

July 1, 2022

Juliana Pearson  
Office of the Chief Data Officer, Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202

***In re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25 (ED-2022-SCC-0026)***

Dear Juliana Pearson,

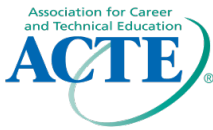
On behalf of the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, and Advance CTE, the nation's longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education across all 50 states and U.S. territories, we are writing in response to the Integrated Postsecondary Education Data System (IPEDS) Information Collection Request 30-day notice.

We would like to re-iterate from our [response](#) to the prior 60-day request our organizations' strong support for the proposed collection of noncredit educational course offerings and related enrollments at institutions, which will develop a baseline set of information and serve as an important step in better understanding and improving these offerings.

In addition, we would like to make the following recommendations.

***Align instruction/program categories across for-credit and noncredit questions:*** We request that the response options for questions on the types and categories offered through for-credit and noncredit education be aligned so that the same response options are available for both questions. Many of the response options proposed for the noncredit question can also be found in for-credit education. Aligning these questions and response options will better demonstrate the breadth of for-credit and noncredit offerings and their comparability. The recommended response options for both questions are listed below:

- Occupational, may lead to a certificate, degree, or other recognized postsecondary credential
- Academic, may lead to a certificate, degree, or diploma
- Workforce Education
- Contract Training/Customized Training
- Remedial Education
- Recreational/Avocational/Leisure/Personal Enrichment
- Adult Basic Education
- Adult High School Diploma or Equivalent
- English as a Second Language
- Continuing Professional Education



**Disaggregate noncredit education data:** We recommend that noncredit data be disaggregated by race/ethnicity and gender identity to ensure the equity implications of noncredit participation are fully understood in the context of the wider postsecondary ecosystem. In addition, we recommend that noncredit data collection be expanded in future reporting to include not only enrollment but also completion and other important outcomes indicators.

**Reinstate the student employment question:** We request that the proposed question on student employment opportunities offered by institutions be reinstated. This question asked about student employment opportunities such as service learning, apprenticeships, assistanceships, cooperative education and internships offered through for-credit and noncredit education. We believe this information is critical to understanding learners' opportunities to engage in work-based learning activities that prepare them for careers.

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Research Director, Catherine Imperatore ([cimperatore@acteonline.org](mailto:cimperatore@acteonline.org)), or Advance CTE's Policy Advisor, Steve Voytek ([svoytek@careertech.org](mailto:svoytek@careertech.org)).

Sincerely,

Kimberly A. Green  
Executive Director  
Advance CTE

LeAnn Wilson  
Executive Director  
ACTE