



May 3, 2024

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

Docket ID ED-2024-SCC-0040

To whom it may concern:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit to the U.S. Department of Education (ED) our comments on Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27 (Docket ID ED-2024-SCC-0040.)

NASFAA represents nearly 29,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every 10 undergraduates in the U.S.

NASFAA does not have any concerns regarding the proposed changes to IPEDS for the 2024-25 through 2026-27 aid years, but we do have larger concerns regarding colleges' and universities' ability to report data to IPEDS going forward. Significant changes to federal student aid legislation, including changes to data use and data sharing provisions that pertain to non-Federal Tax Information (FTI) FAFSA data, were attached to the FAFSA Simplification Act. Institutions are currently lacking further guidance aside from an incomplete verbal answer to a related question during a recent webinar. NASFAA is concerned as the addition of FTI to the ISIR adds a new, even stricter, level of data use and data sharing rules from the Internal Revenue Code (IRC). **This could mean previously permitted activities like sharing applicants' income information from the FAFSA for mandatory reporting like IPEDS is no longer allowed, because that data is now considered FTI and subject to IRC data-sharing rules.**

NASFAA has asked the Department of Education multiple times to provide further guidance on this new provision so we can assist schools moving forward. IPEDS reporting is mandatory, and is an integral part of data and research related to postsecondary education. We urge the Department to release additional guidance specifically outlining what FAFSA data sharing

activities are allowed, and to include IPEDS in these provisions, to allow institutions to fulfill their responsibility to contribute to this essential data source.

We appreciate the opportunity to comment on this information collection. If you have any questions regarding these comments, please contact us or NASFAA Senior Policy Analyst Jill Desjean at [desjeanj@nasfaa.org](mailto:desjeanj@nasfaa.org).

Regards,

A handwritten signature in black ink, appearing to read 'J. Draeger', with a stylized flourish at the end.

Justin Draeger, President & CEO