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I support OIRA's approval of the National Center for Education Statistics (NCES) ICR for the Integrated Postsecondary Education Data System (IPEDS) 2022-23 through 2024-25 (OMB Control #1850-0582) with a term of clearance that directs the NCES to provide a report to OIRA in 180 days regarding 1) the desirability and feasibility of requiring IHEs to provide data on noncredit enrollments by race/ethnicity and gender and 2) in light of these findings, specific steps that NCES will take in the design of IPEDS 2023-2024 and 2024-25.

On p. 9 of Appendix E of the ICR, NCES notes that it will "examine the feedback from the Directed Question related to HEERF reporting requirements to understand the feasibility of collecting noncredit enrollments by race/ethnicity and gender, however, there is no immediate plan to add race/ethnicity and gender breakdowns. These and other student subgroups may be explored for future collection." While I appreciate NCES's declaration of general intent, in light of the high value of these data in furthering President Biden's equity agenda, I encourage OIRA to provide NCES with specific and workable guidance for examining its options and acting on the results of that examination.

Thank you for the opportunity to provide comments.