



July 29, 2026

The Honorable Bill Cassidy
Chairman
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Bernie Sanders
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

Dear Chairman Cassidy, Ranking Member Sanders, and Members of the Committee,

On behalf of the Association of Christian Schools International (ACSI), representing 50 college and universities and over 2,300 Christian schools nationwide and the families whose children will one day enroll in higher education, I write to urge you to oppose S.2511, the College Transparency Act (CTA).

Parents who entrust their children's education to ACSI-member schools do so with a firm expectation of their children's privacy. The federal government has no business compiling a permanent record of their children's personal choices. This bill has not received a single committee hearing to discuss the serious concerns it raises, yet it proposes one of the most sweeping expansions of federal data collection in the history of higher education policy. Proponents describe the CTA as a "transparency" measure meant to help families choose the right college. In practice, it makes students transparent to Washington, not colleges transparent to the public.

Our concerns center on three features of the proposed system:

First, the database contemplated by the CTA does not stop at graduation. It would continue following students into their careers indefinitely, with no mechanism for students to opt-out.

Second, the categories of data subject to collection under Section 2(C) are sweeping — enrollment status, program of study, distance-learning status, credential goals, race, gender, and economic status, alongside an open-ended catch-all for "other data elements" deemed necessary. Helping a family compare colleges does not require the federal government to build a comprehensive personal profile of every student in the country.

Third, the bill's provision for "periodic matching with other federal data systems" reveals the true scope of this proposal. It would allow a student's personal information, once collected, to be cross-referenced against records held by the Social Security Administration, the Internal Revenue Service, the Department of War, and the Census Bureau, long after that student has left school and entered the workforce.

History has shown that centralized federal databases invite misuse, whether through bureaucratic mismanagement or exploitation by hostile foreign actors. Recent reporting on foreign access to U.S. voter registration data is a sobering reminder of what is at stake when sensitive personal information is consolidated in one place without adequate safeguards. The CTA offers no compelling justification for the database it creates, nor any meaningful assurance that the data it gathers will be protected.

We would further note that this expansion runs counter to the current administration's stated goal of reducing the federal footprint in education. Rather than scaling back Washington's role, the CTA would hand the Secretary of Education broad new authority to collect and retain personal data on students long after they have completed their studies.

Additionally, we wonder how long until this or similar data collection will extend beyond higher education to younger students despite FERPA and other privacy measures? It seems only a matter of time before an overreaching government seeks to track more and more students on the basis of a putative transparency policy that is itself fundamentally more a data collection than a transparency policy.

ACSI shares the goal of greater accountability in higher education — families deserve clear information about a college's finances, governance, and educational priorities before making one of the most consequential decisions of their children's lives. But that transparency should flow from institutions to the public, not from students into a permanent federal file without their consent. Turning students into the subjects of a lifelong data-collection program is not the path to a more informed higher education marketplace — it is a significant and unnecessary intrusion into their privacy.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "P. J. Smith". The signature is fluid and cursive, with a prominent initial "P" and a long, sweeping underline.

Vice President for Public Policy and Legal Affairs
Association of Christian Schools International