

December 15, 2025

Ross Santy  
U.S. Department of Education  
Office of Planning, Evaluation, and Policy Development  
400 Maryland Ave., SW  
5<sup>th</sup> Floor  
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 34 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.

In October 2025, members of PostsecData offered [five recommendations](#) to ensure ACTS data meet the same high data quality standards as other IPEDS survey components. The first of those recommendations was to establish clear data definitions and reporting guidance in collaboration with the field. We thank ED for taking steps to partially address this recommendation by providing additional details about the ACTS collection in the documents released on November 13, 2025. The IPEDS Glossary, ACTS Data Codebook, and ACTS FAQs, among other materials, offer important technical information about the collection. We also appreciate the development of the Python script that produces the aggregated calculations for institutions and is intended to reduce institutional burden.

These are important steps in the right direction for supporting institutions with their reporting and reducing the burden associated with the collection. However, we remain concerned that ACTS data will not adhere to IPEDS' high data quality standards due to outstanding questions about data definitions and reporting guidance, the accelerated rollout and lack of field engagement to answer technical questions, and the limited technical assistance available to those responsible for submitting these data.

- [Outstanding questions about data definitions and reporting guidance](#): While we appreciate the additional information ED provided, there are outstanding questions about how to define or report several key data elements. These questions include the following:
  - How should institutions report available data from prior years on students' "sex" without using the previously available "unknown" and "another" categories?

- How should institutions unweight high school GPA if a student or transcript only reports a weighted GPA?
- For students who submit multiple test scores, which test scores will institutions be required to report?

If ACTS data are to be trustworthy and useful to the Administration and IPEDS stakeholders, these and other technical questions should be answered—informed by field input—*before* requiring institutions to submit data.

- Accelerated rollout and lack of field engagement to answer technical questions: 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 typically go through a careful vetting, planning, and implementation process that includes soliciting community input to uncover and answer technical definition and reporting questions. Institutions also are given advance 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. ED has a long history of meaningfully engaging with the field to develop answers to challenging, technical questions, including during the first Trump Administration. In the past, ED used the [National Postsecondary Education Cooperative](#) and [Technical Review Panels](#) to strategically leverage the expertise of higher education practitioners, leaders, researchers, and advocates to ensure institutions have the necessary information to report accurate and reliable data to IPEDS. Forgoing the typical vetting, planning, and implementation process, including opportunities to meaningfully engage with field experts to answer questions like those highlighted above, jeopardizes the quality and utility of the ACTS collection.
- Limited technical assistance resources: Training and support for IPEDS data reporters are essential to ensure all data are reported consistently. Unfortunately, the IPEDS training contract that served this purpose was [canceled](#) earlier this year. ED is pursuing an aggressive schedule for the new ACTS collection. This means institutions and state agencies are working on an accelerated timeline to submit an unprecedented amount of data using an entirely new process. ED's own estimates of the average time reporting burden for this year's ACTS data collection (200 hours) is more than double the estimated burden for all other IPEDS survey components combined (78.5 hours). Given this substantial effort and exceedingly fast timeline, technical assistance support is more crucial than ever. We strongly recommend ED reinstate key contracts to ensure sufficient technical assistance and reporting of consistent data.

These concerns about data quality and consistency cast doubt on the reliability of conclusions drawn from these data. Without clear data definitions and reporting guidance informed by field experts and appropriate technical assistance, apples-to-apples comparisons between institutions are compromised, as is the ability of policymakers, institution leaders, and researchers to feel confident relying on ACTS data to make informed decisions. For example, requiring institutions to assign a gender to students who do not (or did not historically) indicate one without clear guidance on how to do so compromises one of the collection's primary reporting units—the race-sex pair. Likewise, using high school GPA to assess academic preparedness is compromised without clarity on how institutions should calculate and report an unweighted GPA when a student's transcript only provides a weighted GPA. Finally, institutions practicing good data hygiene are unlikely to retain data for six years on applicants who were not admitted to the

institution. This means those institutions only retain data on applicants who were admitted, limiting the ability to compare historical pools of applicants and admits.

Moreover, ACTS data cannot be used for the [stated purpose](#) of assessing “whether institutions of higher education are using race-based preferencing in their admissions processes.” This would be an inaccurate and misleading use of the data because institutions make admissions decisions based on many factors, including those not represented in existing IPEDS data or the proposed ACTS collection. For example, in 2022, nearly 1 in 3 selective four-year institutions [considered legacy status](#) in admission decisions. These policies grant admissions preferences based on applicants’ relationship to alumni or donors. The proposed ACTS collection does not include disaggregated information on students admitted through these policies, which research shows [typically benefit](#) White and wealthy students. Taking steps to improve transparency into admissions processes through the collection of high-quality and meaningful data can deepen public understanding. But, given the complexities of college admissions, the proposed ACTS collection cannot reveal whether race was a determining factor in admissions decisions.

In sum, we appreciate the steps ED has taken to address questions about data definitions and reporting guidance. However, we continue to have serious concerns about the quality, consistency, and usability of ACTS data, including that these data cannot be used for the stated purpose of determining whether institutions are using race-based preferencing in their admissions processes.

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  
Association for Institutional Research  
California Competes: Higher Education for a Strong Economy  
Community College Research Center, Teachers College, Columbia University  
Complete College America  
Council for Opportunity in Education  
Data Quality Campaign  
EdTrust  
Education Reform Now Advocacy  
Excelencia in Education  
Georgetown University Center on Education and the Workforce  
InnovateEDU  
Institute for Higher Education Policy  
NASPA – Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Association of Student Financial Aid Administrators

National College Attainment Network (NCAN)  
NCHEMS  
New America Higher Education Program  
New America's Open Technology Institute  
Prismatic Research & Strategy  
Public Insight  
The Institute for College Access & Success (TICAS)  
The Study Group  
Today's Students Coalition  
uAspire  
Yes We Must Coalition

**Individuals:**

James Murphy, Senior Fellow, Class Action  
Thomas Weko, Former National Center for Education Statistics Associate Commissioner for  
Postsecondary Education