



Non-degree Credentials Research Network

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

Dear Ms. Pearson,

This letter is in reference to the Integrated Post-Secondary Education Data System's Information Collection Request (ICR) 30-day notice, agency/docket number **ED-2022-SCC-0026** and document number **2022-11712**, submitted 6/1/2022 with comments due 7/1/2022. The Non-degree Credentials Research Network based at George Washington University, consisting of approximately 300 researcher and stakeholder members whose work deals with non-degree credentials of all types, submits this comment ***in support of*** the proposed information collection request. We believe that the proposed new data fields to be collected will be generally valuable for our members' work and advance research on public policy issues related to non-degree credentials. In particular, we are pleased by the addition of measures of non-credit educational attainment. We also strongly support the addition of data breaking down enrollments by race and ethnicity, and efforts to incorporate non-credit attainment into other IPEDS data collections, including its surveys on completions, human resources, and finances.

While we strongly support the ICR in the aggregate, we do specifically request an alignment of the language used to describe different types of non-degree and degree programs. Please see Appendix A of the package submitted to OMB, page 6, in which the following questions are proposed:

- Which of the following types of for-credit instruction/programs are offered by your institution?
- Which of the following categories of noncredit education are offered by your institution?

We believe that the same responses should be available to respondents for both questions, preferably incorporating all response options currently offered on either question onto both questions. We believe that this will help analysts and researchers to compare the availability of credit-bearing and non-credit programs. We note that many of the options NCES has proposed for non-credit only can also be found in the universe of for-credit offerings, including remedial courses, continuing education, and contract training. Thus, we propose that the following be added as a term of clearance:

OMB directs NCES to give institutions the following choices for describing both their for-credit instruction/programs and noncredit education offerings:

- *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*

We also request that institutions that double-count certain degree and non-degree enrollments provide an estimate of the number of students who are double-counted, rather than merely checking a box to indicate that double-

counting exists (as is currently proposed; see Appendix A, Part D: "Institutions should attempt to provide an unduplicated headcount; however, NCES recognizes the challenges with reporting an unduplicated count. If your institution is currently unable to provide an unduplicated headcount, please provide a duplicated headcount. Institutions will be asked to indicate whether the headcount is duplicated or unduplicated"). Thus, we propose the following term of clearance:

OMB directs NCES to ask for the number of enrollments (estimated or actual) that are duplicated instead of asking whether their headcount is duplicated or unduplicated.

Finally, we note with concern that the National Center for Education Statistics is not proposing to collect race and ethnicity data on non-credit enrollments in the next wave of data collection. We believe that such data is essential for research and policy evaluation on inequality in higher education. Knowing whether non-credit enrollment is more or less likely to contain racial minorities would be invaluable information for guiding policy decisions on whether and how to financially support non-credit enrollment. Therefore, we propose the following term of clearance:

OMB directs NCES to require that higher education institutions report detailed enrollment data in non-credit programs by race and ethnicity. If not feasible to include this data collection in the next wave of IPEDS questionnaires, NCES should develop a plan for collecting data on noncredit enrollment by race and ethnicity at the earliest possible opportunity.

Again, we strongly support this ICR. We would be pleased to consult with IES about future improvements to IPEDS whenever our insights could be helpful.

Regards,

The NCRN team at George Washington University

Kyle Albert
Andrew Reamer
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Co-signed by the following NCRN members:

Michelle Van Noy (individual signer, affiliation: Rutgers University)
Workcred, an affiliate of the American National Standards Institute
Association for Career and Technical Education
Jane Oates (individual signer, affiliation: Working Nation)
Chris van der Westhuyzen (individual signer, affiliation: University of California, Davis)
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