



October 10, 2025

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

**Re: Integrated Postsecondary Education Data System 2024-25 through 2026-27. OMB Control Number 1850-0582. [Federal Register Number 2025-15536](#) (90 FR 39384)**

Dear Mr. Soldner:

On behalf of the [Council of Graduate Schools](#) (CGS), I am submitting comments on the U.S. Department of Education's (Department) proposed addition of the Admissions and Consumer Transparency Supplement (ACTS) survey component. CGS shares the Department's interest in lawful, fair application and admissions practices. At the same time, we have concerns about the design, scope of required data, and operational feasibility of the proposed ACTS collection as described in the Federal Register notice.

The Council of Graduate Schools (CGS) is an organization of over 400 institutions of higher education in the United States and Canada, along with 24 international institutions, engaged in graduate education, research, and the preparation of candidates for advanced degrees. Representing more than 1.7 million graduate students, CGS advances its mission to improve and strengthen graduate education through federal advocacy, research, and the development and dissemination of best practices.

### **Administrative Burden and Feasibility**

We note that the federal notice requests feedback on the accuracy of burden estimates, the clarity of information requested, and approaches to minimize respondent burden. The proposed ACTS component would require extensive cross-tabulations of application and enrollment data across admissions, registrar, financial aid, and institutional research offices. Universities would need to report applicants, admission, and enrollees by race and sex, further disaggregated by admission test score quintiles, high school GPA quintiles, family income ranges, parental education, and Pell Grant eligibility. While the notice states that "many of the same data elements" will apply to graduate students, the exact requirements remain undefined. In our opinion, the inclusion of the ACTS survey and the collection of this additional data will not improve outcomes for graduate students. Given the recent significant staff reductions at the

Department, it is questionable if there is the staffing to analyze the requested data while also meeting its statutory obligation to provide other useful information through the Integrated Postsecondary Education Data System (IPEDS). For graduate programs in particular, compiling such data will demand significant coordination amongst admissions officers, registrars, financial aid administrators, and institutional research officers. Moreover, it will take more than the estimated 11 hours to collect and compile the additional data required by the ACTS survey.

Graduate reporting presents unique challenges. If a student has transferred universities prior to graduate enrollment, the admitting universities may not have access to records such as high school transcripts, parental education, or family income. Reconstructing these data points would either require burdensome data requests from prior institutions or impose new reporting obligations on students. Such requirements would be inconsistent with current admissions practices and could undermine data processing, while creating a significant administrative burden.

### **Retrospective Data Request**

A major concern is the requirement to submit historical data. Under the proposal, the 2025–26 ACTS collection will cover not only the 2025–26 year but also each of the five prior years (2019–20 through 2024–25 for outcomes, and 2020–21 through 2025–26 for admissions). NCEC intends this as a “baseline” to compare post-Students for Fair Admissions practices. Requesting the previous five years of data collection for graduate students may not be feasible due to school transfers and/or the universities not keeping student-level application data at the graduate level. For example, some universities have migrated student records systems within that period, leaving admissions selection up to specific academic departments across campus with no single data collection system, or older data may reside in siloed platforms. In addition, reconstructing past test scores, GPAs, and financial information by a race-sex subgroup for graduate students may require extensive manual work or contacting academic departments across campus.

### **Data Definitions, Comparability, and Small Cohorts for Graduate Programs**

The notice would require graduate application metrics to be reported by broad fields of study using Classification of Instructional Programs (CIP) code groupings. While the notice acknowledges that graduate students typically apply to specific departments, it overlooks the fact that universities may lack centralized recordkeeping systems for all applicants at the graduate level. Application processes are often decentralized, with data maintained by the college or academic department.

Although ACTS proposes to combine CIP codes into broader fields of study, universities would need to develop new systems to collect and harmonize data across colleges and departments.

Although cross-college collaboration is generally beneficial, this requirement would impose a substantial administrative burden because programs that share a single CIP grouping, such as economics and political science, are often housed in entirely different colleges with separate data systems, reporting requirements, and governance structures.

Program size further complicates reporting. Many doctoral programs receive only a small number of applications each year and admit an even smaller cohort, often limited by available funding. In some fields of study, a large applicant pool competes for very few funded seats, while in others, only a handful of applicants pursue a given program. These variations make it difficult to aggregate data in a way that preserves accuracy and protects student privacy. Making these comparisons at a national level could have unintended consequences, such as identifying students in small cohorts. It should also be noted that academic departments are often the only place on campus where application data is stored.

### **Scope and targeting of required Universities**

The Federal Register notes that “ACTS is expected to be applicable to all four-year universities that utilize selective college admissions.” The term selective four-year, however, is not defined in the notice. CGS requests that the Department provide a clear and operational definition of selective four-year universities and explain how this designation will interface with graduate schools.

In considering the possible impacts of this proposal, we partnered with the American Council on Education (ACE) and other associations on a survey to better understand the concerns of colleges and universities. Survey participants included staff such as the leaders of institutional research offices, senior leaders on college campuses, and analytical staff. These points are outlined in ACE’s letter to the Department. These issues are important to the higher education community, and we urge the Department to avoid imposing additional reporting requirements on universities of higher education and respectfully request that this notice be rescinded.

Thank you for your consideration of these comments. Please do not hesitate to contact CGS if you have questions or require clarification concerning these comments.

Sincerely,



Chevelle Newsome  
CGS President