



October 14, 2025

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Washington, DC 20202

CC: Matt Soldner, Acting Director, Institute of Education Sciences and Acting Commissioner, National Center for Education Statistics

Re: [Docket ID number ED-2025-SCC-0382](#)

To Whom It May Concern:

This letter is submitted on behalf of the 36 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the Department of Education's (ED) proposed addition of the [Admissions and Consumer Transparency Supplement](#) (ACTS) survey component to the Integrated Postsecondary Education Data System (IPEDS). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success.

IPEDS is a set of annual surveys that provide [essential data on more than 6,000 colleges and universities](#) to groups including prospective students and families making college decisions, institutions and systems benchmarking their performance, and policymakers seeking to make data-informed decisions. IPEDS is a trusted source of high-quality data, largely because of its deliberate process for adding or revising data elements. Updates to IPEDS survey components go through a careful vetting, planning, and implementation process, that includes soliciting community input to uncover and answer technical definition and reporting questions. Institutions are also given advanced notice of IPEDS reporting changes, so they have time to prepare and adjust their data systems as needed. By prioritizing field engagement, this rigorous process helps ensure data collections are aligned with practical, on-the-ground realities and each institution has the guidance needed to report data in a consistent manner.

Each step in the vetting and planning process is critical for maintaining high data quality standards while ensuring the administrative burden imposed on institutions is reasonable and fair. Skipping any step will drastically hamper institutions' ability to submit consistent and comparable data and limit practitioners, researchers, decisionmakers, and ED staff's ability to conduct meaningful data analyses.

Forgoing the typical vetting, planning, and implementation process would be concerning even if ACTS consisted of just one new data element. However, the proposed ACTS collection is enormous in scope and would be the largest single change to IPEDS ever implemented. The data collection is [estimated](#) to require responses for more than 100 new questions and more than 10,000 new data fields per year, for

each of the six years of data requested. This is a massive undertaking for any institution, but especially those with only two or three staff members responsible for federal and state data reporting compliance. There are also serious concerns about data availability since institutions were given no warning that they would need to report many of the data elements included in ACTS and may not currently collect them.

In a [memo](#) to the National Center for Education Statistics (NCES), U.S. Secretary of Education Linda McMahon expresses a clear interest in ensuring IPEDS data are “accurate and reliable.” In alignment with Secretary McMahon’s directive and to ensure ACTS data meet the same high data quality standards as other IPEDS survey components, we recommend ED:

1. Establish clear data definitions and reporting guidance in collaboration with the field.
2. Narrow the scope of this year’s data collection to undergraduate students and stagger the rollout of those data elements.
3. Delay the collection of retrospective data.
4. Delay the collection of data on graduate students.
5. Fully staff NCES and reinstate key contracts to ensure sufficient technical assistance and timely reporting of consistent data.

Below are detailed descriptions of our five recommendations to ensure the quality of ACTS survey data. Although, importantly, the depth of these recommendations has been limited by our inability to review a detailed description of this new data collection during the 60-day comment period, as required by the Paperwork Reduction Act ([5 CFR 1320.8\(d\)\(2\)](#)).

#### **1. Establish clear data definitions and reporting guidance in collaboration with the field.**

Clear data definitions and reporting guidance are critical for ensuring data reported to IPEDS are consistent and allow for apples-to-apples comparisons across institutions and over time. ED has a long history of meaningfully engaging with the field to wrestle with and develop answers to challenging, technical questions, including during the first Trump Administration. Through the [National Postsecondary Education Cooperative](#) (NPEC), [Technical Review Panels](#) (TRPs), and 30- and 60-day public comment periods, ED has strategically leveraged the expertise of higher education practitioners, leaders, researchers, and advocates to ensure institutions have what they need to report accurate and reliable data to IPEDS.

For example, the data elements that will be collected through the Admissions survey for the first time this year were explored through an [NPEC report](#), proposed and vetted in a TRP, and subjected to public comment. During [TRP #64: Meeting the Moment: Modernizing the IPEDS Admissions Survey Component](#), representatives from institutions, higher education associations, and state and federal governments as well as researchers and other experts explored detailed technical questions including the benefits, limitations, and burden associated with disaggregating application, admission, and enrollment counts by race/ethnicity and collecting those counts for transfer-in students and graduate students. These discussions and subsequent public comment periods informed the data definitions and reporting guidance that were announced and made publicly available [online](#).

If ACTS data are to be trustworthy and useful to the Administration and IPEDS stakeholders, ED must fully engage the field to address a long list of unanswered technical questions *before* requiring institutions to submit data. The following are examples of outstanding questions that need to be resolved:

1. How is “family income” defined? Should institutions use adjusted gross income to determine family income? If adjusted gross income is pulled from data submitted on the FAFSA, how should institutions handle missing data for students who do not complete a FAFSA?
2. How is “first-generation” defined? Is a student who has one or more parents with an associate degree considered first-generation? Is a student who has only one parent with a bachelor’s degree considered first-generation?
3. How is “merit-based aid” defined? For example, is merit-based aid inclusive of academic and non-academic (e.g., athletic) scholarships? Does merit-based aid include funds awarded based on a combination of need and merit?
4. How should institutions address the differing ways high schools calculate and report high school GPA?
5. Which sections of admissions tests will institutions be required to report scores for by race/sex pair? For people who submit multiple test scores, which test scores will institutions be required to report?
6. What race categories should institutions use given ED’s expected implementation of the Office of Management and Budget’s [Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity](#)?
7. How should the graduation rates disaggregated by admissions test scores and GPAs be measured (e.g., four-, six- or eight-year graduation rates; 100%, 150%, or 200% of normal time)? Will graduation rates include students who transfer in and/or transfer out?
8. How should institutions report available data from prior years on students’ “sex” without using the previously available “unknown” and “another” categories?
9. How should institutions report data on the large number of applicants, admits, and enrollees who do not identify their race/ethnicity, do not submit test scores, do not have an income reported, or otherwise are not able to be disaggregated?
10. What should institutions do if they do not collect information on family income, high school GPA, SAT or ACT scores, or parental education at the required level of detail?
11. Which institutions should be required to submit data for the ACTS survey?
12. Will ACTS data be collected through a new survey component or through existing survey components (e.g., Admissions, Student Financial Aid, and Graduation Rates)?
13. If ACTS data are collected through a new survey component, will it be a Winter or Spring collection?
14. When will the data collected through NCES be published in IPEDS? Will they appear in College Navigator and College Scorecard?

Answers to these, and many other, critical questions should be used to inform clear reporting guidance for institutions. ED should develop and publicly post preview screens at least one year before the new data collection opens. ED should also make available detailed data definitions, answers to frequently asked questions, and information on how data will be collected. All are essential for ensuring institutions are properly prepared to submit new high-quality IPEDS data.

## **2. Narrow the scope of this year's data collection to undergraduate students and stagger the rollout of those data elements.**

The scope of the proposed ACTS collection is unprecedented. For a collection of this size, with numerous currently undefined variables and outstanding technical questions, ED must implement the changes via a multi-year rollout that focuses on a targeted number of vetted elements in the first year, request additional high-priority variables in the following year, and delay the collection of remaining variables to subsequent years after further planning and detailed guidance can be issued.

Multi-year rollouts are a best practice within the tech industry, where companies often start with a minimum viable product and add new features over time. Similarly, strategically staggering the implementation of ACTS would enable data collection to begin this year *and* allow for the implementation of critical data quality practices for additional collections in future years. A staggered rollout would help ensure new data are high quality and consistent across institutions, and ED systems can absorb the quantity of new information over time.

In 2025-26, we recommend ED move forward with the previously planned additions to the Admissions survey, which will provide greater transparency into the college admissions process. These new data elements include the number of applicants, admissions, and enrollments disaggregated by race/ethnicity and the number of applicants enrolled through early decision and early action policies, among other additions. IPEDS announced that these data elements were being added to the 2025-26 data collection last year, and they have been vetted through the typical implementation process for new IPEDS data collections. This means these additions were researched [extensively](#), informed by [field engagement](#), are [clearly defined](#), and have been previewed by institutions.

In 2026-27, ED could begin collecting a targeted set of high-priority additional data elements such as test score quartiles by race/sex pair. Between now and the opening of next year's collection, ED should engage the field to identify the high-priority data elements, create clear definitions, and understand their limitations. Remaining data elements should be delayed further into the future to manage the scope of new data collected each year and allow deep engagement with the field to establish clear data definitions and guidance and provide institutions time to prepare for the new collections.

Finally, like with any new data collection, data reported in the first year should be interpreted with caution so reporting challenges can be surfaced and corrected. Unanticipated reporting questions often arise in the first year of a data collection as institutions go through the full process of submitting new data elements for the first time. These questions are then answered, and additional reporting guidance is provided to institutions, as needed, making second and subsequent year data more reliable for apples-to-apples comparisons. Given this, ED should not take any adverse actions against or launch investigations into institutions based on the first year of any data collection.

## **3. Delay the collection of retrospective data.**

Retrospective data raise data quality concerns, particularly related to consistency and usability. Collecting the retrospective data proposed by ACTS is problematic because:

- Institutions may not have collected the requested data in previous years.
- Data that were collected may not be in a format suitable for submission or align with the proposed definitions.
- Data retention policies may limit the availability of previously collected data.

Additionally, many public institutions receive support for conducting IPEDS reporting from their state postsecondary student unit record systems (PSURs). This structure reduces burden on institutions and ensures high-quality, comparable data are reported. To submit the proposed retrospective data on the accelerated timeline, institutions would be forced to forgo the use of their PSURs for data elements that haven't previously been collected, while still using their PSURs for other data elements. This jeopardizes the quality and comparability of the data and increases the reporting burden on both institutions and their data systems. Together, these issues mean retrospective data collected this year are likely to include large gaps, making them inconsistent and unsuitable for comparisons within and across schools.

To overcome these challenges and preserve data quality, new IPEDS data collections have been designed to focus on future data. This provides institutions with sufficient time to understand data definitions and preview data submission screens so they can structure data sets and collect newly required data in ways that will allow for accurate and consistent submissions to IPEDS.

For retrospective data collected through ACTS to be meaningful for benchmarking and comparison purposes, it's essential that ED collaborates with the field to answer the technical questions outlined in Recommendation 1 as well as specific questions related to the collection of retrospective data, including:

1. What is the feasibility of collecting high quality retrospective data?
2. How many years of data should be collected considering common data retention policies?
3. What should institutions do if they have not been collecting the retrospective data requested?
4. When is the most appropriate time to collect retrospective data (e.g., in the second year of a new data collection after reporting questions have been surfaced and addressed)?

In addition to the overarching concern about data availability, it is important to note that the five years of data requested in the proposed ACTS collection would be particularly unreliable for benchmarking purposes given the abnormalities associated with the COVID-19 pandemic—including [increases](#) in test-blind or test-optional policies—and the challenging rollout of the simplified Free Application for Federal Student Aid (FAFSA) in 2024-25.

#### **4. Delay the collection of data on graduate students.**

Graduate program data have unique challenges that require a longer timeline and substantial field engagement to implement. For example, institutions collect graduate student data at the department level, so they are not always centralized at the institutional level and may not be collected uniformly, even within one institution.

Additionally, while many of the questions listed in Recommendation 1 are also relevant for data on graduate students, extensive research and field engagement are necessary to answer additional outstanding questions specific to data on graduate students. For example, ED will need to provide guidance on how institutions should report data for PhD programs that require students to start in Master's degree programs and how institutions should handle student privacy concerns related to the small sample sizes that will result from the proposed disaggregations by program.

To ensure the quality, consistency, and usability of data collected on graduate students, ED should delay the collection of these data until these questions are resolved. This time should be used to review [existing research](#) on collecting data on graduate students through IPEDS as well as conduct additional comprehensive research into the key issues related to this proposed collection through an NPEC paper and field engagement in one or more TRPs.

**5. Fully staff NCES and reinstate key contracts to ensure sufficient technical assistance and timely reporting of consistent data.**

IPEDS is housed at the National Center for Education Statistics (NCES), which has experienced steep staffing cuts this year. According to [recent reporting](#), just three of 100 staff members remain employed at NCES, and all six staff members who previously worked on the IPEDS data collection were laid off in March. IPEDS staff are responsible for helping ensure a smooth rollout of new collections, determining data definitions, and making decisions about data collection and reporting. NCES staff members who have experience designing and implementing high-quality data collections and who are deeply familiar with IPEDS are essential for ensuring data quality throughout the vetting, planning, implementation, collection, and data release processes.

Additionally, training and support for the institutional researchers, and, in some cases, state agencies responsible for submitting IPEDS data are essential to ensure all data are reported consistently. Unfortunately, the IPEDS training subcontract that served this purpose was [canceled](#) earlier this year. Without the NCES staff infrastructure and capacity or the high-quality support and training for institutional researchers, the ACTS data collection is unlikely to be successful.

In sum, IPEDS data have historically been high quality, making them a trusted source of information for students, families, institutions, and policymakers. Changes to IPEDS data collections typically go through a thorough vetting, planning, and implementation process that includes community input, detailed data specifications and guidance, and comprehensive training to maintain IPEDS' reputation as a reliable source of essential information on colleges and universities across the country.

As proposed, the ACTS data collection would require institutions to submit an enormous amount of new data on an accelerated timeline without vetted definitions, clear reporting guidelines, or vital training and support. Instead, we recommend ED take the following steps to make sure ACTS data adhere to IPEDS' high data quality standards:

1. Establish clear data definitions and reporting guidance in collaboration with the field.
2. Narrow the scope of this year's data collection to undergraduate students and stagger the rollout of those data elements.
3. Delay the collection of retrospective data.

4. Delay the collection of data on graduate students.
5. Fully staff NCES and reinstate key contracts to ensure sufficient technical assistance and timely reporting of consistent data.

If you have any questions about this comment, please contact Erin Dunlop Velez, Vice President of Research at the Institute for Higher Education Policy, at [evelez@ihep.org](mailto:evelez@ihep.org).

Sincerely,

**Organizations:**

AACTE: American Association of Colleges for Teacher Education  
American Association of Collegiate Registrars and Admissions Officers  
American Association of University Women (AAUW)  
American Educational Research Association  
American Statistical Association  
Applied Learning Insights, LLC  
Association for Institutional Research  
California Competes: Higher Education for a Strong Economy  
Campaign for College Opportunity  
Center for Developing Leadership in Science, University of California Los Angeles  
Community College Research Center, Teachers College, Columbia University  
Council for Opportunity in Education  
Data Quality Campaign  
Deiger Research & Evaluation Consulting  
EDGE Partners  
EdTrust  
Education Reform Now  
Georgetown University Center on Education and the Workforce  
Institute for Higher Education Policy  
NASPA - Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Association of College and University Business Officers  
National Association of Student Financial Aid Administrators  
National College Attainment Network  
NCHEMS  
New America Higher Education Program  
Prismatic Research & Strategy  
Public Insight Data Corporation  
The Institute for College Access & Success (TICAS)  
The Study Group  
Today's Students Coalition  
uAspire  
Young Invincibles

**Individuals:**

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Thomas Weko, Former National Center for Education Statistics Associate Commissioner for Postsecondary Education