AMERICAN ASSOCIATION OF COMMUNITY COLLEGES
LEAD ADVOCATE ADVANCE

October 14, 2025

Mr. Matthew Soldner
Acting Commissioner, National Center for Education Statistics
Acting Director, Institute of Education Sciences
United States Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Mr. Soldner:

I write on behalf of the American Association of Community Colleges (AACC) concerning the U.S. Department of Education's August 15 Information Collection Request [Docket No.: ED-2025-SCC-0382]. AACC represents the nation's 1,024 community colleges and their students. The association appreciates the opportunity to submit these comments.

The Department has requested feedback regarding whether open-enrollment institutions are at risk of noncompliance with respect to scholarship awarding practices that provide preferential treatment based upon race and should therefore be subject to the financial aid components of the proposed ACTS IPEDS survey.

The short and definitive answer is no; open-enrollment institutions are not at risk of engaging in unlawful preferential treatment based on race with respect to scholarships. Accordingly, AACC strongly opposes requiring community colleges to report on their financial aid awarding practices and urges the Department to refrain from imposing this new and costly mandate on AACC's members.

There are three primary reasons for this position.

Community colleges are open-enrollment institutions. Open enrollment means that decisions about admissions and the awarding of financial aid are made without reference to the composition of the class – community colleges accept 100% of all applicants. They welcome everyone from their local areas to take advantage of their offerings.

The ACTS requirements would require community colleges to divert limited campus resources to generate data that in many cases are not currently gathered by our institutions, and some of them are simply not available. Consequently, compliance would be costly in time and labor, produce no basis for historical analysis and trends, and reduce

the resources available for supporting students. This situation is partially created by the obvious reality that ACTS requirements are designed to capture the admissions and aid awarding behavior of selective universities, not community colleges. The ACTS' extensive, onerous, and costly framework simply does not dovetail with how our member institutions are organized and operate.

Another reason to exclude community colleges from reporting on financial aid awards is that they award, in the form of institutional aid, only very limited funds from non-public sources. Using the categories provided by the National Postsecondary Student Aid Study (NPSAS), only 5.4% of all community college students received institutional aid awards based on merit, athletics, and other considerations. Many, perhaps most, of these grants are overwhelmingly the "micro" grants that are designed to help students meet unanticipated expenses. This data contrasts starkly with four-year institutions, many of which provide much more significant amounts of institutional financial support to their students.

AACC continues to diligently educate our member institutions about the laws and regulations that govern funds from those colleges that have private foundations. We are clear that community colleges may not award or disburse financial aid from foundations that discriminate on the basis of gender, race, or national origin.

Several members estimate that implementing just the scholarship reporting and corresponding disaggregated data, as envisioned in the ICR, would result in a compliance burden of 250-500 hours across staff in information technology, institutional research, and financial aid offices. As the Department knows, community colleges vary widely in size, capacity, and resources. For our many smaller colleges with research offices staffed by only one or two professionals, this reporting charge would be extraordinarily burdensome and detract from the resources available to support research and financial aid. Because the student academic data the surveys would require is not relevant to admissions or financial aid at community colleges, adding these requirements is likely to create a new barrier to enrollment, especially for adult students to whom the newly required fields would not be applicable.

We appreciate the Department's thoughtful approach to considering whether open-enrollment institutions should be subject to the ACTS survey and their recognition that its admissions components are not relevant for our institutions. For the reasons outlined above, we urge the Department to employ similar logic to exempt open-enrollment institutions from the financial aid components of ACTS. Community colleges award only an extremely limited quantity of non-public financial aid awards and, as described, those

awards are small. Imposing the massive ACTS reporting edifice upon them would be an extremely poor use of public resources to the detriment of students and their teachers.

Thank you for your consideration of these views. Please do not hesitate to contact me or any members of my staff if you have any questions concerning them.

Sincerely,

DeRionne P. Pollard, Ph.D.

President and CEO