

October 9, 2025

Brian Fu
Program Analyst
U.S. Department of Education
Office of Planning, Evaluation, and Policy Development
400 Maryland Ave., SW
5th 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 EdTrust 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). EdTrust is a national nonprofit organization dedicated to advancing policies and practices that dismantle racial and economic barriers in the American education system.

The following sections outline our recommendations. However, the depth of these recommendations is limited due to the lack of a detailed description of this new data collection during the 60-day comment period, as required under the Paperwork Reduction Act ([5 CFR 1320.8\(d\)\(2\)](#)).

Phase In ACTS With Clear Standards and Sufficient Federal Capacity for Guidance

The proposed ACTS survey would impose the largest single expansion of IPEDS ever attempted, requiring institutions to respond to more than 100 new questions and over 10,000 new data fields per year, with submissions retroactive for six years. This volume is staggering for any institution, but especially for those with only a handful of staff responsible for federal reporting compliance. Unlike prior IPEDS changes, ACTS bypasses the standard vetting, planning, and field-engagement process that ensures clear definitions, feasibility, and consistency. As a result, institutions are being asked to report data they may not collect, cannot standardize, or have never been required to retain — raising serious concerns about comparability, quality, and their capacity to meet the accelerated timeline.

The rushed rollout compounds these risks. Many critical technical questions remain unresolved, including definitions of “first-generation,” “family income,” merit aid, and GPA reporting standards. At the same time, NCES staff capacity has been decimated by layoffs

and the cancellation of IPEDS training contracts, leaving institutions with little guidance or support. Without adequate staffing, clear definitional guidance, or a phased rollout, ACTS data is likely to be inconsistent and unreliable. The proposal threatens to divert limited institutional resources away from serving students and toward compliance with an onerous and duplicative reporting system, undermining rather than strengthening the integrity of federal higher education data.

Limit ACTS to Institutions Engaged in Selective Admissions Practices

Given the unprecedented reporting burden, ACTS requirements should be targeted to institutions where admissions practices directly shape student access. Requiring all institutions, especially open-access ones, to comply with these changes would be both inequitable and unnecessary. Options for defining scope include:

- **By selectivity:** Require reporting only from institutions with admission rates below 20–25%, where selectivity is most consequential.
- **By sector:** Prioritize private not-for-profit and for-profit colleges, as well as selective public flagships, where admissions decisions often rely on test scores, legacy policies, or early decision processes that have equity implications.
- **By admissions activity:** Exclude open-access community colleges, regional comprehensives, and broad-access public institutions, which admit nearly all eligible applicants and primarily serve working-class students, students of color, rural students, and first-generation students.

This approach would reduce unnecessary reporting burdens on access-oriented institutions that typically do not often engage in selective admissions practices, while still ensuring transparency where inequitable admissions practices may be most prevalent.

If you have any questions about this comment, please contact Reid Setzer, Director of Government Affairs, at rsetzer@edtrust.org.

Sincerely,

EdTrust