



## *Office of the President*

December 15, 2025

Brian Fu, Acting Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
U.S. Department of Education

Docket: ED-2025-SCC-0382-0001

Dear Acting Chief Fu:

We write regarding the Department of Education's (ED) proposed addition of the Admissions and Consumer Transparency Supplement (ACTS) to the Integrated Postsecondary Education Data System (IPEDS) for the 2025–26 academic year and beyond. Our comments focus on applicable institutions, consumer information for learners and feasibility of certain data collections outlined in the request for comment. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 93-year history of educating traditional-aged students and working adults.

SNHU has a unique structure serving over 200,000 learners online and 3,700 learners on our campus in Manchester, New Hampshire. While not an "open admission" institution per the current definition in IPEDS, SNHU is a largely open enrollment. Currently, SNHU accepts 96 percent of students who apply to the university. Additionally, SNHU grants associate's degrees, bachelor's degrees, and graduate degrees.

Regarding the updated proposals on the data collections, we urge ED to consider lowering the admission threshold for reporting exemptions below 100 percent to 90 or 95 percent. Such a shift would meet the intent of the collection but also reflect the realities of how open admission institutions operate. There are a range of reasons related to core eligibility criteria for admissions that might restrict an institution from fully meeting a 100 percent admission threshold, such as prior education, programmatic criteria, or residency requirements, for example. Additionally, institutions may not enroll students who do not meet federal financial aid eligibility requirements such as satisfactory academic progress and ability to benefit. Maintaining an enrollment threshold between 90-100 percent is consistent with ED's

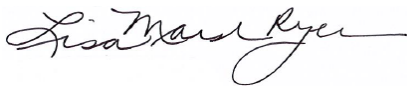
recognition that institutions admitting the “vast majority” of applicants present minimal or no risk for civil rights noncompliance. As such, exempting institutions that accept a high percentage of applicants is both reasonable and aligned with ED’s stated rationale for the new survey component.

We recommend that ED further define what “non-need-based aid” would include. There are a range of federal, state, local and institutional funds that may or may not be included. The current language is too vague for institutions to understand for compliance and for consistent information to be gathered across institutions.

We remain concerned about the feasibility of gathering and then reporting much of the data outlined in the request for comment. The sheer volume of data that would be included through the reporting would be a heavy burden for any institution to report. It is also unclear what the purpose and use of such data would be, rendering the usefulness of the reporting questionable versus the burden on institutions to report. We recommend limiting the reporting to data that institutions can readily access and that can be used to support consumer decision-making.

Thank you for your consideration of our comments on these matters.

Sincerely,

A handwritten signature in cursive script, reading "Lisa Marsh Ryerson".

Lisa Marsh Ryerson  
President  
Southern New Hampshire University