

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

December 11, 2025

*Re: November 13, 2025 Agency Information Collection Activities: Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2025-26 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 November 13, 2025 regarding **Docket No.: ED-2025-SCC-0382**.

This most recent notice comes after an earlier notice was issued on August 15, 2025 regarding Docket No.: ED-2025-SCC-0382. AACRAO, as well as a number of our sister associations, [submitted comments](#) during that first round of information collection. We want to thank the U.S. Department of Education (the Department) for addressing some of the previously submitted comments and for being committed to engaging with the public throughout this process. That being said, we still have significant concerns about the Department's proposal to collect additional admissions data from institutions on such a compressed timeframe.

The Department's proposed timeline to start collecting data in the 2025-2026 academic year is unrealistic. The task of collecting five prior years of data for various student cohorts, some of which have still not been defined by the Department, in such a way so as to ensure accuracy and compliance with student data privacy laws is herculean. Adding to the challenge is the fact that the Department recently abandoned its IPEDS training contracts, so institutional staff are less prepared than ever before at a time when the Department is requesting the largest change to the data system in decades.

Further complicating the data collection is the fact that some of the requested information simply doesn't exist. Some state-level data retention periods are as short as one year, meaning that if institutions are remaining compliant with their state policies, 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's own guidance 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<sup>1</sup>. 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 and we are greatly concerned by the lack of clarity for institutions in this situation. Given the reduction of staffing in the Department and the records retention practices of institutions, we are concerned that asking institutions to contact the Department for further advice and guidance on an individual basis will result in an unmanageable number of requests for the Department and places an undue burden on institutions.

We respectfully urge the Department to reconsider the current plan and scale back the first year of data collection. Historically, for major data system changes, the Department has designated the initial year as a voluntary pilot. Implementing a pilot year would allow institutions that are better prepared to begin reporting while preventing undue burden on less well-resourced institutions, simultaneously allowing the Department to refine the process for optimal data quality. Alternatively, the Department could require only one year of data for the initial cycle before expanding to the desired five years. These approaches would allow both institutions and the Department to better prepare, clarify, and refine the reporting process, ensuring the best possible results. Our primary concern is that rushed reporting will inevitably lead to inconsistent data, potentially resulting in real harm to institutions

Sincerely,

A handwritten signature in cursive script, reading "Melanie Gottlieb". The signature is written in black ink and is positioned above the typed name and title.

Melanie Gottlieb  
Executive Director, AACRAO

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