



June 29, 2022

Stephanie Valentine,

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 Washington, DC 20024

Dear Stephanie Valentine:

Re: ED-2022-SCC-0026

I am writing on behalf of the American Association of Community Colleges (AACC) and the more than 1,000 community colleges it represents. AACC strongly supports making quality institution level data available to all stakeholders and interested parties. As a result, we applaud the Department's current effort to improve the collection of data through IPEDS to better describe postsecondary institutions and their students.

We are pleased to see the responsiveness to suggestions from the field on many of the proposed IPEDS collections. We will limit our comments in this to a few items in particular that AACC is concerned with.

AACC enthusiastically supports the addition of non-credit students to IPEDS reporting. Non-credit students represent an essential element of community college education and training. The absence of a national count of non-credit students leads to significant underappreciation, even misunderstanding of the role and contributions of community colleges. This situation impacts potential students, policymakers, the private sector and the general public.

The current absence of comprehensive data on non-credit students in fact prevents an assessment of what would be gained by capturing these data; however, it is clear that non-credit activity comprises a sizeable minority, and on some campuses a majority, of enrolled students. AACC estimates—very roughly—that, for every two credit students enrolled at a community college, another non-credit student is also enrolled. It is simply unacceptable to exclude these students from institutional counts and the overall picture of that college. The federal government collects some data that is of little utility; this data would be of prime importance in accounting for overall community college contributions.

Non-credit students are often enrolled in programs that lead to good-paying jobs. Many of these programs are part of career ladders or stackable credential courses that result in solid careers. Indeed, a recent study by Opportunity America Found that 65% of the non-credit programs offered at community colleges were in five fields: health care, business, information technology, and advanced manufacturing or skilled trades. These courses are hardly an ancillary, “discretionary” part of the college's activity—they are central to its mission. We would note, too, that non-credit, often certificate programs at other types of institutions are high-profile, and costly, and provide significant professional growth. Their students should be reflected in IPEDS.

The TRP has worked thoughtfully to ensure that new reporting requirements for non-credit students are manageable within colleges' current resource levels. It is because of the complexity of gathering data on these students that more ambitious collection activity, such as student demographic characteristics are being eschewed. AACC appreciates the challenge with reporting unduplicated headcount for non-credit enrollment, and if duplicated headcount is provided as an option, we encourage NCES to limit the number of collection cycles unduplicated headcount is allowed. The TRP addressing this topic and the resulting, pending IPEDS collection proposal forged an appropriate middle ground.

AACC continues to strongly endorse the collection of separate data on dual enrolled students in higher education. Dual enrollment has increased dramatically in recent years, and this new data collection will provide critical insight into how many students are earning postsecondary educational credits while still enrolled in high school. Equitable access to dual enrollment is an important policy consideration, and we endorse the collection of dual enrollment by race/ethnicity and gender. AACC encourages NCES to continue to examine changing the inclusion of dual enrolled students in the non-degree/certificate-seeking category to more accurately reflect the role of dual enrollment activities for attainment of credentials.

We support the amended language on how to treat nonresident students in the race/ethnicity categories throughout IPEDS surveys. We also support the suggested changes in the language for collection of nonbinary genders and encourages NCES to continue to explore ways to maintain student privacy while recognizing the importance of not stigmatizing students.

Sincerely,



Kent A. Phillippe
Vice President, Research & Student Success
American Association of Community Colleges

PH: 202-416-4505
Email: kphillippe@aacc.nche.edu