February 23, 2018

The Honorable Lamar Alexander
Chairman
Committee on Health, Education, Labor, & Pensions
455 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Patty Murray
Ranking Member
Committee on Health, Education, & Pensions
154 Russell Senate Office Building
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

This letter is submitted on behalf of these 50 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to the open call for comments and suggestions on topics to include in the reauthorization of the Higher Education Act (HEA). PostsecData is a nonpartisan coalition of organizations representing students, institutions, states, employers, and privacy and security experts that seeks to advance the use of high-quality data to improve student success and educational equity. It is with this charge that we share the following recommendations for improving postsecondary data in HEA:

- Improve data for students and policymakers by creating a secure, privacy-protected student-level data network (SLDN); and
- Count all students in federal data collections by closing gaps in completion and earnings data.

Improve data for students and policymakers

Policy solutions should focus not on *more* data, but on *better* data. The current postsecondary data infrastructure is duplicative, inefficient, and cumbersome. Worst of all, it does not allow policymakers, college leaders or prospective students to answer many pressing questions about today's postsecondary institutions, programs, and educational equity. While many data points exist, they omit large numbers of students, overlook important postsecondary outcomes, and fail to disaggregate by key student demographics, leading the field to be data rich, but information poor. Because of these insufficiencies of existing data, students and policymakers must make high-stakes decisions using incomplete information. Consider just a few of the current gaps:

- Completion information for part-time and transfer students is not disaggregated by race/ethnicity or gender.
- Metrics fail to measure transfer from community colleges to four-year colleges.
- State data on workforce outcomes largely omit federal employees, members of the military, the self-employed, people who cross state lines, and in most states, students who attend private colleges.
- Current federal metrics on workforce outcomes omit the 30 percent of students who do not receive federal financial aid and fail to provide program-level information.

In calling for better data, we do not suggest piling onto current reporting requirements. Instead, policymakers should remove federal barriers that hamper the use of existing federal, state, and institutional data to answer pressing questions. Matching these data sources through a more coherent, nimble, secure, and privacy-protected student-level data network (SLDN) would create more usable information that could help students navigate the complex higher education marketplace and answer pressing questions about college outcomes. This type of network is crucial to produce the information necessary to evaluate and meet workforce demands, to identify and close equity gaps, to assess how well institutions serve their students, and to inform policy design.[1]

It is clear that students need better information to make decisions about where to invest valuable time and money in a college credential, and policymakers need better information to effectively steward taxpayers' investment in higher education. In response to this need, a bipartisan group of Senators and Representatives introduced the College Transparency Act (CTA), legislation that that would create an SLDN consisting of a limited set of data elements to answer

specific questions of national importance. More than 130 organizations, representing students, institutions, veterans, college access providers, and employers, have publicly endorsed the College Transparency Act (CTA), recognizing that this solution is critical to a more functional postsecondary marketplace that serves all students.[2] HEA reauthorization provides the ideal opportunity to make these needed policy improvements.

Count all students

It is imperative that data improvements in HEA provide accurate, timely, and representative data to students for decision-making. To be sure, *all* students have the right to know what they can expect in return for their investment of time and money, regardless of how they finance their education. An SLDN, as proposed in CTA, would count all students to provide complete answers to pressing questions about postsecondary outcomes. Yet, existing data systems—and other proposals to amend them—fail in this regard.

Policy proposals like the PROSPER Act fall short of providing fully accurate outcomes information because they omit from workforce metrics students who do not receive federal student aid.[3] Thirty percent of students nationwide do not receive federal financial aid—in fact, only about 62 percent of community college students do.[4] Many colleges and systems would be unfairly mischaracterized by these incomplete data. For example, in 2016–17, about 75 percent of California Community College students did not receive federal financial aid—so these students' employment outcomes would not be counted by data solutions proposed in the PROSPER Act.[5]

Students—even those who do not receive Pell Grants or student loans—often benefit from other federal investment like the American Opportunity Tax Credit and other tax exemptions and deductions, which provide relief for students and their families while attending college. Veterans and servicemembers, and the institutions they attend, also can benefit from GI Bill benefits and the Tuition Assistance Program. Furthermore, the federal government supports higher education institutions through research grants from the National Institutes of Health and National Science Foundation, among other agencies, as well as through Title III and Title V programs, which authorize funding and general support for Minority Serving Institutions. If federal data systems exclude students who do not receive federal student aid, the data will not reflect the scope of outcomes for all students who benefit from various federal investments in higher education.

We encourage policymakers to consider solutions like an SLDN that leverages and streamlines existing federal, state, and institutional data to answer critical questions in higher education. Students and policymakers alike have a right to accurate and complete information to make decisions and to enact policies to improve student success and close equity gaps. In the absence of a comprehensive policy solution, recent improvements to IPEDS have been crucial to filling gaps on outcomes for groups like Pell Grant recipients, part-time, and transfer students. These IPEDS improvements are useful and welcome, but they do not fully meet student and policymaker needs. It is important that HEA reauthorization continues the momentum toward better, more representative data by counting all students in outcomes and earnings metrics through a student-level data network.

Thank you for the opportunity to share comments. We look forward to working with the Committee and other lawmakers as HEA reauthorization discussions proceed. If you have any questions about these comments then please contact IHEP's vice president of policy research, Mamie Voight (mvoight@ihep.org or 202-587-4967).

Sincerely,

AccuRounds, Inc.
Achieve Atlanta
Advance CTE
Alloy Engineering Co., Inc.
America Forward
Aspen Institute College Excellence Program

Association for Career and Technical Education

Association of College Unions International

Association of Public & Land-grant Universities

California EDGE Coalition

Center for Law and Social Policy

Colorado Center on Law and Policy

Consumer Action

Council for Adult and Experiential Learning

Data Quality Campaign

Education Commission of the States

Equal Justice Works

Excelencia! In Education

Finger Lakes Advanced Manufacturers Enterprise

George Washington Institute of Public Policy

Higher Learning Advocates

Institute for Higher Education Policy

Jobs for the Future

Knowledge Alliance

Lehman College of the City University of New York

Louisiana State University

Metro Atlanta Chamber of Commerce

NASPA – Student Affairs Administrators in Higher Education

National Association for College Admission Counseling

National Association of Student Financial Aid Administrators

National Skills Coalition

New America Higher Education Initiative

Nexus Research and Policy Center

NIRSA: Leaders in Collegiate Recreation

Ohio State University Office of Institutional Research & Planning

Optimax Systems, Inc.

Postsecondary Analytics

Public Insight

Skills2Compete Colorado

South Asian Fund for Education, Scholarship, and Training

Southeast Ministry

StriveTogether

The Bell Policy Center

The Education Trust

The Institute for College Access & Success

uAspire

United Negro College Fund

Women Employed

Workforce Data Quality Campaign

Young Invincibles

[1] Postsecondary Data Collaborative. (2015). *Envisioning the national postsecondary data infrastructure in the 21st century* [Paper series]. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/postsecdata/mapping-data-landscape/national-postsecondary-data-infrastructure

[2] Postsecondary Data Collaborative. (updated 2017, October 31). Postsecondary Data Collaborative and Workforce Data Quality Campaign applaud bipartisan, bicameral College Transparency Act. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/press/opinions-and-statements/postsecondary-data-collaborative-and-workforce-data-quality-campaign

[3] Roberson, A.J. (2017). Why incomplete data leaves us with incomplete student outcomes. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/postsecdata/data-at-work/why-incomplete-data-leaves-us-incomplete-student-outcomes

[4] U.S. Department of Education. (2015). *Using federal data to measure and improve the performance of U.S. institutions of higher education*. Retrieved from https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf

[5] IHEP analysis of California Community College data.