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RE: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27 ([Docket No.: ED-2024-SCC-0040](#))

EdTrust, an organization committed to advancing policies and practices that dismantle the racial and economic barriers embedded in the American education system, thanks the U.S. Department of Education (“the Department”) for the opportunity to comment on the process for IPEDS data collection. Our responses to some of the provided prompts are below:

**Is this collection necessary to the proper functions of the Department?**

Yes, this collection is necessary to enable equity and accountability, monitor progress, promote transparency, and boost the use of evidence-based research. Data collection is crucial for identifying disparities in educational outcomes based on a variety of factors. This information provides a clear understanding of where inequities exist and helps in formulating [evidence-based targeted interventions](#) to ensure all students have equitable access to educational opportunities. Without comprehensive data, it is challenging to [measure progress toward equity](#) goals or hold institutions accountable for closing achievement gaps effectively. Additionally, publication allows for fair access to post-secondary data to the public.

**Will this information be processed and used in a timely manner?**

Yes, regular data collection allows for monitoring progress over time and evaluating the effectiveness of policies and initiatives aimed at increasing numbers in education. It enables stakeholders to track changes in educational outcomes and identify successful practices that enable policymakers to ask questions about how these efforts can be replicated or scaled up to improve outcomes for all students. For example, EdTrust utilized IPEDS data to understand how the [Higher Education Emergency Relief Funds \(HEERF\)](#) were used in Texas and the relationship with retention rates post dissemination.

**How might the Department enhance the quality, utility, and clarity of the information to be collected?**

*Disaggregate age brackets by race/ethnicity for institutional characteristics such as graduation rates.*

Disaggregating all institutional characteristics, such as graduation rates, by age brackets and race within IPEDS is crucial for providing a more nuanced understanding of educational outcomes among diverse student populations, including adult learners. This approach enables policymakers and educators to identify disparities and tailor interventions that address the specific needs of different demographic groups. Given the increasing focus on adult learners as a key population for achieving [state educational attainment goals](#), enhancing the granularity of data collection in these areas can better reflect the realities of student demographics and contribute to more equitable educational outcomes nationwide. Additionally, through having more information on outcomes by age brackets, learners with [some college, but no degree](#) can be researched with more evidence.

*Consider how to implement inclusive approaches to collecting data on student parents.*

ED should consider how to collect enrollment and outcomes data for student parents and collect the appropriate research and stakeholder engagement to generate informed proposals for new data collections.

Collecting data on the outcomes of student parents would aid the development of equitable and successful data initiatives to increase data transparency. This includes clear definitions and specific instructions to guide reporting practices uniformly across institutions. For example, expanding data categories within IPEDS to include fields dedicated to student parents, such as the number and ages of dependents, types of caregiving responsibilities, and their impact on academic progress, would provide a better understanding of their experiences and outcomes. These improvements are crucial for informing policies and interventions aimed at supporting the educational [success of student parents](#) in higher education.

**How might the Department minimize the burden of this collection on the respondents, including through the use of information technology?**

ED should provide timely, clear, and responsive communications and technical assistance to institutions. These communications and training will help minimize reporting burden for institutions and clarify best practices 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 data elements.

We thank you for your consideration and for the opportunity to comment. Should you have any questions regarding the content of this letter, please contact Reid Setzer, [rsetzer@edtrust.org](mailto:rsetzer@edtrust.org) or Sabreyna Reese, [sreese@edtrust.org](mailto:sreese@edtrust.org).

Sincerely,

EdTrust