

April 8, 2016

Kate Mullan
Acting Director, Information Collection Clearance Division
Privacy, Information and Records Management Services
Office of Management
U.S. Department of Education

RE: CGS Response to Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338)

Dear Ms. Mullan,

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to provide comments and feedback to Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338). CGS membership includes roughly 500 universities in the United States that annually award the vast majority of U.S. doctorates and master's degrees each year.

IPEDS is an important data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. Also, the data collected via IPEDS establishes the "IPEDS universe," which serves as the most reliable reference point for various postsecondary sample survey projects. Broadly speaking, we support the overarching theme of the proposed revisions that aims to eliminate data points with low utility and reduce burden for institutions, including the proposed simplification of "Graduate assistants, by function" in the Human Resources (HR) Form. However, CGS also observes that IPEDS data collection efforts have continued to place their emphasis on baccalaureate education. Particularly, when it comes to the enrollment data, IPEDS, in its current form, does not offer a nuanced benchmark that is reflective of the graduate education community.

The IPEDS data collection instruments only asks aggregated enrollment data for all post-baccalaureate enrollment in both the 12-month Enrollment Form and Fall Enrollment Form. The term "graduate students" for the purpose of IPEDS includes a range of degree objectives: master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs. Yet, race/ethnic and gender compositions of these degree objectives, as well as modes of delivery (e.g., distance education) and enrollment intensity (e.g., full-time v. part-time) varies. For example, the most recent CGS/GRE Survey of Graduate Enrollment and Degrees indicated that women represented about 60% of master's enrollments, while they only constituted about one-half of US doctoral enrollments. Thus, having aggregated figures for all post-baccalaureate degree

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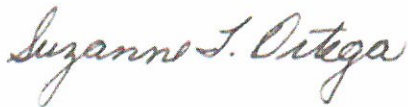
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Association
of Graduate Schools

objectives do not offer meaningful pictures that inform about the state of U.S. graduate education.

Recommendation: Disaggregate graduate student enrollment data reported in Part A – Fall Enrollment for Graduate Students, Fall Enrollment Summary, Fall Enrollment by Distance Education Status of the Fall Enrollment Form, and in Part A – Unduplicated Count, Part B – Instructional Activity in the 12-month Enrollment Form by master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs.

Furthermore, as the only national organization that represents master's and doctoral education in the United States, CGS wishes the Department of Education to consider us as a resource when exploring data tools that better inform the graduate education community. Specifically, we would appreciate opportunities to be a part of future IPEDS technical review panels (TRPs), as CGS has been represented in TRPs for other NCES data collection efforts, including National Postsecondary Student Aid Study and Baccalaureate & Beyond Longitudinal Study.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne T. Ortega".

Suzanne T. Ortega
President