



Honorable Linda McMahon
Secretary of Education
National Center for Education Statistics,
Institute of Education Sciences,
U.S. Department of Education,
400 Maryland Ave. SW
LBJ, Room 5C133
Washington, DC 20202-1200

October 10, 2025

Re: August 15, 2025 Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27

Dear Secretary McMahon,

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), we write to respectfully submit comments on the notice of agency information collection activities published in the [Federal Register](#) on August 15, 2025 regarding **Docket ID number ED-2025-SCC-0382**.

Founded in 1910, AACRAO is one of the oldest nonprofit higher education associations in the nation and represents over 18,000 higher education admissions and registration professionals from 2,300 institutions serving 16.5 million learners worldwide. We provide professional development and voluntary guidance for the higher education community regarding record management, admissions, enrollment management, administrative information technology, and student services.

The White House issued a [Presidential Memorandum](#) on August 7, 2025, that called for greater transparency in college admissions. Shortly afterwards, you directed the National Center for Education Statistics (NCES) to collect admissions data for institutions of higher education to ensure race-based preferences are not used in university admissions processes. On August 15, the U.S. Department of Education (Department) announced a new, extensive data collection—the [Admissions and Consumer Transparency Supplement \(ACTS\)](#) survey that would be added to the existing Integrated Postsecondary Education Data System (IPEDS).

AACRAO partnered with the Association of Institutional Research (AIR), the American Council on Education (ACE), the Association of Public and Land-Grant Universities (APLU), and the National Association of Independent Colleges and Universities (NAICU) to gather feedback from the higher education community about how the proposed ACTS survey would impact institutions and our respective members. The survey received over 550 responses from a variety of campus administrators—including registrars, enrollment management/admissions, financial aid, and institutional research, among others—representing a range of institution types (public/private/not-for-profit/for-profit, 4-year/2-year). Based on the responses we received, as well as AACRAO's own review of the proposed regulatory

changes, we would like to raise a few concerns in the hope of helping to ensure accurate and timely data collection.

Proposed Reporting Timeline

First and foremost, the Department's proposal to implement ACTS starting in the 2025-2026 academic year does not give institutions, nor the Department, enough time to prepare for this reporting. This was clear from our joint survey where 91% of all respondents indicated they are extremely/very concerned with the proposed timeline for gathering and reporting the data. Institutions face several challenges in meeting this deadline, from the requested data simply not being available, to limited institutional resources, to challenges in disaggregating such a large and complex data set to ensure compliance with student data privacy laws.

Data Availability

One of the many challenges institutions face in reporting this data is simply whether or not the requested data exists. Our joint survey found that half of all respondents are extremely/very concerned about a lack of availability of data elements for undergraduate students. Sixty percent of respondents at public 4-year institutions are extremely/very concerned about a lack of availability of data elements for graduate students, with that number rising to 65% for private not-for-profit 4-year institutions. At least half of all survey respondents indicated they simply didn't have some of the requested data elements, including high school GPA for graduate students, graduate students parental education, and graduate students test score quintiles. At least half of all survey respondents indicated that other data elements, such as undergraduate data regarding student family income range and financial aid type and amount, would require significant effort to retrieve. All of this is complicated by unclear data definitions, which 83% of all respondents are extremely/very concerned about. Another important consideration is that admissions data across the institution is fragmented and generally lives outside of the main student information system. In a larger campus setting, admissions data may even be kept in multiple separate systems within a single institution, further complicating an already challenging data collection process.

The proposal to collect data going back five years is also of concern because some state-level retention periods are as short as one year. This means that if institutions are following their own state regulations and destroying the application records in compliance with their state regulation, then they will not have five years of data. When state-level records requirements do not exist, institutions implement their own records retention policies. In such cases, AACRAO recommends that 4-year institutions retain student records for one year after the application term and "until the administrative need is satisfied" for community and technical colleges.¹ In practical terms, this means that it will be impossible for some institutions in certain states to report five years of data to the Department. The Department's proposed information collection does not address this situation and we are concerned about the implications for those institutions.

¹ American Association of Collegiate Registrars and Admissions Officers (2019). *Student Records Management: Retention, Disposal, and Archive of Student Records*.

Reporting Burden

Complying with the Department's proposed data reporting will undoubtedly impose an additional burden on institutions, which already commit significant time and resources to federal reporting. For instance, [a 2015 study](#) found that higher education institutions as a whole spend roughly \$27 billion per year on federal regulatory compliance. The addition of ACTS will only serve to increase this expense.

According to the [Department's own estimates](#), the new ACTS survey will generate over 65,000 annual responses, costing institutions an additional **740,511 hours annually to complete**. By [another estimate](#), the proposed ACTS collection would require responses to more than 100 new questions and thousands of new fields per year, for the current year and five years prior. AACRAO's joint survey found that 84% of all respondents are extremely/very concerned about their institution having insufficient resources/staff given the complexity of the proposed data elements. Small private higher education institutions in particular have limited capacity to take on additional federal reporting, especially on such a tight timeline.

Disaggregating Data

As the primary data stewards on campuses, AACRAO members consistently express concern regarding the privacy of learner data, particularly when data requests are disaggregated. An overwhelming majority of joint survey respondents (73%) are extremely/very concerned about student privacy due to multiple granular disaggregations. Furthermore, disaggregating large amounts of data is a complicated task. 79% of survey respondents are extremely/very concerned at the challenges presented by reporting data disaggregations not previously used in IPEDS (e.g., race-sex pairs, GPA quintiles, parental education). While the Family Educational Rights and Privacy Act (FERPA), the federal privacy law protecting students' education records, does not prevent the Department from pursuing this type of data collection, FERPA does require that institutions only release properly de-identified information after removing all personally identifiable information (PII) and making a reasonable determination that information cannot identify students.

To this end, we strongly encourage the Department to consider measures to protect the personally identifiable information (PII) of individual students. For instance, limiting cell sizes to such an extent that a reasonable person couldn't deduce an individual's identity based on the disaggregated admissions data. Another possibility would be to exclude programs from the reporting requirement if they have fewer than a certain threshold of enrolled students.

Intended Use of Collected Data

While the stated purpose of this new data collection is to "capture information that could indicate whether institutions of higher education are using race-based preferencing in their admissions processes," we are concerned that uncontextualized correlations in the data could cause unintended harm. Numerous factors shape recruitment plans and admissions decisions, including many not reflected in the ACTS. We believe the Department's proposal will have a chilling effect on how institutions approach recruitment, resulting in decreased opportunities for all learners to have access to the economic and social mobility that post-secondary education provides.

For example, rural communities are overwhelmingly ([76 percent](#)) white, and yet it would be wrong to conclude that a recruitment program focusing on rural [communities](#) is actually an example of race-based admissions policies. Similarly, an institution that recruits students from private high schools, which are [disproportionately white](#), or that recruits football and basketball prospects, which are [disproportionately Black](#), isn't necessarily engaging in race-based admissions policies. Fundamentally, admissions decisions are complicated and the Department is oversimplifying the admissions process in ways that could have a detrimental impact on institutions and the learners they serve.

We request more information from the Department regarding the intended use of this data collection and an opportunity to provide contextual information that would help the Department meet its goals. The higher education community and the professional practitioners at institutions have long been partners with the Department in support of national goals and regulatory compliance. This has not changed. Further dialogue and consultation with the community would help to ensure that institutions report accurate data that is reflective of the information the Department is seeking to receive.

Conclusion

Compounding the challenges institutions face in complying with the proposed data collection is the fact that in March of 2025, the Department laid off nearly half its staff, including most of the employees at the NCES who would serve as the main individuals collecting and analyzing this data. A new data collection effort of this scale will require clear guidance from the Department with enough time for institutions to ask clarifying questions to be able to comply and provide accurate data. We have serious concerns that neither the Department nor institutions will be able to meet their obligations as it is currently proposed.

We hope that these comments are well received and we stand ready to work with the Department to meet our mutual goal of serving the learners enrolled in higher education institutions across the United States.

Sincerely,

A handwritten signature in cursive script, reading "Melanie Gottlieb". The signature is written in dark ink and includes a long, sweeping horizontal flourish at the end.

Melanie Gottlieb
Executive Director, AACRAO