



December 7, 2022

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

OMB Control # 1845-0035
ICR Reference # 202208-1845-005

To Whom It May Concern:

Thank you for the opportunity to comment on the U.S. Department of Education's proposed extension of an Information Collection Request for the National Student Loan Data System (NSLDS). This letter is submitted on behalf of these 19 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

In recent years, online education has played an increasingly large role in higher education. Its role massively expanded during the COVID-19 pandemic when colleges pivoted to virtual learning. Despite the prevalence of online learning, federal data on distance education are extremely limited, which prevents policymakers from understanding how students engaged in online learning fare in those courses and programs, and prevents students from making informed higher education decisions.

For those reasons, we recommend adding a new field to NSLDS around distance education, using the definitions from the Integrated Postsecondary Education Data System (IPEDS). This field would distinguish whether each student is enrolled exclusively online, exclusively in-person, or as a hybrid student. This addition to NSLDS would provide policymakers with timely, responsive data to inform investments in higher education and better target interventions. This simple step adds minimal burden to institutions, who are already required to report the number of students who are enrolled exclusively in distance education, partially in distance education, or not in distance education to IPEDS, and already report information on enrollment, persistence, and completion to NSLDS.

If you have any questions about this request, please contact Diane Cheng, Vice President of Research and Policy at the Institute for Higher Education Policy (dcheng@ihep.org).

Sincerely,
AccuRounds
Achieve Atlanta
Advance CTE
Center for American Progress
Center for Law and Social Policy (CLASP)
Corporation for a Skilled Workforce

Data Quality Campaign
Georgetown University Center on Education and the Workforce
Higher Learning Advocates
Institute for Higher Education Policy
National Association for College Admission Counseling
National College Attainment Network
New America Higher Education Program
Public Insight Data Corporation
Skills2Compete - Colorado
State Higher Education Executive Officers Association
The Education Trust
The Institute for College Access and Success
Third Way