



June 30, 2022

Juliana Pearson

PRA Coordinator, Strategic Collections and Clearance Governance and Strategy Division,
Office of Chief Data Officer,
Office of Planning, Evaluation and Policy Development.
U.S. Department of Education
400 Maryland Ave., SW
LBJ, Room 6W208B
Washington, DC 20202-8240

RE: Request for Comments from the Department of Education (87 Federal Register 33140)

Dear Ms. Pearson,

I am pleased to respond to the Department of Education's Request for Comments on the **Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25**. A call for comments was published in the *Federal Register* on June 1, 2022.

Lumina appreciates the collaborative process the Department used to formulate the initial proposals for feedback on the 60-day notice. In the revised proposal there is laudable progress in many areas (i.e. collecting noncredit, gender, and residency data). However, this progress was marred by the Department's disheartening decision to lead into the future by deferring to those who are furthest behind.

Specifically, we believe the proposal would perpetuate racial inequities in educational opportunity by reinforcing structures that fail to capture or recognize the race or ethnicity of who enrolls in noncredit education programs. The Department suggests its decision is based on feedback from four-year systems, but a review of the submitted comments suggests only one four-year system (comment 61) and one university (comment 55) were against collecting these data. Moreover, the least-resourced segment of higher education favored collection (comment 40) while two four-year systems did not take issue (comments 8 & 47). Further, the Department's decision fails to recognize findings in the pre-read paper for Technical Review Panel 62 produced by [Coffey Consulting](#) (2019), which found that noncredit data already are reported in 38 states. All of this call's suggestions of an undue "institutional burden" into serious question.

Our greatest hope is that the Department reconsiders its ability to lead the sector into a more-just future instead of taking a path that perpetuates structures that render the lived experiences of millions of learners invisible.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Mullin".

Christopher M. Mullin, Ph.D.
Strategy Director for Data and Measurement
Lumina Foundation