



Learning from the Initial ACTS Reporting

*Documenting Practitioner Experiences and
Recommendations for Future Reporting*

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RESEARCH REPORT

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Contents

Acknowledgments	iv
Learning from the Initial ACTS Reporting	1
Introduction	1
Major Issues Identified	4
Recommendations for Improving ACTS	14
Conclusion	17
Appendix	19
Methodology	19
Notes	22
References	24
About the Authors	25
Statement of Independence	26

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Learning from the Initial ACTS Reporting

Introduction

On August 7, 2025, the White House issued the presidential memorandum *Ensuring Transparency in Higher Education Admissions*.¹ This memo called for greater transparency in college admissions to “expose unlawful practices” related to the consideration of race in college admissions. This call for transparency was based on the administration’s claim that a lack of data on college admissions raised uncertainty as to whether colleges and universities were continuing to consider race in admissions despite the US Supreme Court’s rulings in *Students for Fair Admissions v. Harvard* and *Students for Fair Admissions v. University of North Carolina*,² which sharply limited the use of race in college admissions.

To address this concern about the availability of data on college admissions, President Trump called for the secretary of education to revise or overhaul the Integrated Postsecondary Education Data System (IPEDS)³ to “remove inefficiencies and better streamline the process to more efficiently organize and utilize data received from the institutions.”⁴ Additionally, President Trump called for the expansion of IPEDS data reporting to provide “adequate transparency in admissions.” The new IPEDS survey, the Admissions and Consumer Transparency Supplement (ACTS), would collect data “that could indicate whether institutions of higher education are using race-based preferencing in their admissions processes.”⁵ The implementation timeline for the new IPEDS survey was 120 days from the date of the memorandum.

The new ACTS survey differed from prior National Center for Education Statistics (NCES) practice in three important ways. First, the new survey’s scope and volume were substantially greater than other new IPEDS surveys, requiring detailed undergraduate and graduate admissions data, data on multiple student characteristics, and seven years of reporting—more than 100 new questions and approximately 10,000 data fields.⁶ Second, the development process did not include the stakeholder consultation and testing typically used when developing or substantially revising IPEDS collections. Third, the 120-day implementation timeline gave institutions little time to understand the new requirements, prepare their systems and data, and coordinate with the staff members needed to complete the collection.

The announcement of ACTS and its timeline was met with concerns from the higher education community.⁷ Many of these concerns were expressed during the public comment period for the new

rule.⁸ Some concerns were legal in nature, such as the argument that the new data collection's purpose of identifying race-based preferences in admissions exceeded the scope of the Supreme Court's ruling,⁹ but most of the concerns from institutions were related to the implementation timeline and process, along with data availability, data quality, and student privacy risks.¹⁰

On December 18, 2025, the US Department of Education launched ACTS with an initial completion deadline of March 18, giving colleges and universities three months to compile and submit all the newly requested data. This deadline was later conditionally extended to April 8 for institutions that could not meet the initial deadline.¹¹ Additionally, a US District Court judge blocked public institutions in 17 states, along with institutions that are members of the six associations that were plaintiff-intervenors, from having to submit ACTS data based on the court's finding that ACTS was promulgated in an arbitrary and capricious manner.¹²

In May 2026, the Urban Institute and the Association for Institutional Research (AIR) launched a national study with two primary goals: (1) to document the experiences of those responsible for ACTS reporting and identify potential implications for the quality, accuracy, and comparability of the submitted data and (2) to use the findings to develop recommendations for improving the reporting process and data quality in future ACTS collection cycles.

The findings presented below draw on several sources. The primary source was a survey administered in May and June 2026 that examined institutions' experiences preparing and submitting ACTS data. The survey received 596 eligible responses from individuals at four-year colleges and universities that were required to report ACTS data. Approximately 63 percent of respondents represented private nonprofit institutions, 35 percent represented public institutions, and the remainder represented other institution types, including for-profits. The study also included two in-person listening sessions held at the 2026 AIR Forum in May, which were open to all forum attendees and involved approximately 70 participants, and three virtual focus groups conducted in July with 25 participants. The focus groups included participants from both public and private nonprofit institutions, with public institutions somewhat more heavily represented. Across the survey, listening sessions, and focus groups, participants primarily worked in institutional research or institutional effectiveness or were other higher education data professionals with direct knowledge of their institutions' ACTS reporting processes. More details on the study's methodology are available in the appendix.

This study was also informed by research conducted in May 2026 for an IPEDS Technical Review Panel (TRP) examining institutional factors that affect IPEDS data quality and the supports institutions

need to produce high-quality submissions. That research included a survey of 335 institutional research and institutional effectiveness professionals and seven virtual focus groups involving 54 participants.

BOX 1

September 2026 Supplemental Explanation by the Department of Education

On September 14, 2026, the US Department of Education published a revision to the discussion accompanying its November 13, 2025, Federal Register notice on ACTS. The department states that the revision was issued “in accordance with” the remand in *Massachusetts v. U.S. Department of Education* (D. Mass. 2026). The revised discussion, which was published after the data were collected for this report, adds details about the collection’s implementation timeline, burden estimates, data quality procedures, and privacy safeguards, all of which relate to topics this report examines from the institutional perspective.

On timeline and readiness, the notice explains that the Department of Education believed it was prepared to execute ACTS on its original schedule and that delaying collection could reduce the data’s usefulness or availability, including because some historical records might no longer be retained. Institutions responding to this report’s survey and focus groups described different circumstances on their end: implementing new reporting processes on a short timeline and working with definitions and guidance that were ambiguous and changing as the collection proceeded. Several study participants pointed to the absence of a Technical Review Panel as one factor contributing to this challenge.

The revised discussion also provides more details on the collection’s intended purpose. It describes the primary purpose of ACTS as providing consumers transparency about college admissions practices while elsewhere describing the collection as measuring outcomes associated with those practices. This distinction reflects a concern study participants raised: ACTS primarily collects information about admissions outcomes rather than the underlying practices that produce them. Participants noted that understanding admissions practices would require additional information about factors such as recruitment strategies, the use of essays and other application materials, and how institutions define and implement holistic admissions.

The supplemental information retains the Department of Education’s original burden estimate of 200 hours per institution and provides additional details about how that estimate was derived, noting that a lower estimate may apply in future cycles as processes become more established. Institutions, for their part, reported spending more staff time on ACTS than the department’s estimate reflected, particularly in the first year, as they developed new reporting processes and compiled newly required data.

The supplemental information also describes the quality assurance and privacy review steps built into the collection to support ACTS’s stated purpose. It states that raw student-level files will be destroyed after quality control activities and that any public or restricted-use data products will

undergo disclosure-risk review before release, providing additional details on issues that participants identified as important privacy concerns.

Read together, the Department of Education's revisions and our findings describe the same first-year ACTS collection from different vantage points. In several areas—particularly institutional readiness, reporting burden, and how well ACTS captured admissions practices—the experiences and concerns study participants reported differ from the department's description of the collection and its expected implementation.

Major Issues Identified

Implementation and Reporting Timeline

Although the presidential memorandum directed the Department of Education to expand IPEDS reporting within 120 days, ACTS was launched 133 days after the memorandum was issued, leaving institutions 90 days to submit their data before the original March 18, 2026, submission deadline.

This meant that the NCES had a little more than four months to create and launch an entirely new IPEDS survey, and institutions were given approximately three months to submit their data. For comparison, Outcome Measures,¹³ which was the most recent major addition to IPEDS, was developed over several years through a long process that involved federal officials working with researchers and higher education leaders.¹⁴ As part of that process, a TRP was conducted before the first Outcome Measure data collection to shape the survey's design.¹⁵

The compressed implementation and collection timeline for ACTS meant not only that the NCES could not follow the historical process for adding a new survey to IPEDS but that institutions had a shorter-than-usual time frame for figuring out how best to report the newly required data. Focus group participants repeatedly raised both issues. Individuals frequently referred to the lack of a TRP or any pilot testing as a major factor in the ambiguity of many of the data definitions. Several participants also spoke of the immense stress they and their colleagues experienced trying to comply with the ACTS deadline. They said their stress was largely tied to the fact that institutions that fail to respond to IPEDS surveys may face fines of up to \$71,545¹⁶ per violation or limitation, suspension, or termination of their eligibility to participate in Title IV of the Higher Education Act.¹⁷ This was a particular concern for individuals at small or underresourced institutions who stated their schools could not afford these fines or any limits to Title IV funds, so they felt immense pressure to meet the ACTS deadline.

According to numerous focus group participants, an additional complication of the short ACTS reporting period was that it occurred during a busy reporting period for institutions and institutional research and institutional effectiveness professionals who often wore several hats and were involved with many of their institution's reporting requirements. Several participants said the ACTS reporting period overlapped with their institution's budget season in addition to existing IPEDS reporting. According to the IPEDS 2025–26 data collection schedule, the reporting period for ACTS overlapped with nine other IPEDS surveys.¹⁸

Institutional Capacity Burden

Institutions were required to provide ACTS data for the 2025–26 academic year in addition to each academic year going back to 2019–20. The Department of Education estimated it would take 200 hours of staff time for an institution to submit these data.¹⁹ Among all respondents to the question, 67 percent reported that their institutions spent at least 200 staff hours on ACTS, 52 percent reported spending at least 250 hours, 28 percent reported spending 400 hours or more, and 6 percent were unsure how many hours their institutions had spent.

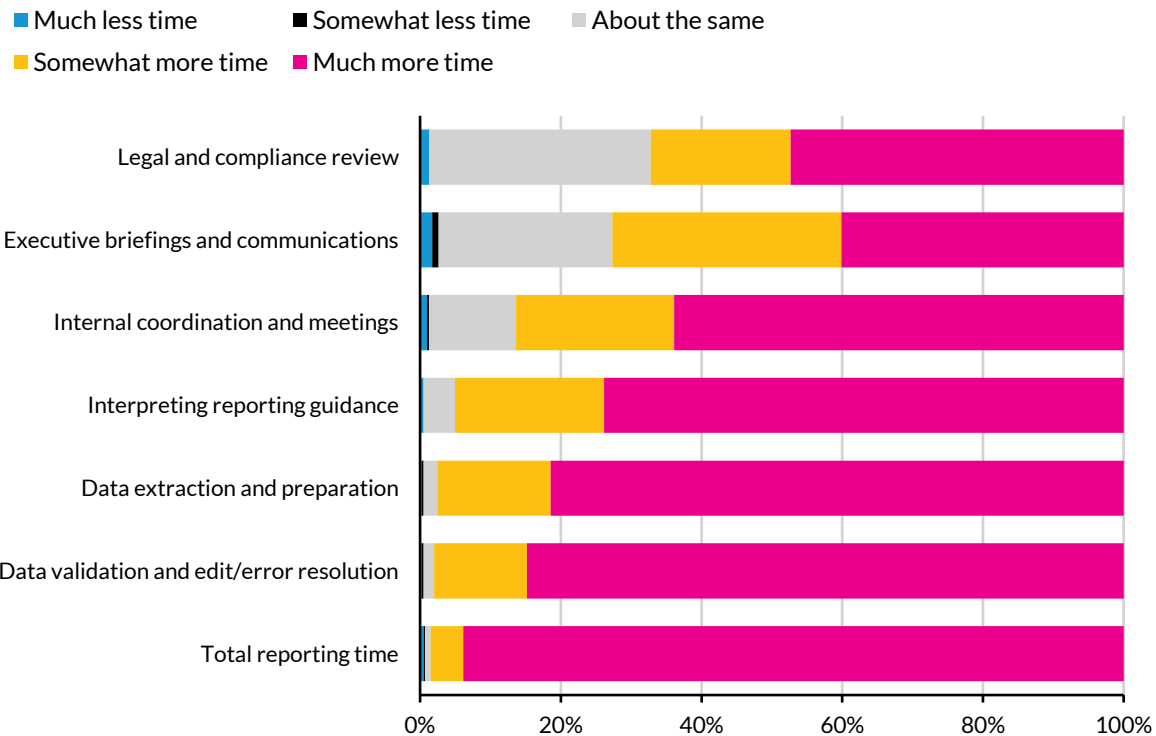
“I calculated that during those four months from when they announced about it until it was due, I spent one-third of my working time on this, and I’m an office of one person.”

—Focus group participant

For context, when asked how staff time spent preparing and submitting ACTS compared with typical staff time for regular IPEDS reporting, 98 percent of respondents indicated ACTS required somewhat or much more time (figure 1). This is supported by the NCES's own estimates, which showed that even at their estimated 200-hour burden level, ACTS reporting would take two and a half times as long to complete as the combined estimate of 78.5 hours for the other 12 IPEDS surveys in the 2025–26 collection year (NCES 2025, table 18).

FIGURE 1

Time Spent on Activities for ACTS Reporting Compared with Typical IPEDS Reporting



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Source: Association for Institutional Research survey of respondents at four-year institutions required to report ACTS data.

Note: ACTS = Admissions and Consumer Transparency Supplement.

Resource Constraints

Resource constraints emerged as the leading contributor to reporting burden. Although resource constraints were not comprehensively defined, most study participants discussed it in the context of time and staff limitations. Ninety-four percent of survey respondents agreed that staffing and time constraints contributed to the burden, and resource constraints received the highest overall ranking when respondents identified their three most consequential challenges. Several focus group participants referenced having small or one-person offices responsible for ACTS submission, which overlapped in timing with other IPEDS reporting requirements. Additionally, focus group participants at many institutions reported staff turnover and leadership changes that made it difficult to provide some of the required data. This was particularly true for the historical data that may have been stored across multiple offices or collected using different methods over the seven-year reporting period.

The next-most-cited issue was ambiguous or difficult-to-interpret data definitions. Focus group participants reported spending hours on the phone with the IPEDS Help Desk²⁰ to ensure they were reporting data correctly. But in several cases, they were given answers that conflicted with ACTS training webinars or prior responses they had received from the IPEDS Help Desk, which created more burden.

Data Submission and Validation Errors

Data submission and validation errors were consistently cited as a major contributor to reporting burden. IPEDS uses validation rules (i.e., edit checks) to identify possible inconsistencies or errors in submitted data. Institutions generally must resolve any flagged issues before their survey data can be accepted. Ninety-two percent of survey respondents agreed that validation edits and errors increased the burden, and 81 percent described identifying and resolving those errors as somewhat or very difficult.

For ACTS, institutions could process student-level data using the web-based or locally installed Aggregator Tool,²¹ a Python script, or a combination of the two. Eighty-six percent of survey respondents reported using only the Aggregator Tool.

Focus group participants described several complications with the Python script. Some institutions encountered difficulties downloading and running the script because it triggered cybersecurity or malware alerts. One participant reported spending a month working with the institution's cybersecurity team before ultimately using the web-based Aggregator Tool.

Participants also described error messages that were vague and that were revealed sequentially rather than all at once. When a submission contained multiple errors, users generally had to resolve each one before the next appeared. This prevented staff members from assessing the full scope of the problems, determining the most efficient way to address them, or estimating how much additional time submission would require. Participants further noted that some errors involved minor discrepancies often caused by rounding.

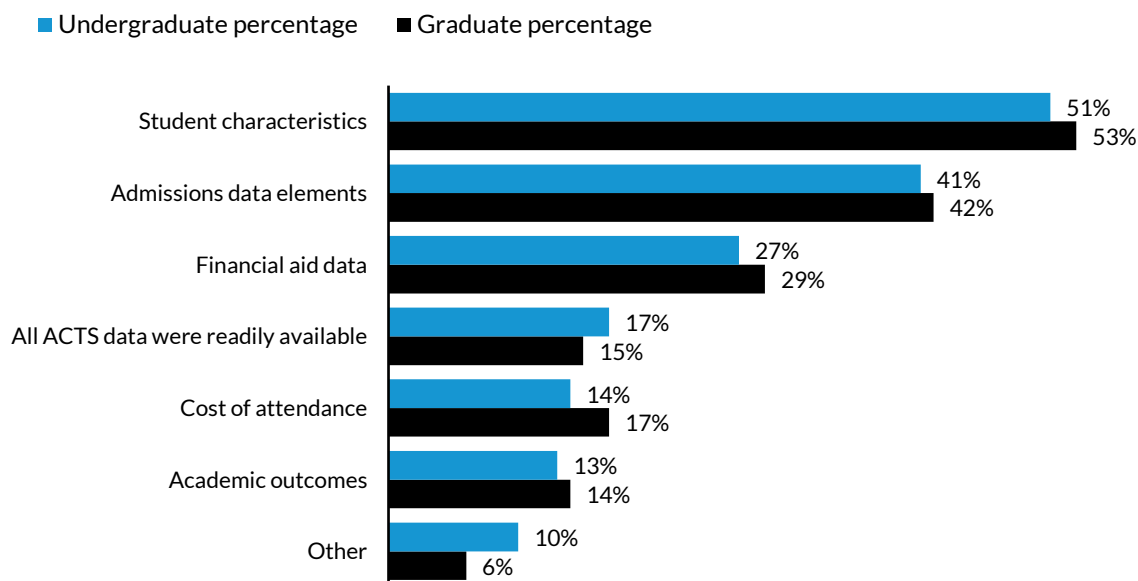
“...for instance, with student financial aid. I was within like \$3 on something, and this is why I said tears, because I literally was on the Help Desk phone crying because like—I don’t know how to fix this, you know.”

—Focus group participant

Data Availability

When asked about the availability of required ACTS data, only 17 percent of respondents reported having all undergraduate data, and just 15 percent indicated they had all the necessary graduate-level data. The three types of data that were most commonly reported missing or unavailable (figure 2) were the same for both the undergraduate and graduate levels: (1) data on student characteristics (e.g., family income and parental college attainment), (2) admissions data (e.g., whether a student was admitted through early action or early decision), and (3) financial aid data (e.g., not all students file a Free Application for Federal Student Aid). Approximately half of respondents identified unavailable student characteristic data at both the undergraduate and graduate levels, while more than 40 percent identified missing admissions data and at least a quarter reported missing financial aid data. Even among institutions that reported having all the ACTS data, several clarified that in most cases, the data were not “readily” available, and they had to invest a significant amount of time and effort to identify where the data were located and compile them in a single location.

FIGURE 2
Types of Data Most Commonly Missing or Unavailable



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Source: Association for Institutional Research survey of respondents at four-year institutions required to report ACTS data.

Notes: ACTS = Admissions and Consumer Transparency Supplement. Academic outcomes refers to the ACTS requirement to report certain student outcomes, such as college grade point average and graduation rates.

In some cases, the issue was not that the data were not available but that the way the institution collected them did not match the ACTS definition. For example, one respondent said their institution identified students who were first-generation students, but their institutional definition did not align with the ACTS definition.

Data Quality and Accuracy

A major concern emerging from both the survey and focus groups was the quality and accuracy of the ACTS data institutions submitted. Fifty-two percent of survey respondents were very or extremely concerned about the accuracy of the reported data, and 64 percent disagreed that ACTS accurately reflects their institution's admissions practices. Focus group participants said their institutions made every effort to apply the same quality standards used for other IPEDS reporting, but they identified four factors that potentially undermined ACTS data quality: the compressed timeline, definitional ambiguity and changing guidance, historical data limitations, and data validation requirements.

Compressed Timeline

Several focus group participants cited the compressed reporting timeline as a challenge to ensuring data accuracy. Pressure from institutional leadership to meet the ACTS deadline and avoid potential fines or penalties meant that, for some institutions, the priority was on-time data submission rather than data accuracy. Particularly challenging was ensuring the quality of the historical data. According to one focus group participant, when trying to provide six years of historical data in a compressed time frame, there is no way to meet the typical IPEDS quality standard.

Definitional Ambiguity and Changing Guidance

Survey findings indicate that definitional ambiguity and changing guidance were widespread concerns. Eighty-seven percent of respondents agreed that ambiguous definitions contributed to their reporting burden, 86 percent cited changing definitions, and 60 percent cited inconsistent guidance from the IPEDS Help Desk. When asked how ACTS data validity and comparability could be improved, the two most frequently selected recommendations were aligning ACTS metrics with existing reporting standards such as IPEDS (66 percent), and providing clearer definitions and guidance (60 percent). Together, these findings suggest that institutions may have interpreted and reported the same underlying phenomena differently, potentially limiting comparisons across institutions.

Focus group participants provided several examples of definitional ambiguity, including whether dual-credit grades should be included when calculating cumulative grade point average after the first

academic year, how tuition and fees should be calculated using the prescribed methodology, and how institutions should report students who deferred admission—whether in the year they applied or the year they matriculated.

“It was not clear if institutions were supposed to report actual cost of attendance (cost incurred) or budgeted cost of attendance used by financial aid.”

—Survey respondent, open-ended response

Participants also described guidance that changed or was applied inconsistently during the reporting period. Several said they attended ACTS informational webinars to ensure they understood the requirements, only to find that some definitions had changed by the time they submitted their data. One participant reported assigning a staff member to check the ACTS frequently asked questions page daily because variable definitions were being updated frequently.

Historical Data

The historical reporting requirement in most cases required institutions to develop new processes rather than simply reuse existing reporting workflows. Ninety-three percent of survey respondents said their institutions developed processes specifically for ACTS, while 81 percent disagreed that assembling data from multiple systems was manageable with minimal challenges. Focus group participants similarly described changes over the seven-year reporting period in institutional data systems, data collection and reporting processes, and definitions as an additional challenge to reporting historical data. One participant reported that their institution had used two different customer relationship management systems and three different financial aid management systems during that period, making it difficult to align data across years.

A related challenge was that ACTS required institutions to report historical information that had not previously been collected through IPEDS. Institutional administrative systems are transactional, meaning records may be updated as information changes or is corrected. For recurring IPEDS reporting, institutions may preserve data snapshots or reporting files that allow them to reproduce what was reported at a particular point. Because ACTS introduced new requirements retrospectively, comparable snapshots often did not exist for the newly required data elements across the full seven-year reporting period.

As a result, institutions frequently had to reconstruct historical ACTS data from current records or archived source data that may have changed. These changes could involve demographic characteristics such as race, ethnicity, or gender, as well as information such as a student’s major or program. Focus

group participants and survey respondents also noted differences in data availability and quality across the applicant pool, admitted students, and enrolled students included in ACTS. Records for students who enroll are typically more complete and are reviewed and used more regularly. Information about applicants or admitted students who do not enroll may receive less ongoing review, reside in separate systems, or no longer be available because of institutional or state data-retention policies.

Staff turnover added another layer of difficulty. At institutions where reporting responsibilities had changed hands and prior processes were not well documented, staff members sometimes had to reconstruct how historical data had been defined, compiled, or reconciled before they could produce comparable data across reporting years.

“Staff turnover led to a lack of archived data that fed into previous reports. Decentralized reporting system meant that the [institutional research and effectiveness] office did not have archived data available.”

—Survey respondent, open-ended response

Finally, participants noted that the seven-year reporting period includes the COVID-19 pandemic, when many institutions temporarily changed admissions, testing, enrollment, and financial aid policies. Because some of those policies were later reversed or modified, comparisons and trend analyses across the ACTS reporting period will need to account for these unusual changes in institutional practices and student behavior.

Data Validation

Eighty-one percent of survey respondents described resolving ACTS validation edits or errors as somewhat to very difficult. Additionally, 99 percent indicated they spent more time on data validation and resolving errors with ACTS than with other IPEDS reporting. Focus group participants cited several ways in which resolving submission errors affected data quality.

One that was frequently referenced was the misalignment between ACTS and other IPEDS definitions and reporting practices. The validation process for ACTS required that data submitted be consistent with prior IPEDS data submissions for areas such as financial aid, enrollment, admissions, and graduation rates. But because ACTS cohorts and definitions did not always align with historical IPEDS reporting, most of the ACTS data that were submitted were flagged as erroneous. As mentioned previously, several focus group participants cited the difference in how students who defer their admission are typically handled in IPEDS compared with how institutions were instructed to handle them in ACTS. An additional discrepancy affecting data quality was that institutions had numerous

students who had changed their sex or race over the seven-year period of data collection. This made aligning their admissions and degree completion demographic data difficult.

These differences frequently triggered data validation errors. According to several participants, some of this confusion between ACTS and IPEDS definitions stemmed from inconsistent answers provided by the IPEDS Help Desk.

One major concern that was widespread across all the focus groups was that resolving some of the errors meant changing data they had previously submitted as part of other IPEDS surveys. Because IPEDS and ACTS definitions were different for many measures, individuals sometimes found it necessary to change their previously submitted IPEDS data to resolve error flags. One individual noted they had to make changes to their previously submitted IPEDS Fall Enrollment data file, and as a result, that file could not be compared with prior years' enrollment data. They summed up their experience with ACTS by saying, "I think this broke IPEDS."

Broader Institutional Concerns

The preceding sections describe the methodological and technical challenges most frequently reported in the survey and focus groups. Participants also raised several broader concerns related to legal and institutional risk, student privacy, the purpose and use of ACTS data, and the human toll of the reporting process.

Legal Compliance and Institutional Risk

Survey findings indicate that ACTS required substantially more institutional attention to legal and compliance issues than typical IPEDS reporting. Sixty-eight percent of respondents said legal and compliance review required somewhat or much more staff time, while 59 percent agreed that legal and privacy concerns contributed to their overall reporting burden. Respondents also expressed substantial concern about the potential consequences and uses of the data: 69 percent were very or extremely concerned about possible regulatory or legal consequences, and 86 percent were similarly concerned about the risk of misinterpretation or misuse.

Institutions generally involved legal counsel to evaluate reporting obligations, monitor litigation, assess compliance risks, and interpret the implications of court actions and changing requirements. Participants attributed this heightened legal involvement primarily to two factors.

The first was the August 2025 Federal Register notice that stated ACTS would be used to determine whether institutions were using race-based preferences in their admissions decisions,

violating the rulings in *Students for Fair Admissions v. Harvard* and *Students for Fair Admissions v. University of North Carolina*.²² Because IPEDS data have not historically been used to determine whether an institution is legally complying with a Supreme Court ruling, general counsels for many colleges and universities were much more involved than they would be for normal IPEDS reporting.

The second factor is related to ACTS's use of student-level data. IPEDS data are typically submitted to the NCES in aggregate form, but institutions using the ACTS Aggregator Tool uploaded student-level records that were then aggregated for submission. The NCES stated that these files would be stored temporarily on the contractor's secure network for auditing and debugging purposes and automatically deleted at the end of the submission period. Even with those assurances, some institutions remained concerned about the handling and retention of personally identifiable student data and sought review from general counsel before using the tool. For these institutions, the issue appeared to be a lack of confidence in, or comfort with, submitting student-level data through a process that differed substantially from typical IPEDS reporting.

Student Privacy Concerns

Privacy concerns extended to the handling of student-level records and to the possibility that individuals could be identified in highly granular aggregated data. Sixty-two percent of survey respondents were very or extremely concerned about the privacy of student-level data, 71 percent expressed that level of concern about federal access to underlying individual-level data, and 62 percent were very or extremely concerned about small cell sizes in aggregated outputs.

Focus group participants explained that when ACTS data were disaggregated by program and student characteristics, some cells contained only a small number of students. One participant reported that three grade point average–related fields each contained data for only one student, raising concern that the student might be identifiable.

Uncertainty Regarding the Purpose and Use of ACTS

Survey responses reflected substantial uncertainty about the anticipated purpose and value of ACTS. Eighty-three percent of respondents disagreed that ACTS would ensure transparency in higher education admissions, and 76 percent disagreed that it would provide prospective students and families better information about admissions and financial aid.

Focus group participants similarly expressed uncertainty about why the ACTS data were being collected and how they would be used. Several said they understood the stated purpose in the Federal Register—to identify institutions that might be using race-based preferences in violation of the Supreme

Court's admissions rulings—but were unclear about how the reported data would serve that purpose. Participants said that if ACTS is intended to increase transparency in college admissions, additional context about institutional admissions policies and decisionmaking processes would be needed. Participants also raised questions about what consequences institutions might face based on the submitted data and who, beyond the federal government, would have access to them.

Human Toll

Survey findings provide context for the stress described during the focus groups. Ninety-eight percent of respondents said ACTS required somewhat or much more total staff time than other IPEDS reporting, and 94 percent agreed that staff and time constraints contributed to their reporting burden. Among all respondents to the staff-hours question, 28 percent reported that their institutions had spent 400 hours or more on ACTS.

Focus group participants described how this workload affected both the staff members responsible for submitting the data and others involved in the process. Some reported that they or their colleagues worked 60 to 80 hours per week to meet the ACTS requirements. Participants also described seeing colleagues in tears and experiencing serious health problems, and some expressed concern that the stress and workload could lead staff members to leave their positions. They attributed this pressure to ACTS's high-stakes reporting requirements, its overlap with other IPEDS surveys and federal compliance reporting, and competing institutional responsibilities such as the annual budget process. Participants emphasized that institutional research and institutional effectiveness offices are often small and responsible for numerous reporting obligations; in some cases, a single individual managed institutional reporting compliance as only one part of their job.

“I am looking toward retiring a lot sooner than I was before FVT/GE [financial value transparency and gainful employment] and now ACTS came up. It’s really quite a shame, the burden that they have put on us emotionally, physically, mentally.”

—Focus group participant

Recommendations for Improving ACTS

Based on survey responses and focus group conversations, below are the most frequently cited recommendations for improving ACTS.

Clarify and Align Definitions

The two most frequently cited recommendations from survey respondents for improving ACTS data validity and comparability were using definitions that align with other existing reporting, such as IPEDS (66 percent), or ensuring ACTS metrics have clearer definitions and guidance (60 percent). Another 43 percent recommended minimizing changes between cycles. Focus group participants stated that confusing and changing definitions created a major limitation in ACTS data's quality. Because many institutions interpreted definitions differently or received inconsistent guidance from the IPEDS Help Desk, focus group participants expressed substantial concern that differing interpretations and inconsistent guidance could limit the validity of comparisons across institutions.

Participants recommended that the Department of Education issue clear, written definitions aligned wherever possible with existing IPEDS standards and avoid changing those definitions during a reporting cycle. A TRP could provide one mechanism for developing and reviewing this guidance with input from institutional data professionals.

Convene ACTS Technical Review Panel

One of the most frequent complaints among focus group participants regarding the development of ACTS was the lack of a TRP. Participants believed that had a TRP been convened, issues related to definitional ambiguity and data availability could have been identified and addressed earlier. This concern was echoed in a separate study in which institutional research and institutional effectiveness professionals associated the absence of an ACTS TRP with shifting definitions, difficult-to-fulfill data demands, and concerns about resulting data reliability (Goodman et al. 2026). Even though the ACTS data collection is already in place, participants believed that convening a TRP could still provide value by clarifying definitions, identifying opportunities to improve reporting processes, and strengthening data quality in future collection cycles.

“ACTS would greatly benefit from undergoing the established Technical Review Panel (TRP) process. The primary issues contributing to institutional burden (e.g., ambiguous definitions, misaligned metrics) would likely have been identified and addressed through a formal TRP review.”

—Survey respondent, open-ended response

Improve Technical Systems and Validation Tools

Focus group participants said one way to reduce the burden level for ACTS is to ensure that any aggregation tool shows all data validation errors at one time. The current process of seeing subsequent data errors only after prior ones are resolved is time consuming. Additionally, access to the Python tool should be simplified and properly vetted with security documentation that institutional technology departments can sign off on to avoid triggering malware alerts.

Several people also suggested allowing institutions to build and test files in the Aggregator before the collection opened so files are ready to be uploaded rather than having to be built from scratch under a short timeline.

Better Integrate ACTS with IPEDS

Survey findings indicate that ACTS frequently required institutions to create a parallel reporting process: 93 percent of respondents said their institutions developed new processes specifically for ACTS, while only 50 percent agreed that those processes resembled existing processes for other data reporting.

Focus group participants consequently suggested integrating ACTS requirements into existing IPEDS surveys and reporting processes rather than maintaining ACTS as a stand-alone collection. For example, combining ACTS with the IPEDS Admissions survey and eliminating duplicate collection of completions data already reported elsewhere. They believed that using established IPEDS infrastructure and workflows could streamline submission, reduce duplication, and lessen the need for institutions to develop separate reporting systems.

“...the idea of taking the aspects of what they’re asking for and working them into the already existing surveys would be huge for us.... I already have multiyear systems in place, data files structured the way I need them.”

—Focus group participant

Strengthen Privacy and Transparency Safeguards

Before any public release of ACTS data, the Department of Education should apply appropriate small-cell suppression and other disclosure-control procedures. Focus group participants said the department should state in writing exactly how student confidentiality will be protected and how crosswalks and identifier files will be secured or destroyed. Participants said it would also be helpful if there was publicly available documentation that clearly states the purpose of ACTS, what analyses are planned, and any data limitations so secondary users of ACTS can properly use it.

Conclusion

Calls for greater transparency in college admissions and for expanding the admissions data collected through IPEDS pre-dated ACTS. College access organizations, lawmakers, and researchers had previously urged the Department of Education to collect more detailed admissions information through IPEDS.²³ Those proposals generally anticipated that any expansion would follow the deliberate process historically used to develop new IPEDS components, including consultation with a Technical Review Panel and an implementation timeline that allowed institutions to prepare their data systems and reporting processes. ACTS did not follow that process, and the findings from this study illustrate the consequences participants associated with its compressed development and implementation—for both the people responsible for submitting the data and the quality of the resulting information.

Study participants described compiling and submitting ACTS data under significant time pressure, working with definitions and guidance that changed during the collection, and reconstructing years of historical information from systems and records that had changed. These conditions raise important questions about the resulting data's accuracy and comparability. This cycle of ACTS data should therefore be interpreted with caution, particularly when used for trend analysis or comparisons across institutions.

The study also documents the human effects participants associated with ACTS reporting. Institutional research and institutional effectiveness offices are often small and responsible for numerous federal, state, and institutional reporting obligations. The long hours, stress, and, in some cases, health effects described during the focus groups demonstrate that the consequences of a compressed and changing data collection process are not merely administrative.

The findings do not argue against using IPEDS to increase transparency in college admissions. Rather, they underscore the importance of pursuing that goal in ways that avoid the burden and data-

quality concerns identified in this study. The recommendations outlined in this report offer the Department of Education a starting point for improving future ACTS collections while strengthening data quality and reducing the burden on the people responsible for reporting the data.

Appendix

Methodology

To document how institutions experienced ACTS and to identify recommendations for future ACTS reporting, we used a mixed-methods approach. This consisted of a web-based survey, two in-person listening sessions conducted at the 2026 Association for Institutional Research Forum, and three virtual focus groups. Across the survey, listening sessions, and focus groups, participants were primarily institutional research, institutional effectiveness, and other higher education data professionals with direct knowledge of their institutions' ACTS reporting processes. The survey and focus groups occurred after the ACTS submission deadline had passed, so respondents were able to speak about their full experiences preparing and submitting the data.

The online, anonymous survey was distributed as an open link by AIR through several channels between May 19 and June 22: (1) an email invitation was sent to individuals within the AIR community who are employed by four-year institutions, (2) an article about the survey was included in the May issue of the AIR newsletter, (3) a QR code linking to the survey was featured as part of the rotating slides at the AIR Forum, and (4) an invitation and link were posted to LinkedIn. The survey received 612 responses. Of those, 596 respondents indicated that their institutions were subject to ACTS reporting requirements and were eligible to continue the survey.

The profile of the survey respondents is below. Not all respondents completed all questions.

TABLE A.1

Characteristics of Survey Respondents

	Number of respondents	Share of the total
Are you the institution's IPEDS Keyholder or state coordinator?		
Yes	330	65.0%
No	175	34.4%
Don't know	3	0.6%
Total	508	
Which of the following best describes your institution's sector?		
Private nonprofit four-year or above	318	62.6%
Public four-year or above	176	34.6%
Private for-profit four-year or above	11	2.2%
Other	3	0.6%
Total	508	
How would you describe your institution's admissions selectivity?		
Selective (admits most applicants)	379	74.8%
Highly selective (acceptance rates are ~25% of applicants)	51	10.1%
Open admission	34	6.7%
Most selective (acceptance rates ~10% of applicants)	31	6.1%
Not sure	12	2.4%
Total	507	
Which of the following describes your individual role(s) in the ACTS reporting?^a		
Validation, review, and communication	441	88.0%
Interpretation and decisionmaking	425	84.0%
Project management and coordination	419	83.0%
Data preparation and processing	419	83.0%
Data compilation and submission	407	81.0%
Other	14	3.0%

Source: Association for Institutional Research survey.

Note: ACTS = Admissions and Consumer Transparency Supplement; IPEDS = Integrated Postsecondary Education Data System.

^a Multiple-response question; percentages will not add up to 100 percent.

To complement the survey, we convened two in-person listening sessions and three virtual focus groups. The listening sessions were held on May 27 with approximately 70 participants across the two sessions. The sessions were open to all AIR Forum attendees. The three virtual focus groups were held on July 22, 24, and 29 with a total of 25 participants. The focus groups included participants from both public and private nonprofit institutions, with 56 percent from public institutions and 44 percent from private nonprofit institutions. Both the listening sessions and focus groups used a common semistructured protocol that asked participants to discuss their overall experience with ACTS; specific challenges with collecting, preparing, and submitting the data; and recommendations for future collections. The listening sessions at the AIR Forum were not recorded, but notes were taken and summarized. The focus groups were recorded and transcribed.

The study was also informed by research conducted in May 2026 for an IPEDS TRP examining institutional capacity and its implications for IPEDS data quality. That research included a survey of 335 institutional research and institutional effectiveness professionals and seven virtual focus groups involving 54 participants. The complete report, its findings, and methodology can be found in Goodman et al. (2026).

Limitations

This study has several limitations. Because the survey was distributed as an anonymous, open link, we could not calculate a response rate. Additionally, survey respondents and listening session and focus group participants constituted a self-selected group and may not be representative of all institutions required to report ACTS data. Some individuals may have participated in more than one component of the study, so the survey, listening sessions, and focus groups should not be treated as fully independent samples. The focus groups were recorded and transcribed using artificial intelligence, which may have introduced errors, particularly around technical terminology, that could affect the accuracy of some quotes drawn from those sessions. The listening sessions were not recorded, and the findings from them rely on contemporaneous notes rather than transcripts. Finally, the survey and focus group findings reflect participants' experiences and perceptions rather than an independent audit of the ACTS data that institutions submitted.

Notes

- ¹ “Ensuring Transparency in Higher Education Admissions,” The White House, August 7, 2025, <https://www.whitehouse.gov/presidential-actions/2025/08/ensuring-transparency-in-higher-education-admissions/>.
- ² *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, 600 U.S. 181 (2023).
- ³ IPEDS is the US Department of Education’s system of interrelated annual surveys, administered by the National Center for Education Statistics, that collects institution-level data—covering topics such as enrollment, admissions, completions, faculty and staff, finances, and financial aid—from every college, university, and technical or vocational institution that participates in Title IV federal student aid programs.
- ⁴ “Ensuring Transparency in Higher Education Admissions,” The White House.
- ⁵ *Agency Information Collection Activities: Comment Request: Integrated Postsecondary Education Data System (IPEDS) 2024–25 Through 2026–27*, 90 Fed. Reg. 39384 (Aug. 15, 2025).
- ⁶ James S. Murphy, “The Significant Technical Problems with the Trump Administration’s New Admissions Survey Component,” JamesSMurphy.com blog, August 19, 2025, <https://jamesismurphy.com/2025/08/19/the-significant-technical-problems-with-the-trump-administrations-new-admissions-survey-component/>.
- ⁷ Johanna Alonso, “Colleges Push Back Against Trump’s Effort to Collect More Admissions Data,” *Inside Higher Ed*, October 16, 2025, <https://www.insidehighered.com/news/admissions/traditional-age/2025/10/16/institutions-advocates-argue-against-admissions-data>.
- ⁸ “Integrated Postsecondary Education Data System (IPEDS) 2024–25 through 2026–27: ED-2025-SCC-0382,” regulations.gov, accessed September 21, 2026, <https://www.regulations.gov/docket/ED-2025-SCC-0382>.
- ⁹ Office of the California Attorney General, “Comments on Integrated Postsecondary Education Data System (IPEDS) 2024–25 through 2026–27 Information Collection Request (ICR), Docket No. ED-2025-SCC-0382, OMB Control No. 1850-0582,” letter to Linda McMahon and Matthew Soldner, October 14, 2025, <https://oag.ca.gov/system/files/attachments/press-docs/10.14.2025%20IPEDS%20Letter.pdf>.
- ¹⁰ Alonso, “Colleges Push Back.”
- ¹¹ Association for Institutional Research, “ACTS Reporting Update: Conditional Extensions May Be Granted Through April 8,” news release, March 6, 2026, <https://www.airweb.org/article/2026/03/06/acts-extensions-may-be-granted>.
- ¹² *Commonwealth of Massachusetts v. Department of Education*, No. 26-11229-FDS (D. Mass. Apr. 3, 2026), memorandum and order on plaintiffs’ motion for a preliminary injunction, <https://storage.courtlistener.com/recap/gov.uscourts.mad.297314/gov.uscourts.mad.297314.142.0.pdf>.
- ¹³ Outcome Measures is an IPEDS survey component that reports degree and certificate completion (or, absent completion, enrollment status) for entering undergraduate cohorts, including first-time, full-time students, as well as part-time and transfer-in students, tracked at set intervals after entry.
- ¹⁴ Doug Lederman, “The New, Improved IPEDS,” *Inside Higher Ed*, October 12, 2017, <https://www.insidehighered.com/news/2017/10/12/new-federal-higher-ed-outcome-measures-count-part-time-adult-students>.
- ¹⁵ See Technical Review Panel Report 45 at “Reports and Suggestions from Past IPEDS Technical Review Panels,” Technical Review Panel, accessed September 21, 2026, <https://ipedstrp.rti.org/>.

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- ¹⁶ “IPEDS Frequently Asked Questions,” US Department of Education, Institute of Education Sciences, National Center for Education Statistics, accessed August 25, 2026, <https://surveys.nces.ed.gov/ipeds/public/survey-materials/faq?faqid=1>.
- ¹⁷ Title IV of the Higher Education Act of 1965 authorizes the federal student financial aid programs, including Pell grants and federal student loans. Institutions must participate in IPEDS to remain eligible to participate in Title IV programs, and failing to meet IPEDS reporting requirements can jeopardize that eligibility.
- ¹⁸ “Schedule of IPEDS Data Collection, 2026–27,” US Department of Education, Institute of Education Sciences, National Center for Education Statistics, accessed September 9, 2026, <https://surveys.nces.ed.gov/ipeds/public/data-collection-schedule>.
- ¹⁹ “Docket (ED-2025-SCC-0382): Supporting Statement,” Regulations.gov, November 13, 2025, <https://www.regulations.gov/document/ED-2025-SCC-0382-3465>.
- ²⁰ The IPEDS Help Desk is the technical support service the NCES makes available to institutional staff by phone and email for questions about survey requirements, data definitions, and the data collection system; for this collection, it also fielded ACTS-specific questions.
- ²¹ The Aggregator Tool is the application the NCES built for ACTS that allows institutions to upload student-level data files, which the tool then aggregates into the summary counts required for submission. It was available both as a web-based application and as a version institutions could download and run locally.
- ²² [Agency Information Collection Activities: Comment Request: Integrated Postsecondary Education Data System \(IPEDS\) 2024–25 Through 2026–27](#), 90 Fed. Reg. 39384 (Aug. 15, 2025).
- ²³ James S. Murphy, “Letter: Expand Disaggregated Data in Higher Ed,” *Education Reform Now*, February 1, 2023, <https://edreformnow.org/2023/02/01/letter-expand-disaggregated-data-in-higher-ed/>.

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