

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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Office of Management and Budget
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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) 2024-25 Through 2026-27
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We appreciate the opportunity to provide comments to the Office of Management and Budget (OMB) 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)—hereafter “the associations”—previously submitted [a comment](#) to the National Center for Education Statistics (NCES) on May 2, 2024.¹ We stand by our statement that the Academic Libraries (AL) component should be maintained as a part of IPEDS. The associations strongly object to the proposed elimination of the AL component, and we urge OMB not to approve it. We would welcome the opportunity to work with NCES or other federal agencies to find a solution that maintains this critically important dataset for higher education.

Our comments on this occasion specifically and briefly address the five questions identified in the Federal Register notice.

(1) Is this collection necessary to the proper functions of the Department?

As stated in our [previous comment](#), the associations believe that eliminating the AL component from IPEDS would result in NCES failing to meet its statutory obligations.

¹ American Library Association, Association of College and Research Libraries, Association of Research Libraries, and Association of Southeastern Research Libraries, Comment ID ED-2024-SCC-0040-0688 on FR Doc # 2024-04509 (May 2, 2024), <https://www.regulations.gov/comment/ED-2024-SCC-0040-0688>; Orbis Cascade Alliance, Comment ID ED-2024-0040-0549 on FR Doc # 2024-04509 (April 17, 2024), <https://www.regulations.gov/comment/ED-2024-SCC-0040-0549>.

Section 151 of the Education Sciences Reform Act (ESRA) of 2002 (Public Law 107-279) stipulates that the mission of NCES includes collecting, analyzing, and reporting education statistics in a manner that is “relevant and useful to practitioners, researchers, policymakers, and the public.” Those practitioners include academic librarians and library administrators, whose comments have clearly indicated that they make effective use of this data.

Section 153 of the ESRA requires that NCES “shall collect, report, analyze, and disseminate statistical data,” on education “at the preschool, elementary, secondary, postsecondary, and adult levels,” including data on “the existence and use of school libraries” in the United States.² 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 AL component is the tool that collects data specifically on libraries' significant and critical investment in the quality of education provided to postsecondary students.

(2) Will this information be processed and used in a timely manner?

Academic library staff and leadership indicate that they routinely use IPEDS AL component data for institutional assessments, peer comparisons, and research. Our [previous comment](#) offered a more detailed account of those uses. While the work of academic libraries may not have a high level of public visibility, these studies and uses of the data directly inform critical decision-making, policy, and academic services for postsecondary students at the institutional, state, and national levels.

NCES’s reply (Appendix E) to the public comments indicates that they see limited usage of the AL component file. However, that does not encompass all methods by which AL component data can be accessed, which include custom data files, institution comparisons, statistical tables, and more. It is also worth noting that users may download the data once for further analysis, and a single download may thus result in many possible uses.

Removal of the AL component from IPEDS would deprive academic libraries and higher education institutions of comprehensive, comparative, and longitudinal data that they use to evaluate and improve academic resources.

(3) Is the estimate of burden accurate?

For respondents, the AL component burden is lower than that of other components of IPEDS, as noted in our previous comment. While few specific comments NCES received address whether the estimated number of hours for the AL component is accurate in their perception, our analysis of the submitted comments suggests that almost all commenters who addressed the response burden of the AL component indicate that it is low, and any burden to respondents is

² Prior to this submission, NCES has interpreted “school libraries” under this provision to include postsecondary schools, an interpretation the associations agree with; NCES has presented no rationale for changing that interpretation in this proceeding. See Elise Miller McNeely, “The History and Origins of Survey Items for the Integrated Postsecondary Education Data System (2022–23 Update),” U.S. Department of Education, 2023, at AL-1, available at <https://nces.ed.gov/ipeds/pdf/NPEC/data/The-History-and-Origins-of-Survey-Items.pdf>.

far outweighed by value of the data. Continuing to improve the clarity and effectiveness of the survey would better serve respondents and the higher education community, rather than eliminating the AL component.

(4) How might the Department enhance the quality, utility, and clarity of the information to be collected?

The associations and our members previously had the opportunity to offer suggestions for improvements to the AL component through a joint [ACRL/ALA/ARL IPEDS Advisory Task Force](#). The task force contributed their subject-matter expertise to enhancing the data quality and clarifying instructions for the collection process. They were also involved in conversations about the sustainability of the AL component in 2021-22. However, NCES did not make clear to our associations or the task force members that the only options under consideration for sustainability were transfer of the AL component to another federal agency or its complete elimination, as NCES's reply asserts (Appendix E). The task force has been on hiatus since NCES indicated it would not make further changes to the academic library data collected.³ We would welcome the opportunity to re-engage in this work and contribute to improving the quality, utility, and clarity of the academic library data.

We also would appreciate any opportunity for direct engagement between NCES and association staff. ACRL, ALA, ARL, and ASERL staff are well-versed in how the data is used and how it could be improved. We would be more than happy to offer specific suggestions for improvements to enhance the quality and utility of the data if the AL component is maintained.

In Appendix E, NCES claims that data quality issues with the AL component are a rationale for its proposed elimination; we disagree. While technological changes to information and publishing systems have made it a challenge for libraries to collect standardized metrics, particularly for electronic circulation, those issues should be dealt with through clarification of reporting standards and improved engagement with the respondent community; using these challenges as a justification for elimination of this survey component is neither sufficient nor appropriate.

(5) How might the Department minimize the burden of this collection on the respondents, including through the use of information technology?

We believe the AL component, as proposed for administration in academic year 2024-25, appropriately minimizes response burden. Collection of basic statistics about the size of library holdings, budgets, and circulation—as collected in the AL component—is standard practice for academic libraries, and it allows them to understand how resource and service usage changes over time and provides value to their institutions and students' academic success.

³ There have been no changes to the AL component since two minor definitional changes were made for the 2021-22 collection cycle. The last substantive changes to the instructions occurred in 2020-21. <https://nces.ed.gov/ipeds/report-your-data/archived-changes/>.

Conclusion

The associations understand and regret the capacity and budget challenges NCES faces that have led to this proposal to eliminate the AL component from IPEDS. However, we stand by our belief that academic library data has a valuable place within IPEDS and the rationales provided do not justify its elimination. In particular, we reiterate that the proposed elimination of the AL component, without an adequate alternative collection, would place NCES out of compliance with its legal obligation to collect data about postsecondary libraries. For the reasons articulated here and in our previous comment, we urge OMB not to approve the proposed elimination of the AL component.

We would welcome the opportunity to collaborate more closely with NCES in identifying an alternative solution. For example, NCES could work with the academic library community to explore alternative data collection workflows. Our associations collect some data similar to the Academic Libraries component, and while we depend on IPEDS for its comprehensive, mandated, and integrated results, we would welcome the opportunity to collaborate more closely with NCES.

Should OMB permit NCES to proceed with its proposal to eliminate the AL component in its current form, the associations respectfully request continued consideration of a transition to another federal entity, such as the Institute of Museum and Library Services, as NCES notes in Appendix E. If any such an arrangement could be made, that would be preferable to losing this valuable resource.

Libraries are central to student success and the mission of higher education. The comprehensive and unique longitudinal data available from the IPEDS AL component makes it possible for practitioners, researchers, institution administrators, policy makers, and the public to quantify the usage and value of the services libraries provide. To lose this source of information would do a disservice to the higher education community and the needs of postsecondary students in this rapidly changing information age.

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 Rутtenberg (judy@arl.org).