

August 14, 2026

Kaitlin Lilienthal
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RTI International
3040 East Cornwallis Road
Research Triangle Park, NC 27709-2194

Re: IPEDS Technical Review Panel #72: IPEDS Data Quality: Practices, Strategies, and Structures to Support High-Quality Submissions

Dear Kaitlin Lilienthal:

Thank you for the opportunity to submit comments on the Integrated Postsecondary Education Data System (IPEDS) Technical Review Panel's (TRP) [recommendations](#) for improving IPEDS data quality. The [Institute for Higher Education Policy](#) (IHEP) is a nonpartisan, nonprofit research, policy, and advocacy organization. We believe that all people—regardless of background—should have the opportunity to participate and succeed in postsecondary education and beyond. We lead the [Postsecondary Data Collaborative](#) (PostsecData), a nonpartisan coalition of organizations committed to using high-quality postsecondary data to improve student success and advance strong outcomes for all students.

IPEDS is a [foundational](#) component of the nation's postsecondary education data infrastructure that provides comprehensive, publicly available information on over 6,000 colleges and universities through a set of annual surveys. IPEDS fulfills [statutory requirements](#) that the U.S. Department of Education (ED) publicly share consumer information on each college's costs, financial aid, enrollment, graduation rates, and other metrics. Because institutions that participate in federal financial aid programs are required to complete the surveys, response rates are close to 100 percent. This federal framework for data collection makes it possible to compare colleges using consistent metrics and definitions, unlike state-level data.

For decades, IPEDS has earned a reputation as a trusted source of postsecondary data by carefully vetting new survey elements and engaging practitioners, researchers, and data policy experts to ensure definitions and reporting requirements are practical and consistent. The rushed rollout of the Admissions and Consumer Transparency Supplement (ACTS) highlights how skipping those steps risks undermining data quality in IPEDS.

To maintain and strengthen the quality, consistency, and usability of IPEDS data, we recommend the National Center for Education Statistics (NCES) do the following:

1. Improve data definitions and reporting guidance.
2. Strengthen stakeholder engagement and transparency around substantive changes to IPEDS.

Improve data definitions and reporting guidance

Clear data definitions and reporting guidance are critical for ensuring data reported to IPEDS are consistent and allow for apples-to-apples comparisons across institutions and over time. NCES should provide clear and consistent definitions and reporting guidance to institutions.

We agree with the TRP panelists' suggestion that NCES should provide examples demonstrating how IPEDS definitions should be applied in different institutional contexts. Current IPEDS guidance is often framed around traditional four-year institutions and programs, limiting its applicability to other sectors and to programs with different lengths, academic calendars, and delivery models. For example, IPEDS guidance could demonstrate how the same definition applies across institutions with different structures and academic models, including two-year colleges, institutions with rolling admissions, and institutions operating on quarter-based calendars.

We also agree with panelists' recommendation that NCES provide a comprehensive list of all individual data elements required for each reporting year. This list should include the survey component(s) each data element is needed for and explain how survey components are interdependent. NCES should also clearly identify instances where data values are required to align across survey components, including any cross-component validation requirements.

Strengthen stakeholder engagement and transparency around substantive changes to IPEDS

Adding or modifying data elements can help ensure that IPEDS remains useful for students, families, institutions, states, researchers, and policymakers. In developing those changes, NCES should engage stakeholders early in the process, provide meaningful opportunities for feedback, and provide sufficient lead time and reporting guidance to institutions before implementing changes. Those steps are crucial for ensuring IPEDS data quality.

We recommend that NCES:

1. Host Technical Review Panels (TRPs) before substantive changes are made to IPEDS, particularly when introducing new data collections. NCES should use the TRP process early in the development of new or substantially modified collections to solicit practitioner feedback, resolve implementation challenges, and provide sufficient time to incorporate recommendations before reporting begins. Early stakeholder engagement can identify unclear definitions, reporting challenges, and validation issues before implementation.

The [implementation challenges](#) associated with the Admissions and Consumer Transparency Supplement (ACTS) demonstrate the consequences of introducing new data collections without sufficient practitioner input, testing, and implementation time. Institutions encountered unclear and changing guidance, along with technical challenges and long processing times associated with new and untested submission tools. Engaging institutional practitioners earlier in the development process could help identify and address these issues before a collection opens.

2. Incorporate feedback from statutorily mandated public comment periods before finalizing changes to an IPEDS data collection. The new ACTS collection opened on December 18, 2025, just three days after the public comment period closed. This accelerated rollout left almost no time for NCES to meaningfully review public comments, revise the collection in response to stakeholder feedback, and communicate any changes to institutions before reporting began. Public comments should meaningfully inform the development of a new or modified IPEDS data collection.
3. Provide detailed data reporting previews and guidance to institutions at least one year before opening a new IPEDS data collection or implementing major changes to an existing IPEDS data collection. Institutions need sufficient lead time to understand new requirements and definitions, prepare their data systems and reporting processes, coordinate across campus offices, test data extraction processes, conduct quality assurance, and, if needed, begin collecting data elements that they don't currently collect. For ACTS, the guidance necessary for institutions to understand required data elements was not released until November 13, 2025, the beginning of the 30-day comment period. The ACTS data collection opened on December 18, leaving institutions only five weeks to prepare for the new collection. This compressed timeline created increased institutional burden and created uncertainty around whether they were reporting data correctly, which [risks](#) undermining data quality.

IPEDS remains the nation's most comprehensive source of postsecondary education data and has a long history of producing high-quality, reliable information. By providing clearer reporting guidance, strengthening stakeholder engagement, and supporting institutions in meeting reporting requirements, NCES can further improve the quality, consistency, and usability of IPEDS data for students, policymakers, researchers, and institutions.

We commend NCES for its commitment to strengthen IPEDS data and look forward to continued collaboration to improve postsecondary data. For questions about this letter, please contact Jocelyn Salguero, Assistant Director of Policy (jsalguero@ihep.org) at the Institute for Higher Education Policy.

Sincerely,

Institute for Higher Education Policy (IHEP)