



August 23, 2024

Gregory Martin
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Office of Postsecondary Education
400 Maryland Ave., SW
5th Floor
Washington, D.C. 20202

CC: James Kvaal, Under Secretary
Ben Miller, Deputy Under Secretary
Dr. Nasser Paydar, Assistant Secretary for Postsecondary Education, Office of Postsecondary Education
Amanda Miller, Deputy Assistant Secretary for Higher Education Programs, Office of Postsecondary Education
Antoinette Flores, Deputy Assistant Secretary for Policy, Planning, and Innovation, Office of Postsecondary Education

Re: [Docket ID No. ED-2024-OPE-0050](#)

To Whom It May Concern:

This letter is submitted on behalf of the 14 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the Department of Education’s (ED’s) proposed regulations related to program integrity and institutional quality. PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

PostsecData strongly supports ED’s efforts to improve access to high-quality, accurate information about online education. Online education is an essential part of the postsecondary education system, providing convenient and flexible access to postsecondary opportunities for millions of students. Indeed, the availability of online educational offerings [expanded rapidly](#) in the aftermath of the COVID-19 pandemic. Yet we currently lack sufficient information regarding the availability and student outcomes of online programs, as well as their compliance with federal rules and regulations.

Given these gaps in our nation’s higher education data infrastructure, two provisions of ED’s proposed regulations are particularly critical:

1. **Expand the definition of “additional location” to include virtual locations.** Proposed 34 CFR 600.2 would incorporate a revised definition of “additional location” that includes a virtual location for programs offered entirely through distance education or correspondence courses. This change would enable ED to better understand the prevalence of distance

education programs and distinguish between programs offered fully through distance education from those that occur fully or partially on a physical campus or correctional institution. In addition to enhancing ED's ability to measure student outcomes, this change would enable student loan borrowers to access closed school discharges if their college closes its online operations while maintaining a physical presence, or vice versa.

2. **Require distance education data reporting on federal aid recipients.** Proposed 34 CFR 668.41 would require institutions to report whether students receiving federal financial aid are enrolled in distance education or correspondence courses, such as through the National Student Loan Data System (NSLDS). This change would provide valuable information on the outcomes of students who are enrolled online and help inform student-centered policies for distance education. In particular, we hope that these data will allow for the publication of aggregate student outcomes by distance education status in the College Scorecard. This will provide students access to useful and actionable information about the programs and institutions they are considering based on their preferred learning modality. This data reporting would be implemented no earlier than July 1, 2026, to give institutions and ED time to adjust their respective data reporting systems.

These provisions were broadly supported by negotiators during the negotiated rulemaking. PostsecData has [previously](#) called for [similar changes](#), noting that with the addition of distance education data in NSLDS, ED "could provide timely, responsive data to inform future investments and target interventions." Institutions are already required to report annually on the number of students enrolled in distance education to ED's Integrated Postsecondary Education Data System (IPEDS) and already report student-level data on enrollment and completion to NSLDS. This is a critical – and long overdue – step that ED can take to support students, including those most likely to enroll in online educational programs, such as parenting students, working adults, and student veterans.

Thank you again for the opportunity to submit these comments in support of increased data transparency. If you have any questions about this comment, please contact Diane Cheng, Vice President of Research and Policy at the Institute for Higher Education Policy, at dcheng@ihep.org.

Sincerely,

AccuRounds
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Arnold Ventures
Complete College America
Data Quality Campaign
EdTrust
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
National Association for College Admission Counseling



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Third Way