



August 14, 2026

Kaitlin Lilienthal
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RTI International
Submitted via email: ipedstrpcomment@rti.org

RE: Comments on IPEDS Technical Review Panel #72 - "IPEDS Data Quality: Practices, Strategies, and Structures to Support High-Quality Submissions"

Dear Ms. Lilienthal:

On behalf of the Association for Institutional Research (AIR), thank you for the opportunity to comment on the summary and suggestions from Technical Review Panel #72. AIR contributed the background study that informed the panel's discussion, *Voices from the Field: Institutional Capacity and Support Needs for High-Quality IPEDS Submissions*, drawing on a national survey of 335 IPEDS reporters and seven focus groups with 54 participants across institution types, sizes, and experience levels. AIR generally supports the panel's suggestions. The comments below build on the suggestions as well as lessons we have learned from our community during the implementation of the IPEDS Admissions and Consumer Transparency Supplement (ACTS) survey.

Data Quality Is a Shared Responsibility

Across the evidence and input AIR has gathered from the data community, one pattern stands out above all others: institutional data quality is not solely a function of institutional effort or good intent. Even highly committed institutions face avoidable data-quality risks when definitions, guidance, and quality-control processes are incomplete or arrive too late. High-quality data depend on institutions and NCES working through a shared, well-communicated, and well-supported process. We see four elements of that partnership as the highest-leverage opportunities available to NCES: (1) training and shared practice, (2) documentation that is stable, accessible, and available ahead of time, (3) communication with enough lead time for institutions to plan, and (4) real channels for institutional feedback to shape process and definitions before problems surface in submitted data. We address each in turn, along with what happens when they are absent.

AIR supports the panel's emphasis on institutional practices that strengthen data quality, including cross-functional participation, documented reporting processes, internal validation, succession planning, and visible leadership support for IPEDS reporting. Institutions have an important responsibility to build and sustain these practices. At the same time, their effectiveness depends on stable definitions, timely guidance, consistent technical assistance, and reporting systems designed with institutional realities in mind. Institutional practice and federal infrastructure should therefore be viewed as complementary responsibilities, not substitutes for one another.

1. Training and Shared Practice

The loss of structured, in-person IPEDS training and the state coordinators' annual conference removed a mechanism by which practitioners nationwide heard the same answer to the same question at the same time and could carry that shared understanding back to their campuses or member institutions. Its absence compounds every other source of inconsistency in the system. We recommend NCES invest in restoring shared-learning infrastructure at the scale institutions describe needing.

Institutions in our study specifically identified the loss of AIR's national training program — and the community of practice it supported — as a gap that current resources have not filled. This finding reflects a need not simply for additional training materials, but for structured opportunities in which practitioners can learn together, ask questions, and develop a shared understanding of reporting requirements. This infrastructure should include accessible, role-specific onboarding for new keyholders, coordinators, and additional users so that those receiving reporting access also understand the responsibilities and requirements associated with their roles.

We also encourage NCES to extend that same consistency standard to the guidance NCES itself provides to the Help Desk. The Help Desk can only be as consistent as the direction it receives, and during ACTS, practitioners reported that answers to the same question varied depending on whom they reached or changed after a collection was already underway.

2. Documentation That Is Stable, Accessible, and Available Ahead of Time

Institutions consistently report documentation gaps that create entirely preventable data-quality risk. IPEDS survey instructions document year-over-year changes, but the data import specifications many institutions rely on for automated reporting do not — leaving reporters to discover changes only when their submissions break. Some institutions report abandoning automation altogether because the import specification has proven less reliable than manual review. Finance Survey instructions have similarly not kept pace with evolving Governmental Accounting Standards Board (GASB) and Financial Accounting Standards Board (FASB) requirements, producing the same avoidable Help Desk calls year after year. Recent ACTS quality-control reviews illustrated two additional risks. Some coding errors that could have been identified during submission were detected only through post-collection review, requiring institutions to reprocess and resubmit multiple years of data. Other edits flagged differences between ACTS and Graduation Rates data even when both submissions were accurate because the components captured race/ethnicity at different points in time.

We recommend NCES commit to publishing annual change logs for data import specifications, updating Finance Survey guidance to reflect current accounting standards, documenting cross-survey validation logic in a form institutions can consult proactively rather than discover reactively, and applying that validation logic during submission in a way that distinguishes genuine errors from legitimate definitional differences (such as differing collection points for race/ethnicity) rather than flagging both as inaccurate reporting. These steps require treating documentation and validation as data-quality tools.

3. Communication With Enough Runway to Plan

Institutions report that specifications, definitions, and reporting guidance often arrive too close to — or during — a reporting window to be useful. This is not simply an inconvenience; it directly produces the cross-survey inconsistencies this panel was convened to address. One clear illustration comes from the recent ACTS collection: institutions did not receive clear guidance on how to treat students who had deferred admission until after many had already completed related survey components. Institutions that revised their data based on that guidance then found that their Admissions figures no longer matched their Fall Enrollment or Graduation Rate submissions — not because the underlying institutional data were inaccurate, but because the reporting expectations had not been sufficiently clear from the outset.

A more recent example arose this summer during the ACTS quality-control process. Many institutions received QC reports on July 20 followed by revised reports on July 21, initially leaving roughly eight working days to validate months of compiled data before the July 31 deadline. The review arrived without advance notice, in the middle of the summer, when many IR/IE offices were short-staffed and already managing FVT/GE and STATS reporting. NCES subsequently extended the deadline to August 12 after institutions raised concerns, and AIR

appreciates that responsiveness. Nevertheless, the compressed initial timeline illustrates the data-quality risk created when validation processes and expectations are not communicated well in advance.

As federal reporting processes become more interconnected — linking institutions with NCES, contractors, federal administrative systems, state systems, and other data partners — changes must be planned and tested across the full reporting chain. A new collection, major revision, or new quality-control process implemented without sufficient lead time, stable specifications, or fully developed procedures creates exactly the kind of compressed, high-stakes reporting window that increases, rather than reduces, the risk of error.

Meaningful lead time requires more than advance notice that a change is coming. We recommend NCES provide stable survey screens, definitions, import specifications, validation rules, codebooks, and known changes far enough in advance for institutions to assess data availability, modify systems and processes, test submissions, and resolve questions. Quality-control procedures should likewise be communicated in advance, with adequate time to address the results. Wherever possible, new requirements should apply prospectively rather than require institutions to reconstruct historical data that were not collected under the new definitions. NCES should treat usable lead time as a data-quality requirement, not a courtesy.

4. Feedback Channels That Shape Process

Institutions are far more likely to produce accurate, consistent data when they have had a genuine opportunity to flag gaps, ambiguities, and edge cases before a collection launches or a significant change takes effect — which is precisely the function the TRP review-and-comment process has historically served. We recommend NCES restore that process for any new collection, major revision, or new quality-control process, on a timeline that allows it to do its job.

TRPs also serve a function beyond error prevention: they give NCES direct insight into the practices, constraints, and systems already in place at institutions — for example, what data are and are not captured during routine processes, how long records are retained, and where institutions' working definitions of common data elements diverge before a collection ever standardizes them. That kind of institutional knowledge is difficult to gather any other way, and it is exactly what determines whether the assumptions underlying a new collection, major revision, or new quality-control process match reporting reality.

What Happens When These Are Missing

AIR regularly hears directly from members navigating open questions about survey mechanics that go unanswered for extended periods. We also encourage NCES to communicate clearly and consistently about how submitted data will be retained, protected, and ultimately released — uncertainty on that front erodes institutional confidence just as much as unresolved reporting questions do. This kind of uncertainty compounds: institutions cannot plan effectively, and confidence in the collection erodes even when the underlying data submitted are accurate.

We want to be direct about this because it is easy to treat it as a morale issue rather than a data-quality issue — it is both. A reporting community that trusts the process and has confidence that its questions will be answered in a timely way is better positioned to engage with that process accurately and in good faith. We therefore encourage NCES to treat timely responses, transparent communication about data use, and closure of unresolved reporting questions as integral components of its data-quality strategy.

Capacity Is Not Distributed Evenly

An important finding from the AIR background study is that at institutions with under 2,500 students — where IPEDS reporting frequently rests with a single keyholder — data reporters express the lowest confidence in data

accuracy of any size category and have the least infrastructure to absorb gaps in training, communication, or process. Two-year and technical institutions face a related but distinct problem: core IPEDS definitions were built around a four-year, full-time enrollment model that does not fully reflect their enrollment patterns or the students they serve. We encourage NCES to evaluate any changes discussed in this section — training investment, documentation, communication timelines, and feedback mechanisms — for their effect on these institutions specifically, since they carry a disproportionate share of the burden with the least capacity to absorb it.

AIR's Continued Role

AIR remains committed to supporting the field in producing high-quality IPEDS data, and has continued offering virtual IPEDS training without federal funding since that support ended. We would welcome the opportunity to partner with NCES, RTI, and AEM in restoring national training and strengthening the documentation, communication, feedback, institutional practices, and field-based research infrastructure described above.

Thank you for your consideration of these comments. Please do not hesitate to contact us with any questions.

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 and the last name "Keller" following in a similar style.

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