AICCU
ASSOCIATION OF INDEPENDENT CALIFORNIA COLLEGES AND UNIVERSITIES

October 7, 2025

Mr. Brian Fu
Acting Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Subject: Docket No.: ED-2025-SCC-0382

Dear Mr. Fu:

The Association of Independent California Colleges and Universities (AICCU) is the organizational voice for over 85 nonprofit, accredited, degree-granting institutions across California. Together, our campuses enroll over 184,000 undergraduates and 162,000 graduate students. Of those undergraduates, more than 47,500 are Pell Grant recipients, highlighting our sector's deep commitment to access, affordability, and student success. Our campuses serve as vital pillars in their communities by driving economic growth through employment, supporting local businesses through substantial spending, and enriching the cultural landscape with impactful programs that engage K-12 schools and beyond.

Thank you for this opportunity to comment on the proposed Admissions and Consumer Transparency Supplement (ACTS) expansion to the Integrated Postsecondary Education Data System (IPEDS). While AICCU and our member institutions support efforts to enhance transparency in higher education, we are concerned the proposed supplemental survey would impose substantial new administrative burdens on institutional research offices and other departments and may result in unintended consequences that could hinder, rather than advance, the intended policy goals

Conflicting with the Historical Purpose of IPEDS:
Since its inception in 1986, IPEDS has served as the federal government's core, comprehensive source of postsecondary data. Its purpose is to collect consistent, comparable, institution-level information from all colleges and universities that participate in federal student aid programs. This information provides a national baseline on enrollment, financial aid, student outcomes, and institutional resources, supporting transparency, accountability, and informed policymaking.

The proposed ACTS expansion conflicts with this longstanding purpose in several important ways:

- **Shift from institutional-level to applicant-level reporting**: ACTS introduces elements such as high school GPA and standardized test scores, which are not standardized nationally. GPA scales vary widely (weighted vs. unweighted) and many institutions are now test-optional, making comparisons across institutions unreliable.

- **Departure from focus on core federal policy needs**: Historically, IPEDS has focused on data tied directly to federal mandates and policy needs. ACTS introduces data elements that are not tied to federal requirements and in some cases duplicate information already collected through other sources, such as the Common Data Set or ranking organizations.

- **Risk of misinterpretation**: Including inconsistent admissions variables risks producing misleading comparisons that could erode public confidence in IPEDS data.

AICCU recommends that ED limits ACTS data elements to institution-level variables that are nationally comparable and tied to federal policy needs.

Concerns with the Process:

AICCU is concerned with the abbreviated process that the U.S. Department of Education (ED) is adopting for ACTS. Historically, major changes to IPEDS have been preceded by extensive research and stakeholder consultation to preserve accuracy, comparability, and trustworthiness before public comment.

AICCU recommends that ED restore this practice for ACTS.

Recent staffing reductions at ED and the National Center for Education Statistics (NCES) raise concerns about the department's capacity to manage the ACTS expansion. The extremely tight 120-day timeline further compounds these challenges, particularly given the technical complexities of standardizing GPA scales, reconciling test score inconsistencies, and accurately reporting race/ethnicity data. These factors make careful planning, pilot testing, and a phased rollout essential.

For example, the National Postsecondary Education Cooperative (NPEC) would traditionally commission exploratory papers on proposed data collections. These papers gather information regarding the types of data to be added, evaluate the history of similar data collections, and provide recommendations to ensure the accuracy and integrity of the proposed data. This step has not been taken for the ACTS expansion.

AICCU recommends that NPEC's procedures be completed prior to any implementation.

Additionally, Technical Review Panels (TRP) have historically been convened to evaluate the usefulness of proposed collections and the burden of collecting the data. TRPs typically include 30 or more data users and data reporters, bringing together a wide perspective on use, need, and collection burden. They also review sample collection forms, which are published for public comment. No TRP has been convened to evaluate the ACTS proposal, and no sample forms have been shared.

AICCU recommends that ED convene a TRP to review the proposal and draft forms before proceeding.

Without adherence to established research and stakeholder consultation practices, the proposed expansion risks creating impractical reporting requirements that could compromise both data quality and institutional capacity to comply. Survey findings from the Association for Institutional Research (AIR) shows that most institutional research professionals are extremely concerned about the proposed timeline, the requirement for five years of historical reporting, and limited staff capacity. This only further underscores the need for pilot testing and phased implementation.

AICCU recommends that ED pilot test the survey with a diverse set of higher education institutions before a broader national rollout. Additionally, a phased rollout strategy should be implemented to establish a baseline understanding of purpose, goals, and burden, along with realistic timeframes for reporting targeted metrics.

Extraordinary Burden on Higher Education Institutions:
AICCU is concerned that the proposed reporting requirements would place an immense burden on institutional research staff at colleges and universities, particularly smaller, less resourced institutions. The ACTS proposal calls for the submission of highly disaggregated admissions, financial aid, and outcomes data—including race-sex combinations by income bands, GPA and test score quintiles, Pell status, parental education, and more. All of this data is to be reported not only for the current year but also retroactively for the past five years. This could include thousands, if not tens of thousands, of applicants over those five years. Institutions may not have the information for applicants dating back that far or have retained information in a suitable format for reporting.

The proposed data collection comes at a time when institutions are already managing new reporting obligations under the Financial Value Transparency (FVT) framework and the development of regulations under H.R. 1, the One Big Beautiful Bill Act. Collectively, these initiatives add significant additional reporting burdens to institutional staff who are already operating at capacity.

ED must balance burden with usefulness. At this level of disaggregation, cell sizes could be so small that institutions cannot report without risking student privacy and violating federal student privacy laws. Colleges and universities are already following current federal and state laws, and the U.S. Supreme Court's ruling in the *Students for Fair Admissions v. Harvard College* case.

To reduce burden and maintain data integrity, AICCU recommends that ED limit historical reporting to the current year and the previous year and provide at least one year's notice prior to implementation. This will allow institutions sufficient time to locate, clean, and test the data to ensure accuracy.

Summary of AICCU Recommendations:
To ensure the proposed ACTS survey is practical and achievable, AICCU recommends that ED:

1. **Restore proper vetting and stakeholder engagement** by commissioning NPEC exploratory papers and convening a TRP to review ACTS and draft forms.

2. **Limit ACTS data elements to institution-level, nationally comparable variables** tied to federal policy needs.

3. **Coordinate with existing data collections** to prevent duplication, including the Common Data Set and National Association for College Admission Counseling surveys.

4. **Limit historical reporting** to the current and previous year to maintain data integrity and reduce burden.

5. **Provide sufficient lead time** (at least one year) for institutions to locate, clean, and test data.

6. **Pilot test and phase in any new elements** with a diverse set of institutions before broader implementation.

7. **Protect student privacy** by requiring aggregation that prevents disclosure of small student subgroups.

Thank you for the consideration of our concerns and of our recommendations on how to make the proposed ACTS survey more practical to implement and less burdensome for campus staff. Ensuring the feasibility of the proposed survey through transparency and meaningful stakeholder engagement will strengthen data quality and enhance public trust in the information reported.

Sincerely,



Kristen F. Soares
President