

October 15, 2025

Amber Northern
U.S. Department of Education
Office of the Secretary
400 Maryland Ave., SW
Washington, DC 20202

CC: Matt Soldner, Acting Director, Institute of Education Sciences and Acting Commissioner,
National Center for Education Statistics

Re: [Docket ID number ED-2025-IES-0844](#)

To Whom It May Concern:

This letter is submitted on behalf of the 51 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to the Department of Education's (ED) request for information (RFI) on redesigning the Institute of Education Sciences (IES). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success. Our comments focus on the postsecondary data collections administered by the National Center for Education Statistics (NCES), an independent statistical agency within IES.

Federal education data are essential for evidence-based policymaking and consumer choices. These data provide unique insights and a level of depth, scale, and comprehensiveness not available from other sources. The postsecondary data collections administered by NCES provide students with the information they need to make college decisions and provide institutions and policymakers with the evidence necessary to shape policy in ways that improve student outcomes. States, institutions, researchers, and policymakers rely on federal data to understand student success, compare outcomes across states and institutions, and ensure that all students receive strong outcomes from their higher education experience, including their post-college outcomes. For example, research using NCES data [spurred FAFSA simplification efforts](#) in Congress and informed other federal policies.

For state leaders, federal postsecondary data offer critical insights that states could not produce on their own. While many states have robust administrative data systems, they still [rely on federal data](#) to benchmark progress, ensure data consistency, expand capacity, and fill in gaps in their own data systems. States also use NCES data for budgeting and forecasting, such as estimating institutional revenue and expenses, forecasting student financial aid needs, and

refining aid allocation formulas. When legislative changes impacted data sharing and state budgeting in Virginia, the State Higher Education Executive Officers (SHEEO) Association [stepped in](#) to help the state and other states estimate the impact of FAFSA simplification, using NCES data. As another example of the state impact of federal data, NCES data informed the [2024 GAINS for Student Parents Act](#) in California, which expanded support for parenting students.

To ensure that IES can best meet the needs of students, states, institutions, policymakers, and the field at large, we recommend that NCES:

1. Remain within the federal government, rather than privatizing or shifting data collections to states.
2. Continue administering the Integrated Postsecondary Education Data System (IPEDS), National Postsecondary Student Aid Study (NPSAS), and Beginning Postsecondary Students longitudinal study (BPS).
3. Develop a longitudinal study of program completers, not limited to bachelor's degree recipients.
4. Streamline data collection processes.
5. Maintain high standards for statistical rigor, data security, and privacy protections.
6. Provide sufficient guidance and training for data reporters, to ensure data quality.
7. Ensure data are made available to the public, in a timely fashion.
8. Meaningfully engage with stakeholders, particularly around changes to data collections.
9. Ensure sufficient staffing to manage data collections, ensure data quality, and release data to the public.

Our detailed recommendations are below.

- 1. Keep NCES's data collections within the federal government, rather than privatizing or shifting them to states.**

The federal government plays an irreplaceable role in collecting in-depth, comprehensive, and comparable postsecondary data that inform decision-making by students, states, institutions, and policymakers. States and private entities cannot reproduce NCES data. Stitching together existing state systems cannot match the comprehensiveness and comparability of postsecondary data collected by the federal government. While many states have statewide longitudinal data systems (SLDSs) that provide important information about education and workforce pathways, those state systems vary widely in depth and scope, as well as in definitions and technical specifications. SLDSs often exclude data about private institutions, and many systems cannot track outcomes if a student moves to another state. Moreover, states vary in their [data governance policies](#), and it would be immensely challenging to address the governance protocols required for all 50 states to share data with each other.

Private data collections also cannot replicate the scale, data elements, and public transparency of NCES data collections. For example, NCES manages the Integrated Postsecondary Education Data System (IPEDS), a set of annual surveys that provide essential data on over 6,000 colleges and universities. IPEDS is uniquely comprehensive because all colleges that participate in federal financial aid programs are required to complete the surveys, and thus, response rates are [close to 100%](#). Without enforcement authority to mandate reporting, private surveys cannot match the comprehensiveness of federal data. Additionally, for longitudinal studies that follow students through college and into the workforce, the federal government provides a more sustained funding source than a privately funded initiative where funding comes and goes in short timeframes. Longitudinal studies require sustained funding to avoid disruptions and to ensure data comparability over time. Private data collections would also be unable to link data shared by colleges and students with federal data, such as earnings, federal loan borrowing amounts, and FAFSA data. Furthermore, unlike the federal government, private data collections often charge a fee to access their data, making them out of reach for many stakeholders in the field.

In contrast to state and private data sources, federal data reporting requirements standardize data collection practices across all institutions in all 50 states for elements like net price and graduation rates. This allows colleges, college systems, and states to benchmark their performance, identify best practices, and ensure access to accurate and actionable information. As mentioned above, states [rely on federal data](#) to benchmark progress, guide budgeting decisions, ensure data consistency, and expand capacity. Institutions also use NCES data to compare themselves to other institutions, such as through IPEDS [Data Feedback Reports](#). NCES data are essential to meet the needs of states, institutions, students, and other stakeholders in the field, and thus NCES's data collections must remain within the federal government.

2. Continue administering the Integrated Postsecondary Education Data System (IPEDS), National Postsecondary Student Aid Study (NPSAS), and the Beginning Postsecondary Students longitudinal study (BPS).

As IES is considering the priority of federal data collections, it is essential to continue administering IPEDS and NCES's postsecondary sample studies. These foundational data collections are necessary for supporting consumer choice and evidence-based policymaking by states, institutions, and federal policymakers.

Integrated Postsecondary Education Data System (IPEDS)

As previously mentioned, IPEDS is a set of annual surveys that provide essential data on over 6,000 colleges and universities. IPEDS fulfills [statutory requirements](#) for ED to publicly share consumer information on each college's costs, financial aid, enrollment, graduation rate, and other metrics. This federal framework makes it possible to compare colleges using consistent metrics and definitions. IPEDS is uniquely

comprehensive because all colleges that participate in federal financial aid programs are required to complete the surveys, and thus, response rates are [close to 100%](#).

IPEDS data have historically been high quality, making them a trusted source of information for students, families, institutions, and policymakers. Prospective [students and families](#) rely on IPEDS data to answer key questions about the likely costs and outcomes at colleges they're considering. When making choices about which colleges to apply to and attend, students access IPEDS data through tools like the College Scorecard to find the best fit college and program for their educational and career goals. [States rely](#) on IPEDS data for benchmarking against regional and national trends, to support state budgeting, ensure data consistency, and extend capacity. Institutions also use IPEDS data to compare themselves to other institutions, such as through the [Data Feedback Reports](#).

National Postsecondary Student Aid Study (NPSAS)

As a large, nationally representative study, NPSAS provides crucial insights on [affordability](#), [student enrollment](#), and [other aspects](#) of students' postsecondary education and training experiences. NPSAS fulfills statutory [requirements](#) for NCES to collect and disseminate statistics on access to and opportunity for postsecondary education, including financial aid, as well as to [survey](#) federal financial aid recipients at least every four years. The study's large sample sizes, incorporation of administrative data (including FAFSA data that's only available from the federal government), and collection of student interview data enable analyses that are not possible via other data sources. Other institution-level data can't tell us what students can afford, whether they can cover tuition and living expenses, or which students face the greatest financial barriers. NPSAS data have been used to inform state [legislation](#) supporting student parents, federal policy around [FAFSA simplification](#), and other topics.

To best support the needs of states, institutions, researchers, and policymakers, NCES should continue administering the full NPSAS study every four years and an administrative data collection between the full collections. The full study would include student surveys in addition to administrative data. Congressional appropriators from both sides of the aisle have supported NPSAS and directed NCES to maintain the NPSAS collection frequency through language in the [fiscal year 2024 funding law](#). Collecting NPSAS data less often than every four years would weaken our understanding of student experiences in higher education. Ever-evolving student experiences in higher education, such as pandemic-related disruptions and recent changes to the financial aid process, make maintaining the current NPSAS data collection frequency vital.

Additionally, while NCES should explore options to streamline the NPSAS data collection using administrative data, it is imperative to retain the student surveys. The NPSAS student surveys collect unique information that cannot be pulled from other data sources, such as whether students were working while enrolled, what they spent on course materials, and whether they experienced food insecurity. The student surveys

are also used to supplement information from other sources, making the data more accurate and comprehensive. For example, the income of federal aid applicants is pulled from the FAFSA, while self-reported income on student surveys helps fill in the gaps for students who do not apply for federal financial aid.

Beginning Postsecondary Students longitudinal study (BPS)

NCES's postsecondary longitudinal studies offer unique and valuable insights about student experiences, progress in college, degree completion, employment outcomes, and other outcomes after college. By following the same group of students over time, through their college enrollment and beyond, NCES's longitudinal studies allow researchers, states, and policymakers to better understand students' trajectories through higher education and the workforce, as well as examine how different factors affect students' likelihood of persisting and succeeding.

BPS is a large, nationally representative study that tracks students' experiences and outcomes through their postsecondary enrollment and after college. BPS is the only source of information about how [students' affordability gaps](#) shape their completion, loan repayment, and wages. Additionally, BPS provides insights on the experiences of specific student populations that are not captured in other data sources, such as the outcomes of [veterans and first-generation students](#).

To ensure that researchers, states, and policymakers have the information they need to shape policies to improve student outcomes, NCES should continue administering BPS and ensure that collected data are released in a timely fashion. The three-year follow-up study for students who started college in 2019-20 is complete and NCES published its ["First Look" report](#) on that follow-up study (BPS:20/22) in September 2024. But the data for BPS:20/22 are still unavailable to the public and to researchers, and all remaining work related to the 2025 follow-up study (BPS:20/25) has been cancelled.

3. Develop a longitudinal study of program completers, which is not limited to bachelor's degree recipients.

At a time when policymakers at the state and federal level are demanding more information about the return on investment of postsecondary education, it is crucial for NCES to strengthen data collections that help states, institutions, researchers, and other stakeholders answer critical questions about graduates' post-college outcomes. This new longitudinal study would replace the Baccalaureate and Beyond longitudinal study (B&B), which has been discontinued. While B&B was limited to bachelor's degree recipients, this new study would include completers at all credential levels. Given the growth of sub-baccalaureate credentials and the expansion of Pell Grant eligibility to short-term workforce programs, it would be most useful to track the post-college outcomes of students who complete any undergraduate credential, from short, medium, and long-term certificates to associate's and bachelor's degrees.

When developing this new study, NCES should explore options for leveraging administrative data, such as earnings and student loan repayment. However, it is essential to also maintain a student survey component to examine important issues that are not captured in administrative data. For example, B&B included survey questions on employment characteristics, family status, homeownership decisions, financial security, and teaching experience.

4. Streamline data collection processes.

Streamlining and modernizing data processes within IES would make processes more efficient and lead to higher quality data that better meets the needs of students, families, states, institutions, researchers, and policymakers.

First, a federal student-level data network (SLDN) would add efficiency to data collections, as well as provide better, more complete data about student outcomes. This SLDN would improve upon our existing federal data by counting all students and all outcomes, even as students transfer between colleges or move between the workforce and postsecondary education and training. Current federal data do not provide a complete picture of students' outcomes because they exclude earnings for students who do not receive federal financial aid, even if they were supported by taxpayer funds like workforce training programs (WIOA), military or veterans' benefits, or tuition tax credits. To better reflect today's learning ecosystem, it is especially important to include and connect all postsecondary education and workforce training programs, given new policies like Workforce Pell. A federal SLDN would fill in those gaps and provide some aggregate data back to states and institutions so they can develop and implement targeted, data-informed strategies aimed at supporting student success.

Additionally, a federal SLDN would add substantial efficiency to federal and state data collections. For example, the SLDN could be used to calculate the hundreds of metrics institutions must provide on IPEDS student-related surveys, enabling colleges to report data only once. The SLDN could also simplify the collection of administrative data in NCES's postsecondary sample studies. Moreover, a more robust and accurate SLDN could help colleges meet their reporting requirements to state governments, thus reducing burdens on colleges and state budgets alike. To reform our data system in ways that match the experiences of today's students and help policymakers identify whether postsecondary education and training are serving all students well, NCES should create and manage a privacy-protected, federal SLDN. This change would require legislative action, as well as in-house expertise and adequate staffing to build the system.

Second, ED should assess data governance and matching within ED-managed data systems. ED collects a vast amount of administrative and statistical data as a part of its routine processes and collections, but only a fraction of these data are available to inform policymaking and research. To ensure that ED processes and institutional

outcomes are transparent, it is essential for ED to undertake internal assessments of data governance and offices. Because ED's data collections were developed for a variety of purposes and across different offices, to efficiently streamline data governance, ED should assess its use of identifiers across institutions, assess data quality in administrative systems, and create a mechanism for access for researchers.

5. Maintain high standards for statistical rigor, data security, and privacy protections.

NCES's data collections have historically been high quality, making them a trusted source of information for students, families, institutions, states, researchers, and policymakers. To maintain the utility of those data for the field, NCES must maintain its high standards for [statistical rigor](#). This requires adhering to responsible procedures around data collections and reporting, statistical methods, and data quality checks, as well as maintaining the staffing and expertise needed to ensure the quality and accuracy of data collections.

Additionally, NCES must continue adhering to strict privacy and security requirements around protecting personal information when collecting, reporting, and publishing data, as is currently [required](#). When working with individual student data, particularly personally identifiable information (PII), it is essential to treat those data with the highest level of integrity, privacy, and purpose. NCES has a track record of ensuring that students' personal data are not misused, and those protections must be maintained.

6. Provide sufficient guidance and training for data reporters, to ensure data quality.

One of NCES's key data collections is the Integrated Postsecondary Education Data System (IPEDS), which requires colleges to report data on a series of annual surveys. Training and support for the institutional researchers and, in some cases, state agencies responsible for submitting IPEDS data are essential to ensure all data are reported accurately and consistently. Unfortunately, the IPEDS training subcontract that served this purpose was [canceled](#) earlier this year. The loss of those online trainings and in-person workshops may affect the quality of data reported to IPEDS, harming NCES's ability to meet the needs of the field.

Additionally, NCES must provide clear guidance for institutions, particularly around changes to data collections. NCES should develop and publicly post preview screens at least one year before new data collections open. NCES should also provide detailed data definitions, answers to frequently asked questions, and information on how data will be collected. All are essential for ensuring institutions are properly prepared to submit consistent, high-quality IPEDS data.

7. Ensure data are made available to the public in a timely fashion.

A critical benefit of NCES data is that the information is made widely available to the public for free. Unlike the federal government, private data collections often charge a fee to access their data and state data systems have different access rules, depending on the state. To help IES meet the needs of students, state and local leaders, researchers, policymakers, companies, and other organizations, the data collected by NCES must be widely accessible and posted in a timely fashion.

At a minimum, NCES should continue offering tools and resources like the [College Scorecard](#), [DataLab](#), [IPEDS data tools](#), [IPEDS Data Feedback Reports](#), [College Navigator](#), [Condition of Education](#), and other dashboards and reports. The College Scorecard is a consumer tool that relies heavily on IPEDS data, along with other sources. DataLab is a secure, web-based platform that allows users to create custom analyses using data collected by NCES, as well as browse ready-built data tables. Each dataset and tool enables students, families, states, researchers, institutions, and policymakers to make informed decisions and improve postsecondary outcomes. These tools and resources should be well supported and maintained so stakeholders can easily access the data without encountering technical problems. Additionally, NCES should continue publishing survey materials and methodology documentation for its collections to help the field accurately interpret the data.

NCES should also continue providing secure, remote access to restricted-use data, process new applications to access those data, and ensure that disclosure risk reviews are completed in a timely manner. Researchers who meet strict security requirements can apply for a restricted-use data license to conduct more detailed and complex analyses, though NCES's review of new applications is currently suspended. Restricted-use data provide access to source files and variables not available through DataLab, enable linking to other data sources, and allow much greater flexibility in the construction of analyses by enabling researchers to analyze data using statistical software. To meet privacy and security requirements, researchers must submit their analyses to IES for disclosure risk review before publishing the data. This review protects student privacy and helps ensure analyses accurately represent the data; however, delays in the review process can prevent researchers from publishing critical findings. Typically, the disclosure risk review has taken five to ten business days. But those reviews are now taking many months, due to staffing reductions at IES. NCES should ensure that disclosure risk reviews are processed in a timely manner.

To best inform decision making by students, states, institutions, and policymakers, NCES should release data as quickly as possible, while maintaining high quality standards. This requires sufficient staffing to oversee the work and approve data releases. Recent staffing cuts and contract cancellations have led to delays in releasing data from the Beginning Postsecondary Students longitudinal study (BPS) and the [Condition of Education report](#). Though the BPS:20/22 data collection has long been completed and

NCES published its [“First Look” report](#) in September 2024, the data for that study have not yet been made available to the public; they should be released.

Additionally, NCES should make its data more easily accessible through developing new or expanding existing application programming interfaces (APIs). Currently, the process of downloading and building data sets necessary to answer key questions often involves drawing on information from multiple sources within ED, including multiple files from Federal Student Aid (FSA), the College Scorecard, and IPEDS. If users were able to instead identify variables of interest across these sources through an API or other shared interface, this process could be streamlined considerably. Critically, this change will ensure that data linkages across institution-level data from FSA and IPEDS are more readily accessible given the different identifiers these data sources currently use. By building an API that incorporates and harmonizes these different sources, researchers could be confident that the linked datasets were accurately merged. The College Scorecard already maintains an API that could serve as a baseline for this combined data.

8. Meaningfully engage with stakeholders, particularly around changes to data collections.

NCES has had a long and successful history of meaningfully engaging stakeholders to answer emerging policy-relevant questions, preserve data quality, and ensure that its data collections meet the needs of the field. Through the [National Postsecondary Education Cooperative \(NPEC\)](#), [Technical Review Panels](#) (TRPs), and public comment periods, NCES has strategically leveraged the expertise of higher education practitioners, states, institutions, researchers, and advocates to develop changes to data collections and ensure that institutions and states have what they need to report accurate and reliable data.

For example, updates to IPEDS survey components typically go through a careful vetting, planning, and implementation process that includes soliciting community input to uncover and answer technical definition and reporting questions. Institutions are also given advance notice of IPEDS reporting changes so they have time to prepare and adjust their data systems as needed. By prioritizing field engagement, this rigorous process helps ensure data collections are aligned with practical, on-the-ground realities and each institution has the guidance needed to report data in a consistent manner. Each step in the vetting and planning process is critical for maintaining high data quality standards while ensuring the administrative burden imposed on institutions is reasonable and fair. Skipping these steps would drastically hamper institutions’ ability to submit consistent and comparable data and limit the ability of practitioners, states, researchers, decisionmakers, and ED staff to conduct meaningful data analyses.

When considering changes to its data collections, NCES should gather stakeholder input via processes like NPEC and TRPs, as well as public comment periods. To ensure that the field can provide meaningful feedback, NCES should provide detailed proposals for review and allow sufficient time for the field to respond, before changes are implemented.

9. Ensure sufficient staffing to manage data collections, ensure data quality, and release data to the public.

NCES staff play key roles in overseeing data collections and data quality, developing changes to surveys, monitoring reporting compliance, approving the public release of data, and providing guidance to institutions around data reporting. Historically, NCES has had a relatively [small staff](#) compared to other statistical agencies like the U.S. Census Bureau and the Bureau of Labor Statistics. However, it now lacks the necessary staff to effectively oversee those data systems. After recent layoffs, there are [only three employees left](#) out of 100 at NCES. Though positions have recently been posted to support the National Assessment of Educational Progress, none of the staff positions supporting NCES's postsecondary data collections have yet been restored. To ensure that NCES can effectively provide data to support consumer choice and evidence-based policymaking, it must be sufficiently staffed.

Our nation's future relies on the strength of our education system and how well it prepares all learners to participate in their communities and in the workforce. Decisions made by educators and policymakers should be informed by the best data and research possible. NCES's high-quality postsecondary data collections are essential for consumer choice and evidence-based policymaking. The federal government is uniquely situated to lead and produce those insights, which help inform policies and practices that support college access, affordability, and success for all students. To best meet the needs of the field, NCES should take the steps outlined above and receive the funding and staffing necessary to achieve its goals.

Thank you again for the opportunity to provide feedback. If you have any questions about this comment, please contact Diane Cheng, Vice President of Policy at the Institute for Higher Education Policy, at dcheng@ihp.org.

Sincerely,

Organizations:

AACTE: American Association of Colleges for Teacher Education
Achieve Atlanta
Advance CTE
Advance Illinois
All4Ed
American Statistical Association

AnLar
Association for Career and Technical Education
Association for Institutional Research
California Competes: Higher Education for a Strong Economy
Clearinghouse on Women's Issues
Community College Research Center, Teachers College, Columbia University
Council for Opportunity in Education
Data Quality Campaign
EDGE Partners
EdTrust
Education Reform Now
Excelencia in Education
Feminist Majority Foundation
Georgetown University Center on Education and the Workforce
InnovateEDU
Institute for Higher Education Policy
Jobs for the Future
Knowledge Alliance
Michigan Community College Association
National Association for College Admission Counseling
National Association of Student Financial Aid Administrators
National College Attainment Network
New America Higher Education Program
Prismatic Research & Strategy
The Bers Group
The Hope Center for Student Basic Needs
The Institute for College Access & Success (TICAS)
Third Way
Today's Students Coalition
UnidosUS*
Young Invincibles

Individuals:

Anne-Marie Nuñez, Professor, University of Texas El Paso
Awilda Rodriguez, Associate Professor, College of Education, University of Maryland,
College Park
Brian J. Reiser, Professor, School of Education and Social Policy, Northwestern University
Carolyn Sloane Mata, CM Education Insights and Solutions
Darcie E. Harvey, Private Education Consultant
Katie Broton, Associate Professor, University of Iowa
Kristine Jan Cruz Espinoza, Assistant Professor, California Lutheran University
Matt Giani, Research Associate Professor, The University of Texas at Austin
N. F. Tennesen, Doctoral Candidate, University of Iowa

Norman M. Bradburn, Professor Emeritus, University of Chicago
Roy Y. Chan, Assistant Professor, Lee University
Ryan Wells, Professor, University of Massachusetts Amherst
Stacey Brockman, Assistant Professor, Wayne State University
Ty McNamee, Assistant Professor, University of Kentucky

** Denotes signatory added on October 17, 2025*