



U.S. DEPARTMENT OF EDUCATION  
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

January 13, 2009

Matthew Reed  
The Institute for College Access & Success  
2054 University Avenue  
Suite 500  
Berkeley, CA 94704

Dear Matt:

Thank you for your letter dated January 2, 2009, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register on December 2, 2008. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS and your very comprehensive and thoughtful comments on how the student financial aid survey could better inform student decision-making and improve college accountability. In addition, we would like to thank you for your continued support of IPEDS through service on the National Postsecondary Education Cooperative (NPEC) and the IPEDS Technical Review Panel (TRP).

In your letter, you suggest additional items for the IPEDS student financial aid survey to meet short-term needs for additional data on student debt. You also recommend that the Department, in the longer term, work to better integrate IPEDS and the National Student Loan Data System (NSLDS) to help reduce institutional burden while improving data quality and providing more data for the public. Finally, you suggest that the NSLDS collect data on private school loans and report more detailed data on student borrowing. We understand, and share, your organization's interest providing relevant, accurate, and timely data on college affordability to students, policymakers, and the public.

In the response below, we give you some context about the constraints that we face in making additional changes to IPEDS at this time and make suggestions about how and when you might reintroduce these ideas. We also discuss the relationship among the NSLDS, IPEDS, and other postsecondary education data relevant to college costs, and make suggestions about how you can support our efforts to promote further coordination and collaboration.

### **Proposed Additional Changes to IPEDS**

NCES appreciates your support for the additional changes to IPEDS detailed in the Federal Register notice. It is very helpful to us to have validation from our data users that

the effort we put into designing, piloting, and implementing such changes will result in more useful and relevant data on postsecondary education.

While we also appreciate your suggestions for additional changes to the student financial aid survey, we are unable to make those changes at this time. During the 2008-09 IPEDS data collection, we began a three-year process implementing two major changes to the data system—the transition to the new ED race/ethnicity reporting categories and the addition of HEOA mandated data items. We are also in the process of making a handful of additional changes and improvements to the data (changes to first professional and doctor's degree categories, additions to institutional finance data, and improvements to financial aid data) approved by OMB in June 2008. For the next three years, title IV institutions and the IPEDS data collection system will face a heavy burden as we implement these changes.

As you can imagine, the implementation of the new race/ethnicity reporting categories throughout the data collection system puts a huge strain on institutions. While NCES has spent a large amount of resources and staff time reprogramming our data collection instruments and providing training and support to data providers, most of the cost and burden of this transition is borne by the institutions themselves. At this time, institutions are investing heavily in changes to their IT and reporting systems, revising application and other forms, and re-surveying their students and employees to re-categorize them by the required full implementation in 2010-11.

The Higher Education Opportunity Act (HEOA) mandated an additional set of changes to IPEDS that, unfortunately, must be implemented concurrently with the new race/ethnicity categories. Title IV institutions now face additional mandated reporting in the 2008-09 data collection, with virtually no time to prepare their IT and reporting systems for the changes. Additional mandated items in collection year 2009-10, such as a net price component, will continue to add burden to the collection during this three-year timeframe.

Beginning with the 2011-12 data collection cycle, we will once again be in a position to introduce changes to improve IPEDS and consider additional measures on student outcomes and finances. Your continued participation on NPEC and the IPEDS TRP will ensure that you have the opportunity to present your recommendations as we prepare for data collection in 2011-12 and beyond.

### **Integrating Department Data Systems**

We agree that the NSLDS is a valuable source of data on federal student financial aid and that we need to work towards linking these data with IPEDS. Our student-focused data

collections, such as the National Postsecondary Student Aid Study and its longitudinal offshoots (Beginning Postsecondary Students and Baccalaureate and Beyond), already link with NSLDS to enable researchers and policy makers to conduct detailed analyses of the correlates of student debt burden. While we are able at this time to link with NSLDS at the student level, you correctly noted that we are currently unable to link at the institution level due to differences in institutional identifiers and definitions.

As we await the appointment and confirmation of new leadership at the Department of Education, staff at NCES, the Office of Postsecondary Education (OPE), and the office of Federal Student Aid (FSA) have begun preliminary conversations about how to work more collaboratively on financial aid data. These discussions include ways that we can better integrate, use, and disseminate data collected by the different offices. Be assured that we are beginning to take concrete steps to advance data integration, i.e. sharing data dictionaries and reporting instructions, and reviewing identifier crosswalks between OPE and IPEDS identifiers. We invite you to continue to think about how such integration would serve the public's need for more accurate and timely data on student financial aid and college costs, and to share your ideas with NCES, OPE, and FSA.

### **Suggestions for Changes to NSLDS Data Collection and Reporting**

As you know, the NSLDS is managed by FSA and NCES does not control NSLDS data collection or reporting. NSLDS staff in Federal Student Aid have been quite helpful in initiating discussions of data integration, and appear open to modifications to NSLDS, such as the addition of information about certificate/degree completion. We recommend that you communicate your recommendations for the inclusion of private student loans in NSLDS and for more detailed reporting on student borrowing using NSLDS to that office.

Once again, we appreciate your comments on the IPEDS OMB clearance request and we look forward to working with you in the future on many of these issues.

Sincerely,

Elise Miller  
Program Director  
Postsecondary Institutional Studies Program