

December 12, 2025

Ross Santy
U.S. Department of Education
Office of Planning, Evaluation, and Policy Development
400 Maryland Avenue SW
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:

On behalf of the National Association for College Admission Counseling ([NACAC](#)), we write in response to the Department of Education's revised Admissions and Consumer Transparency Supplement (ACTS)¹ proposal to expand IPEDS. While we appreciate the department's decision to limit ACTS to the four-year sector and to exempt institutions admitting 100 percent of applicants, the revised proposal does not resolve the core concerns raised by our members or the concerns from NACAC's October comment letter². Significant issues related to feasibility, data quality, privacy, and the risk of misinterpretation remain unaddressed and threaten the usefulness and integrity of the ACTS dataset.

Recent feedback from NACAC members underscores these concerns, with institutions describing the ACTS proposal as "unworkable," "technically infeasible," and "misaligned with how admissions data are collected and stored." Many reported that the changes would divert limited staff capacity away from direct student support.

The proposed timeline and operational demands are unworkable.

The accelerated timeline continues to pose major challenges for institutions. NACAC members repeatedly emphasized that meeting the proposed requirements would require hundreds of staff hours, system modifications, and extensive cross-unity coordination — work that cannot be accomplished within the proposed timeframe without sacrificing accuracy, student privacy, or essential student-facing services.

Several institutions noted that the proposed timeline would require reallocating staff from advising, recruitment, and financial aid to focus exclusively on ACTS reporting — an impact they described as "harmful to students during the peak admissions cycle."

¹ Federal Register. (2025, August 15). *Agency information collection activities; submission to the Office of Management and Budget for Review and Approval; comment request; integrated postsecondary education data system (IPEDS) 2024-25 through 2026-27*. U.S. Department of Education. <https://www.federalregister.gov/documents/2025/11/13/2025-19874/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-for>.

² National Association for College Admission Counseling. (2025, October 7). Comment letter on ACTS–IPEDS admission data public comment (Docket ID ED-2025-SCC-0382). https://www.nacacnet.org/wp-content/uploads/NACAC_ACTS-IPEDS-Admission-Data_Public-Comment-Letter_2025.10.pdf.

Key data definitions and reporting questions are unresolved.

Despite the materials released in November³, institutions still lack clear guidance on how to implement several core elements of ACTS collection. Unresolved issues include:

- How to report “sex” for students who did not provide it in prior years or whose records included now-disallowed categories.
- How to unweight GPAs when transcripts offer only weighted values.
- How to report multiple standardized test scores.
- How to categorize aid types consistently across institutions.

These ambiguities directly affect data consistency and comparability. Without standardized, field-informed definitions, institutions will produce disparate datasets that undermine the transparency goals the department intends to achieve.

System limitations and feasibility challenges will produce inaccurate reporting.

Admission CRMs and student information systems are not designed to collect or retain several of the data elements ACTS requires. NACAC members reported that:

- CRMs frequently purge or suppress incomplete, duplicate, or non-enrolled applicant records.
- Historical data predating system upgrades or CRM migrations are inaccessible, inconsistent, or not stored at the required level of granularity.
- Many institutions do not collect standardized test scores or high school GPAs for all applicants, especially in test-optional environments.

Attempting to reconstruct missing historical data will lead to inaccurate and inconsistent interpretations across institutions, undermining the reliability of the ACTS collection.

As one member noted, “Our CRM automatically scrubs non-enrolled records after each cycle. We cannot retroactively recreate data that no longer exist.” Others echoed that their systems “were not built to store the level of granularity ACTS requires,” particularly for test-optional applicants.

The burden estimate remains unrealistic and substantially exceeds institutional capacity.

The Education Department’s own analysis estimates that ACTS alone will require approximately 200 hours per institution, more than double the combined reporting burden for all other annual IPEDS components⁴. Institutions responding to NACAC’s survey projected that meeting the revised ACTS requirements could demand between 500 and 1,600 hours in the first year alone — far exceeding federal projections and placing disproportionate strain on institutions with fewer staff or older data systems.

³ U.S. Department of Education. (2025, November 13). *Admissions and Consumer Transparency Supplement (ACTS) — Proposed Collection under Docket No. ED-2025-SCC-0382*. Regulations.gov. <https://www.regulations.gov/docket/ED-2025-SCC-0382/document>.

⁴ U.S. Department of Education. (2025, November 13).

This burden will divert staff capacity away from critical admissions, advising, and student support functions and will disproportionately affect less-resourced institutions.

The proposed data collection risks misinterpretation and misuse.

The revised proposal maintains that ACTS is intended, in part, to identify whether institutions are using “race-based preferencing” in their admissions processes. This remains deeply problematic for several reasons:

- Admission decisions rely on many factors not represented in ACTS or IPEDS, including essays, recommendations, institutional mission, and context of opportunity.
- ACTS does not capture information on legacy admissions, donor influence, athletic recruitment, or early-decision practices — factors that research shows disproportionately benefit more affluent applicants.⁵
- Increasing numbers of applicants decline to report race or ethnicity, leading to incomplete datasets.
- Presenting GPA and test scores alongside race in isolations invites misleading conclusions about institutional intent or applicant merit.

As NACAC noted in our October comment letter⁶, this framing invites simplistic and harmful narratives about admission processes and risks penalizing institutions that enroll diverse student bodies. NACAC members expressed deep concern that the data, without context, could be “misleading to the public and harmful to institutional autonomy,” particularly if used to single out institutions enrolling diverse student bodies.

There are unresolved privacy risks.

The department has not yet articulated how applicant-level privacy will be protected or how reidentification risks — especially for small programs or institutions enrolling limited numbers of students by race-sex combination — will be mitigated. Institutions are particularly concerned about releasing disaggregated data that could expose sensitive student information in ways Congress has not authorized or intended.

Members from smaller institutions emphasized that ACTS reporting could unintentionally reveal identifying information about applicants, noting, “We may have only one or two applicants in a given race-sex category. Reporting that data publicly poses unacceptable privacy risks.”

Transparency is essential — but requires accuracy, context, and responsible implementation.

NACAC and its members support meaningful transparency in admissions. Our profession has long called for improvements to federal data systems that elevate student opportunity and strengthen public understanding. However, transparency must not come at the cost of data integrity, institutional feasibility, or student privacy.

⁵ Institute for Higher Education Policy. (2024, July 1). *Legacy looms large in college admissions, perpetuating inequities in college access*. <https://www.ihep.org/legacy-looms-large-in-college-admissions-perpetuating-inequities/>

⁶ National Association for College Admission Counseling. (2025, October 7).

As stated previously, “data should be a tool for expanding opportunity, not narrowing it.”⁷ NACAC members consistently emphasized that they support responsible transparency and are eager for improvements to federal data systems. However, they stressed that transparency must be paired with accuracy and context to avoid undermining public trust in admissions processes.

Our recommendations:

To advance the department’s transparency goals while ensuring valid and consistent reporting, we urge the Education Department to:

1. Delay implementation until adequate field engagement, technical guidance, and systems testing can occur.
2. Establish a structured technical working group composed of admission professionals, state data leaders, researchers, and CRM providers to develop clear, actionable definitions.
3. Restore robust IPEDS technical assistance, including training and a phased rollout.
4. Pilot ACTS with a voluntary cohort before requiring systemwide reporting.
5. Clarify publicly that ACTS data cannot determine whether race influenced admission decisions.
6. Develop privacy safeguards that prevent reidentification and protect students across institution types.

Let’s work to ensure accuracy, equity, and accountability moving forward.

We appreciate the Education Department’s willingness to refine ACTS and respond to feedback; however, substantial concerns remain. NACAC is committed to working collaboratively to build federal data systems that are accurate, transparent, and supportive of college access. The revised ACTS proposal still requires meaningful adjustments to ensure that the data collected are usable, equitable, and reflective of the complex admissions landscape.

Sincerely,



Sean Robins
Director of Advocacy
National Association for College Admission Counseling

⁷ National Association for College Admission Counseling. (2025, October 7).