



Association for Institutional Research

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Executive Director & CEO

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December 15, 2025

Dr. Matthew Soldner  
Acting Commissioner, National Center for Education Statistics  
Acting Director, Institute of Education Sciences  
United States Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

CC: Mr. Ross Santy, Office of Planning, Evaluation, and Policy Development, U.S. Department of Education

Re: Docket ID number ED-2025-SCC-0382

Dear Dr. Soldner,

On behalf of the Association for Institutional Research (AIR), thank you for the additional opportunity to comment on the proposed Admissions and Consumer Transparency Supplement (ACTS) to the Integrated Postsecondary Education Data System (IPEDS). AIR is a nonprofit association representing institutional research, institutional effectiveness, and other higher education data professionals who collect, verify, and submit IPEDS data each year. AIR also served as the national IPEDS training subcontractor for more than 20 years, providing education and support to data reporters and users through over 11,000 annual training interactions.

In October 2025, AIR offered recommendations to help ensure ACTS meets its intended objectives while maintaining the accuracy, comparability, and trust that underpin IPEDS. We appreciate the Department's release of additional documentation on November 13, 2025. The ACTS Data Codebook, FAQs, and related materials offer helpful technical guidance, and we welcome the development of the Python script and aggregator tool designed to reduce institutional burden.

While these steps are constructive, AIR remains deeply concerned that ACTS, as currently structured, will not yield data of sufficient quality to support reliable decisions, actions, or policies. This concern is based on AIR's experience providing IPEDS training, as well as our direct engagement with the professionals responsible for submitting these data. Since the November release of ACTS documentation, AIR staff and institutional experts have reviewed the materials in preparation for developing AIR-sponsored training and have engaged with nearly 900 IR/IE professionals, fielding hundreds of technical questions. These interactions reveal important unresolved issues that must be addressed prior to implementation. Because ACTS data will be highly visible and carry significant compliance, reputational, and policy implications for institutions, it is critical that these issues be resolved before data collection begins.

In response to earlier public comments, NCES expressed confidence in institutions' ability to "provide high quality data required by the ACTS components." The data community does not share that assessment. Institutions are struggling to interpret new requirements, locate and validate needed data, and determine whether their systems can produce the mandated cohorts. Although some ACTS elements overlap with other

IPEDS components, several applicant and student cohorts defined for ACTS have not previously been used in federal reporting. Even where individual data elements are familiar, applying those definitions to newly defined cohorts is not straightforward.

### Significant Unresolved Questions

Several major questions must be resolved before the ACTS collection opens:

- **Which institutions are required to report.** Institutions need definitive guidance—ideally a list of IPEDS IDs—because current instructions leave many “edge cases” unresolved. Given the compliance and reputational consequences of non-reporting, greater clarity is essential.
- **Clear definitions for the undergraduate and graduate applicant cohorts.** Institutions need explicit direction on which individuals are included.
  - Undergraduate: Does the cohort include only applicants who are first-time in postsecondary education, or all who are first-time at the institution, including transfer-in students?
  - Graduate: Should institutions include applicants who are first-time at the institution or first-time in the specific program?
- **How to report multiple test scores for the same applicant.** Institutions need clarity on which scores to report when multiple ACT or SAT submissions exist (e.g., highest score, most recent score, superscore, all scores).

In addition, two data elements present significant technical concerns that are explained in more detail below.

**1) Recalculating High School GPAs.** While ACTS guidance in the FAQs states that unweighted GPAs with a maximum of 4.0 should be used in all reporting sections, many institutions receive only weighted GPAs. Recalculation methods for admissions purposes are typically locally defined, inconsistently documented, and not governed as official student record data. As a result, these recalculated values are not designed to support national reporting, cross-institutional comparability, or policy inference.

While NCES may provide one defined method for unweighting or converting these values for ACTS, the application of a new conversion approach would be difficult if not impossible for institutions to implement as high schools weight GPAs using many different approaches and the resulting data would not meet quality standards. Thus, it is likely that many institutions will report the data as “missing” as stipulated in the ACTS FAQ— “If the data are known to contain significant inaccuracies, please indicate that you do not have the data to report.”

**2) Coding of Missing Values for Sex.** The lack of an “unknown” or “missing” category for sex presents a major data-quality problem. For example, institutions frequently receive applicant records with missing sex information. ACTS nevertheless requires institutions to report a value for each individual, as the previously allowed “unknown” and “another” categories are no longer permitted. For a collection that will be closely scrutinized, this requirement raises substantial risks to both data integrity and institutional credibility.

The current guidance to impute sex based on the overall population proportion is not workable for individual-level reporting. Imputation at the individual level requires assigning each person a sex value, yet there is no defensible method for determining which individuals receive which assignment. As a result, institutions would be required to create individual-level values that are then used repeatedly across different aggregations and analytic configurations. Thus, any subsequent ACTS metrics that rely on sex—such as test score distributions, quintile-based comparisons, or admission rates by sex—will be distorted. These comparisons will be, at best, meaningless and, at worst, misleading.

This is a fundamental data quality issue. Missing data must be coded as missing, not created through arbitrary assignment. Other ACTS elements—test scores, parental education, family income, race/ethnicity—are not subject to artificial imputation. NCES’s own Statistical Standards emphasize that imputed values must rely on defensible, transparent methods—not ad hoc assignment.

### **Substantial Gaps in Data Availability.**

Missing data for prior years is likely to be substantial if institutions are following state and professional data-retention policies. Applicant-level data are often retained for only one or two years, meaning many institutions will not have complete records for the multi-year ACTS reporting period. As a result, historical data will be unavailable for a large share of required elements, and only future cycles will allow for more complete and reliable reporting.

Although the current ACTS materials indicate that institutions may mark data as unavailable, AIR members remain concerned about potential compliance or enforcement repercussions for doing so, particularly given the high visibility of this collection. The ACTS documentation includes language that does not clarify expectations or allay these concerns. For example, it states (emphasis added): “Because the majority of the data elements needed to complete the ACTS survey component are also necessary to complete other IPEDS surveys (e.g., Admissions, Cost, Completions, Fall Enrollment, Graduation Rates), *NCES expects missing data quality to be high.*”

Based on AIR’s conversations with institutional research professionals, registrars, and admissions professionals, this expectation of “high-quality missing data” is likely overstated. Many of the ACTS elements have not previously been collected, retained, or stored for required cohorts in ways that would allow institutions to reconstruct the required data for earlier years.

### **Reduced Data Quality Due to Accelerated Timeline**

As AIR highlighted in its October 14 letter, the accelerated rollout of ACTS departs from the deliberate, consultative process that has long ensured IPEDS data quality (e.g., the use of technical review panels). The absence of such a process for ACTS has left many fundamental questions unanswered and increases the likelihood of inconsistent interpretation and reporting across institutions.

Bypassing this established planning and review process jeopardizes the quality and usefulness of ACTS data. As noted earlier, AIR has already received hundreds of technical questions from institutions that cannot be resolved with the current materials. Without meaningful engagement with practitioner expertise, NCES is limited in its ability to provide the guidance institutions need to report data in a consistent and comparable manner.

### **Limited Technical Assistance Resources**

The quality and consistency challenges are intensified by limited technical assistance resources. The long-standing IPEDS training contract was canceled earlier this year, just as ACTS introduces an unprecedented volume of new data on an accelerated timeline. AIR respects RTI's long-standing role as a provider of IPEDS Help Desk services and agrees with NCES that the Help Desk is well positioned to continue to provide outstanding assistance to institutions. However, providing access to a help desk alone is not sufficient for a new, high-stakes data collection such as ACTS that involves an estimated 2,000 institutions and more than doubles the combined burden of all other IPEDS survey components (200 hours as compared to a combined 78.5 hours). Given the scale, visibility, and complexity of this collection, institutions need training and technical assistance that is proactive, scalable, and readily available to address common questions and promote consistent approaches. AIR strongly encourages the Department to reinstate or provide equivalent support to ensure institutions can meet the new requirements reliably.

### **Data Use**

Concerns about data quality and consistency raise significant questions about the reliability of conclusions drawn from ACTS. Without clear definitions, consistent methodological guidance, and sufficient technical support, institutions will not be able to produce comparable data. Policymakers will therefore have limited confidence in ACTS for analysis or decision-making.

Several unresolved issues highlight these risks:

- Assigning sex values where none exists undermines race–sex reporting categories.
- Inconsistent approaches to converting weighted GPAs result in missing or non-comparable data, weakening measures of academic preparation.
- Standard data-retention practices mean many institutions retain historical data only for admitted students, limiting comparisons across applicant pools.

Moreover, ACTS data alone cannot support the stated purpose of determining “whether institutions of higher education are using race-based preferencing in their admissions processes.” Admissions decisions reflect many factors not captured in IPEDS or ACTS, including legacy preferences, athlete recruitment, and other institutional policies. Without data on these factors, ACTS cannot isolate the role of race in the decision process. Increasing transparency is valuable, but ACTS cannot answer questions it is not designed to measure.

### **Conclusion**

AIR appreciates the Department's efforts to provide additional information and clarification. However, we remain concerned about the quality, consistency, and usability of ACTS data, particularly given the high-stakes and public nature of this collection and the fact that these data cannot support reliable conclusions about race-based preferencing.

Although we recognize the tight timeline, AIR encourages the Department to adopt several practical steps to improve data quality and reduce burden. These include clarifying foundational definitions, allowing missing values to be coded as such, and explicitly acknowledging the unavailability of historical data. Taken together, these measures would help to strengthen the consistency, interpretability, and responsible use of ACTS data.

However, AIR strongly believes that the most effective way to improve data quality and usability would be to delay the collection by at least nine to twelve months, remove the requirement to report historical data, and re-engage field experts through an expedited technical review process. Given the stakes for institutions and the public, taking additional time now would significantly improve the reliability and credibility of the resulting data.

AIR remains ready to assist the Department by contributing practitioner expertise toward refining definitions, improving feasibility, and supporting a data collection that yields accurate and meaningful information.

Sincerely,

A handwritten signature in black ink that reads "Christine M Keller". The signature is written in a cursive, flowing style.

Christine M Keller, PhD  
Executive Director & CEO  
Association for Institutional Research