

Delivered electronically

June 29, 2022

PRA Coordinator
Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW
LBJ Building,
Room 6W208B
Washington, DC 20202-8240

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2022-23 Through 2024-25 (Docket ED-2022-SCC-0026)

We the undersigned 29 organizations write to express our strong support for the U.S. Department of Education's [updated guidance](#) in the Federal Register detailing revised changes to how institutions of higher education report data to the National Center for Education Statistics (NCES) through the Integrated Postsecondary Education Data System (IPEDS).

We are very heartened by the updated guidance by the Department, which will allow institutions to report aggregate demographic information on their “domestic” or “eligible non-citizen” students, including all “students who completed high school or equivalency within the United States and were not on an F-1 visa at the time of high school graduation.” By reporting the demographics of these students, undocumented students and DACA recipients will thus be classified in their respective race and ethnicity categories, generating the accurate and comprehensive information needed to measure enrollment, persistence, and other student success metrics across race/ethnicity lines.

Likewise, we also appreciate and commend NCES for not only replacing the term “nonresident alien” with “nonresident” in order to be more inclusive and align with the current administration’s recommendation to drop the term “alien,” but for your decision to add “U.S.” (“U.S. nonresident”) on collection pages to reduce confusion with terms related to state residency.

Finally, as we [noted previously](#), the questions posed in Appendix D, especially regarding the removal of the nonresident category, merit thoughtful analysis—we stand ready to support and engage in such discussions. We thank you for the actions taken to date and for those yet to come. If you have any questions, please feel free to contact Miriam Feldblum, Executive Director, Presidents’ Alliance on Higher Education and Immigration (miriam@presidentsalliance.org).

Thank you,



Miriam Feldblum
Executive Director
Presidents’ Alliance on Higher Education and Immigration

CC: Tara Lawley, Postsecondary Branch Chief, IPEDS Program Director, National Center for Education Statistics

On behalf of:

**Aliento Education Fund
American Association of Collegiate Registrars and Admissions Officers
American Immigration Council
Capital Area Immigrants' Rights (CAIR) Coalition
Clearinghouse on Women's Issues
Feminist Majority Foundation
FWD.us
Hispanic Federation
Immigrants Rising
ImmSchools
Institute for Higher Education Policy (IHEP)
Japanese American Citizens League
League of United Latin American Citizens (LULAC)
National College Attainment Network
National Immigration Forum
National Skills Coalition
Niskanen Center
North Carolina Justice Center
Presidents' Alliance on Higher Education and Immigration
RAICES
ROC United
Teach For America
The Education Trust
The Institute for College Access & Success (TICAS)
UnidosUS
Welcoming America
World Education Services
World Education, Inc.**