

American Library Association, Association of College and Research Libraries, Association of Research Libraries, and Association of Southeastern Research Libraries Comment on Proposed Removal of the Academic Libraries Component from NCES IPEDS

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Manager of the Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave. SW, LBJ, Room 4C210
Washington, DC 20202-8240
via regulations.gov

Re: Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27 (89 FR 15558)
Docket No.: ED-2024-SCC-0040

Thank you for the opportunity to provide comments on the Department of Education's Agency Information Collection Activities on the Integrated Postsecondary Education Data System (IPEDS). The American Library Association (ALA), Association of College and Research Libraries (ACRL), Association of Research Libraries (ARL), and Association of Southeastern Research Libraries (ASERL) urge the Department of Education and the National Center for Education Statistics to maintain the Academic Libraries (AL) component as a part of IPEDS.

The associations strongly object to the elimination of the AL component and instead, invite the Department to partner with our organizations and members to find a solution that maintains this critically important open and transparent dataset for higher education. Our associations have consulted on the library component of IPEDS for many years to help sustain its value to our community and to higher education broadly, and we are eager to continue that consultation to ensure ongoing data collection and integrity.

Academic library statistics have been collected at the federal level in some form since 1966, and in conjunction with IPEDS since 1988. The AL component took its current form in 2014. This long history reflects the key educational role of libraries and their centrality to the mission of higher education. Academic libraries hold a unique position as the heart of their institutions: No other unit supports all other parts of the institution and its educational mission as libraries do.

Our comments will demonstrate that:

1. the AL component of IPEDS supports the agency mission and statutory obligation, as well as a higher education ecosystem that relies on this data;
2. data from the AL component of IPEDS is critical to understanding the value libraries provide to the institutional mission;
3. removal of the AL component from IPEDS—a mandatory and therefore comprehensive reporting system—will deprive institutions of the ability to effectively benchmark with peers for purposes of investment and resource allocation, particularly with respect to student enrollment and success;
4. with the inclusion of academic library data, IPEDS is a unique longitudinal dataset that enables the higher education sector to understand the cost of information over time, as well as the correlation between research expenditures and the cost of information; and
5. the AL burden is both lower than other components of IPEDS and willingly met by libraries themselves.

Although we understand the importance of routine review of data collection and its associated burden on both respondents and agency staff, the associations assure the Department that the AL component of IPEDS is highly used. Libraries are evidence-oriented and outcome driven, demonstrated by our professional associations' commitment to our own data collection. For many academic libraries in the US, who collect member data for the ACRL and/or ARL, there is no increased burden in providing the same data to IPEDS, but there is an added benefit in contributing those data to an open dataset available to all and inclusive of all. If the Department perceives burden in the Academic Libraries Component, our associations encourage partnership with us to address those issues. There is no burden-related or under-utilization rationale for a wholesale removal of the survey from IPEDS.

1. The AL component of IPEDS supports the agency mission and statutory obligation, as well as a higher education ecosystem that relies on this data.

Eliminating the AL survey from IPEDS administration would result in NCES failing to meet its statutory obligations: Section 153 of the Education Sciences Reform Act (ESRA) of 2002 (Public Law 107-279) requires that NCES “shall collect, report, analyze, and disseminate statistical data” on education that includes data on “the existence and use of school libraries” (“school” specifically including postsecondary education) in the United States. Within the same section, the ESRA separately requires NCES to collect data on “the financing and management of education, including data on revenues and expenditures.” The ALS is the tool that collects data specifically on libraries' significant and critical investment in the quality of education provided to students.

IPEDS provides basic data needed to describe—and analyze trends in—postsecondary education in the United States, including numbers of students enrolled, staff employed, dollars

expended, and degrees earned. By excluding information from academic libraries in IPEDS, the agency will create data accuracy and comparability issues in this longitudinal survey. IPEDS is a mandate from the Department of Education. Anything less than a mandatory annual survey, for example as a separate optional (and less than annual) data collection, would result in poor return rates and data gaps. IPEDS provides the only freely available, comprehensive source for academic library statistics in the United States.¹

Providing open, publicly accessible data about higher education is critical to transparency and earning and maintaining public trust. Trust in US higher education is in measurable decline—and media and information literacy is more crucial than ever amid growing crises of misinformation and disruptive emerging technologies. We urge NCES to maintain publicly available data about investments in academic libraries as key trusted institutions on the forefront of information literacy in the US.

Libraries operate within a wider ecosystem supporting higher education that depends on accurate data to drive economic decision-making. This ecosystem provides jobs and economic benefit to our universities and their surrounding communities; by providing research support, often including access to online and physical resources, academic libraries contribute to this benefit. Library information system vendors routinely rely on IPEDS data to determine accurate pricing for institutions and their users. That these pricing structures are tied to a publicly available set of data is important for accountability and transparency in the multi-billion-dollar marketplace of academic information. Meanwhile, through the longitudinal data in IPEDS, the academic library community can track the rising cost of information against relatively flat investments in libraries, as well as budget cuts to institutions broadly, to be more informed consumers and stewards of institutional funds.

Expanded public access requirements for funded research being implemented throughout federal agencies have produced associated effects on the journal marketplace, with many academic libraries experimenting with new models of bundling subscription and open access fees. The success of this public policy commitment to expanded access to taxpayer-funded research depends in part on our collective ability to support the transition to public access through fair and sustainable business practices. Rather than eliminating the AL component from IPEDS, NCES might consider expanding its survey to address this issue.

The compulsory nature of IPEDS reporting means that the resulting dataset is comprehensive, reflecting the scope of higher education institutions of all types nationwide. Although both ACRL and ARL collect data from academic libraries, ACRL is unable to compel responses and the results are not representative. The associations also benefit from the existence of IPEDS: Because academic libraries know they must report to IPEDS, they collect data required by those standardized metrics, and they are more willing to report the same metrics—and then some—to

¹ The library survey was on a periodic cycle (every three years) in the Higher Education General Information Survey series (HEGIS) between 1966 and 1988. For ten years, IPEDS collected the library information every two years, 1988 to 1998. It moved out of IPEDS from 2000 to 2012, but was collected independently every two years. Since 2012, the survey has returned to IPEDS and is collected annually. Response rates and accuracy suffered under the periodic collections.

ACRL and ARL. Without the AL component on IPEDS, ACRL's survey response rates will likely decrease, leading to lower quality data and a loss of valuable information about academic libraries nationwide.

The IPEDS AL component is also essential for standardization across the library field. It sets the definitions and standards for collecting key metrics. Libraries can then insist that their vendors and service providers make data available consistent with those standards, for example using COUNTER report standards for capturing electronic circulation.² The combination of standardization and compulsion, and the care devoted to collecting and publishing the data, ensures the public availability of the high-quality, comprehensive data that institutions, libraries, and vendors value from IPEDS.

2. Data from the AL component of IPEDS is critical to understanding the value libraries provide to the institutional mission.

Data from the AL component of IPEDS is essential to understanding library contributions to student success and academic research. Its elimination would be detrimental not only to libraries, but to higher education institutions as a whole.

IPEDS data, including the AL component, provide the building blocks of more advanced analytics that help academic libraries and the higher education sector innovate. The data are used by researchers, library and assessment professionals, library and information science faculty, and professional organizations to understand the evolving nature of academic libraries and their impact on higher education. A review of published scholarly literature shows insights drawn from IPEDS in areas such as graduation and retention rates, and student achievement more broadly, that rely on variables including the AL component.

As collaborative partners supporting the full life cycle of scholarly and educational inquiry, the mission of academic libraries is to create an equitable, enduring, and barrier-free research information environment to advance research and learning. In 2021 ARL institutions, on average, reported \$605 million in research expenditures. This funding came from federal sources—the National Institutes of Health, National Science Foundation, Department of Defense, and others—as well as institutional research investments, nonprofit organizations, and state and local funding. Libraries provide critical infrastructure and services to support the scholarly and scientific needs of researchers on their campuses.

Well beyond the ARL or ACRL constituencies, colleges and universities invest significant funding in libraries to support additional essential functions:

- Libraries provide essential course content, readings, reserves, and assignments.

² Project COUNTER (Counting Online Usage of NeTworked Electronic Resources) is a standard for counting the usage of electronic resources and digital content: <https://www.projectcounter.org/>.

- Libraries teach information literacy.
- Libraries provide essential resources, services, and training for leading research universities.
- Libraries contribute to student learning and achievement on professional exams.
- Libraries are often a focal point and center of engagement for students.
- Libraries contribute to student success in internships, job placement, and graduate school.
- Library holdings and special collections are important to faculty recruitment and retention.
- Librarians contribute to faculty research productivity.
- Librarians support faculty teaching and pedagogy in the discipline.

Total operating expenditures for 3,613 libraries at degree-granting postsecondary institutions in 2020-21 was nearly \$8 billion. Those libraries hold nearly 3 billion physical and electronic materials (books, media, and databases). They serve 19 million students and 1.5 million faculty.³ Libraries are an effective and efficient use of resources, driving the values of the institution for democratization of access to information.

Researchers have used academic library data alongside other IPEDS institutional data to examine the relationship between academic library services and student success at a national level. Crawford found a strong correlation between library expenditures per student FTE and graduation and retention rates.⁴ In an earlier study, Mezick found a statistically significant correlation between the number of library professional staff and student retention, particularly among doctoral-granting institutions.⁵ A study focused on community colleges found some significant, positive relationships between library output measures and graduation and retention rates.⁶ Womack, focusing on ARL member institutions, found library staffing correlated with high levels of research activity.⁷ Numerous single-institution studies have looked at the relationship between library metrics and institutional measures of success and found positive correlations.⁸

If the AL component is discontinued, campuses would lose the following:

³ NCES, *Digest of Education Statistics 2022*.

⁴ Gregory A. Crawford, "The Academic Library and Student Retention and Graduation: An Exploratory Study," *portal: Libraries and the Academy* 15, no.1 (2015): 41–57;

"Pennsylvania Academic Libraries and Student Retention and Graduation," *Pennsylvania Libraries: Research & Practice* 2, no.2 (2014): 129–41.

⁵ Elizabeth M. Mezick, "Return on Investment: Libraries and Student Retention," *Journal of Academic Librarianship* 33, no.5 (2007): 561–66.

⁶ Katy Mathuews & Brad Pulcini, "Academic Libraries' Impact on Community College Student Success," *Library Assessment Conference* (2016):

<https://www.libraryassessment.org/wp-content/uploads/bm~doc/29-mathuews-2016.pdf>.

⁷ Ryan P. Womack, "ARL Libraries and Research: Correlates of Grant Funding," *Journal of Academic Librarianship* 42, no.4 (2016): 300–12.

⁸ Many such studies are referenced in ACRL's report, *Academic Library Impact: Improving Practice and Essential Areas to Research* (2017),

<https://www.ala.org/acrl/sites/ala.org.acrl/files/content/publications/whitepapers/academiclib.pdf> as well as its precursor, *Value of Academic Libraries: A Comprehensive Research Review and Report* (2010), https://www.ala.org/acrl/sites/ala.org.acrl/files/content/issues/value/val_report.pdf.

- Visibility of the library as a major component of the research enterprise and how that investment connects to students, faculty, and community success;
- For the many colleges and universities that are not part of ARL or not subscribers to the ACRL licensed data, access to comprehensive data about the academic library sector as an industry, including expenditures per student and library staffing per student; and
- Visibility and partnership of libraries as key data stewards on campus.

3. Removal of the AL component from IPEDS will deprive institutions of the ability to benchmark with peers for purposes of investment and resource allocation.

Academic libraries routinely use IPEDS data for benchmarking and peer comparison, driving programmatic excellence and improvement. Rigorous program review, including review for accreditation, requires due diligence with respect to benchmarking. The IPEDS AL component provides accurate comparative data to help libraries advocate for resources to better serve their students. There is no other survey of academic libraries that collects this comprehensive data, so eliminating the library portion of the IPEDS survey will mean that academic libraries no longer have access to the information that they need to compare themselves with libraries at other institutions. For example, the University of Kentucky uses IPEDS AL data for benchmarking with similar institutions that fall outside their existing peer networks, such as membership organizations and consortia. It has helped them develop their budget request in alignment with peer libraries.

The AL data are used in program evaluation and review,⁹ drive research on the impact of libraries,¹⁰ and are the basis for learning activities in graduate studies in library science.¹¹ In such courses, students use this dataset to learn about library services, complete benchmarking assignments, and develop strategies for collecting data about library services. To lose access to an ongoing dataset on academic libraries will negatively impact library science graduate study, the operation of academic libraries, and research on the impact of academic libraries in higher education.

⁹ ACRL, *Standards for Libraries in Higher Education* (2018), <https://www.ala.org/acrl/standards/standardslibraries>

¹⁰ David Schwieder and Lisa Janicke Hinchliffe, "A Multilevel Approach for Library Values Assessment," *College & Research Libraries*, 79, no.3 (April 2018), <https://crl.acrl.org/index.php/crl/article/view/16727/18650>.

¹¹ For example, see Professor Lisa Hinchliffe, UIUC iSchool, 594 EVO: Evaluation and Assessment of Library Services, and Dominican University School of Information Studies, LIS 708: Evidence-Based Planning, Management, and Decision-Making.

Finally, as federal financial aid is tied to accreditation, it is crucial that academic libraries are accounted for in such accreditation reviews and reflected in IPEDS data.¹²

4. With the inclusion of academic library data, IPEDS is a unique longitudinal dataset that enables the higher education sector to understand the cost of information over time.

Elimination of the Academic Libraries component would create an equity issue for many academic libraries, researchers, and students, not all of whom can subscribe to costly data services. While ACRL and ARL do collect statistics, not all libraries participate nor are able to afford the cost of access to the datasets. The IPEDS AL component is thus the only accurate, comprehensive, and public source of information about academic libraries. Because it is tied to the IPEDS data collection cycle, all institutions respond to it. In addition, the data is freely available to everyone—academic library and other senior administrators and decision-makers, faculty, and students, who are the most critical stakeholders.

The IPEDS AL component provides longitudinal data about US academic library staffing and funding. Because the costs of providing scholarly literature to universities are expanding exponentially, it is vital to the sustainability of academic libraries that they are funded adequately. Library administrators use AL information to help them advocate for sufficient staffing and funding after decades of defunding of academic libraries. Increasingly digital and seamless access to online resources has given rise to a false impression that libraries are no longer relevant or that all information is free, but these are far from the reality. Libraries have been serving expanding numbers of students—providing both access to high-quality resources and training them to navigate the digital ecosystem—while staffing and budgets have not increased to match.

Removal of the Academic Libraries component from IPEDS would have negative impacts on academic library users. Research, teaching and learning, and information literacy are dependent on well funded, well staffed libraries with dynamic and responsive collections. Many libraries are already understaffed and underfunded and removal of academic libraries from higher education data collection sends a message that library services and resources are not important.

¹² Southern Association of Colleges and Schools Commission on Colleges, *Resource Manual for the Principles of Accreditation* (SACS COC, 2024), <https://sacscoc.org/app/uploads/2024/02/2024-POA-Resource-Manual.pdf>.

5. The AL burden is both lower than other components of IPEDS and willingly met by libraries themselves.

By the NCES's own calculations of burden, many components remaining in the survey have a greater burden of completion than the AL component (as shown in Table 3 from Supporting Statement Part A, OMB No. 1850-0582 v.33, copied below). For experienced keyholders, the Academic Libraries component ranks as 5th lowest out of the twelve components for average preparation hours and 3rd lowest in total preparation hours. For new keyholders it is 4th lowest out of twelve for both average and total preparation hours.

Table 3. Average 2022-23 self-reported preparation hours by experienced and new IPEDS keyholders, by IPEDS component

| IPEDS component | Experienced keyholders | | | | New keyholders | | |
|-----------------|-----------------------------|--|---------------------------------|------------------------------------|--|---------------------------------|------------------------------------|
| | Total number of respondents | Average 2022-23 self-reported preparation hours per respondent | Estimated number of respondents | Estimated total preparation hours* | Average 2022-23 self-reported preparation hours per respondent | Estimated number of respondents | Estimated total preparation hours* |
| IC | 6020 | 3.26 | 4,515 | 25067 | 4.03 | 1505 | 2496 |
| C | 6020 | 6.47 | 4,515 | 21040 | 7.35 | 1505 | 3956 |
| E12 | 6009 | 7.16 | 4,507 | 25931 | 8.11 | 1502 | 4649 |
| SFA | 5888 | 8.95 | 4,416 | 32917 | 9.19 | 1472 | 5411 |
| OM | 3656 | 8.91 | 2,742 | 17671 | 10.11 | 914 | 3599 |
| GR | 5358 | 3.13 | 4,019 | 19800 | 7.40 | 1339 | 3535 |

| | | | | | | | |
|--------------|-------------|-------------|--------------|--------------|--------------|-------------|-------------|
| GR200 | 5016 | 3.48 | 3,762 | 10222 | 3.77 | 1254 | 1631 |
| ADM | 1995 | 3.56 | 1,496 | 4253 | 4.09 | 499 | 891 |
| EF | 5982 | 7.19 | 4,487 | 25157 | 10.26 | 1495 | 5818 |
| F | 5833 | 9.40 | 4,375 | 37534 | 10.95 | 1458 | 6539 |
| HR | 5978 | 8.21 | 4,484 | 31255 | 11.39 | 1494 | 6791 |
| AL | 3748 | 5.45 | 2,811 | 14303 | 5.93 | 937 | 2823 |

Many academic libraries—and particularly in large, research-intensive organizations such as ARLs—openly and willingly collect data for IPEDS in collaboration with their institutional research offices, and are more than willing to continue that practice. These touchpoints of institutional collaboration and cross-institutional data aggregation provide a high return on investment for senior leaders. At the University of Florida, for example, administrators have been able to correlate the growth of the university’s research budget with funding for the library—underscoring the contributions of the 21st century library to the advancement of the research enterprise.

While our associations believe that the respondent burden of the AL component already has been appropriately minimized, we welcome the opportunity to work with NCES to explore any possibilities to make the data easier to collect.

Conclusion

Our associations understand that NCES is understaffed relative to its expansive remit.¹³ Eliminating the AL survey component and this critical dataset will not solve that staffing shortage. Instead, we propose to collaborate on survey effectiveness and efficiency to continue to serve the higher education community.

¹³ American Statistical Association, “Fix the Staffing Shortage at the National Center for Education Statistics (NCES): Fiscal Year 2025 Appropriations Request,” https://www.amstat.org/docs/default-source/amstat-documents/pol-nces_staffingappropsfy24.pdf.

Given the value of this academic library data and the risks inherent in its elimination, ACRL, ALA, ARL, and ASERL would strongly support work towards a solution that preserves this annual data collection. We recognize the cost to NCES of this effort. However, we do not see in this proposal sufficient rationale for eliminating the Academic Library component in particular, and neither the proposal nor its supporting documents address how that data is used, its value to libraries and the institutions they serve, or alternatives to its elimination. We would welcome the opportunity to contribute to identifying a workable solution to continue this data collection going forward. We strongly believe that elimination of the Academic Libraries component without an alternative solution would do a disservice to libraries and to higher education as a whole.

Thank you for your consideration. If we can provide more information, please contact Gavin Baker (gbaker@alawash.org), Sara Goek (sgoek@ala.org), or Judy Ruttenberg (judy@arl.org).

Additional Endorsements:

University System of Maryland and Affiliate Institutions (USMAI)