



Association for Institutional Research

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Executive Director & CEO

Christine M. Keller, Ph.D.

October 14, 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. Brian Fu, Acting Chief Data Officer, 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 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, the individuals responsible for collecting, verifying, and submitting IPEDS data each year to inform the decisions that advance student success. AIR was also the national IPEDS training subcontractor for over 20 years, providing education, resources, and support to IPEDS keyholder and practitioners through more than 11,000 training interactions annually – webinars, tutorials, workshops, and online courses.

For decades, IPEDS has served as the nation’s most trusted source of comprehensive, comparable information on colleges and universities. Each year, more than 6,000 institutions report to IPEDS, providing the foundation for tools that millions of students and families use to make informed choices—such as the College Scorecard and other admissions and affordability resources. IPEDS data are also central to institutional benchmarking, accountability, and policymaking. Its credibility rests on the consistency of its definitions, the care taken to validate new elements before collection, and the collaboration between NCES and the higher education data community.

To bolster our observations and recommendations, AIR conducted a national survey and collected feedback from more than 580 institutional research, institutional effectiveness, and other data professionals. Drawing on that feedback and AIR’s two decades of experience as the national IPEDS training provider, AIR offers the following recommendations to help NCES strengthen transparency while maintaining the accuracy, comparability, and confidentiality that define IPEDS.

Challenges & Concerns Identified

1) Data Quality Risks

AIR members expressed concern that the proposed ACTS collection introduces significant risks to data quality, accuracy, and comparability. Collectively, the concerns highlight the risk that ACTS data, as currently structured, would not meet IPEDS's long-established standards for reliability, consistency, and trustworthy data.

- **Incomplete or inaccessible data.** Many proposed elements—such as applicant race/ethnicity, test score quintiles, and family income ranges—are not uniformly collected or maintained across institutions. In some cases, data are not collected, not retained, stored in separate systems, or are limited to a specific use. For example, the current federal interpretation is that FAFSA data should only be used for aid packaging, not reporting.
- **Ambiguous definitions and reporting guidance.** Eighty-three percent of survey participants reported uncertainty about one or more of the proposed data definitions. Several key terms, including “parental education,” “merit versus need-based aid,” “high school GPA,” and “student or final GPA” lack common definitions or differ from existing IPEDS usage. Without common definitions, institutions may report similar data in inconsistent ways, undermining comparability.
- **Retrospective data availability.** Eighty-eight percent of AIR members identified the five-year retrospective reporting requirement as untenable for most institutions. Applicant-level data are typically retained for only one or two years, and older records are often incomplete or incompatible with current systems. In addition, data from the COVID-era admission cycles are analytically unreliable for longitudinal or comparative purposes.
- **Graduate admissions data collected at program level.** Unlike undergraduate admissions, graduate admissions decisions are typically decentralized—made at the program or department level using criteria specific to each discipline. This variation means that combining graduate admissions data into broad categories at the institutional level will produce misleading comparisons. AIR survey respondents identified multiple data elements that are unavailable, difficult to retrieve, or not consistently applicable to graduate admissions, including parental education, high school GPA ranges, family income ranges, and test score quintiles.

2) Bypassing IPEDS Change Management Process

The deliberate and inclusive process used to add or revise IPEDS survey components is essential to maintaining the credibility and comparability of federal higher-education data. Through consultation, pilot testing, and phased implementation, definitions are clarified, systems are aligned, and institutional staff are trained to collect and report data accurately. This process is not a procedural formality — it is the foundation that ensures IPEDS data are consistent, reliable, and trusted by students, policymakers, and the public.

The proposed ACTS collection departs from this proven approach. It bypasses consultation with data experts and other stakeholders, omits time for testing and communication, and gives institutions little opportunity to prepare their systems and staff. Instead, the Department proposes implementing in 120 days the largest single

expansion in IPEDS history, adding more than 100 new questions and roughly 10,000 data fields, coupled with extensive retrospective reporting. Such haste risks sacrificing data quality and undermining the credibility of the entire collection. Nearly all AIR survey respondents (91 percent) expressed concern about the proposed schedule and their institutional capacity, noting that it is too condensed to allow sufficient testing and validation to ensure accurate reporting.

A compressed rollout schedule threatens to erode public confidence before ACTS even begins. Experience from other large-scale federal initiatives shows that a “fix-it-later” approach can create persistent doubts about the validity of results, overshadowing even well-intentioned reforms. Once trust in the data is lost, it is difficult to rebuild. A phased and tested approach—consistent with the established IPEDS change management process—would mitigate these risks and maintain confidence in the resulting data.

3) Student Privacy Risks

The proposal currently includes no guidance on privacy protection. AIR members raised strong concerns about the potential for reidentification and other privacy risks arising from the proposed ACTS disaggregations. Unlike current IPEDS components, ACTS would combine numerous demographic and financial variables at a more granular level, significantly increasing the likelihood that individual students could be identified. Without clear rules, institutions face uncertainty about how to balance transparency with confidentiality, particularly for small programs or student groups where combinations of variables such as race, income, and aid type could inadvertently identify individuals. Without paying attention to small cell sizes and additional safeguards, both the analytic integrity and the credibility of the new collection could be at risk.

Recommendations

AIR offers the following recommendations to ensure ACTS achieves its intended objectives while maintaining the standards of accuracy, comparability, and trust that underpin IPEDS. These recommendations are unified by a common goal: preserving IPEDS’s reputation as the nation’s trusted source of reliable, comparable, and meaningful higher education data. AIR urges NCES to approach ACTS implementation deliberately—testing, defining, and validating before collecting—to ensure that new information strengthens, rather than weakens, public understanding of college access and admissions.

1) Follow the standard IPEDS change management process

AIR recommends that NCES adhere to the established IPEDS change management process, which includes consultation, pilot testing, and phased implementation. The scope of the ACTS collection should likewise be calibrated to the availability of reliable data and the technical capacity of institutional data systems to ensure that implementation supports, rather than hinders, the Department’s transparency objectives. A multi-year-phased approach ensures that new collections are feasible, well-defined, and grounded in high-quality data.

- **Prioritize available data elements.** Focus initial transparency efforts on data that are already collected, clearly defined, and readily available. Remove items that duplicate information elsewhere in IPEDS, such as graduation rates or cost of attendance. Begin with the new admissions data already scheduled for the 2025–26 IPEDS collection—applicant, admitted, and enrolled students by sex and by race—and expand only after pilot testing and consultation with institutional data experts to include additional items such as Pell eligibility for enrolled students and race–sex pairs.

- **Begin with undergraduate data.** Given undergraduates represent 83 percent of all U.S. postsecondary students, AIR recommends limiting ACTS initially to undergraduate data elements and deferring or narrowing graduate data collection. Results from the AIR survey indicate that for a significant number of institutions graduate student cohort status (applicants, admits, enrolled) and race-sex pairs could be easily reported. While other graduate student admissions metrics would require new data collection processes or system enhancements.
- **Eliminate historical reporting requirements.** Attempting to reconstruct multiple years of historical files would introduce inconsistency and degrade data quality due to missing, incomplete, or incompatible records. AIR recommends that NCES limit the collection to data reported prospectively.
- **Clarify definitions and reporting guidance through field collaboration.** Engage institutional data experts—through a mechanism such as a Technical Review Panel—to refine definitions and develop clear reporting guidance well in advance of each implementation phase. Standardized definitions and pilot-tested elements will enhance both the quality and utility of the resulting information.
- **Restore NCES capacity and technical assistance infrastructure.** Restore staffing and reinstate key contracts for technical assistance and training to support institutions through the rollout and to sustain ongoing data quality monitoring. Also pursue technology-based efficiencies—such as expanded data-upload options, automated validation tools, and cross-system integration guidance—to reduce duplicative reporting and institutional workload.

2) Adjust Scope and National Burden

Reduce the overall scope of the ACTS collection to reflect realistic expectations for data availability and institutional data system capacity, while still advancing transparency and public understanding of the admissions process. The current proposal would require all four-year institutions with “selective admissions” to report new data—approximately 1,700 institutions. However, AIR’s analysis of IPEDS data shows that more than 80 percent of these institutions admit over half of their applicants. Requiring extensive new reporting from institutions with broad access missions would generate limited new insight for NCES or the public, while diverting resources from efforts that could more effectively improve data quality and strengthen public understanding.

The national reporting burden also warrants substantial reduction. The Department’s own estimate for ACTS—740,511 burden hours—exceeds the total combined burden hours for all other IPEDS surveys in 2025–26 (628,188 hours). A more balanced and feasible approach would begin with a phased implementation, focusing first on undergraduate data elements that are already available and well defined, before expanding to additional areas through pilot testing. Such a measured rollout would align the scope of the collection with institutional capacity and protect the quality and comparability of the resulting data.

3) Scale Back Disaggregations and Establish Clear Standards to Protect Student Privacy

Limit the number of intersectional disaggregations to prevent small cell sizes that increase the risk of reidentification and compromise student privacy. Priority should be given to broadly used and analytically meaningful breakdowns, such as race–sex pairs or test score quartiles, rather than numerous cross-tabulations that yield very small groups.

Establish explicit privacy standards—including minimum cell-size thresholds, suppression and rounding rules, and documentation of disclosure limitations. These measures are essential to balance transparency with confidentiality and to ensure that reported information remains accurate, interpretable, and responsibly protected.

Conclusion

AIR supports federal efforts to enhance transparency and understanding of the admissions process, when such efforts are grounded in data that are accurate, comparable, and meaningful. However, as currently structured, the proposed collection risks producing data that are inconsistent across institutions, difficult to interpret, and potentially misleading to students and families who rely on federal information to make well-informed choices. Transparency attains its purpose only when the underlying data are of demonstrable quality – accurate, comparable, reliable, and responsibly protected.

By adopting a phased, deliberate, and collaborative approach, NCES can ensure that ACTS strengthens, rather than weakens, the nation’s higher education data. AIR and its members stand ready to contribute their expertise to help NCES refine definitions, test new metrics, and establish clear privacy standards that preserve both data integrity and transparent information for students.

Thank you for considering these recommendations and for continuing to engage with the data professionals who make IPEDS possible. Together, we can ensure that the next generation of IPEDS reporting provides transparent, accurate, and meaningful information that serves all students, institutions, and the public good.

Sincerely,

A handwritten signature in black ink that reads "Christine M Keller". The signature is fluid and cursive, with the first name "Christine" being more prominent than the last name "Keller".

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