability and utilization for full-time, non-first-time students.** This information, obtainable through the proposed changes to student categories, will help inform policies that support students who may have reached maximum aid benefits during previous enrollments but still require financial support to complete a credential; **(2) improved visibility into the financial experiences of part-time students.** This change would provide additional aid information on less than full-time students, a group representing [nearly 40 percent](#) of undergraduates in the U.S.; **(3) enhanced understanding of graduate student finances.** Making aid

information for graduate students easily identifiable through IPEDS will improve the field's understanding of the costs graduate students face and how they finance their education.

## **2. Align the Cost of Attendance measure with the FAFSA Simplification Act requirements.**

PostsecData recommends aligning the Cost of Attendance (COA) measures in IPEDS with the [legislative changes](#) to COA required of institutions starting in 2023-24. The FAFSA Simplification Act and the Consolidated Appropriations Act, 2022 modified the COA components and how consumer information pertaining to them must be shared. To ensure consistency in the information that students receive about COA, the revised definitions and calculations should be implemented in IPEDS reporting as well. For example, the FAFSA Simplification Act requires institutions to estimate food and housing (formerly “room and board”) costs for students who are living with family and dictates that these expenses must be more than \$0. Currently, institutions cannot report those data to IPEDS. Data collections should be modified to allow reporting of food and housing expenses for students living off campus with family. The FAFSA Simplification Act also clarifies individual COA components, such as allowable transportation expenses and standard allowances for living expenses. Where needed, data collections should be updated to reflect all statutory changes. Finally, NCES should ensure alignment between IPEDS definitions and those included in COA disclosures, which are required to be published on institutions' websites. This information should also be incorporated into FAQs, user manuals, data flags, and information text boxes to promote understanding across the field.

## **3. Engage stakeholders on the adoption and implementation of Office of Management and Budget (OMB)'s Statistical Policy Directive No. 15.**

PostsecData encourages ED to engage stakeholders early and often throughout the process of updating race and ethnicity reporting in IPEDS surveys in alignment with revised guidance to OMB's Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity [issued in March 2024](#). Following this directive, ED, along with other federal agencies, needs to develop an action plan to disaggregate student data by race and ethnicity within eighteen months of the publication of new standards. Additionally, all data collections and publications must comply with the new standards by March 2029. To ensure effective implementation, ED should proactively engage stakeholders in the field and solicit feedback on how to best present data on multiracial students. By leveraging the collective expertise of IPEDS data users, ED can refine how race and ethnicity information is presented for optimal reporting and accessibility. Examples of stakeholder engagement activities include Technical Review Panels, listening sessions, or other opportunities for feedback. For example, ED previously used this approach in November 2006 with [Technical Review Panel #17](#) to gather feedback on implementing OMB's previous race and ethnicity standards.

Furthermore, ED should provide timely, clear, and responsive communications to institutions, states, and the research community regarding its plan to implement the new OMB race and ethnicity standards. These communications will help minimize reporting

burden for institutions and clarify best practices for using the race and ethnicity data for analyses that might rely on data reported under both old and new standards, such as comparisons of trends over time. ED should ensure updated user manuals, FAQ pages, information text boxes, and data dictionaries include information about new race and ethnicity data elements.

**4. Consider how to implement inclusive approaches to collecting data on students with disabilities.**

ED should consider how to collect enrollment and outcomes data for students with disabilities and conduct the appropriate research and stakeholder engagement to generate informed proposals for new data collections. Collecting data on the outcomes of students with disabilities would aid the development of equitable and accessible initiatives and increase data transparency overall.

PostsecData is excited about the proposed changes to the 2024-25 through 2026-27 IPEDS data collections, which will improve data transparency, reporting, and usability. These enhancements will ensure the data are comprehensive, impactful, and more inclusive for students and the field of postsecondary education. We appreciate ED's proactive and deliberate efforts to modernize this critical postsecondary data system to meet the needs of today's students, institutions, policymakers, and other data users. Collecting robust affordability, admissions, enrollment, completion, and outcome information in IPEDS is integral to informing equitable policymaking at the federal, state, and institution levels and to promoting consumer choice in college-going decisions.

We look forward to continuing to work with ED and NCES to improve IPEDS and appreciate the thoughtful and detailed approach to these enhancements. Please contact Taylor Myers, Assistant Director of Research and Policy ([tmyers@ihep.org](mailto:tmyers@ihep.org)) at the Institute for Higher Education Policy with any questions.

Sincerely,

AccessLex Institute  
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ACT's Center for Equity in Learning  
Arnold Ventures  
Association for Career and Technical Education  
Complete College America  
Corporation for a Skilled Workforce  
Data Quality Campaign  
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