Public Comment Received During the 60-day Comment Period and NCES Responses

Comments related to the Integrated Postsecondary Education Data System (IPEDS) 2015–2016 Pension Liabilities Update
Comment Number: 1

Docket: ED-2015-ICCD-0124
Integrated Postsecondary Education Data System (IPEDS), Web-Based Collection System

Comment On: ED-2015-ICCD-0124-0001
Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2015–2016 Pension Liabilities Update

Document: ED-2015-ICCD-0124-0009
Comment on FR Doc # 2015-26598

Submitter Information

Name: Sarah Garrick

General Comment

Dear Director,

On behalf of Dr. Dennis Fixler (BEA's Chief Statistician), I am forwarding you a signed letter of support for the National Center for Education Statistics' IPEDS.

Please consider this BEA's formal response to the Federal Register notice of October 20, 2015.

If there are any questions, please let me know.

Thank you,

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Office of the Director
Admin/Point-Of-Contact For:
Dennis Fixler, Chief Statistician-Direct: 202-606-9607
David Johnson, Chief Economist-Direct: 202-606-9603

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November 24,2015
Director of Information Collection Clearance Division
U.S. Department of Education
400 Maryland A venue, S W
LBJ Room 2E 103
Washington, DC 20202-4537

U.S. Department of Commerce
Economics and Statistics Administration

RE: *Federal Register* notice of October 20,2015, for the National Center for Education Statistics' Integrated Postsecondary Education Data System (IPEDS) (OMB Number: 1850-0582)

Dear Director:

The Bureau of Economic Analysis (BEA) strongly supports the National Center for Education Statistics' continued efforts to collect data using the Integrated Postsecondary Education Data System (IPEDS). The data collected on this survey are crucial to key components ofBEA's economic statistics.

IPEDS data are used in the national income and product accounts (NIP As) to help estimate personal consumption expenditures (PCE). Additionally, IPEDS data are used to estimate output for private education in the benchmark input-output accounts. Finally, there are benefits from the IPEDS data used by the U.S. Census Bureau in the preparation of its Annual Survey of Government Finances (ASGF). BEA uses the ASGF data to estimate components of state and local government spending in the NIP As. BEA requests that a detailed accounting of the unfunded pension liability total or a ratio of the funded to unfunded pension liability is included in addition to the changes listed in Federal Register notice. The attachment shows the IPEDS data codes used by BEA.

Please keep BEA informed about any modifications to the form. We are particularly interested in any modifications proposed during the form's approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, at 202-606-9618 or by e-mail at Tiffany.Burrell@bea.gov. Should you need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,
Dennis J. Fixler
Chief Statistician

BEA's Usage of the IPEDS

Data Codes Used	BEA Uses for the Data
F2e011	Estimation of PCE for gross operating expenses of private higher education, schools, colleges, and universities at an annual level.
F2e031	
F2e041	
F2e051	
F2e061	
F2e112	
F2d01	
F2dll	
F3d01	
F3d06	
F3d07	Estimates used in the benchmark for the input-output accounts.

RESPONSE:

Dear Ms. Garrick,

Thank you for your feedback posted on November 25, 2015, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2015-16 Pension Liabilities Update published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment.

The implementation of the Government Accounting Standards Board (GASB)'s Statement 68 will impact the reporting of financial data to IPEDS. NCES has added the collection of a screening question and three fields in order to accommodate this change and provide clarity to the IPEDS finance data. Thank you for writing on behalf of the Bureau of Economic Analysis (BEA) to share the importance of the IPEDS Finance data in your agency's statistics and to support our effort to quantify the impact of GASB Statement 68.

In response to BEA's request to collect a detailed accounting of the unfunded pension liability total or a ratio of the funded to unfunded pension liability, NCES will not be able to fulfill this request for the 2015-16 collection cycle. However, we will consider the cost and benefits of the requested change for future collections and submit revisions to the Office of Management and Budget (OMB) as applicable. Please continue to monitor the Federal Register for the IPEDS Clearance Package for our 2016-19 collections.

Thank you again for your comment.

Sincerely,
Richard J. Reeves
Branch Chief Postsecondary Data, Administrative Data Division
National Center for Education Statistics
U.S. Department of Education