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Dear OMB and ED staff,

At the University of Alaska Fairbanks, we have a long tradition of providing noncredit instruction that disseminates knowledge about cutting-edge research, Alaska Native knowledge systems and workforce training to communities throughout Alaska. Recently we expanded our offerings and now reach noncredit learners throughout the world with our edX partnership. Our noncredit programs emphasize the North and its diverse peoples and cultures using a variety of offerings and modalities with instruction by our Community campuses and learning centers as well as our main campus in Fairbanks, Alaska. We appreciate the intent behind the drive to report noncredit instruction but have several concerns and recommendations. We specifically recommend that any change to reporting be delayed until the 2024-2025 year at the earliest to allow for development of data collection processes for noncredit enrollment data and having deliberate discussions to meaningfully and tightly define noncredit categories.

Implementing changes to IPEDS reporting will create an undue burden on many institutions, including UAF. The landscape of noncredit offering is complex with no clear definitions and consensus on what falls within the definitions for reporting purposes. Noncredit offerings are widely distributed and handled through multiple systems to facilitate ease of individual operations. Currently, data for noncredit activity are not collected within the enterprise student information system used for credit-enrolled students, making it difficult to track students enrolled in both for-credit and noncredit activities. The significantly increased effort, time, and resource commitment required to structure and collect data for noncredit reporting will reduce our ability to provide essential noncredit activities that our community members and stakeholders rely on, especially in rural locations.

Lastly, we recognize the value of including race and ethnicity data to enable improved assessment of inequalities in higher education, however providing demographic data is often voluntary for noncredit activities, so including this in reporting may be inaccurate and requiring it may deter noncredit learners from participation. Noncredit courses that are delivered through third-party platforms, such as edX and Canvas Catalog, may not collect demographic data. For these reasons, we recommend not requiring institutions to report noncredit activity by race/ethnicity and gender categories.

With warm regards,

Jenn Pedersen and Chantelle McGinness

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