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Please consider this comment on behalf the University of Wisconsin System (UWS), one of the largest systems of public higher education in the country, educating approximately 165,000 students each year and employing 40,000 faculty and staff across Wisconsin.

Collecting noncredit enrollment counts will impose substantial burden on both our institutions and our system office that completes IPEDS surveys. Currently there is no central collection of noncredit enrollment and a high likelihood that our campuses do not collect this data in a comprehensive or consistent manner. Additionally, expansion into noncredit data appears premature in light of the challenges institutions already have in understanding how to categorize and report sub-baccalaureate certificate programs in light of the recently expanded IPEDS collection categories. In short, we would do well to get a better handle on certificate enrollments before expanding into noncredit. Thanks for your consideration.