



October 13, 2025

Mr. Matthew Soldner
National Center for Education Statistics
Institute of Education Sciences
U.S. Department of Education
400 Maryland Ave. SW
LBJ, Room 5C133
Washington, DC 20202-1200

RE: Docket No.: ED-2025-SCC-0382, Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27

Dear Mr. Soldner,

As president of the Association of Public and Land-grant Universities (APLU), I write to provide comment on the Department of Education's (ED) information collection request *Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27*.

APLU is a membership organization that fosters a community of university leaders collectively working to advance the mission of public research universities. The association's U.S membership consists of more than 240 public research universities and state university systems spanning across all 50 states, the District of Columbia, and six U.S. territories. The association and its members collectively focus on increasing student success and workforce readiness; promoting pathbreaking scientific research; and bolstering economic and community engagement. Annually, its U.S. member campuses enroll 4.4 million undergraduates and 1.4 million graduate students, award 1.3 million degrees, employ 1.2 million faculty and staff, and conduct \$64 billion in university-based research.

APLU has a long history of support for robust higher education data to inform students, families, states, and policymakers, as well as to equip institutions with better information to assess their programs. New data collections should be a collaborative effort between ED and stakeholders in furtherance of mutual goals of driving student completion and developing the next generation of the American workforce. Such collections should balance the benefits of the data being reported with the substantial administrative resources required for compliance. Unfortunately, the proposal does not come close to striking the right balance, presenting immensely more administrative burden in relation to the benefits of the data.

The proposal as written stands in stark contrast to ED's message on regulatory relief, returning education to the states, and reducing the scope of the Department. Requirements such as these lead to administrative spending at the expense of investment in the core mission of supporting students. As ED gathers stakeholder feedback, I urge you to consider these comments and recommendations in furtherance of an accurate and efficient collection. APLU offers these comments and recommendations to strengthen the quality and useability of data collected under the regulation, while appropriately minimizing the burden on institutions reporting the information to meet the administration's transparency goals without undue hardship. We note, in particular, the recent impact of the prior administration's rushed data collections, like the

Gainful Employment/Financial Value Transparency regulation, that proved counterproductive to all interested parties, including the Department and institutions.

Key Recommendations

To gauge the impact of the collection on institutions, APLU partnered with the Association for Institutional Research and other higher education associations to [survey](#) over 500 institutional research professionals. To further inform our comments, APLU partnered with member institutions to [model](#) the collection's hundreds of tables and thousands of fields to be reported.

In consultation with member institutions, APLU identified the following key recommendations to appropriately balance the value and quality of data returned with the administrative efforts required for compliance. These recommendations offer suggestions for how ED can provide needed clarity and guidance to produce valid data to inform departmental actions:

- 1) To ameliorate concerns about data privacy and provide some institutional relief on burden, APLU recommends ED **require only institutions with more than 10,000 applicants to report the data** on applied, admitted, and enrolled undergraduates **disaggregated by race-sex pairs, test score quartile, and standardize high school GPA quartile.**
- 2) To enhance data quality APLU urges ED to **extend the reporting deadline for reporting admissions-related data elements.**
- 3) To strengthen the comparability of data being collected across different institution types and make it useful for students and families, APLU urges ED to **stagger the collection of data elements.**
- 4) To enhance transparency, **ED should allow institutions to explain any data anomalies.**
- 5) To increase the quality and validity of collected data, ED should provide **clarity and guidance on several terms and circumstances to facilitate consistent reporting across all institutions.**

The collection request includes two comments for response, one seeking information on the types of institutions that should be required to report this data, and one on the burden required for compliance. Responses to each question, along with detailed explanations of APLU's key recommendations, follow.

Direct Question 1: Applicable Institutions

ED requested feedback "pertaining to the types of institutions required to complete the ACTS component, including whether there are other objective characteristics that the Department could use to identify institutions that have a low-risk or high-risk of noncompliance with Title VI." APLU notes many institutions are open-admissions (i.e., non-selective) or relatively open-admissions. Thus, these institutions receive a low enough number of applications that student privacy would be at risk with disaggregated reporting, based on existing IPEDS Admissions data. APLU urges the Department to narrow the range of institutions subject to this collection.

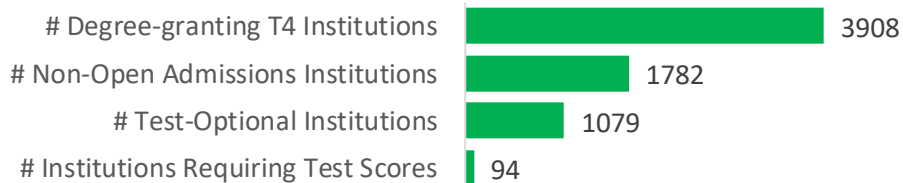
APLU Policy Recommendation

While APLU recognizes the administration’s interest in increased data to assess institutional admissions policies, we also note the interest to safeguard student and consumer privacy. As there is no standardized definition of “selective admissions” and to protect student privacy, APLU recommends ED **require only institutions with more than 10,000 applicants to report the data** on applied, admitted, and enrolled undergraduates **disaggregated by race-sex pairs, test score quartile, and standardize high school GPA quartile**. Note that the existing IPEDS Admissions survey collects test scores by quartile and switching to quintile can disrupt the ability for longitudinal data analysis and quality control. Race-sex pairs and test scores are items already collected in IPEDS, minimizing the effort required from ED to provide common definitions and reporting instructions, and high school GPA is something that many institutions already collect and can more easily report, especially if ED provides a way to standardize across weighted and unweighted GPA. APLU believes that if ED were to limit its initial collection to undergraduate admissions solely disaggregated by race-sex pairs, test score quartile, and standardized GPA quartile, privacy concerns relating to cross-tabulation associated with revealing personally identifiable student information can be addressed, while giving ED an initial dataset. The Department could later reassess whether adding additional disaggregation would risk privacy.

Additional Background

The majority of Title IV degree-granting institutions are open admissions. In Fall 2023, of the 3,908 degree-granting Title IV institutions required to complete the Admissions component of the IPEDS survey, over half selected that they had open admissions and thus did not consistently collect data on admissions requirements like test scores and GPA. To illustrate the variability in the usage of test scores as an admission criterion, of the 1,792 schools that are not open admissions in 2023, about five percent reported test scores from the SAT or ACT were required, while 61 percent reported they were optional. Thirty-one percent (or 609) indicated that test scores were not considered for admission – even if submitted. In fact, the number of institutions requiring test scores dropped from 118 in 2022 to 94 in 2023.

Fall 2023 Undergraduate Admissions



In addition to inconsistencies in test-optional and other admissions policies, APLU observes that a high percentage of institutions have low counts of applicants, which could lead to data privacy issues when disaggregating by five or six applicant characteristics. Of the 1,782 institutions that are not open admissions, about 29 percent had 1,000 or fewer applicants and 63 percent had 10,000 or fewer applicants, which poses serious data privacy issues. IPEDS does not have small cell size suppression. Reporting income data cross-tabulated with race-sex pair, high school GPA, and parental education pose significant privacy issues for students because it could lead to small cell sizes and single out their personal information. Some proposed data elements (GPA, family income, parental education) are inconsistently defined and may not add insight to institutions’ admissions policies while putting students’ privacy at great risk.

At the graduate level, admissions data has never been collected by the federal government for all Title IV institutions. In [AIR's survey](#) of hundreds of institutional researchers, most respondents indicated that metrics like high school GPA, family income, test scores, and GPA are either not collected in their systems or require significant and undue burden to retrieve.

Direct Question 2: Time Burden

ED also solicits feedback on the anticipated amount of time it would take for institutions to compile and submit data elements in ACTS. According to supporting documents submitted by ED to OMB in the [IPEDS 2024-25 to 2026-27 data collection renewal](#), the average estimated annual total burden hours for completing IPEDS across all participating institutions in 2025-26 is 657,134 hours. As ED attempts to balance reporting burden against the utility of the data, APLU urges the Department to consider the amount of time required for successful reporting depends on a number of factors, including the availability and quality of data; data validity; and staffing constraints.

According to the AIR survey, ED vastly underestimates the time required to complete the collection request. 55 percent of respondents estimated it would take more than 250 hours to complete the ACTS, 33 percent estimated 100 to 249 hours, and 12 percent estimated less than 100 hours. Increasing burden will increase institutional spending on compliance reporting and take dollars away from crucial spending on instruction and student supports.

In one state with strict prohibitions on sharing financial aid data, an institution estimates 500 hours, given the wide-ranging collaboration across departments required to report the data. This is not an isolated example; many states have strict interpretations of federal guidance governing sharing financial aid data. Another university system estimated that this collection would exceed their total current IPEDS burden. The first-year reporting burden will be significantly larger than subsequent year reporting due to the requirement to report five years of historical data.

APLU Recommendations

APLU appreciates ED for asking feedback on institutional burden as the department attempts to balance burden and cost to higher education with valuable data used in decision-making. We believe that establishing a reporting process that is well planned, clear, transparent, and not substantially burdensome on institutions will contribute to quality data that students and families can use in their college decision process and that policymakers can use to hold institutions accountable. APLU offers the following recommendations to enhance data quality, strengthen the comparability of the data collected, enhance transparency, and increase the validity of the data collected.

To enhance data quality, APLU urges ED to **extend the deadline for reporting admissions-related data elements** into April instead of February, which is when the Admissions component typically closes. This will provide institutions with more time to perform quality control on their data and does not delay the collection of the data beyond the 2025-26 IPEDS collection cycle. Given the applicability of the data collection to the administration's higher education priorities and the negative consequences to institutions who fail to report data correctly on time, ED should provide institutions at least until April to comply.

To strengthen the comparability of data being collected across different institution types and make it useful for students and families, APLU urges ED to **stagger the collection** of data elements as follows:

- **Collect fall 2025 data in the 2025-26 collection and, at a minimum, delay the retrospective reporting of the five historical years.** Rushed efforts lead to catastrophic outcomes for students and families (e.g., the rushed implementation of the FAFSA Simplification resulted in delayed FAFSA completion and financial aid offers for hundreds of thousands of students). Delaying the reporting of retrospective data allows ED time to develop and implement quality controls to ensure the highest data quality, while also giving institutions time to gather and collate their historical data to meet high quality standards as well. Under the proposed collection and timelines, APLU is deeply concerned quality will suffer greatly. Thus, the data the Department would receive is insufficient for high-stakes determinations and bears great risk of unintended consequences for institutions complying in good faith.
- **Collect the financial aid data in the IPEDS Financial Aid survey component in subsequent years.** Family income range, Pell eligibility, and parental education are all self-reported data (e.g., collected on the Common Application, institutional application, or the FAFSA), and many institutions do not yet collect this data for applicants who do not complete the FAFSA. Even on the FAFSA, the definitions for these data elements have been altered after the FAFSA Simplification Act. APLU urges ED to delay the collection of these data elements to future IPEDS collection periods to give institutions time to gather the data from applicants and admits so that the data set is complete. Otherwise, this data will be missing at many institutions and will not provide policymakers, students, and families with the data they seek to make informed decisions. Building the collection of financial aid data into the IPEDS Financial Aid component would smooth the transition and align with ED's goals of cutting regulatory red tape and easing burden on institutions. This approach would also have the benefit of grouping information thematically, making it easier for consumers to analyze and utilize the data while also giving ED time to define necessary financial aid terms (e.g., merit aid, family income) and publish sample survey questions to reduce reporting burden and ensure quality.
- **Collect graduation and cumulative postsecondary GPA in future years.** Admissions data should be separated from longer-term outcomes data like graduation rates and cumulative postsecondary GPA because outcomes data are impacted by more than immediate decisions and practices of the institutions. For example, institutions cannot quickly change practices and policies that impact student success, like instructional strategies, support services, curricular pathways, and advising. When institutions make changes to these practices and policies, it can take years for impacts to be seen. Collecting the admissions and outcomes data together could suggest that admissions requirements alone impact outcomes, which could mislead students and families in their college decision-making process.
- **Begin graduate admissions data collection by collecting applicants, admits, enrolled students overall and assessing admissions criteria at the CIP- and award-level.** While it is feasible for institutions to report the number of applicants, admitted, and enrolled students at the graduate level overall, APLU has heard from many member institutions that graduate admission criteria are not consistent across all degrees or programs. Testing and undergraduate GPA requirements also vary substantially across the institution. ED should explore how these criteria differ by collecting whether an admission requirement (i.e., test scores, undergraduate GPA, documentation of work experience, personal statement or essay) is needed in all, some, or none of the programs in a specific CIP code and award level. For example, a [screening question](#) could gather this information.

To enhance transparency, **ED should allow institutions to explain any data anomalies.** Currently in the IPEDS survey, institutions are allowed to explain inconsistencies or anomalies in their data for items that are used in the College Navigator website where students and families go to explore statistics for their college decisions. This provides transparency for decision-makers and researchers, as a change in data (e.g., large percentage changes are observed if the actual counts are low to begin with) can be caused by many factors, such as economic conditions, state funding support, changes in federal law, and academic offerings. For the new ACTS survey component, this practice of allowing institutions to explain anomalies in their data also ensures quality and transparency.

To increase the quality and validity of collected data, ED should provide **clarity and guidance on the following terms and circumstances to facilitate consistent reporting across all institutions:**

- **Data on Race Unavailable:** After the *SFFA* decision, race/ethnicity was no longer used in admissions decisions, so the collection of these data for applicants and admits also became limited.
- **Data on Sex Possibly Unavailable:** Institutions collect this data at different points in the admissions process and may not be available for all applicants in all instances.
- **FAFSA Variables:** Additionally, demographics data is generally optional on applications and the FAFSA, which is not completed by all students. ED should provide instructions on how institutions proceed in these instances. Note that family income and parental education are self-reported and only by Title IV enrolled students (thus excluding non-Title IV and many applicants).
- **Standardized GPA Definition:** For high school grade point averages, institutions receive both weighted and unweighted GPAs from students. ED should guide institutions on how to standardize GPA and provide specific instructions on how GPA can be consistently reported in the case weighted and unweighted high school GPA are not both collected by institutions. To provide context for how applicable the GPA quartiles might be in the admissions process, ED should also collect the count and percentage of students reporting GPA to the institution, similar to how the IPEDS Admissions survey already collects the count and percentage of students reporting admission test scores. Related, the new data collection requires gathering and reporting of “students’ average cumulative GPA at end of AY.” Institutions will need ED clarification on how to report cumulative GPA because the methodology differs across programs and levels.
- **Test Scores:** Institutions accept many types of admission tests, depending on the academic program. ED should provide clear instructions on which test scores institutions should report (i.e., ACT and SAT scores) and how to handle multiple test attempts. To provide context for the representativeness of the data, ED should continue to collect the number of students that submit test scores, as the majority of selective institutions no longer require them.
- **Tuition and Aid:** For institutions without differential tuition, cost of attendance remains the same for large numbers of students, resulting in many tables that duplicate information. If the intent is to retrieve data on net price, ED should add these questions to the existing financial aid survey, rather than adding them to a brand-new survey. Further, terms such as family income, parental education, merit-based aid would require definitions.
- **Branch Campuses:** ED should also clarify how regional/branch campus data should be reported. Some institutions with multiple campuses report data through one IPEDS ID number. Institutions with both regional campuses noncompetitively admitted and campuses with competitive admissions would be required to report data as one institution, masking the information ED seeks.

Additional Background on Data Availability and Quality

Not all institutions have access to the data elements required to be reported under the regulation. If the required data elements do not exist in institutional systems, then more time will be spent hunting down the data and performing quality control to ensure it meets ED reporting standards. For example, test scores are not consistently collected or accessible for the entire applicant pool at test-optional institutions, which comprise about 61 percent of non-open admissions institutions.

The collection also does not reflect the reality of how institutions receive applications or store data on non-matriculated students. Each year at institutions across the country, a number of applicants begin the application but never submit, as well as submit incomplete applications. Many of these students, even at open-admissions institutions and programs, fail to enroll. The [American Association of Collegiate Registrars and Admissions Officers](#) published recommendations that records for applicants who do not end up enrolling are retained for two to five years in order to appropriately balance student privacy and institutional duties. This recommendation has been applied at many institutions, and data for non-matriculated students have been eliminated from college data systems for some, if not all, of the required reporting period for ACTS. Further, many institutions do not package federal, state, or institutional aid until a student is admitted. Other examples include variables like race/ethnicity and sex which are asked on the Common Application, but not all institutions use this tool or have access to this data for applicants. Other variables such as family income and parental education are collected on the FAFSA, but institutions only have access to this data for enrolled students, not for applicants and potentially not for admits.

To further complicate the collection, several financial aid-related data pieces will not be available to institutions at the time of required reporting. For example, 2025-26 academic year financial aid information, including income, will not be available until the end of the federal student aid year, June 30, 2026. APLU member institutions report that aid from local organizations typically arrives late in the summer/early in the fall term, making timely reporting very difficult. Institutions are unlikely to have data that was not previously required to be collected. Current IPEDS reporting requires multiple handoffs between financial aid and institutional research offices. Many states have laws that would hamstring the collection of the data required under this collection, complicating an already intricate process. Some states prohibit institutional research offices, who may be responsible for the collection and reporting of this data, from accessing financial aid data unless it is related to the application and administration of financial aid.

The inclusion of graduate student admissions in the collection raises concerns unique to this data. Key elements, such as standardized admissions metrics and financial aid categories, are often unavailable or inconsistently defined at the graduate level. Graduate funding structures (e.g. assistantships, stipends, tuition waivers) do not align with undergraduate aid classifications, making meaningful reporting difficult. The majority of graduate students do not complete the FAFSA, making the required collection of several data elements (e.g., family income, parental education) impossible. Some graduate programs do not collect GPA for all students nor do they require standardized test scores from the GRE or GMAT, resulting in incomplete data. In fact, at most institutions, entrance requirements and processes vary across departments, making a standardized collection difficult. Further, it is unclear if the collection is required for international students. Inclusion of international students further burdens institutions and muddies the data as GPA scores and scales vary from country to country.

Additional Background on Data Validity

The ACTS covers a six-year period featuring several events with confounding factors on admissions, including the COVID pandemic (2020-21), change in practices due to *SFFA v. Harvard* (2023-24), and implementation of the FAFSA Simplification Act (2024-25). Because the collection requires data across these years, institutions will spend substantial resources identifying and resolving data anomalies and inconsistencies.

The cross-tabulation requirements (race-sex pairs across multiple quintiles and categories) will [create hundreds of data cells per table](#). Many institutions with less diverse populations will have quintiles that do not make sense for small populations. Other examples impacting validity include the fact that data on applicants and admits are not typically processed and as rigorously controlled as data on enrolled students at institutions. Further, GPA scales vary by locality and state so data would not be comparable across institutions.

Additional Background on Staffing Constraints

As the data required in ACTS are held in various systems across the institutional infrastructure, under-resourced institutions with limited staffing capacity will be even more challenged and burdened by reporting the data. The financial aid tables alone would require complex joins between admissions, financial aid, and student information systems that many institutions currently do not perform. This level of granular cross-tabulation typically requires significant IR office time and potentially new reporting infrastructure for software vendors to develop. Retroactive reporting requires a significant investment in time and resources. Institutions may not have access to data elements for prior years in which they were not statutorily required to collect.

The ACTS proposal bypasses standard NCES/IPEDS vetting processes that ensure quality data is collected, reported, and utilized by consumers. Institutions need sufficient lead time, sample forms, and training resources from ED to ensure accurate reporting. As we saw with the previous administration's bungled FAFSA roll out and rushed GE/FVT collection, when the required information and guidance is not available, financial aid personnel must dedicate additional resources to costly administrative requirements at the expense of their core mission – student supports.

We thank you for consideration of APLU's views in response to the agency's collection request. To summarize, ED should increase the strength and useability of the data by providing institutions clarity on several data elements, extend and stagger the reporting timeline, and adjust the institutions subject to the requirements. Such changes would maximize the benefits of reported data while minimizing the impact on institutions. As the proposal currently stands, it would overwhelm institutions, drain resources, and likely lead to substantial flaws in the data received by the Department. Please know APLU is eager to continue to serve as a resource.

Sincerely,



Waded Cruzado
President
Association of Public and Land-grant Universities