



November 30, 2022

U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20024

OMB Control # 1845-0035

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To Whom It May Concern:

Thank you for the opportunity to comment on the Department of Education’s proposed extension of an Information Collection Request for the National Student Loan Data System. Arnold Ventures is a philanthropy dedicated to tackling some of the most pressing problems in the United States. For the past six years, we have invested in research, policy development, litigation, and advocacy to end predatory behavior in higher education and increase the return on investment of higher education for both students—especially students who have been historically marginalized—and taxpayers. Should you have further questions regarding these comments, we welcome the opportunity to discuss them further.

The National Student Loan Data System (NSLDS) is a critical source of information for policymakers, institutions, and stakeholders. Data from NSLDS are behind much of the information from the College Scorecard, and inform other public data sources, such as those on the Federal Student Aid Data Center, as well. The additional items for data collection that we suggest here would help to ensure better, more accurate, and more useful data, both for the Department and for the broader benefit of public policymaking.

Improve Data on Distance-Education Programs

Distance-education programs are a significant part of the higher education system. Particularly during the pandemic, when institutions rapidly moved online, its role has never been more prominent. One online learning provider found through a survey that students are more comfortable with online education now.¹ And many of the institutions that moved from ground-based to online expect never to return to an entirely ground-based world.

¹ “Voice of the Online Learner 2022: Shifting Preferences in Post-Pandemic Online Learning,” Wiley University Services, 2022, https://universityservices.wiley.com/voice-of-the-online-learner-2022/?utm_source=PR&utm_medium=release.



Yet data on distance education are extremely limited. Information reported to the Integrated Postsecondary Education Data System (IPEDS) include only the numbers of students enrolled and completing distance-education programs. Sample surveys reflect the broader postsecondary environment, but cannot provide information on specific institutions or programs. College Scorecard does not even allow users to search for online program options or to understand the outcomes of those programs, likely in large part due to the limitations of available data.

Distance-education information is also critical for the Department's oversight efforts. In enforcing the state authorization requirements, for instance, the Department would be aided by high-quality information about the distance-education offerings at an institution and the state of origin for such institutions' students. And as COVID-era flexibilities end for institutions following the end of the national emergency, this information can help ensure the Department knows where students continue to be enrolled online – and can target its monitoring to ensure those institutions are in compliance with the regular rules and regulations governing distance education.

Accordingly, we recommend that the Department seek to collect information on online program offerings. This information could be included in NSLDS by requiring institutions to report, for any program in which at least one course can be completed online, whether a Title IV participant is enrolled exclusively online (and within that category, whether the student is in distance education or in correspondence courses), exclusively as a brick-and-mortar student, or as a hybrid student. Additionally, the Department could establish location-level reporting for distance-education programs. While there are many more gradations that could be included to provide richer information, even this minimal level of reporting would greatly enhance available information on distance education.

Thank you for your consideration of these comments. With questions or for further discussion, please contact Clare McCann at cmccann@arnoldventures.org.

Sincerely,

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