

**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](mailto: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.**