

January 17, 2025

Austin Caperton  
IPEDS Technical Review Panel Task Leader  
RTI International  
701 13<sup>th</sup> Street NW, #750  
Washington DC 20005

Dear Mr. Caperton,

This letter is submitted by the Institute for Higher Education Policy (IHEP) in response to the request for comments on recommendations from the Technical Review Panel #71 “Implementing SPD 15 in IPEDS: Revised Standards for Maintaining, Collecting, and Presenting Race/Ethnicity Data.”

IHEP is a nonpartisan, nonprofit research, policy, and advocacy organization committed to driving systemic change in higher education to advance equitable outcomes and generational impact for communities historically marginalized on the basis of race, ethnicity, or income. As the leaders of the Postsecondary Data Collaborative, a coalition of diverse organizations that advocates for high-quality data to ensure equitable access and success in higher education, we provide timely, evidence-based, and student-centered research to inform policy decisions, with a particular focus on improving racial and socioeconomic equity, postsecondary value, and postsecondary data quality.

All students deserve equal access to the transformative benefits of postsecondary education, yet existing data practices often mask disparities for underrepresented and racially or ethnically marginalized communities. IHEP is pleased to see the progress the Department of Education (ED) is making towards developing an action plan to implement the [Office of Management and Budget \(OMB\)’s Statistical Policy Directive No. 15 \(SPD 15\)](#) across its many collections, particularly the Integrated Postsecondary Education Data System (IPEDS). These revisions to OMB’s over two-decade-old standards provide a crucial opportunity for ED to improve data collection practices, providing a more nuanced and accurate representation of a vastly diverse population and making data collection systems more reflective of student identities and experiences. However, the effectiveness of these changes in supporting equitable access and success for all students depends on how the data are collected, reported, published, and utilized.

The Integrated Postsecondary Education Data System (IPEDS) serves as a comprehensive public repository for data on college access, persistence, and completion over time among diverse student groups. By including more detailed disaggregation in IPEDS, ED has an opportunity to enable institutions, researchers, policymakers, and other stakeholders to identify gaps in student

outcomes and develop targeted interventions that address these inequities—conversely, a lack of sufficient disaggregation risks masking disparities in student outcomes.

IHEP recommends that ED:

1. **Collect and Publish Disaggregated Race and Ethnicity Data on Multiracial and Multiethnic Students:** Ensure public access to detailed data on multiracial and multiethnic students through IPEDS, rather than combining them into a “two or more races” category.
2. **Clarify Impacts of New Reporting Methods:** Provide clear and accessible guidance on how the updated SPD 15 standards and resulting data will impact eligibility for Minority-Serving Institution (MSI) designations.
3. **Enhance Institutional Capacity:** Offer resources and training to institutions in order to improve and support the accuracy, consistency, and reliability of updated data collection and reporting.

### **Collect and Publish Disaggregated Detailed Race and Ethnicity Data for Multiracial and Multiethnic Students**

Multiracial and multiethnic individuals are one of the fastest-growing groups in the U.S., yet these students, especially those from underrepresented backgrounds, have often been overlooked in data and policy.<sup>1</sup> As more students identify as such, data systems must adapt to reflect the true diversity of our nation’s higher education system.

Currently, IPEDS only reports five major race categories and one ethnicity category in addition to categories for students whose race is unknown or who are nonresidents. It also combines all non-Latinx multiracial students into a “two or more races” category. This aggregation obscures multiracial student identities and makes it difficult to understand their unique experiences and outcomes.

To implement SPD 15, ED should prioritize data collection and presentation approaches that improve transparency and visibility for multiracial and multiethnic students within IPEDS. Specifically, ED should avoid grouping all multiracial and multiethnic individuals into a single catch-all category, such as “two or more races,” as this prevents meaningful disaggregation of race and ethnicity data.

Instead, ED should collect and publish data through IPEDS on students’ race or ethnicity "[alone or in combination](#)," counting students in all groups they identify with. This provides a more accurate picture of student diversity, especially for historically undercounted groups, and allows for insights into multiracial student identities. ED should collect and publish these data separately for monoracial (“alone”) and multiple-category (“in combination”) identifiers. This strategy balances the need for data on multiracial students with concerns about reporting burden

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<sup>1</sup> <https://www.census.gov/library/stories/2021/08/improved-race-ethnicity-measures-reveal-united-states-population-much-more-multiracial.html#:~:text=The%20Multiracial%20population%20has%20changed,changes%20in%20each%20racial%20category.>

and data quality. It also provides a consistent data reporting framework across different collections, reducing the overall burden for both data reporters and users.

### **Clarify Impacts of New Reporting Methods**

How ED counts multiracial and multiethnic students could significantly affect Minority Serving Institutions' (MSIs) eligibility for federal grant programs, which [relies in part on enrollment data collected through IPEDS](#). Enrollment data could look vastly different depending on the presentation approach. For example, nationally representative data show that when including students who identify as multiracial, the proportion of students who identify as Black, Asian, American Indian or Alaskan Native, or Native Hawaiian or Pacific Islander is substantially higher than when only counting those who identify exclusively with one race category.<sup>2</sup> ED should clarify whether reported counts of students by race “alone” or “in combination” will be used to determine MSI eligibility. This clarification would help streamline processes for identifying MSIs and make it easier for institutions to apply for federal programs.

### **Enhance Institutional Capacity**

Adoption of the newly revised SPD 15 standards will introduce institutional capacity challenges for data reporting. ED should provide clear guidance, resources, trainings, technical assistance, and detailed documentation to support institutions and other data reporters in implementation.

We commend ED on its proactive start to understanding the implications of data presentation and encourage them to continue to prioritize disaggregation as development of its action plan moves forward. We appreciate the opportunity to provide feedback. If you have any questions about this comment, please contact Taylor Myers, Assistant Director of Research and Policy at the Institute for Higher Education Policy ([tmyers@ihep.org](mailto:tmyers@ihep.org)).

Sincerely,

Taylor Myers  
Assistant Director of Research and Policy  
The Institute for Higher Education Policy

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<sup>2</sup> Author's analysis of National Postsecondary Student Aid Study (NPSAS) 2020. Variables: RAWHITE, RAHISP, RABLACK, RAASIAN, RAINDIAN, RAISLAND, RACE. Weights: WTA000.