



March 6, 2021

Dr. Janice Kelly-Reid
RTI International
4600 Silver Hill Road
Washington, DC 20233

Dear Dr. Kelly-Reid,

Thank you for the opportunity to participate in IPEDS Technical Review Panel #62 and to submit comments on RTI International's summary of the panel's deliberations.

Although the summary is painstaking and thorough, capturing many of the fine points of the discussion, I am concerned about what I believe to be a significant omission and by the overall impression conveyed by the account – that the group urged mainly caution and slow, deliberate steps in adding consideration of noncredit education to IPEDS data collection.

As quoted in the summary, words to that effect were occasionally used. But overall, participants were united in expressing strong support for moving forward promptly to add basic measures of noncredit instruction to IPEDS data collection.

More specifically, the group coalesced around recommendations to add measures of noncredit instruction to two types of IPEDS surveys: institutional characteristics and enrollment.

As noted in the summary, institutions – and indeed, states – use a variety of terms to characterize the noncredit education they offer. But participants in the TRP agreed on three broad categories of noncredit instruction that would encompass the overwhelming majority of what's offered on campuses nationwide and could be described in an IPEDS survey so as to be clearly transparent to all institutions, whatever terminology they use internally. The three categories:

- Career/technical (could also be referred to as occupational or vocational)
- Foundational skills/college readiness (could be referred to as precollege or remedial)
- Personal/enrichment

Within these categories, there was some discussion at the TRP of how to treat customized contract training – whether to separate it out as a fourth category or include it in career/technical/occupational – and this was not resolved.

But this did not interfere with the broader consensus in favor of moving immediately to add questions on these three categories to both the institutional characteristics and enrollment surveys.

The group largely agreed that any measure of noncredit education should be based on noncredit courses, as opposed to other activities, such as guest lectures or community engagement. We agreed that it would be easier for institutions to track clock hours than headcounts. After much discussion – not mentioned in the summary – we also agreed that IPEDS should begin to collect data not just on clock hours but also on the total number of students enrolled in the three types of noncredit instruction.

My notes of the session suggest that we made three specific recommendations:

1/ Add check boxes for each of the three types of noncredit instruction to the institutional characteristics survey

2/ Add two questions to the 12-month enrollment survey:

- Contact hours by the three types of noncredit instruction
- Total number of participants by the three types of noncredit instruction (voluntary at first)

3/ Conduct more study and hold additional TRPs on whether and how to include noncredit education in the finance and human resources surveys.

I fully understand – I think everyone who participated in the TRP understood – the stakes involved in making changes to IPEDS data collection. IPEDS data must be accurate and authoritative. They must be based on solid definitions. There is no room for uncertainty or ambiguity, and the data must be reliable for users.

But surely IPEDS can find ways to innovate, staying current with national trends and changing institutional practices, while still protecting the integrity of the data it collects.

Among possible next steps: a deliberative process to agree on wording and survey instructions to ensure that institutions fully understand the three types of noncredit.

I can see a strong argument for starting with voluntary collection of total noncredit enrollments.

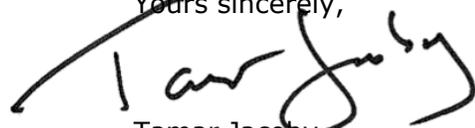
Another idea to consider: rethinking the length of the “preview” period that IPEDS customarily builds into the introduction of a new question. Instead of a “preview year,” why not a preview period of, say, three years to allow institutions to adjust to new survey items and collect and organize data accordingly?

My own research on community college noncredit education suggests that many institutions will respond to an opportunity of this kind. My organization recently fielded a national survey of community college workforce education that included two dozen precise, detailed questions about noncredit offerings and enrollments. Some 37 percent of community colleges nationwide responded to the survey, and a number of institutions – and several state education agencies – emailed or telephoned me to talk about how our questions were helping them conceptualize and categorize their noncredit offerings with an eye to better data collection.

This is anecdotal evidence, based on a relatively small number of cases, and I fully understand: IPEDS data collection will and must be held to a different standard than my private researcher’s survey.

But I believe the consensus at the TRP argued for more urgency than is reflected in the RTI summary, and I urge that IPEDS move forward with dispatch to add questions on noncredit education to its surveys on institutional characteristics and enrollment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tamar Jacoby', written over a horizontal line.

Tamar Jacoby
President