

Appendix F: Comment Matrix
(Docket ID: ED-2025-SCC-0382)

Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2025-26 Through 2026-27 (OMB #1850-0582).

Note: The association of specific Comment IDs with themes below are provided for illustrative purposes only. Many comments include multiple themes.

Topic / Topic #	Exemplar Comment IDs	Summary of Comment	Response
0 – Nonresponsive Comments	<u>mi7-o1qg-a1hs</u> <u>mi7-npdo-imjy</u> <u>mi7-oixz-tm5t</u> <u>mi7-nzx0-svxy</u> <u>mi7-nrqt-yyvf</u> <u>mi7-ohiw-r9n4</u> <u>mi7-ny58-696c</u> <u>mi7-nu5t-bbrc</u> <u>mi7-p7db-y2oi</u> <u>mi7-okr2-khjm</u> <u>mi7-nw2u-wfn6</u> <u>mi7-p94z-nf7r</u> <u>miu-qa0o-ckx0</u>	Respondents voice concerns that are unrelated to the present collection, most typically, about the Department’s negotiated rulemaking process relating to professional degrees.	NCES thanks the respondent for their comment, but notes that it is unresponsive to the proposed collection. As such, no action is taken in response.
1 – Burden: Community	<u>mhx-xehu-lr63</u> <u>mi4-r854-7qdm</u> <u>mie-pnw1-zykt</u>	Respondents voice concern that the proposed ACTS collection	NCES thanks the respondent for their comment. In response,

<p><i>Colleges</i></p>	<p>mig-ddte-ux6n mip-02i6-b64x miq-nel1-wr7u mj3-c10o-ukbz mj3-cyco-paxj mj7-c90f-mqs3 mj7-e2xc-4lay mj7-fdoy-5bja mj7-garv-ggts mj7-jjib-al2o mj7-k6kt-8xmo miq-nel1-wr7u miy-v29e-zr79 miy-wx8r-lc2g miy-y14k-kl86 mj0-92jz-26t8 miy-o9aj-zgu1 mj0-in2l-4opr mj0-cnys-wmsf mj0-ifre-29y4 mj0-lmlw-apyi mj1-pymc-a9k6 mj1-y8rh-xflm mj1-zkuv-jc6t mj7-q9bn-q3iq mj7-v4bc-29p6 mj8-0ykn-ls3n</p>	<p>places undue burden on a specific class of institutions: those that are largely viewed as community colleges but award a small number of baccalaureate degrees.</p>	<p>NCES is limiting eligibility to degree-granting four-year colleges and universities that are (1) primarily baccalaureate or above, or (2) graduate with no undergraduate degrees.</p>
<p><i>2 - Burden: Generally, but Particularly for Smaller and</i></p>	<p>mi3-j76l-7f77 mi4-px0o-zqua mi6-3osl-p6bh mi3-ngdr-i2ds mi5-3wqb-az8f</p>	<p>Respondents voice concern that the proposed ACTS collection places undue burden on institutions, particularly small or</p>	<p>NCES thanks the respondent for their comment, and acknowledges that the ACTS component represents an</p>

<p><i>Lower Resourced Institutions</i></p>	<p>mi6-d57v-dehg mi6-kkpr-uk30 mi6-phfp-thj8 mi7-pin9-axer mi8-z2zq-deck min-euft-6dnz miq-haly-rmj6 mir-siwl-o3ea miy-v29e-zr79 miy-wx8r-lc2g miy-o9aj-zgu1 mj2-xggo-6tq9 mj3-075s-iksp mj4-kolw-zpmg mj4-kolw-xhml mj7-a3zp-lrf4 mj7-h4yz-xy97 mj0-7e28-qvsd miy-wkth-4fvz mj0-and5-mjcl mj1-n6i5-kxd8 mj7-m12x-wg27 mj7-nowb-u18w mj7-ocxm-qkuh mj7-ojos-kjoo</p>	<p>lower-resourced institutions.</p>	<p>increase in burden. NCES is similarly cognizant that increased burden will have differential impact on institutions based upon their existing capacity.</p> <p>NCES has taken two steps to mitigate burden to the extent possible.</p> <p>First, whenever appropriate, NCES has used variables and/or variable definitions that are used elsewhere within the IPEDS collection. This reduces the complexity of complying with a wholly new requirement.</p> <p>Second, NCES is introducing an innovation in IPEDS collection through the use of a new two-step process. In the first step, institutions prepare a student-level file aligned to predefined submission templates. In the second, institutions import the file into the IPEDS Aggregation Tool (or perform the aggregation locally) and then upload the resulting file to the IPEDS Collection System. This removes</p>
--	--	--------------------------------------	--

			<p>burden associated with local calculations or manual entry.</p> <p>As always, the IPEDS HelpDesk remains available to assist institutions who experience difficulties submitting their ACTS data.</p> <p>Given the specific directives found within the Presidential Memorandum on <u>Ensuring Transparency in Higher Education Admissions</u>, no additional changes have been made in response to these comments.</p>
<p>3 - Burden: Nonselective Institutions</p>	<p>mi3-j76l-7f77 mi5-2qne-fe70 mi4-r854-7qdm mi5-6rdr-enlv mi6-ejfl-qxy3 mi6-phfp-thj8 mi7-pin9-axer mif-266c-xouc mi8-z2zq-deck mil-rlk1-22s2 min-ogrr-ng8a mip-02i6-b64x miq-nel1-wr7u mit-eydz-jvre miw-99ht-e5fz mj1-jp00-cis5</p>	<p>Respondents voice concern that the proposed ACTS collection places undue burden on a specific class of institutions: those that are open-admission or are “effectively” open-admission.</p>	<p>NCES thanks the commentors for their response.</p> <p>NCES is cognizant that institutions have multiple tools as their disposal to shape each year’s incoming class. This includes specific decisions regarding who is admitted (and via what mechanisms) as well as decisions related to institutional aid to meet potential enrollees’ financial needs. As a result, NCES takes the position that eligibility for the ACTS component cannot</p>

			<p>be defined solely by an institution’s status as “open-admission” or by a pre-determined “selectivity” metric.</p> <p>As a result, NCES proposes that a subset of institutions be made exempt from ACTS reporting. Specifically, institutions that, in a given year covered by the ACTS requirement, are (1) open admission <i>or</i> admit 100 percent of applicants, <i>and</i> (2) attest that they do not award any non-need-based financial aid may be exempted from that year’s collection.</p>
<p>4 – <i>Timeline Concerns</i></p>	<p><u>mi4-x1te-fhk9</u> <u>mi4-oohb-0ikj</u> <u>mi3-o51d-2nvx</u> <u>mi6-1hp5-6624</u> <u>mi6-kkpr-uk30</u> <u>mi7-pjk2-znnd</u> <u>mi6-9cms-o9xk</u> <u>mie-pnw1-zykt</u> <u>mi8-xwlo-j5su</u> <u>mil-rlk1-22s2</u> <u>min-ogrr-ng8a</u> <u>min-euft-6dnz</u> <u>min-nij7-33uz</u> <u>miq-978f-whr1</u> <u>miq-i4mx-y3y7</u></p>	<p>Respondents voice concern that the timeline for implementing the ACTS collection was too brief, challenging NCES to develop a high-quality collection and institutions to submit high-quality data in response.</p>	<p>NCES thanks the commentors for their response.</p> <p>In the Presidential Memorandum on <i>Ensuring Transparency in Higher Education Admissions</i>, President Trump required the ACTS component be established “[w]ithin 120 days of the date of this memorandum, and to be initiated this 2025-26 school year.” This timeline precludes technical review panels, pilot collections, phased in collection</p>

	mir-siwl-o3ea mir-seuc-ydvk mit-6z6a-x4q7 mj1-jp00-cis5 mj2-xggo-6tq9 mj3-075s-iksp miy-wkth-4fvz mj0-and5-mjcl mj1-n6i5-kxd8 mj7-i7pb-rzkc mj7-j0oz-3io4 mj7-jnn3-nsa7 mj7-jrz1-oype mj7-m12x-wg27 mj7-nowb-u18w mj7-lcp9-2d4o mj7-n3y5-06u5 mj7-noem-akc5 mj7-ny4g-kkf4 mj7-oijp-54xc mj7-sryh-shqc		<p>approaches, or other steps which might have been feasible in its absence.</p> <p>To the extent possible, NCES has sought to take steps to reduce the complexity of the collection. This includes reliance upon long-standing IPEDS variables and the reduction of manual data entry. NCES has also extended the collection window for the ACTS collection beyond that of other surveys collected in the Winter collection window to provide additional focused time for response.</p> <p>No change is made in response to this comment.</p>
<p><i>5 - Availability of Requested Data Elements</i></p>	mi4-x1te-fhk9 mi3-o51d-2nvx mi4-r4m3-lmco mi6-kkpr-uk30 mit-eydz-jvre miw-99ht-e5fz mit-6z6a-x4q7 mi6-phfp-thj8 miq-nel1-wr7u mj0-and5-mjcl mj7-j0oz-3io4 mj7-jnn3-nsa7	<p>Respondents report that they do not collect variables sought by the ACTS collection, including those that may be used independently or for the purpose of creating various disaggregations.</p>	<p>NCES thanks the commentors for their response.</p> <p>As noted in the collection materials accompanying the ACTS, NCES requires institutions report only those ACTS data they have available. NCES does not anticipate institutions collecting new data in response to the ACTS component. Users should</p>

	mj7-jrz1-oype miy-v29e-zr79 mj7-a3zp-lrf4 mj7-h4yz-xy97 mj0-7e28-qvsd mj0-in2l-4opr mj7-fyp3-n414 mj7-m12x-wg27 mj7-nowb-u18w mj7-lcp9-2d4o mj7-n3y5-06u5 mj7-noem-akc5 mj7-ny4g-kkf4 mj7-ocxm-qkuh		<p>review the codebooks accompanying the collection to identify the reserve code that indicates a variable is not available for reporting (e.g., a “-1” value).</p> <p>As always, the IPEDS HelpDesk remains available to assist institutions who experience difficulties submitting their ACTS data.</p> <p>No change is made in response to this comment.</p>
<p>6 - Clarity of Data Definitions</p>	mi4-x1te-fhk9 mi4-p0h3-7ury mi4-r4m3-lmco mi6-kkpr-uk30 mi6-9cms-o9xk mi7-pin9-axer min-nij7-33uz mj7-jnn3-nsa7 mj2-xggo-6tq9 mj3-075s-iksp mj7-i7pb-rzkc mj7-bffy-rssa mj1-k1cr-wyd3 mj1-jh4r-ad50 mj7-m12x-wg27 mj7-nowb-u18w mj7-n3y5-06u5 mj7-noem-akc5	<p>Respondents express concern that there is a lack of clarity in variable definitions.</p>	<p>NCES thanks respondents for their comments.</p> <p>The ACTS collection is accompanied by a codebook which outlines the operational definition of each variable and how it should be coded for collection. Whenever appropriate, NCES has used variables and/or variable definitions that are used elsewhere within the IPEDS collection.</p> <p>If institutions have questions</p>

	mj7-ny4g-kkf4 mj7-ocxm-qkuh mj7-sryh-shqc mj7-kzog-t5ge mj7-mgdr-fr3h		<p>regarding variable definitions after reviewing the collection materials accompanying the ACTS, assistance is available from the IPEDS HelpDesk.</p> <p>No change is made in response to this comment.</p>
<p>7 - Institutional Cost</p>	mi3-hrni-ej1y mi4-mrdw-qo4y mi4-px0o-zqua mi6-ejfl-qxy3 mi6-phfp-thj8 mi6-9cms-o9xk mif-266c-xouc mid-bgb8-ud6u mie-0rvc-eeap mig-cfl2-i372 mil-rlk1-22s2 min-euft-6dnz min-fgcp-5met miq-978f-whr1 miq-haly-rmj6	<p>Respondents express concern that complying with the ACTS requirement will be costly for institutions.</p>	<p>NCES thanks respondents for their comments.</p> <p>Any change to IPEDS has the potential to represent an increased resource burden on institutions. Notwithstanding burden reductions elsewhere, the addition of a new component and/or new data years necessarily adds burden.</p> <p>Commenters are reminded, however, that the contents of the ACTS collection are informed by policy questions and other details outlined in the Presidential Memorandum on <u><i>Ensuring Transparency in Higher Education Admissions</i></u> and the Secretary's subsequent <u>Directive</u>.</p> <p>As noted previously, NCES has</p>

			<p>sought to reduce the burden of ACTS wherever possible. This includes through the use of existing variables and variable definitions and through reducing the need to manually enter data into the IPEDS Collection System. NCES is unable, as some commenters have requested, to offset this burden through other means (e.g., stipends or honoraria).</p> <p>No change is made in response to this comment.</p>
<p>8 - Lookback Data</p>	<p>mi3-hrni-ej1y mj7-a3zp-lrf4 mj1-n6i5-kxd8 mj7-nowb-u18w mj7-n3y5-06u5 mj7-noem-akc5 mj7-ny4g-kkf4 mj7-sryh-shqc mj7-ojos-kjoo</p>	<p>The commentor argues that data need not be collected prior to 2023, the year that <i>Students for Fair Admissions v. Harvard</i> was decided.</p>	<p>NCES thanks the commentor for this comment.</p> <p>NCES proposed lookback period is designed to collect time-series data that are amenable to a wide range of analytic techniques. We are particularly mindful that trend analyses depend upon multiple years of data to credibly distinguish underlying secular trends from other potential causes. As such, no change is made in response to this comment.</p>

			As noted in the collection materials accompanying the ACTS, NCES requires institutions report only those ACTS data they have available. Institutions should contact the IPEDS Helpdesk with concerns related to the availability of lookback data.
<i>9 - Comments Received via the 60-Day Notice</i>	<u>mi3-hrni-ej1y</u>	The commentor argues that a large number of comments received during the 60-day notice process were “spam,” and should not be reported or considered by ED for the purpose of evaluating the requested information collection.	<p>NCES thanks the commentor for this comment.</p> <p>It is NCES’s practice to acknowledge all comments received in response to an information collection request, regardless of their number or the position they advocate.</p> <p>Notably, the quantity and tenor of comments received are only two factors considered when evaluating public comment regarding new or changing information collections.</p> <p>No change is made in response to this comment.</p>
<i>10 - Data Confidentiality</i>	<u>mi3-hrni-ej1y</u> <u>mi7-o7ro-ali4</u>	The commenters argue that the granularity of ACTS data may	NCES thanks commentors for their comments.

<p><i>and Small Cell Sizes</i></p>	<p>mi6-9cms-o9xk mie-pnw1-zykt miq-978f-whr1 mir-siwl-o3ea mit-6z6a-x4q7 mj7-jnn3-nsa7 mj2-xggo-6tq9 mj1-jh4r-ad50 mj0-and5-mjcl mj0-7e28-qvsd miy-wkth-4fvz mj7-ny4g-kkf4 mj7-ojos-kjoo mj7-kzog-t5ge mj7-lcp9-2d4o</p>	<p>increase its privacy risk, and that small cell sizes arising from that granularity may not be analytically useful.</p>	<p>NCES takes seriously its statutory responsibility to protect the “confidentiality of persons” in its collection, reporting, and publication of data (see Section 183 <i>Education Sciences Reform Act of 2002</i> [ESRA]). This includes data collected and reported via IPEDS, which is not otherwise collected under a pledge of confidentiality. NCES also strives to collect data that are analytically useful, and comport with the agency’s statistical purpose and goal of shedding light on questions of education policy and practice.</p> <p>Small cell sizes arising in the ACTS collection have the potential to raise concerns about data confidentiality and analytic utility. While these two factors must be appropriately balanced, confidentiality is of paramount concern.</p> <p>To that end, prior to any ACTS-related reporting or dissemination (including the release of any ACTS data), the</p>
------------------------------------	--	---	---

			<p>data will be viewed by the Institute of Education Sciences' (IES's) Disclosure Review Board (DRB). The purpose of the DRB is to recommend or review statistical techniques applied to data that mitigate the risk that data could be used to reidentify any individual.</p> <p>Importantly, the DRB may also recommend that the NCES Commissioner make ACTS data available only as a Restricted Use Data File. In that instance, data will only be licensed to qualified researchers who (1) register a research plan with NCES that represents a bona fide statistical purpose, (2) agree to ESRA confidentiality provisions and acknowledge that any attempt on their part to reidentify an individual from the ACTS data is a felony, (3) agree to have any analyses arising from the ACTS data reviewed by IES for disclosure risk prior to sharing them with non-license holders, and (4) receive final approval from the NCES Commissioner to access the data.</p>
--	--	--	---

			<p>Prior to collection, it is impossible to know with certainty the extent to which small cells will occur within the ACTS data and the specific metrics and/or disaggregates that might be affected. As such, it is impossible to predict the extent to which analytic utility might be affected by their prevalence or risk mitigation approaches. Along with the Disclosure Review Board and the IES team that performs analysis-specific disclosure risk reviews, NCES will prepare and review initial tabular reports arising from the ACTS data to understand the potential impact of small cell sizes on its utility.</p>
<p><i>11 - Eligibility Thresholds</i></p>	<p>mi3-hrni-ej1y mi4-r4m3-lmco mj0-7e28-qvsd mj7-bffy-rssa mj7-jrz1-oype mj1-jp00-cis5 mj0-92jz-26t8 mj7-lcp9-2d4o mj7-sryh-shqc</p>	<p>Commenters argue that characterizing any institution that does not have a 100 percent acceptance rate as being “selective” and therefore in-scope of ACTS is ill-advised. Others argue that the award of aid should not be considered in eligibility determinations.</p>	<p>NCES thanks the commentors for their comments.</p> <p>NCES does not argue that institutions with anything other than a 100 percent admission rate are “selective.” Rather, NCES (and the field more broadly) currently lacks data to inform a specific cut-point at which a relationship between selectivity and admissions rates</p>

			<p>may begin. Indeed, as noted in the Presidential Memorandum on <u><i>Ensuring Transparency in Higher Education Admissions</i></u> and the Secretary's subsequent <u>Directive</u>, one purpose of the ACTS collection is to address a "persistent lack of available data" related to the college admissions process. NCES will review the relationship between selectivity and admissions practices to inform future ACTS collections.</p> <p>NCES continues to believe that eligibility for the ACTS component should depend not only on an institution's admission rate but also their financial aid practices. NCES is cognizant that institutions have multiple tools as their disposal to shape each year's incoming class. This includes specific decisions regarding who is admitted (and via what mechanisms) as well as decisions related to institutional aid to meet potential enrollees' financial needs. As such, considering them jointly is justified for the purposes of the</p>
--	--	--	--

			<p>ACTS component.</p> <p>No changes are made to the proposed collection at this time.</p>
<p>12 - Scope of Requested Data Elements</p>	<p>mi4-p0h3-7ury mi3-ngdr-i2ds min-fgep-5met mj4-kolw-zpmg mj4-kolw-xhtml mj7-fh1n-c42i</p>	<p>Commentors argue that the scope of requested data elements exceed that outlined in the Presidential Memorandum and/or the Secretary’s subsequent Directive to NCES.</p>	<p>NCES thanks the commentors for their comments.</p> <p>The Secretary’s <u>Directive</u> to NCES requires that, among other data elements, it collect “data for each race-and-sex pair’s graduation rates, final GPAs, financial aid offered, financial aid provided, and other relevant measures” (emphasis added). In this case, NCES has identified several measures that may be relevant to contextualizing other data collected as part of ACTS, including those that focus on student outcomes. This includes, but is not limited to, remedial coursetaking and parental income.</p> <p>Because many of the ACTS metrics are new, NCES cannot quantify the utility of “other relevant measures” with certainty prior to this inaugural collection. Following the</p>

			<p>collection of the ACTS data, NCES will evaluate the analytic utility of these data compared to their associated burden. This evaluation will inform future ACTS collections. No changes are made to the proposed collection at this time.</p>
<p><i>13 - Consideration of Additional Data Elements</i></p>	<p>mi4-p0h3-7ury min-ogrr-ng8a mj7-jnn3-nsa7 mj2-xggo-6tq9 mj7-a3zp-lrf4 mj1-k1cr-wyd3 mj7-j0oz-3io4 mj7-n3y5-06u5</p>	<p>Commenters suggest that additional data elements are necessary to understand institutional admissions practices.</p>	<p>NCES thanks the commentors for their comments.</p> <p>NCES appreciates commentors' suggestions for additional data that might be collected via ACTS to provide a more fulsome assessment of admissions practices. Suggestions include, but are not limited to, qualitative data and data about the relative weight of various quantitative admissions metrics. Absent these data, some commenters worry analyses based on the ACTS data may draw incorrect conclusions.</p> <p>For its inaugural collection, NCES prefers to leverage data elements that are either (1) already commonly reported via other IPEDS survey components, or (2) used for other internal and</p>

			<p>external reporting purposes.</p> <p>Following the collection of the ACTS data, NCES will evaluate the analytic utility of the current set of ACTS data elements. This evaluation will inform future collections.</p>
<p><i>14 - Institutional Data Capacity or Policy and Impacts on Data Quality or Utility</i></p>	<p>mi4-px0o-zqua mi4-r4m3-lmco mi6-phfp-thj8 mi6-9cms-o9xk mie-pnw1-zykt mi8-xwlo-j5su miq-nel1-wr7u mj2-xggo-6tq9</p>	<p>Commentors argue that institutions may not collect all required ACTS data elements in a consistent manner and across a variety of student groups.</p>	<p>NCES thanks the commentors for their comments.</p> <p>Institutions may collect and store some data elements sought by the new ACTS component in different ways, both over time and across student populations. As noted elsewhere, NCES has sought to limit the number of data elements that are new to IPEDS reporting. Instead, NCES has sought to include variables and/or variable definitions that are used elsewhere within the IPEDS collection, albeit for different purposes. Some ACTS metrics derived for some student groups, such as those in different graduate programs, may not be comparable when aggregated. This motivates the collection of 4-digit CIP codes as part of the ACTS graduate student</p>

			<p>collection.</p> <p>Finally, NCES requires institutions report only those ACTS data they have available. Institutions that experience reporting difficulties are encouraged to contact the IPEDS Helpdesk for additional support. When necessary, users should review the codebooks accompanying the collection to identify the reserve code that indicates a variable is not available for reporting (e.g., a “-1” value).</p> <p>No changes are made to the proposed collection in response to these comments.</p>
<p><i>15 - Records Retention Concerns</i></p>	<p><u>mi4-r4m3-lmco</u> <u>mi6-3osl-p6bh</u> <u>mi6-ejfl-qxy3</u> <u>mi6-phfp-thj8</u> <u>mi6-9cms-o9xk</u> <u>mif-266c-xouc</u> <u>mi8-z2zq-deck</u> <u>mie-pnw1-zykt</u> <u>mi8-xwlo-j5su</u> <u>mig-cfl2-i372</u> <u>min-ogrr-ng8a</u> <u>min-nij7-33uz</u> <u>min-fgcp-5met</u> <u>miq-978f-whr1</u></p>	<p>Commentors argue that local records retention policies may complicate (or preclude) completion of the ACTS surveys by some schools in some years.</p>	<p>NCES thanks the commentors for their comments.</p> <p>Some institutions may have records retention policies such that some ACTS data elements have already been destroyed.</p> <p>NCES requires institutions report only those ACTS data they have available. Institutions that experience reporting difficulties are encouraged to contact the</p>

	mir-vpce-2lim mir-seuc-ydvk mit-eydz-jvre miw-99ht-e5fz mit-6z6a-x4q7 mj2-xggo-6tq9 mj7-nowb-u18w		<p>IPEDS Helpdesk for additional support. When necessary, users should review the codebooks accompanying the collection to identify the reserve code that indicates a variable is not available for reporting (e.g., a “-1” value).</p> <p>No changes are made to the proposed collection in response to these comments.</p>
<p><i>16 - Alternative Approaches to Data Collection</i></p>	mi4-r4m3-lmco miw-99ht-e5fz mj4-kolw-zpmg mj4-kolw-xhtml mj7-rklo-uwpv	<p>Commentors argue for alternative approaches to collecting the ACTS data beyond the current IPEDS collection.</p>	<p>NCES thanks the commentors for their comments.</p> <p>NCES notes that the Presidential Memorandum on <i>Ensuring Transparency in Higher Education Admissions</i> identifies one purpose of the ACTS collection is to address a “persistent lack of available data” related to the college admissions process. NCES believes that “persistent lack” cannot be fulsomely addressed unless data are (1) of high-quality and (2) can be collected both systematically and regularly across all relevant institutions. The existing IPEDS collection, rather than ad hoc approaches to</p>

			<p>data gathering, is best positioned to meet these goals.</p> <p>No changes are made to the proposed collection in response to these comments.</p>
<p>17 - Use, Analysis, and Consequences of ACTS Data</p>	<p>mi6-3osl-p6bh mi5-6rdr-enlv mi7-m0u1-kkus mif-266c-xouc mid-bgb8-ud6u mir-siwl-o3ea mir-seuc-ydvk mj4-kolw-zpmg mj4-kolw-xhtml mj2-xggo-6tq9 mj7-ojos-kjoo</p>	<p>Commentors argue that the purposes of the ACTS data and subsequent analyses are unclear, and that there may be unintended consequences of its collection and use.</p>	<p>NCES thanks the commentors for their comments.</p> <p>NCES believes the purposes of the ACTS collection are clear, including via the Presidential Memorandum on <i>Ensuring Transparency in Higher Education Admissions</i> and the Secretary’s subsequent Directive. For example, the former notes both that “[i]t is therefore the policy of [the] Administration to ensure institutions of higher education receiving Federal financial assistance are transparent in their admissions practices” and that the ACTS collection is addressing a “persistent lack of available data” related to the college admissions process.</p> <p>NCES will use the ACTS data for statistical purposes, releasing one or more descriptive reports</p>

			<p>or table compendia demonstrating the utility of the new collection. Although those initial reports have not been formalized, their contents can be reasonably anticipated given the domains of data collection (e.g., admissions practices, degree completion) and the typical unit of analysis (i.e., race × sex pairs).</p> <p>It is impossible to predict the full range of analyses that will ultimately arise from the ACTS data. However, NCES anticipates that future analyses will employ more complex statistical methods to explore variation over time and the association between metrics of interest and key institutional, policy, and historical factors. The impact of these analyses on future policymaking cannot be predicted.</p> <p>No changes are made to the proposed collection in response to these comments.</p>
<p><i>18 - Burden Estimate</i></p>	<p>mi5-6rdr-enlv mir-siwl-o3ea</p>	<p>Commentors argue that NCES's burden estimate for ACTS is too</p>	<p>NCES thanks the commentors for their comments.</p>

	<p>mir-seuc-ydvk miw-99ht-e5fz mj2-xggo-6tq9 mj1-jp00-cis5 mj7-sryh-shqc mj7-ny4g-kkf4 mj7-kzog-t5ge mj7-noem-akc5</p>	<p>low or otherwise inaccurate.</p>	<p>As shown in Part A of the Supporting Statement accompanying this proposed collection, NCES anticipates the burden associated with this collection to not exceed 200 hours in its first year. This represents 25 workdays at 1.0 FTE or 50 workdays at 0.5 FTE.</p> <p>NCES believes this estimate is reasonable because (1) the bulk of data collected by the ACTS survey is already reported by institutions in existing IPEDS collections; (2) the cohorts of students reported on in the ACTS component are largely familiar, being used in other IPEDS surveys; and (3) the structure of the ACTS data files is identical year over year. As such, NCES anticipates that, once an institution creates their first year's set of data files, the marginal effort to create additional years should decrease. Some of that decreased effort may be offset by the need to adapt data cleaning and recoding procedures to respond to</p>
--	--	-------------------------------------	---

			<p>changing institutional data definitions over time or to pull older data from data warehouses.</p> <p>Some commenters specifically raise concerns that NCES's effort to reduce burden through the use of record-level data to generate an uploadable aggregate file may actually increase burden. NCES believes otherwise, given our successful use of record-level templates in other collections involving thousands of postsecondary institutions (e.g., the National Postsecondary Student Aid Study).</p> <p>As it does with every IPEDS collection, NCES encourages feedback about the accuracy of its burden estimates. Feedback received in the inaugural ACTS collection will be used to inform future information collection requests.</p> <p>No changes are made to the proposed collection in response to these comments.</p>
--	--	--	---

<p><i>19 - Other Technical Suggestions</i></p>	<p><u>mi6-bxsv-efhv</u> <u>miq-haly-rmj6</u> <u>mj4-hcrv-gmn8</u></p>	<p>Commentors offer technical suggestions for improving the collection of ACTS data.</p>	<p>NCES thanks the commentors for their comments, which include technical suggestions for how ACTS data might be best collected. Examples include (1) changes to the format of proposed templates, (2) the use of sample surveys, rather than IPEDS, and (3) the use of different categorizations for some demographic categories.</p> <p>NCES will conduct a thorough review of all aspects of the ACTS data collection following its close in Spring, 2026. Unless otherwise governed by existing regulations, Executive Orders, or legislation, suggestions like those provided by commentors will be considered at that time, and may inform future plans for the collection of ACTS data.</p> <p>No changes are made to the proposed collection in response to these comments.</p>
<p><i>20- ED, IES, and/or NCES Capacity</i></p>	<p><u>mi7-m0u1-kkus</u> <u>mi6-9cms-o9xk</u> <u>min-ogrr-ng8a</u></p>	<p>Commentors express concern about NCES’s capacity to effectively manage the ACTS</p>	<p>NCES thanks the commentors for their comments.</p>

<p><i>Concerns</i></p>	<p>miw-99ht-e5fz mj1-jp00-cis5 mj7-jnn3-nsa7 mj1-jh4r-ad50 mj7-fyp3-n414 mj7-sryh-shqc mj7-ny4g-kkf4 mj7-kzog-t5ge mj7-n3y5-06u5 mj7-ocxm-qkuh</p>	<p>component, including but not limited to its collection, validation, analysis, and reporting. A subset of commenters express concerns about capacity to provide technical assistance to colleges and universities that need to provide ACTS data.</p>	<p>NCES and its IPEDS contractor have confidence in their joint capacity to collect, validate, and report the ACTS data. The Fall 2025-26 IPEDS collection cycle was conducted successfully in late 2025. NCES anticipates the Winter 2025-26 collection will be similarly successful.</p> <p>NCES anticipates that the inaugural publication and release of the ACTS data will proceed on a timeline that lags that of other Winter components. This lag will provide ample time for (1) thorough quality assurance and disclosure risk reviews and (2) the design, review, and publication of reports, tables, and other ACTS data products.</p> <p>Some commenters expressed concern that sufficient technical assistance will not be available to support institutions as they complete ACTS. The IPEDS Helpdesk is available and prepared to respond to inquiries from institutions in all phases of the collection.</p>
------------------------	--	---	---

			No changes are made to the proposed collection in response to these comments.
<i>21 - The Collection Is Unnecessary</i>	mj7-jjuu-ei08 mj5-ah0p-5vs8 mj7-xtr1-dz1j	Commentors argue that the ACTS collection, or the data it collects, are unnecessary.	<p>NCES thanks commentors for their comments.</p> <p>In the Presidential Memorandum on <i>Ensuring Transparency in Higher Education Admissions</i>, President Trump required that IPEDS establish the ACTS component “[w]ithin 120 days of the date of this memorandum, and to be initiated this 2025-26 school year.” As such, no changes can be made in response to these comments.</p>
<i>22 - Statements in Support of the ACTS collection</i>	mj1-jcwj-3tqs mj7-xda1-4ifn	Commentors register a comment in favor of the ACTS collection and/or its purposes.	NCES thanks commentors for their comments.
<i>23 - Procedural Questions Related to the ACTS 60-Day Notice</i>	mj7-lfdb-m8p2	Commentors raise questions about the 60-Day Notice component of this information collection request.	<p>NCES thanks commentors for their comments.</p> <p>NCES believes that the information contained in the 60-day notice provided the public a sufficient basis to provide thoughtful comments to the Department on the proposed collection. This is evidenced by the large number of comments received, both pro and con, in</p>

			response to the agency's request.
--	--	--	-----------------------------------