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## **Comments Received:**

The proposed data collection for noncredit activities would place an undue burden on institutions and students. Noncredit activities utilize distinct platforms from institutional student information system; this is by design to support the easiest entry for students and to align with the unique needs of the units offering these noncredit activities. Common institutional practices, such as no enterprise-level registration system for noncredit activities and no unique identifiers assigned to enrollees, means any data submitted under current practices would at best be an estimate. Current practices do not permit parsing of unduplicated counts with the accuracy expected by IPEDS in reporting, especially with the scale of activities occurring at our public institution. For example, one unit with our institution currently has 223 distinct noncredit activities (50 new activities added last year), which led to 22,000 enrollments in the last academic year. We have many other units with noncredit offerings, including at nontraditional sites for extension activities in support of our land grant mission, which increase the burden of data collection. To provide accurate data of noncredit activities, the proposed change would require investment in a new student information system or an overhaul of the existing student information system along with registration procedures to support enrollments at scale - either scenario would require costly infrastructure changes and create additional barriers for students seeking these noncredit activities. The proposed definition for noncredit activity is also too broad and leaves much room for interpretation; for example, noncredit developmental education could be interpreted to include summer camps for youth. The additional burden and cost associated with the proposed data collection of noncredit activities would have a chilling effect on existing and future offerings, and harm our ability to serve our mission to support the public good through continuation and expansion of these noncredit activities.