NACAC
National Association for College Admission Counseling

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U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Comment on Proposed IPEDS Revision — Admissions and Consumer Transparency Supplement (ACTS), Docket No. ED-2025-SCC-0382

To Whom It May Concern,

On behalf of the National Association for College Admission Counseling (NACAC), we write to express serious concerns regarding the Trump administration's recently announced Presidential Memorandum[1] directing the Department of Education to implement a new federal admissions data collection through the proposed Admissions and Consumer Transparency Supplement (ACTS)[2]. While we support efforts to improve admissions transparency, we have deep concerns about the scope, timing, and potential misuse of the proposed collection. The proposed approach risks undermining college access, overburdening institutions, and misrepresenting the very students it purports to serve.

For years, institutions of higher education have worked to enroll students with the potential to succeed in college and contribute to their communities, with consideration to many factors — not only test scores. This shift, supported by researchers, civil rights organizations, and policymakers across the political spectrum, has been essential to recognizing talent in every community. Importantly, prior Department leadership at National Center for Education Statistics (NCES) had already initiated improvements to IPEDS admissions data, including the addition of application, admission, and enrollment data disaggregated by race/ethnicity, with a scheduled implementation in December 2025. Those changes were grounded in research, stakeholder input, and a transparent process. By contrast, the new ACTS proposal reflects a rushed, politically motivated effort that threatens to weaponize admissions data against colleges and students.

The proposed collection would require institutions to submit detailed data on applicants, admits, and enrolled students — including race, sex, GPA, and standardized test scores — from the current cycle and the past five years. The ACTS proposal raises the risk that admissions will be misrepresented as a formulaic exercise in numerical sorting. This approach is both misleading and dangerous; it could be used to justify de facto racial quotas[3] or penalize institutions that enroll diverse classes, even though such practices have long been prohibited under *Bakke v. Regents of the University of California* and reaffirmed in *Students for Fair Admissions (SFFA) v. Harvard College and the University of North Carolina*.

[1] The United States Government. (2025, August 7). *Ensuring transparency in higher education admissions*. The White House. https://www.whitehouse.gov/presidential-actions/2025/08/ensuring-transparency-in-higher-education-admissions/.
[2] Federal Register. (2025, August 15). *Agency information collection activities; comment request; integrated postsecondary education data system (IPEDS) 2024-25 through 2026-27.* U.S. Department of Education. https://www.federalregister.gov/documents/2025/08/15/2025-15536/agency-information-collection-activities-comment-request-integrated-postsecondary-education-data
[3] Hawkins, D. (2025, May 27). A return to racial quotas in college admission? (opinion). Inside Higher Ed. https://www.insidehighered.com/opinion/views/2025/05/27/return-racial-quotas-college-admission-opinion.

Additionally, many colleges do not have this data readily available in the form requested and producing it would be resource-intensive and, in some cases, impossible. Institutions already face serious staffing and reporting constraints, and the timeline to comply by December 2025 leaves little room for review. Meanwhile, NCES, the agency tasked with analyzing the data, has seen its staff reduced from approximately 100 individuals to only three. It is not realistic to expect such a complex data set to be processed quickly and accurately under current conditions.

Perspectives from the College Admission Counseling Profession

The following quotes are from members of NACAC, who represent a wide variety of postsecondary institutions. They illustrate both practical challenges and concerns about transparency and equity under the proposed ACTS requirements.

- "We are not trying to hide anything, the admissions process is complex. Admission processes are different across institutions and that's what makes institutions of higher education in the U.S. so unique and valued."

- "Admissions data without context risks misleading the public — numbers alone can't explain the complexity of holistic review."

- "Transparency must not come at the expense of student privacy or institutional autonomy."

- "We can't report what we don't collect, and in some cases, students simply don't provide the data."

- "My concern is the significant time and resources required to collect and report new data we currently don't track. For a smaller institution with limited staff, this could shift attention away from direct student support and create unintended burdens without additional resources."

- "The estimated hours per response likely underestimates the true time commitment. For many institutions, meeting the new requirements will necessitate changes to their underlying data management systems and require significant verification; particularly in the first year. It's possible that an institution could spend several hundred hours developing a reliable and valid approach to responding. We hope that the time burden will be systematically and realistically estimated based on the typical state of university data systems and that this burden will be a key factor in shaping the final reporting requirements."

- "A significant challenge is the requirement to report on years prior to the development of the specific methodology. Depending on the final specific request this could mean that the required data was never collected, is no longer available, or would need to be verified and formatted in ways that are difficult or impossible to do retroactively. Many institutions have changed admissions Customer Relationship Management (CRM) systems over the last five-year period, which complicates data access, increases the time burden, and potentially compromises reliability and validity."

- "This submission will necessitate collaboration across multiple offices, data systems and require additional full-time equivalent (FTE) resources. While we can manage this new burden, concerns remain about how less well-funded institutions will cope with this submission."

- "Our institution estimates 1,600 additional labor hours if older data are required and 500 hours if limited to recent data. A spring 2026 deadline is unrealistic without finalized definition. We cannot supply all requested data: test scores are optional (submitted by only one-third of students, often self-reported), and race/ethnicity, gender, family income, and parent education fields are frequently incomplete. Undergraduate data is relatively organized, but graduate admissions data is inconsistent and underdeveloped. Clear definitions will be essential, particularly for parent education, first-generation status, GPAs (with AP/IB/honors weighting), and multiple test scores. Financial aid reporting raises further questions, including how to define and categorize need-based vs. merit aid and whether tuition waivers, remission, or exchange programs are included."

Beyond feasibility, the purpose of this collection raises profound concerns. Coupling race with grades and test scores risks mischaracterizing the admissions process and the creation of misleading narratives that could be used to punish institutions that are enrolling diverse student bodies. The administration has chosen to spotlight GPA and standardized test data — metrics known to privilege affluent applicants with access to elite schools, tutors, and test prep — while ignoring factors such as legacy admissions, which disproportionately benefit wealthy white students. Many applicants today choose not to disclose their race; requiring institutions to submit incomplete datasets will further distort the reality of who is applying and being admitted. Taken together, these choices suggest a political agenda that would narrow opportunity, rather than expand it.

We therefore urge the Department to:

- Delay implementation of ACTS until meaningful stakeholder engagement can occur, including input from colleges, researchers, and civil rights advocates.
- Provide clear public guidance on the scope, format, and use of admissions data, including how student privacy will be safeguarded and how the Department will prevent misuse of the information.
- Recommit to responsible improvements to IPEDS, such as disaggregating outcome measures, tracking Pell student graduation rates, and expanding admissions data on a realistic timeline informed by research and field expertise.

Data should be a tool for expanding opportunity, not narrowing it. The proposed ACTS collection risks sidelining talented students, penalizing institutions serving diverse communities, and distorting public understanding of admissions. We remain committed to working with the Department to ensure that federal data systems are accurate, transparent, and supportive of college access for all.

Sincerely,

Sean Robins
Director of Advocacy
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