

December 15, 2025

Ross Santy
Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: [Docket ID: ED-2025-SCC-0382](#)

Dear Mr. Santy,

This letter is submitted on behalf of EdTrust in response to the Department of Education's (Department) revised information collection request proposing to add 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.

In our October comments, EdTrust raised significant concerns about the proposed ACTS data collection. ACTS represents an unprecedented expansion of IPEDS introduced without going through the necessary vetting and field-engagement processes to ensure data quality and feasibility of implementation. The reporting burden on institutions is extraordinarily high, with the proposed data collection requesting six years of retrospective data and more than 100 new questions. Yet as of the date of this submission, institutions have not been provided with pertinent information, such as clear definitions, preview screens, or reporting guidance.

We continue to underscore that many institutions — particularly those serving students of color and students from low-income backgrounds — have strained data collection capacity and do not currently collect several of the required elements in a standardized format. Given the National Center for Education Statistics' (NCES) staffing shortages, in addition to the cancellation of IPEDS training supports, most institutions will have limited ability to report high-quality data. Finally, we continue to recommend a phased rollout, combined with a narrow, well-defined subset of undergraduate data elements, as well as delaying retrospective and graduate-student reporting at the initial rollout and restoring federal capacity to provide guidance and technical assistance.

While we appreciate that the Department did respond to several questions raised by EdTrust and others, we continue to have significant concerns about data quality, given the accelerated timeline put forth, limited community engagement, and considerable number of outstanding technical questions that remain. Furthermore, while narrowing the population of schools required to submit ACTS data is a positive step, it does not address the core issues raised in our earlier comments. Without clear guidance and advanced planning support, it will not be possible for many institutions to

comply with accurately reporting new data elements, particularly at the proposed scale. This means important questions around family income, first-generation status, disaggregation requirements, and so on will likely not be reflected accurately. Furthermore, the lack of traditional IPEDS vetting structure — as well as continued staffing shortages at NCES — will likely lead to submissions that are not comparable, complete, or indeed useful for policymakers and the public. Finally, and perhaps most importantly, while the Department's revised notice raises the question of how information technology might reduce institutional burden, we strongly encourage the Department to first address the field's substantial concerns regarding the design and intended use of ACTS data. Without addressing these underlying issues, leveraging technological tools will not meaningfully reduce burden or improve data quality, and the resulting data will be ill-suited for use in policymaking, or as a tool for public transparency or institutional accountability.

Given these unresolved issues, we urge the Department to delay the implementation of ACTS reporting requirements until the field has had an opportunity to fully engage with the Department, definitions and reporting guidance are finalized, and adequate technical assistance resources and the capacity to support implementation are in place.

If you have any questions about this comment, please contact Reid Setzer, director of government affairs, at rsetzer@edtrust.org.

Sincerely,

EdTrust