

October 14, 2025

Submitted electronically via Federal eRulemaking Portal: <https://www.regulations.gov>

U.S. Department of Education
National Center for Education Statistics (NCES)
Docket ED-2025-SCC-0382

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

To Whom It May Concern,

On behalf of the undersigned organizations and our member colleges and schools that educate the graduate and professional healthcare workforce, we appreciate the opportunity to comment on the National Center for Education Statistics proposed addition of an Admissions and Consumer Transparency Supplement (ACTS) to the Integrated Postsecondary Education Data System (IPEDS). We offer the following recommendations to ensure feasibility, data quality, and protection of student privacy across graduate and professional programs.

Implementation Timing and Institutional Readiness

We respectfully request clear, consolidated guidance on effective dates and the submission timeline—including whether there will be a formal “preview” year, the first year for which ACTS data will be required, and the specific due dates aligned to IPEDS collection windows. Aligning data collection from applicants, financial aid, and registrar offices with the eventual reporting of data requires multi-cycle planning. A published timeline (with at least one full admissions cycle of lead time) will allow institutions to update applications, data pipelines, governance policies, and QA processes to ensure data collected by universities matches the data requested in the ACTS.

Five-Year Backfill

The proposed five-year retrospective backfill will be especially challenging for programs who have not collected the specific data requested in ACTS. We ask the department and NCES to allow flexibilities where historical elements (e.g., test score bands, parental education, fine-grained aid categories) were not collected or retained.

Definitions and Reporting Guidance

To ensure accuracy in reporting requirements, we request detailed data dictionaries and examples for key elements including family income, parental education, acceptable sources for test scores and GPA quintiles as well as guidance on different aid categories (standardized treatment of institutional merit vs. need-based, mixed awards, and outside scholarships). We urge the department and NCES to publish validation rules and example crosswalks from centralized application services used in the health professions.

Privacy and Compliance

Prospective and enrolled students may decline to provide demographic or background information. We request explicit guidance on distinguishing “declined to answer,” “not collected,” and “unknown” in all ACTS elements. How nonresponse affects denominators for disaggregation (e.g., race-sex pairs, income bands) and any public reporting; what re-identification safeguards for ACTS outputs will be implemented to protect programs especially those with smaller cohorts. Guidance is also needed for institutions on existing privacy notices and consent forms with clarification on if they must revise application and enrollment forms to reflect ACTS use cases. Clarity here is essential to maintaining student trust, complying with the [Family Educational Rights and Privacy Act](#), (20 U.S.C. §1232g; 34 C.F.R. Part 99), and ensuring institutions remain in good standing even when applicants decline to share sensitive data.

Conclusion

Health-professional programs—including pharmacy— and graduate programs in pharmaceutical sciences and related disciplines face ongoing workforce pressures. If applicants perceive expanded data collection as intrusive or confusing, some may opt out of providing information or even disengage from application processes. We encourage ED/NCES to assess and publicly report on potential participation effects, offer plain-language templates schools can use to explain the purpose of ACTS, and allow pilot testing with feedback before full implementation.

We appreciate NCES’s commitment to transparency and look forward to partnering to implement ACTS in a way that is accurate, privacy-protective, and feasible for graduate and professional programs educating the nation’s healthcare workforce. Please contact [Susan Vos](#) or [Olunife Akinmolayan](#) if the department would like to engage in further conversations regarding preparing the next generation of healthcare professionals and scientists.

Sincerely,

American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy
Association of University Programs in Health Administration