

October 31, 2024

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U.S. Department of Education
400 Maryland Ave., SW
Washington, D.C. 20202

RE: Docket ID ED-2024-IES-0116

This letter is submitted on behalf of the 25 undersigned organizations and 8 individuals. We are enthusiastic about the potential for the data users conference to address critical themes in educational equity and urge the National Center for Education Statistics (NCES) to consider the following in developing the conference materials. We appreciate the proactive steps the Department of Education [has already taken](#) to ensure the conference is widely accessible to organizations, institutions, and individuals representing distinct viewpoints, including offering the conference in virtual format and providing ample notice of timing.

We offer the following detailed suggestions in response to directed questions included in the request for information:

Question 1: What are existing or emerging issues for data users that you consider critical for each of the three conference themes?

1. Address plans for the implementation of the Office of Management and Budget's Statistical Policy Directive No. 15.
2. Discuss issues and guidance for the treatment of Federal Tax Information found on the Free Application for Federal Student Aid (FAFSA).

Question 2: How can conference organizers best identify and convene a broad and diverse array of attendees?

3. Recruit participants with expertise in specific student groups' experiences, representing a diverse group of institutions, and leverage membership organizations and associations to support outreach.

Question 3: What NCES-affiliated products and processes are of greatest interest to data users? Are there any specific updates or modifications that would be helpful to data users?

4. Discuss preserving and improving the NCES postsecondary sample studies.
5. Discuss potential improvements and recent changes to the Integrated Postsecondary Education Data System (IPEDS).

Specifically, we recommend NCES Data Users Conference organizers incorporate the following recommendations in developing conference agendas, invitations, and participant lists. These recommendations are described in more detail below.

1. Address plans for the implementation of the Office of Management and Budget (OMB)'s [Statistical Policy Directive No. 15 \(SPD15\)](#).

NCES should provide updates and/or solicit feedback on the implementation of this directive, including how ED will collect and present aggregate data on multiracial or multiethnic students and whether ED will provide options for more detailed race and ethnicity disaggregation, such as Tribal affiliations. There is strong field interest in ED's implementation of SPD15, which can help data users identify and measure achievement gaps (*Theme 1*) throughout the educational pipeline, as well as understand the ways in which educational outcomes are changing for different groups over time (*Theme 2*). Given the scheduled dates in February 2025, NCES should use the conference to solicit feedback from key stakeholders to inform the development of ED's Action Plan to implement SPD15.

The conference should include sessions on SPD15 implementation and data collection, reporting, and use for specific subpopulations of students. For instance, recent research indicates that current methods of presenting data on race and ethnicity systemically undercount [American Indian and Alaska Native students](#) and fail to adequately capture information on Tribal affiliation. Likewise, the lack of detailed data disaggregation for [Asian American and Pacific Islander students](#) can mask inequities within the broader group and make it more difficult for researchers and practitioners to identify and provide support to underserved populations within this community. These findings underscore the need for improvements to current approaches to data disaggregation and the importance of data collection that includes detailed categories of race and ethnicity.

Additionally, the conference should include information on how ED's implementation of SPD15 could affect eligibility for Minority-Serving Institution (MSI) designations. ED should also clarify what steps it will take to promote technical and systems alignment and minimize disruptions to institutions, states, and other data-users.

2. Discuss issues and guidance for the treatment of Federal Tax Information found on the Free Application for Federal Student Aid (FAFSA).

While FAFSA data is primarily used for the administration of federal financial aid, it also serves other important purposes. Starting with the 2024-25 cycle, certain information on the form is [designated Federal Tax Information \(FTI\)](#). This has led to changes in how some data used in the FAFSA process, such as students' family income, may be shared and used. For example, NCES data products such as the National Postsecondary Student Aid Study (NPSAS) and the Integrated Postsecondary Education Data System (IPEDS) currently include metrics based on FAFSA data on family income. These data enable analysis of gaps in postsecondary access, success, and post-college outcomes along socioeconomic lines (*Theme 1*). The NCES Data Users Conference should provide opportunities for data users to hear guidance and discuss considerations on how FTI can be used. In particular, the discussion should include consideration on how NCES data collections might be affected by the classification of these data as FTI.

3. Recruit participants with expertise in specific student groups' experiences, representing a diverse group of institutions, and leverage membership organizations and associations to support outreach.

Conference organizers should recruit participants from a diverse array of institutions. In particular, it is essential to include participants from less selective and open access colleges, rural-serving institutions, and Minority Serving Institutions (MSIs), which play an important role in providing access and support to students from historically underrepresented communities. To encourage institutional participation and help shape conference agendas, ED should reach out to institutional associations and organizations that represent or work with MSIs.

In addition, the experiences of Black, Latinx, Indigenous, and underrepresented Asian American and Pacific Islander students, students from families with low incomes, first-generation students, student parents, students with disabilities, students from rural communities, and other historically underserved groups should be reflected in the conference programming and attendees. NCES should engage researchers with expertise on these populations in developing conference materials, as well as practitioners within institutions, advocacy organizations, and community-based organizations that specialize in serving these specific populations, to ensure that the needs and experiences of these communities are adequately reflected in the conference discussions.

4. Discuss preserving and improving the NCES postsecondary sample studies.

The conference provides an opportunity for ED personnel to discuss and solicit feedback from the field on planned or potential changes to NCES postsecondary sample studies, which are of great interest to data users. Those studies provide invaluable information on postsecondary pathways, affordability, and outcomes to inform policymaking, field-driven research, and ongoing efforts to promote student success. For more than 30 years, the National Postsecondary Student Aid Study (NPSAS), the Beginning Postsecondary Students Longitudinal Study (BPS), and the Baccalaureate and Beyond Longitudinal Study (B&B) have yielded comprehensive insights about how students pay for college, their progress through college to degree completion, and their employment and loan repayment experiences after leaving school. Unlike other data sources, these studies are nationally representative and allow data to be broken out by a range of student characteristics, such as race, ethnicity, gender, and financial background.

Any actions to scale back or eliminate these studies weaken the field's ability to glean data-informed insights about students' experiences and outcomes, including the ability to address inequities in student outcomes (*Theme 1*) or to understand changes in education over time (*Theme 2*). For example, ED's [planned reduction in the frequency of NPSAS](#) will deprive data users of timely data that is not available elsewhere. Such actions deserve careful consideration and discussion, and the NCES Data Users Conference provides a unique opportunity for data users to hear from ED personnel, to share their concerns, and to offer feedback. The conference should include discussion of planned and potential changes to the studies, such as changes to frequency, increased reliance on administrative data sources, reduced survey questions, or different sampling methodologies.

Additionally, the conference should include a discussion around restoring longitudinal data collections on the outcomes of credential completers. The Baccalaureate and Beyond Longitudinal Study (B&B) was the only nationally representative source for insights into what happens to students after they earn a bachelor's degree. ED's discontinuation of B&B creates a significant gap in the field's understanding of return on investment of a postsecondary degree. The conference should explore options for restoring longitudinal data collections on the outcomes of students who

complete their credentials, including whether and how to expand the survey to include completers at the associate and certificate levels, to generate more robust information about post-completion outcomes nationally.

5. Discuss potential improvements and recent changes to the Integrated Postsecondary Education Data System (IPEDS).

IPEDS data are the primary source of information on higher education institutions nationwide, including school-level data on institutional characteristics, enrollment, completion and graduation rates, finance, financial aid and net price, faculty and staff, academic libraries, and more. These data also provide much of the information included in the College Scorecard. The NCES Data Users Conference should include discussions around needed improvements and refinements to this valuable data resource, as well as provide updates around planned and recently implemented changes to IPEDS surveys.

For example, the conference should discuss ways to align the Cost of Attendance (COA) measures in IPEDS with the legislative changes to COA required of institutions starting in 2023-24, to ensure that IPEDS data accurately reflect the estimates that students are provided by colleges. The FASFA Simplification Act and the Consolidated Appropriations Act of 2022 modified the COA components and how consumer information pertaining to them must be shared. For example, the FAFSA Simplification Act requires institutions to estimate food and housing (formerly “room and board”) costs for students who are living with family and dictates that these expenses must be more than \$0. IPEDS collections should be modified accordingly, to allow reporting of [food and housing expenses for students living off campus with family](#).

ED should also consider how to collect enrollment and outcomes data through IPEDS for students with disabilities and conduct the appropriate research and stakeholder engagement to generate informed proposals for new data collections. Collecting data on the outcomes of students with disabilities would aid the development of equitable and accessible initiatives and increase data transparency overall.

In addition to discussing potential improvements to IPEDS, the conference should include updates on recently implemented changes to IPEDS surveys, such as the disaggregated data on admissions and new data on admissions considerations recently added to IPEDS. NCES could also share insights and solicit feedback on the new IPEDS Cost survey to ensure data users understand how to leverage this new survey and understand any changes from previous IPEDS surveys.

We appreciate the opportunity to provide feedback on the inaugural NCES Data Users Conference and are available for further discussion. If you have any questions about this comment, please contact Kim Dancy, Associate Director of Research and Policy at the Institute for Higher Education Policy, at kdancy@ihep.org.

Sincerely,

Organizations:

AccessLex Institute

California Competes: Higher Education for a Strong Economy

Complete College America

Data Quality Campaign
EdTrust
Education Reform Now
Excelencia in Education
FirstGen Forward
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
National Center for Learning Disabilities
National College Attainment Network
NCHEMS
New America Higher Education Program
Nexus Research and Policy Center
Public Agenda
Southern Regional Education Board
SSTAR Lab - University of Wisconsin Madison
State Higher Education Executive Officers Association
The Hope Center for Student Basic Needs
The Institute for College Access & Success
Third Way
Trellis Strategies
Wichita State University TRIO Talent Search Programs
Young Invincibles

Individuals:

Angela Boatman, Boston College
Kristine Jan Cruz Espinoza, California Lutheran University
Carolyn Fast, Director of Higher Education Policy and Senior Fellow, The Century Foundation
Barbara A Schmertz, Maryland Higher Education Commission
Steven Graunke, Miami University
Rachel Christeson, NC-SARA
Susannah Livingood, University of Oklahoma
Donald Heller, University of San Francisco