



February 25, 2026

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

Dear Dr. Soldner,

On behalf of the Association for Institutional Research (AIR), I am writing to formally request that the deadline for the Admissions and Consumer Transparency Supplement (ACTS) be extended from March 18 to June 18, 2026, to support the accuracy, integrity, and usability of the resulting data. This request is informed by recent community survey findings and practitioner feedback and reflects concerns about institutional capacity and the stability of implementation guidance and systems.

In early February, AIR surveyed institutional research and other data professionals regarding ACTS implementation. Nearly 400 respondents participated. Approximately 90 percent identified one of four primary barriers affecting timely and accurate submission: (1) staffing capacity; (2) data availability or quality; (3) interpretation of definitions or requirements; and (4) timing or uncertainty related to evolving guidance.

These barriers directly affect institutions' ability to validate, reconcile, and document their submissions appropriately. A modest extension would mitigate several of these pressures—particularly those related to staffing capacity, error resolution, and definitional clarification. Consistent with this, 87 percent of survey respondents indicated that a deadline extension would provide the greatest benefit to data quality and integrity.

For institutions with smaller institutional research offices or more limited technical staffing, the strain can be particularly pronounced, especially where responsibilities for admissions, financial aid, and IPEDS reporting are concentrated within a small number of staff. Some institutions expect to meet the March 18 deadline. Even among that group, many report doing so only by reallocating staff and compressing validation processes. Several indicated that additional time would materially improve accuracy, documentation, and error resolution.

Qualitative feedback from AIR's Data Policy Advisory Panel reinforces these findings. Institutions describe extensive effort reconciling decentralized graduate admissions and financial aid data across multiple systems; reconstructing historical data following enterprise system transitions; coordinating multi-campus submissions; and preparing for anticipated validation errors as submission activity increases.

Institutions also report that key aspects of the ACTS implementation environment have continued to evolve during the collection window. Upload templates have been revised; definitions and guidance have been clarified; and technical tools, including submission scripts and aggregation tools, have been updated or delayed. Overall, these changes have strengthened the collection. For example, the decision to allow a blank value for the

sex variable—an adjustment AIR actively advocated for—improves accuracy and reduces forced reporting. At the same time, each update requires institutions to revisit files and reassess validation procedures. In a first-cycle collection of this scope and complexity, compressed timelines combined with evolving systems and guidance increase the likelihood of inconsistent interpretation and avoidable validation errors. When systems and guidance are still stabilizing, institutions need sufficient time to incorporate improvements carefully; without it, the reliability and usability of the resulting dataset may be affected.

Institutions are also managing other federal reporting cycles and campus priorities. Mid-April coincides with the close of the IPEDS spring collection, and mid-May is typically one of the most operationally demanding periods on campuses due to end-of-term processing, graduation activities, financial aid packaging, and summer enrollment preparation. Extending the deadline to June 18 would allow institutions to navigate these competing demands while maintaining appropriate attention to validation and documentation.

For these reasons, AIR respectfully requests that the ACTS deadline be extended to June 18, 2026. This delay represents a reasonable response to current implementation realities and would strengthen the overall quality and usability of the data produced through this collection.

AIR appreciates your consideration and would welcome the opportunity to provide additional information if helpful.

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