

AMERICAN COUNCIL ON EDUCATION



GOVERNMENT RELATIONS

July 17, 2008

IC Clearance Official
Office of Information and Regulatory Affairs
Attention: Education Desk Officer
Office of Management and Budget
725 17th Street, NW
Room 10222
New Executive Office Building
Washington DC 20503

Re: OMB Emergency Regulations Request

Dear Sir/Madam:

Thank you for the opportunity to comment on the proposed emergency review requested by the U.S. Department of Education as detailed in the July 16, 2008 *Federal Register*.

On behalf of the higher education associations listed below, I urge you to deny the emergency data collection request, as it is both unnecessary and undesirable. The survey the Department proposes to initiate on an expedited basis is an extensive student level data collection that presents both definitional and logistical challenges. More significantly, we have analyzed the questionnaire submitted to the Office of Management and Budget (OMB) for emergency clearance, and we strongly believe that the scope of the questionnaire goes far beyond customer satisfaction and attempts to ascertain the views of Pell Grant recipients on complex institutional policy matters with the goal of effecting federal policy changes.

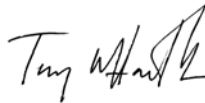
There is no appropriate federal rationale for this survey to be done without giving the public, including the higher education institutions, an opportunity to comment. In fact, by seeking an "emergency review," the Department precludes external input that would enhance the value of the effort, such as, for example, incorporating the perspective that a study of transfer of credit issues should not be limited to Pell Grant recipients.

The OMB notice asks for comments on five issues:

- Is this collection necessary to the proper functions of the Department?
- Will this information be used in a timely manner?
- Is the estimate of burden accurate?
- How might the Department enhance the information to be collected?
- How might the Department minimize burden?

The response to the first three issues is a resounding no. While the survey results may inform functions at the Department, the particular emergency aspect of the request is not related to the operation of the Department. On the latter two questions, the best way to enhance the collection and minimize burden would be to integrate this into regular data collection activities. There is no additional benefit to be derived from the unnecessary “emergency” designation of this data collection, and I urge you again to deny the request.

Sincerely,



Terry W. Hartle
Senior Vice President

TWH\ksm

On behalf of:

American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
American Indian Higher Education Consortium
Association of American Universities
Association of Jesuit Colleges and Universities
Council for Higher Education Accreditation
National Association of Independent Colleges and Universities
National Association of State Universities and Land-Grant Colleges
United States Student Association