



October 14, 2025

Matthew Soldner,
Acting Director, Institute of Education Sciences;
Acting Commissioner, National Center for Education Statistics
U.S. Department of Education
400 Maryland Ave., SW, 5th Floor
Washington, DC 20202

**Re: Integrated Postsecondary Education Data System (IPEDS) 2024–25 through 2026–27—
Admissions and Consumer Transparency Supplement (ACTS) survey component; Docket ID ED-
2025-SCC-0382**

Dear Mr. Soldner,

The American Association of University Women (AAUW), founded in 1881, is one of the nation’s oldest and largest gender equity organizations. Our mission is to advance equity for women and girls through research, education, and advocacy. We also administer millions of dollars annually in fellowships and grants, and we see firsthand how employment policies shape women’s economic security.

AAUW supports better data—but ACTS, as drafted, risks doing more harm than good. Students and families deserve clear, comparable information, and policymakers need high-quality data to monitor equity. However, the proposed ACTS survey represents an unprecedented expansion of IPEDS—more than 100 new questions and over 10,000 new data fields annually, with six years of retroactive submissions—a scale that threatens data quality, institutional capacity, and student privacy, especially at campuses with small compliance teams. The notice positions ACTS as a screening tool to spot admissions patterns that could suggest unlawful use of race, and it would apply primarily to selective colleges and universities rather than open-access institutions.

1) Overbroad scope and data-quality risks

ACTS would require very granular breakouts at both the undergraduate and graduate levels—for example, by race and sex, GPA and test-score quintiles, income bands, Pell status, and application round. Many of these elements are not standardized across institutions, are not routinely stored over time, or cannot be accurately rebuilt for past years. Imposing thousands of new fields on a compressed timeline invites inconsistent definitions, backfilled estimates, and “apples-to-oranges” comparisons across institutions.

2) Institutional burden: scale, source, and real-world impact

In its own filing, the Department estimates 740,511 annual burden hours across institutions for the 2025–26 IPEDS cycle. On top of that, ACTS would require five prior years of backfilled data in 2025–26 to establish a pre-SFFA baseline. Plainly put, meeting ACTS as written would force campuses—especially those with 1–3 institutional research/compliance staff—to divert months of staff time away from student-facing services (advising, financial-aid counseling), equity work (closing completion gaps), and routine compliance (Clery, consumer disclosures), simply to stand up new extracts, rebuild histories, and resolve validation errors. That tradeoff undermines the proposal’s stated goal of helping students.

3) Student privacy and Personally Identifiable Information (PII)



Very detailed breakouts (race, sex, program, admission round, test/GPA quintile, aid) can make it possible to identify individual students. This is especially true in small programs and graduate subfields with only a few students. The Department should not compel disclosures that effectively reveal protected student records. Minimum-cell thresholds, robust suppression, and privacy-preserving aggregation are essential to avoid inadvertent exposure.

4) Using a statistical survey as an enforcement screen is a slippery slope

IPEDS is a statistical collection run by NCES. The notice and related Administration directives frame ACTS as a way to “capture information that could indicate” unlawful preferencing and reference remedial action if institutions fail to submit “sufficient” data. To non-specialists: this repurposes a statistics tool into a pre-investigation filter. That shift can (a) pressure institutions to rush or over-report data to avoid flags, (b) chill lawful, equity-minded practices, and (c) erode trust in IPEDS itself. If the Department seeks to enforce civil-rights laws, it should use targeted investigations with due-process safeguards and ensure the Office for Civil Rights is fully staffed and resourced to do that work, rather than converting a statistical survey into a compliance trigger.

5) Recommendations

To achieve transparency without sacrificing quality, feasibility, or privacy, AAUW urges ED to reconsider this approach and adopt the following:

- Withdraw and re-propose after proper vetting. Convene an IPEDS Technical Review Panel, publish the full instrument and definitions, and provide at least one year of preview screens before collection.
- Phase-in elements over multiple years, starting with undergraduate items already vetted for the 2025–26 Admissions survey; delay graduate-level and complex disaggregates until definitions are finalized and feasibility is proven.
- Delay retroactive reporting (at most one prior year) until definitions are settled and institutional retention policies are addressed; do not require five-plus years of backfill in the first collection.
- Resource the field and enforcement properly: fully staff IPEDS support, restore training, provide clear FAQs/validations, and use a soft launch with a first-year safe harbor.
- Protect privacy: codify minimum cell sizes and suppression rules; avoid publishing highly granular cross-tabs that increase re-identification risk; ensure clear FERPA-aligned safeguards.

Conclusion

AAUW supports equity-centered transparency. But ACTS is overbroad, under-specified, privacy-risking, and unworkable on this timeline—and using it as an enforcement screen would distort IPEDS’ statistical mission. Withdraw and re-propose a phased, feasible, privacy-protective plan that yields accurate, comparable, student-useful information.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in purple ink that reads "Meghan Kissell".

Meghan Kissell
Senior Director, Policy & Member Advocacy