



December 15, 2025

Submitted via Regulations.gov

Ross Santy
Data Officer
Office of Planning, Evaluation and Policy Development
U.S Department of Education
400 Maryland Ave SW
Washington, DC 20202

RE: ED-2025-SCC-0382; Agency Information Collection Activities; Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2024-25 Through 2026-27

Dear Mr. Santy:

On behalf of the more than 3 million members of the National Education Association (NEA), we submit the following response to the Department of Education’s proposed revisions to the Integrated Postsecondary Education Data System (IPEDS) 2024-25 through 2026-27 published in the Federal Register on November 13, 2025. **The proposed changes to IPEDS are concerning given their implications for transparency, equity, administrative burden, and weakening of federal data capacity. The Department’s revised proposal to limit new admissions data collection requirements to a subset of four-year colleges and universities does not eliminate these concerns and introduces significant concerns that the data collected may be used in furtherance of the Administration’s continuing attacks on institutions of higher education. Therefore, NEA continues to oppose these proposed changes to IPEDS.**

Background

The Integrated Postsecondary Education Data System (IPEDS) is the cornerstone of federal postsecondary data infrastructure in the United States. Administered by the National Center for Education Statistics (NCES) within the Department of Education, IPEDS was created by the Higher Education Act of 1992 to ensure consistent, comparable, and publicly accessible data on institutions of higher education that participate in Title IV federal financial aid programs.

IPEDS plays a vital role in promoting transparency, accountability, and equity in higher education. The system collects comprehensive data annually from over 6,000 institutions on a wide range of metrics, including student enrollment and demographics, admissions, graduation and completion rates, financial aid distribution, faculty and staffing, institutional finances, and academic offerings. These data are used by policymakers, researchers, advocates, and the public to evaluate institutional

performance, monitor access and outcomes, and support evidence-based decision-making at the federal, state, and institutional levels.

IPEDS is particularly valuable because it enables disaggregated analyses by race, gender, income status, and enrollment intensity. These analyses are essential for identifying opportunity gaps, tracking progress, and holding institutions accountable for serving all students effectively. The value of IPEDS depends largely on the integrity, consistency, and usability of the data it collects. The system works best when implemented with adequate resources, clear definitions, stakeholder input, and institutional support. Support is particularly necessary for under-resourced institutions that may lack staffing or infrastructure to meet expanded reporting requirements. As such, any changes to IPEDS must be weighed carefully to ensure they do not undermine the very transparency, and equity goals the system is designed to serve.

Admissions Data and Equity Implications

The proposed expansion of IPEDS to include disaggregated admissions data, particularly with an emphasis on test scores and grade point averages (GPAs), risks undermining the ability of colleges and universities to conduct holistic admissions reviews that consider the full context of an applicant's background, challenges, and achievements. Overreliance on standardized academic metrics fails to capture important non-quantitative factors such as resilience, leadership, and overcoming systemic barriers, all of which are widely recognized as legitimate and essential elements of equitable admissions practices.

Notably, in *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, 600 U.S. 181 (2023) (*SFFA*),¹ the Supreme Court explicitly preserved the right of institutions to consider an applicant's lived experiences and the effect of race on those experiences. The Court stated:

“[N]othing in this opinion should be construed as prohibiting universities from considering an applicant's discussion of how race affected his or her life, be it through discrimination, inspiration, or otherwise,” even though “[t]he student must be treated based on his or her experiences as an individual—not on the basis of race.” 600 U.S. at 230-31.

The expanded data collection proposed by the Department, which centers on applicants' test scores, GPAs, and race/ethnicity, is misaligned with the Court's directive to evaluate students based on individualized experiences. By disaggregating and analyzing admissions patterns primarily through the lenses of academic metrics and race, the Department's approach ignores the nuanced, context-sensitive admissions practices that the Court found to be permissible, and in fact, required.

Moreover, we do not believe this proposal can be viewed in isolation. These proposed revisions are part of the administration's broader, escalating, and unlawful efforts to dismantle diversity, equity, and inclusion (DEI) initiatives in higher education. Public reporting and recent policy actions reflect a coordinated campaign across the administration targeting DEI programming, admissions practices, and even basic demographic data collection. The administration has even cited this rationale to cut funding for institutions and to eliminate whole grant programs.

These concerns are reflected in the federal district court's decision in *American Federation of Teachers v. Department of Education*, No. SAG-25-628, 2025 WL 2374697 (D. Md. Aug. 14, 2025),

¹ <https://supreme.justia.com/cases/federal/us/600/20-1199/>

Dkt. 83,² which noted the Department’s abrupt reversal of its prior interpretation of the *SFFA* ruling. As the court referenced, the Department had previously advised institutions that:

“Nothing in the SFFA decision prohibits institutions from continuing to seek the admissions and graduation of diverse student bodies, including along the lines of race and ethnicity, through means that do not afford individual applicants a preference on the basis of race in admissions decisions.” 2025 WL 2374697, at *21 (quoting ED’s prior *SFFA* guidance).

The Department’s current approach, demanding disaggregated race-based data on admissions outcomes, stands in contradiction to both the earlier guidance and the principle of individualized review affirmed by the Supreme Court.

Compounding these contradictions, President Trump’s April 2025 Executive Order on accreditation requires accreditors to evaluate institutional performance using program-level student outcomes data, while explicitly prohibiting consideration of race, ethnicity, or sex in that context.³ A related Dear Colleague Letter from the Department further directs that factors such as race, ethnicity, or income level may not be used as part of an accreditor’s evaluative criteria, even when those factors are central to understanding disparities in access, persistence, and degree attainment.⁴ **This inconsistency between the Department’s demands for data from institutions and non-binding guidance for accreditors underscores the politicized nature of the current proposal and raises significant concerns about selective enforcement and suppression of equity-focused evaluation.**

Concerns Regarding Data Validity, Collection Capacity, and Privacy Risks

The proposed data collection also raises serious concerns about the accuracy, consistency, and ultimate utility of the admissions data being requested. The Department’s plan to collect and disaggregate student GPAs and standardized test scores across institutions fails to account for the fundamental lack of standardization in these metrics. For example, high school GPAs are calculated on varying scales. Some institutions use a weighted 5.0 scale to reward advanced coursework, while others use a standard 4.0 scale. Without a reliable mechanism to normalize this data across schools and states, comparisons will be misleading at best and inaccurate at worst. As multiple data experts have noted, the data being requested will not support valid cross-institutional or longitudinal analysis.⁵

Compounding the problem of poor data validity is the current lack of capacity within the Department of Education to carry out such a complex collection effort responsibly.⁶ In March 2025, the administration’s mass RIF of Department personnel terminated more than 95% of NCES staff, including all six NCES staff members who had previously been responsible for IPEDS. Only three employees out of over 100 are left at NCES. This decimation of personnel and institutional memory severely limits the Department’s ability to manage, validate, or interpret the data it seeks to collect.

This reduction in federal capacity has been further exacerbated by budget cuts to key technical partners. The Department of Government Efficiency (DOGE) cut the Department of Education’s contracts with RTI International, the research institute that has historically supported IPEDS

² <https://democracyforward.org/wp-content/uploads/2025/08/DCL-MSJ-opinipn.pdf>

³ <https://www.whitehouse.gov/presidential-actions/2025/04/reforming-accreditation-to-strengthen-higher-education/>

⁴ <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2025-04-30/changes-approval-process-changing-accrediting-agencies>

⁵ <https://hechingerreport.org/proof-points-new-college-admissions-data-collection/>

⁶ <https://www.insidehighered.com/news/faculty-issues/research/2025/09/25/gutted-nces-releases-first-batch-higher-ed-data>

operations, by approximately 50%.⁷ As a result, RTI has had to eliminate technical review panels that previously evaluated proposed changes to IPEDS and discontinued training and support services for institutions. These training courses were essential to ensure accurate, consistent reporting by colleges and universities. Similarly, the administration has terminated Department contracts with the Association for Institutional Research (AIR), which provided professional development and training for institutional researchers across the country, further jeopardizing the quality of data submissions.

In addition to concerns about collection and reporting accuracy, NEA is also deeply troubled by the risks to student data privacy and data integrity. As the Department moves to disaggregate data by test scores, GPAs, race, sex, income level, and other factors, it will inevitably produce data subsets that contain small numbers of students, particularly within selective programs or underrepresented groups. In such cases, data must often be suppressed to protect student privacy, rendering it incomplete or unusable for analysis. Where data is not suppressed, small N-distortions may lead to misleading averages or patterns, contributing to flawed interpretations that may harm students or institutions.

Collectively, these issues reflect a fundamental mismatch between the ambitious scope of the proposed data collection and the actual capacity and readiness of the Department to carry it out responsibly. Without adequate personnel, oversight mechanisms, institutional training, or safeguards for validity and privacy, this proposal risks producing unreliable data, increasing burden on institutions, and undermining public trust in the federal education data infrastructure.

The unreliability of the data that will result from this effort raises significant questions about the Department's motivations for collecting it. While the revised proposal, under which only four-year institutions that do not admit all applicants and award non-need-based aid would be required to submit admissions data, may reduce some of the administrative burden and data-quality concerns surrounding universal collection, its narrowed focus only enhances concerns about selective, politicized enforcement. The Department and the Trump Administration more broadly continue to target four-year colleges and universities that express views disfavored by the Administration with a range of punitive actions, including the illegal withholding of federal research and grant funding and arbitrary civil rights enforcement actions.⁸ These steps are plainly intended to coerce colleges and universities into abandoning lawful practices to promote diversity, equity, and inclusion on campus because of the Administration's ideological opposition to them. Likewise, the Administration's proposed "Compact for Academic Excellence in Higher Education" would give preferential treatment in federal funding competitions to institutions that agree to adopt the Administration's anti-DEI, anti-trans views in admissions and financial aid award decisions, among other conditions.⁹ Viewed in this context, the collection of disaggregated race-based admissions data only from selective institutions that provide non-need-based financial support to students would provide another avenue for the Administration to attack colleges and universities that do not espouse its preferred viewpoints through arbitrary and unjustified enforcement actions.

⁷ <https://hechingerreport.org/proof-points-new-college-admissions-data-collection/>

⁸ See, e.g., *President & Fellows of Harvard Coll. v. U.S. Dep't of Health & Hum. Servs.*, 2025 WL 2528380, at *36-37 (D. Mass. Sept. 3, 2025) (finding that Administration used alleged discrimination "as a smokescreen for a targeted, ideologically-motivated assault on this country's premier universities, and did so in a way that runs afoul of the APA, the First Amendment, and Title VI"); *AAUP v. Trump*, 2025 WL 3187762, at *1-2 (N.D. Cal. Nov. 14, 2025) (Administration's withholding of UCLA's federal funding unless university agreed to "review its DEI programs, change its handling of student protests, and adopt the administration's views on gender" was "coercive and retaliatory conduct in violation of the First Amendment and Tenth Amendment").

⁹ [Compact-for-Academic-Excellence-in-Higher-Education-10.1.pdf](#).

Conclusion

The NEA respectfully submits these comments for consideration. **In light of the concerns highlighted in this letter, we urge the Department to reconsider the proposed admissions data collection as currently designed. Any revisions to IPEDS should align with both the legal framework articulated by the Supreme Court and the foundational values of equity, fairness, and institutional autonomy in serving diverse student populations.** Please do not hesitate to contact me or Bianca Singh at BSingh@nea.org, should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Daaiyah Bilal-Threats". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Daaiyah Bilal-Threats
Senior Director, Education Policy and Implementation Center
National Education Association