

May 20, 2019

James Woodworth  
Commissioner  
National Center for Education Statistics  
U.S. Department of Education  
550 12th Street SW  
Washington, D.C. 20202-0023

Integrated Postsecondary Education Data System (IPEDS) 2019-20 through 2021-22  
Docket ID number ED-2019-ICCD-0028

Dear Commissioner Woodworth,

The Integrated Postsecondary Education Data System (IPEDS) is a vital tool that enables students and their families, institutions, researchers, and policymakers to better understand the nation's higher education systems and to make informed decisions. The undersigned appreciate the opportunity to provide comments regarding the U.S. Department of Education (the department)'s proposed changes to IPEDS data collection.

## Changes to Reporting on Distance Education

The proposed change in distance education reporting in the completions survey component will better align the survey with the ways institutions organize their programs. In the circumstance that an institution offers more than one program under a Classification of Instructional Programs code, current reporting requires institutions to simply check "yes" to a distance education question if any of said programs are offered via distance education. The current format makes it impossible to identify the number of programs offered by distance education. The proposed change will have institutions clarify whether programs are entirely distance education, have a distance education component, or use distance education as a supplement for onsite classes, and we think this is a beneficial change to the data collection.

Similarly, proposed changes to the twelve-month enrollment survey component, with regard to distance education enrollments, will bring institutional reporting and thus available data into alignment with modern realities. At the moment, distance education enrollments are only collected via the fall enrollment component of the survey. As noted in the department's description of proposed changes, the fall enrollment figure potentially masks some of the true enrollment levels of institutions that offer programs only in distance education. Together, these proposed changes to reporting regarding distance education will bring reporting and data up to date with the current higher education landscape. We commend them.

## Changes to Reporting in the Finance Component

Furthermore, we commend the department for acting on the Technical Review Panel (TRP)'s recommendations to include financial health indicators, expanded discounts and allowances details, and “endowment net assets” instead of “endowment assets” in the finance component of the survey. Each of these changes will lead to greater understanding of student aid and institutional finances.

## Further Opportunities for Improving the Finance Component

The purpose of the IPEDS TRP has been to convene experts in the sector who together would suggest changes to the surveys that would keep the instrument relevant within and for the current postsecondary landscape. A substantial number of changes are now under consideration at the department, many of which originated from recent proceedings of the TRP;<sup>1</sup> however, we were surprised that an issue regarding the finance survey—and a recommendation considered by experts in higher education finance to be an essential change—has not been included in those considerations. That recommendation is to break down the *student services* category into two parts: *pre-enrollment student services* and *post-enrollment student services*.

We urge the department to consider this recommendation as well.

The issue has been broached by the TRP, most recently during the fifty-seventh convening of the IPEDS TRP (October 2018). At the conclusion of the October 2018 TRP, Representative Mark Takano (D-CA), then chair of the House Veterans Affairs Committee, submitted a letter to the IPEDS project director urging the separation of marketing and recruiting expenses from the student services expense category.<sup>2</sup> Representative Takano argued this would help the public identify institutions that are focusing a disproportionate amount of their resources toward marketing. Indeed, some institutions spend more on recruiting new students than on supporting current student success.<sup>3</sup> This is especially crucial in the context of institutions preying on student veterans, as they are a subset of students that present an even larger source of public tuition funds from which to draw revenue.<sup>4</sup> Prior to this, a 2015 IPEDS TRP considered ways to

---

<sup>1</sup> “Report and Suggestions from IPEDS Technical Review Panel #57: IPEDS Financial Metrics,” [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/TRP57\\_Summary.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP57_Summary.pdf)

<sup>2</sup> Letter from Representative Mark Takano to IPEDS project director Janice Kelly-Reid, dated December 26, 2018. <https://drive.google.com/file/d/1f9bLBibMkpeeFRJpjrAtD4889iuBTiH1/view?usp=sharing>

<sup>3</sup> Stephanie Hall, “How Much Education Are Students Getting for Their Tuition Dollar?” The Century Foundation, February 28, 2019, <https://tcf.org/content/report/much-education-students-getting-tuition-dollar/>

<sup>4</sup> “Should Colleges Spend the GI Bill on Veterans’ Education on Late Night TV Ads?” Veterans Education Success, April 2019, [https://vetsedsuccess.org/wp-content/uploads/2019/04/VES\\_Instructional\\_Spending\\_Report\\_FINAL.pdf](https://vetsedsuccess.org/wp-content/uploads/2019/04/VES_Instructional_Spending_Report_FINAL.pdf)

add expense categories like marketing to the finance portion of the survey, but ultimately decided against the approach out of uncertainty over how best to define marketing.<sup>5</sup>

This dilemma would be solved, however, by breaking down the *student services* category into *pre-enrollment student services* and *post-enrollment student services*. This is a viable solution given that the current student services category is broad in definition, and one on which financial and business officers already report receiving the least clear guidance.<sup>6</sup> Breaking the student services category into two parts would be a logical first step at providing clarity.

## Concluding Thoughts

The finance component of the IPEDS survey has been updated seven times since 1987 in order to accommodate the changing nature of the different sectors within higher education.<sup>7</sup> Increased transparency and accountability are urgently needed in higher education, especially with regard to the use of public sources of funding like Title IV, GI Bill, and other veterans education funds. We urge the Department to take into consideration the multiple and sustained calls for a change to the IPEDS finance component that would break up *student services* into two new categories that could be broadly described as *pre-enrollment student services* and *post-enrollment student services*. This change would immediately address issues of transparency and accountability.

Sincerely,

American Federation of Teachers  
American for Financial Reform  
Anthony Walsh, The Century Foundation  
Education Reform Now  
George Washington Institute of Public Policy  
Higher Learning Advocates  
Maryland Consumer Rights Coalition  
National Consumer Law Center (on behalf of its low-income clients)  
New America Higher Education Initiative  
Robert Shireman, The Century Foundation  
Stephanie Hall, The Century Foundation  
Student Debt Crisis

---

<sup>5</sup> "Report and Suggestions from IPEDS Technical Review Panel 46: Improvements to the Finance Survey," [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/TRP46\\_Summary.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP46_Summary.pdf)

<sup>6</sup> Tammy Kolbe and Robert Kelchen, "Identifying New Metrics Using IPEDS Finance Data," National Postsecondary Education Cooperative, 2017, [https://nces.ed.gov/ipeds/pdf/npec/data/NPEC\\_Paper\\_New\\_IPEDS\\_Finance\\_Metrics\\_2017.pdf](https://nces.ed.gov/ipeds/pdf/npec/data/NPEC_Paper_New_IPEDS_Finance_Metrics_2017.pdf).

<sup>7</sup> Allison Bell, "Improving the IPEDS Finance Component," National Postsecondary Education Cooperative, March 2015, [https://nces.ed.gov/ipeds/pdf/npec/data/NPEC\\_Paper\\_Improving\\_the\\_IPEDS\\_Finance\\_Component\\_2015.pdf](https://nces.ed.gov/ipeds/pdf/npec/data/NPEC_Paper_Improving_the_IPEDS_Finance_Component_2015.pdf).

The Education Trust

The Georgetown University Center on Education and the Workforce

The Institute for College Access and Success

Third Way

Veterans Education Success

Woodstock Institute