The Honorable Lamar Alexander
Chairman
Senate Health, Education, Labor, and
Pensions Committee
United States Senate
Washington, D.C. 20510

The Honorable Patty Murray
Ranking Member
Senate Health, Education, Labor, and
Pensions Committee
United States Senate
Washington, D.C. 20510

April 24, 2015

Dear Chairman Alexander and Ranking Member Murray,

As members of the Postsecondary Data Collaborative (PostsecData), we appreciate the opportunity to comment on the Senate Health, Education, Labor, and Pensions (HELP) Committee white paper on Consumer Information. The PostsecData Collaborative is a coalition of organizations that advocates for the use of high-quality postsecondary data to inform policymaking, institutional improvement, and consumer choice—all to improve student success, especially success of low-income students and students of color. Our group includes participants from a large swath of the higher education community, including experts and organizations that represent students, states, researchers, advocates, the business community, and institutions and systems of higher education. Through the Collaborative, we seek consensus among our diverse set of organizations on key postsecondary data issues, particularly those that impact students. This letter explains points of consensus supported by the organizations listed below.

When data are used responsibly, they can inform decisions made by students, families, federal and state policymakers, employers, and educators at all levels. To build trust in the data, systems and collections should prioritize usability, privacy and security, and careful management of reporting burden to provide stakeholders with the information they need to answer critical questions and improve policy and practice. We are encouraged by the HELP Committee's explicit focus on postsecondary data policy and your interest in hearing input from the field on an array of data topics. The white paper makes clear that you are considering a variety of potential solutions, and to inform that process, the undersigned organizations recommend the following:

1. Overturn the ban and create a student unit record system at the federal level, including protocols for ensuring the privacy and security of student data;
2. Leverage existing federal data and publicly report aggregate results;
3. In addition to consumer information and federal policymaking, recognize state policymaking, institutional policy and practice, and research as core purposes for federal postsecondary data;
4. Maintain focus on consumer use and awareness, and ensure the inclusion of critical data elements used by students and other stakeholders;
5. Improve specifications of IPEDS Outcome Measures now as an interim step toward better information on student completions in federal data;
6. Continue to require mandatory participation in federal data collections, but allow third-party, voluntary collections to continue; and
7. Maintain the Department of Education as a steward of federal data with the flexibility to develop metrics to inform decisions, while promoting transparency and public access to data.

We agree that the federal government plays a key role in collecting and reporting consistent, comprehensive postsecondary data in ways that promote student success. We also agree that the current system is not as effective as it could be if systems were streamlined in ways that reduce burden and protect student privacy. We hope these recommendations are useful in your policy development process.

1. Overturn the ban and create a student unit record system at the federal level, including protocols for ensuring the privacy and security of student data

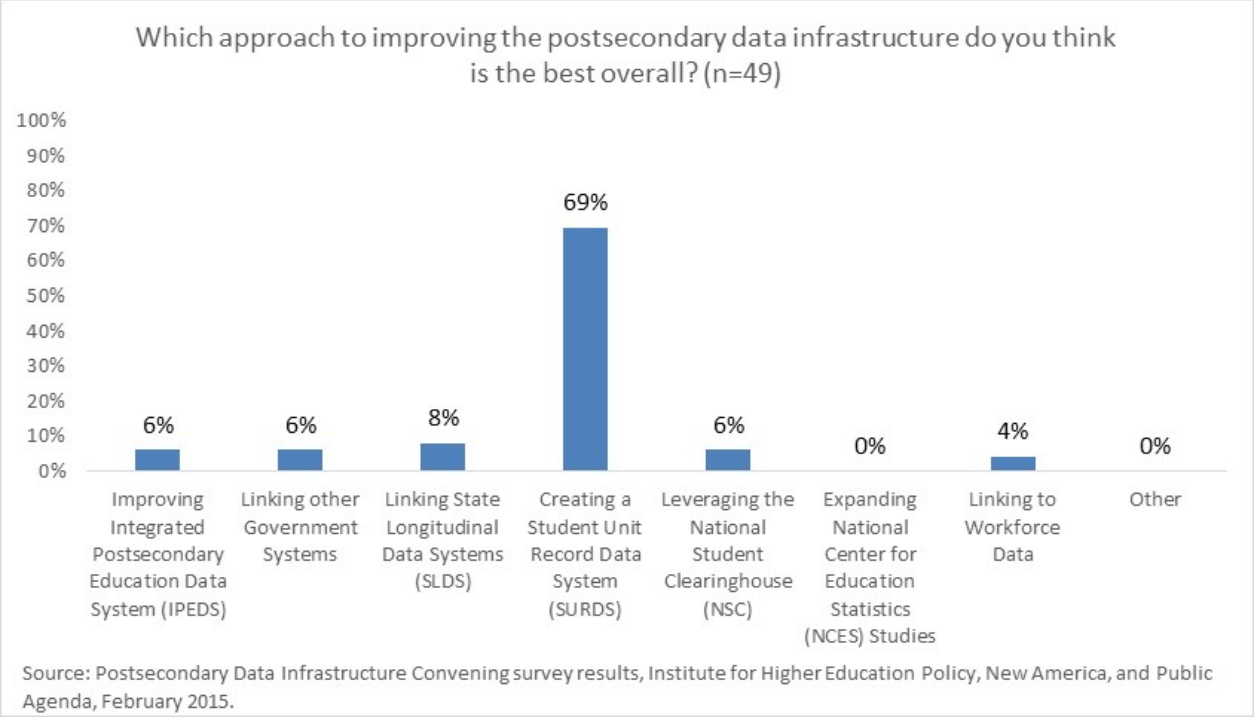
The statutory ban on a federal student unit record system stifles the ability of policymakers to answer critical questions about our postsecondary system, limits the information available to consumers, and imposes unnecessary burden onto institutions. We recommend overturning this ban and directing the Department of Education to engage with the higher education community to design and implement a student unit record system that is managed, secured, and protected by the federal government. To build this system, the Department of Education should:

- Leverage data already held by the federal government, including Federal Student Aid data in the National Student Loan Data System (NSLDS) and other administrative data systems; employment and earnings data already held by federal agencies, such as the Social Security Administration/Internal Revenue Service (SSA/IRS); and data on students, veterans, and members of the military in the Departments of Defense and Veterans Affairs systems.
- Secure and protect student-level data at the federal level, leveraging the National Center for Education Statistics (NCES) procedures for protecting student-level data collected for its sample surveys, including penalties for violating security protocols.
- To protect personally identifiable information, de-identify data wherever possible, and direct NCES to implement procedures for protecting confidentiality in cases of small sample sizes. Allow states and educational institutions to query the data system for data to (1) deploy in combination with their own, larger datasets to improve policy and practice and better serve students and (2) fully understand aggregate figures reported by the Department of Education. Policies and procedures will need to balance the utility of data with appropriate privacy protections.
- Define uniform data specifications—in consultation with stakeholders—to govern institutional reporting. Using these data, calculate and publish aggregate, institution-level and/or program-level statistics, including on IPEDS measures such as enrollment and graduation rates. This change would negate the need for institutions to report the student-level components of IPEDS, reducing institutional reporting burden, while providing critical information to students, families, states, educational institutions, federal policymakers, and employers.
- Allow states to report data to the unit record system on behalf of institutions using statewide longitudinal data systems (SLDS), thereby reducing reporting duplication and managing burden for institutions. SLDS will remain valuable in meeting the unique, more precise needs of individual states.
- Maintain a feedback process by which data elements are added, removed, or amended and data reporting procedures are continually streamlined based on input from stakeholders.

Respondents to a recent survey of postsecondary data experts representing colleges, students, states, systems, foundations, policy organizations, and the business community overwhelmingly selected a student unit record data system (SURDS) as the best overall approach to improving the federal postsecondary data infrastructure (Figure 1). This survey was conducted in advance of a convening focused on postsecondary data needs at the national level. Given the focus on national data needs, these experts realize that a SURDS could collect more comprehensive data, would be more flexible and adaptable to changing postsecondary data needs and increasing student mobility, and would reduce institutional reporting burden in the long-term—all while keeping data secure and protecting student privacy.

Figure 1: Survey Results from Federal Postsecondary Data Infrastructure Convening

The majority of survey respondents identify a student unit record system as the best approach to improving the national postsecondary data infrastructure.



Source: Postsecondary Data Infrastructure Convening survey results, Institute for Higher Education Policy, New America, and Public Agenda, February 2015.

The convening's conversations illuminated the value of a student unit record system as part of the nation's data infrastructure, with other data systems—such as SLDS and NCES sample studies—serving important purposes as well. In fact, a substantial majority (88 percent) of respondents to a post-convening survey (n=33) supported a repeal of the ban on a student unit record data system. Other key findings from the survey include:

- 78 percent of respondents agreed that "Creating a federal student unit record system (SURDS) would be the most effective strategy for generating the measures and metrics necessary to meet data needs at the national level."
- 83 percent of respondents agreed that "A student unit record system (SURDS) would have to leverage and build upon the other data systems discussed [at the convening]."
- 86 percent of respondents agreed that "Improving data quality, linkages and use at both the state and federal level does not have to be a mutually exclusive policy choice; each contributes to strengthening the national data infrastructure."

We strongly agree with the concept in the HELP Committee's white paper that new student-level data should be collected for all students, including those who do not receive Title IV federal financial aid. The majority (81 percent) of respondents to the post-convening survey referenced above also agreed "there is a compelling reason for the federal government to collect data on all students, including those who do not receive federal financial aid, but do attend Title IV institutions." Non-federally-aided students must be included in a student unit record system to ensure data are comprehensive and representative of all students and all institutions and because an entire institution benefits from the public subsidies targeted toward aided students. If a SURDS were limited only to federally aided students, it would only cover slightly more than half (57 percent) of all college students and only 44 percent of students at public community colleges. It would even omit about one quarter of the lowest income students—a key demographic of

interest for public policy purposes (Figure 2). The SURDS should include all students attending Title IV institutions to ensure consumers can access information applicable to them (regardless of their aid status) and policymakers have the data necessary to answer questions about all students and compare aided and non-aided students.

Figure 2: Federal Student Aid Receipt by Student and Institutional Characteristics

A data system limited to federally aided students would omit large portions of students.

	Percent of students receiving federal student aid	Percent of students not receiving federal student aid
All students	**57%**	**43%**
Bottom Income Quintile	76%	24%
Second Income Quintile	71%	29%
Third Income Quintile	59%	41%
Fourth Income Quintile	47%	53%
Top Income Quintile	34%	66%
Dependent	58%	42%
Independent	57%	43%
Public 2-Year	44%	56%
Public 4-Year	61%	39%
Private Non-Profit 4-Year	68%	32%
Private For-Profit 4-Year	80%	20%

Source: IHEP analysis of 2012 National Postsecondary Student Aid Study (NPSAS:12) using PowerStats, http://nces.ed.gov/datalab.

2. Leverage existing federal data and publicly report aggregate results

Whether or not the federal government creates a SURDS as we recommend, it should at the very least leverage the administrative data that it currently holds. Using NSLDS, the Department of Education should calculate and publicly report data on student loan volume, cumulative student debt disaggregated by completion status, and the status of outstanding loans annually at the institution and/or program level. These data are not published currently, and the Department of Education is uniquely situated to provide this information. Also, by linking NSLDS data with earnings data, the Department could publish employment and earnings information at the institution and/or program level for the 57 percent of students who do receive federal financial aid.

States are using Unemployment Insurance (UI) wage records to attempt to calculate earnings, employment, and return on investment. However, state-level UI records suffer from several limitations. They do not capture workforce outcomes for the self-employed, military employees, federal civilians, postal employees, railroad employees, or students who are employed in another state. While some of these limitations can be partially addressed by combining UI data with other data sources[1] or UI data in other states, earnings data held by federal agencies, including SSA, do capture these populations, improving overall data quality. By publishing workforce outcomes data using SSA data or building processes for states and institutions to query SSA data for cohorts of students for their own policy development purposes, consumers and policymakers will have access to better data to inform decision-making.

[1] For example, the Federal Employment Data Exchange System (FEDES) provides participating states with employment information for federal employees.

3. In addition to consumer information and federal policymaking, recognize state policymaking, institutional policy and practice, and research as core purposes for federal postsecondary data

The white paper emphasizes two key postsecondary data uses—federal policymaking and consumer information. These purposes are critical, but they do not encompass all of the vital, productive uses of federal postsecondary data. In particular, we urge the Committee to consider the importance of federal data in state and institution-level decision-making. While state longitudinal data systems (SLDS) and institutional data systems allow more refined and nuanced state and institution-specific analyses, federal data are the only source of comprehensive, comparable data for benchmarking and comparing key metrics. For one example of a state-level use case, see the National Center for Higher Education Management Systems (NCHEMS) state-by-state comparisons using IPEDS data.

Furthermore, research plays an essential role informing postsecondary policy and consumer choice, so federal policy should not overlook researchers as key data users. In fact, to support the call for better data, the paper cites a number of research reports on topics like student loan default,[2] undermatching,[3] return on investment,[4] and consumer choice.[5] Without access to high-quality data, researchers at colleges and universities, think tanks, policy and research organizations, associations, and other non-governmental organizations could not continue to provide insights that help policymakers answer key questions facing our nation and inform the next generation of higher education policies.

4. Maintain focus on consumer use and awareness, and ensure the inclusion of critical data elements used by students and other stakeholders

The white paper is right to focus on data usability so students, policymakers, institutions, and researchers can access the data necessary to inform decision-making. Data should not be collected simply for data's sake, but rather reported in a way that facilitates use. Consumers deserve accurate, timely, and understandable information to help them make college choices, and we appreciate the Committee's emphasis on providing students with this key information. We support the Committee's concepts for making data usable by consumer testing student-facing tools, improving accessibility and transparency of data for download and analysis, requiring institutions to place consumer disclosures and net price calculators prominently on their websites, and creating a universal net-price calculator. Students likely underutilize some consumer information because it is "buried" and/or part of a long list of disclosures on a college website. To increase the chances that students will find and use the information, it needs to be prominently displayed in the places where consumers are likely to be looking for such information and labeled in a way that is meaningful to consumers.

For just a few examples of how non-governmental organizations can use downloadable data to create useful tools, see The Education Trust's College Results Online, The Institute for College Access and Success' College InSight, U.S. Chamber of Commerce Foundation's Leaders and Laggards, New America's Federal Education Budget Project, NCHEMS' HigherEdInfo, and the American Institutes for Research's Delta Cost Project.

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[2] Clare McCann and Jason Delisle, "Student Loan Defaulters Aren't Who You Think They Are," New America Foundation, October 23, 2014, http://www.edcentral.org/defaulters/.

[3] William G. Bowen, Matthew M. Chingos, and Michael S. McPherson, *Crossing the Finish Line: Completing College at America's Public Universities.* (Princeton, NJ: Princeton University Press, 2009).

[4] Anthony Carnevale, Stephen J. Rose and Andrew R. Hanson, "Certificates: Gateway to Gainful Employment and College Degrees," Georgetown University Center on Education and the Workforce, 2012, https://cew.georgetown.edu/report/certificates/.

[5] Andrew Kelly and Mark Schneider, "Filling in the Blanks: How Information Can Affect Choice in Higher Education," American Enterprise Institute, January 2011, http://www.aei.org/wp-content/uploads/2011/01/fillingintheblanks.pdf.

While we appreciate the paper's emphasis on data use, we are concerned that it focuses only on data related to "student financing, success, and safety." These topics are important, but additional examples of data use (Figure 3) show why limiting federal data collection to *only* these items is too narrow. Eliminating other data would make it impossible to answer pressing policy questions such as:

- How many students are enrolled in college and what is their demographic makeup, particularly with respect to race/ethnicity and income level?
- What do institutional profiles look like in terms of geographic location, selectivity, and institution type (e.g. Carnegie classification, minority-serving institution status, predominately online offerings, etc.)?
- What are the trends in college expenditures and how can those trends inform efficiency improvements and cost reductions?

Existing federal data are used extensively to answer questions about college access, institutional characteristics, and expenditures, as well as student financing, success in and after college, and safety. Figure 3 shows examples of consumer and research tools that repurpose IPEDS data on these other topical areas to communicate important information. Eliminating key elements from federal data collections would leave substantial gaps in these (and other) useful tools and would jeopardize efforts to use data more effectively.

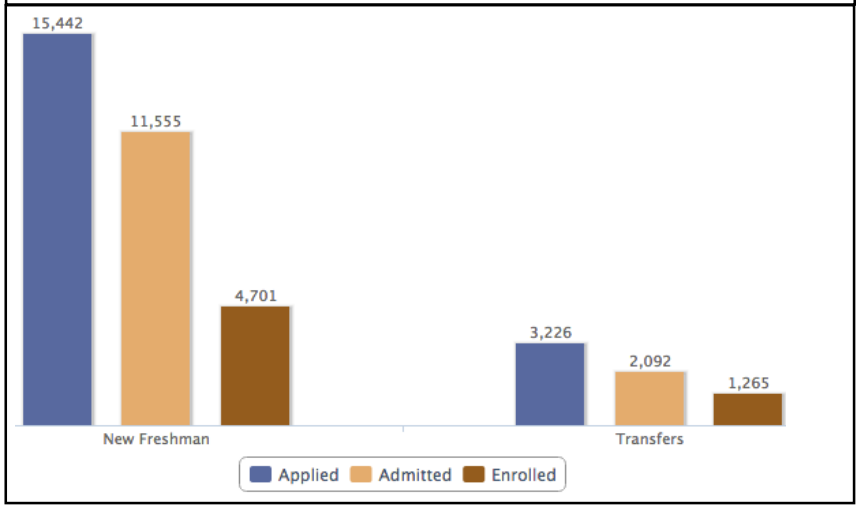
We appreciate the Committee's interest in managing institutional reporting burden. When institutions spend less time reporting data, they can spend more time using it to inform policy and practice. However, burden can be reduced in better ways, such as by streamlining collections and leveraging data that already exist. By improving data systems and collections to include critical data elements, consumers and other data users could answer questions that currently remain unanswered, such as:

- Do part-time, adult, Pell Grant receiving, military, and underprepared students have equal access to postsecondary education, and are they graduating?
- Are students who do not graduate from their first institution transferring or dropping out? What do student mobility patterns look like?
- What does college cost for *all* students and what types and amounts of aid do all students receive, not only first-time, full-time students?
- How well do colleges prepare students for the workforce?
- How much debt do students accrue in college and what are the repayment outcomes? How do debt and repayment results differ for completers and non-completers?

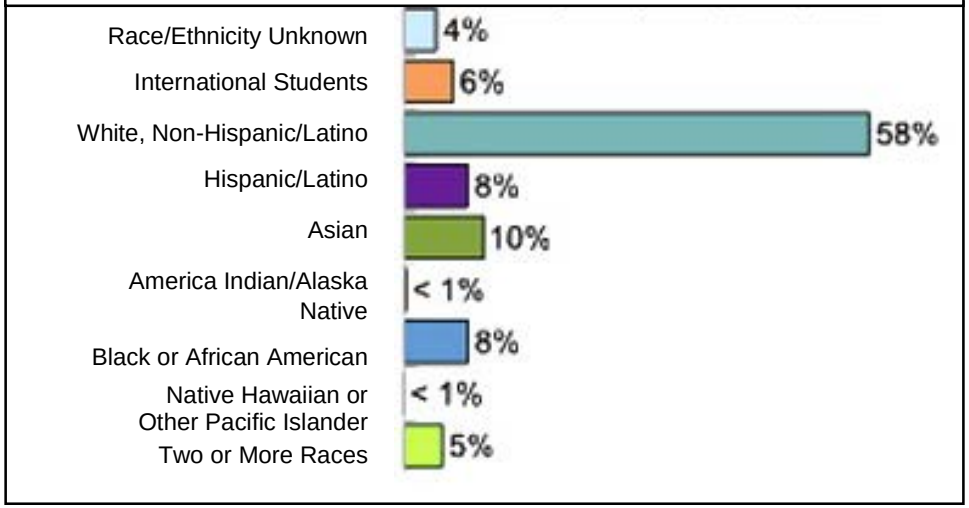
Figure 3: Data Use Examples on Enrollment, Admissions, and Expenditures

Federal data are valuable at providing information on topics other than student financing, success, and safety.

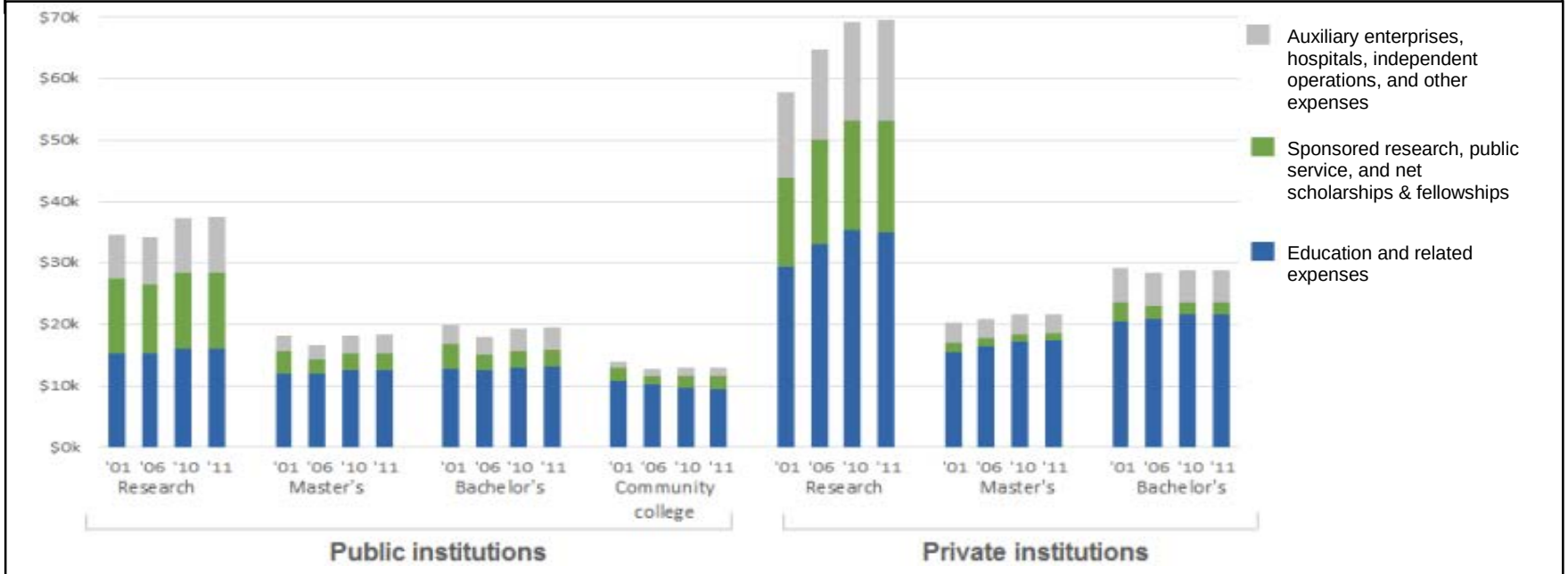
Admissions data for the University of Tennessee from AASCU's and APLU's College Portraits website



Demographic data for Vanderbilt University from NAICU's U-CAN website



Expenditures data from the American Institutes for Research's Delta Cost Project (Trends in College Spending, 2001-2011)



5. Improve specifications of IPEDS Outcome Measures now as an interim step toward better information on student completions in federal data

The new IPEDS Outcome Measures survey intends to capture completion and transfer data for part-time and transfer students, instead of only first-time, full-time students, providing information that is more reflective of today's college students. However, the Outcome Measures as specified face several limitations. They only track completion after six years and other outcomes (transfer, still enrolled) after eight years, even for two-year programs. They also do not distinguish students based on the type of credential sought or earned (BA, AA, certificate); disaggregate by demographic characteristics or financial aid receipt; report the type of institution or program the student transfers to; include students beginning at times other than the Fall semester; or capture non-degree-granting institutions. Because the higher education community has identified such limitations, we recommend revising the Outcome Measures' specifications now so the resulting data will be more useful. Waiting will only compound the limitations noted above and acknowledged in the white paper. Fourteen members of the Postsecondary Data Collaborative previously submitted joint comments suggesting how these measures could be improved.

6. Continue to require mandatory participation in federal data collections, but allow third-party, voluntary collections to continue

Mandatory data collections, like IPEDS or a student unit record data system, serve an essential public purpose in producing comparable information across all institutions at the national level, and should be maintained. Voluntary initiatives cannot ensure full institutional participation, nor can they guarantee all the data are made public at the level necessary to inform decision-making. Additionally, disclosure requirements without mandatory collections do not guarantee the desired data are made available to consumers.[6] To meet the public needs, data must live in the public domain, and in particular, must not require a fee for public access or institutional participation.

Third-party, voluntary data collections should not replace mandatory, federal collections, but we encourage Congress not to make any statutory change that would limit the ability of voluntary initiatives to continue. Many voluntary data collections exist to serve different needs than federal or state collections or fill gaps in federal collections. They also can serve as testing grounds to explore new data as the field of postsecondary education continues to evolve. For example, the Student Achievement Measure, Voluntary Framework of Accountability (VFA), Complete College America, and Access to Success have moved the field forward in specifying metrics that measure things like student progression, enrollment and success in developmental education, credit accumulation, completion rates for low-income and transfer students, and gaps between student populations. As consensus emerges among multiple initiatives about the importance of key measures, those measures should be incorporated into federal collections, such as a student unit record data system or IPEDS. Third-party initiatives also should be permitted to assist institutions meet state and federal reporting requirements to help manage reporting burden.

[6] Kevin Carey and Andrew P. Kelly, "The Truth Behind Higher Education Disclosure Laws," Education Sector, 2011, http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure_RELEASE.pdf.

7. Maintain the Department of Education as a steward of federal data with the flexibility to develop metrics to inform decisions, while promoting transparency and public access to data

We believe that the U.S. Department of Education (ED) plays a constructive and essential role in postsecondary data collection and reporting. It is important that ED be transparent and consultative about regulatory changes, metrics definitions, methodological decisions, and data collection requirements and use data in a manner that provides opportunities to improve upon practice. Limiting ED's role could render our postsecondary data system too inflexible to adapt to current or changing needs—including, potentially, future Congressional requests for information to guide policy decisions.

ED also should have some flexibility to develop and report metrics when circumstances require it. Experience has shown that implementation can reveal flaws in statutorily-created or -mandated metrics and that new metrics can become relevant and important over time. For example:

- The IPEDS net price definition is defined in statute, so while its limitations are well understood, it cannot be fixed without statutory action. For instance, the logic behind the uneven net price income bands is unclear[7] and net price data for middle and high-income students are not representative of those students because the metric is defined to include only Title IV aid recipients.
- As interest in student debt and loan repayment grew in recent years, the Office of Federal Student Aid published a series of data tables about the student loan portfolio. Because of their ability to be flexible and responsive to evolving needs of policymakers and the public, they were able to produce and make public analyses on things like repayment plans and loan statuses. Relying solely on the often cumbersome and lengthy statutory process likely would have delayed publication of these key statistics.

ED needs to be able to make necessary and timely amendments to metrics and data collection requirements, particularly with respect to metrics that inform policy development or provide information to the public. ED also needs the flexibility to create tools for institutions to access and analyze education data for their own improvement purposes. Congress should provide appropriate parameters for and oversight over ED's action, but it should avoid dictating rigid and prescriptive metrics and data collection requirements in statute that might limit flexibility or improvements.

However, ED should not operate in a vacuum. In developing and reporting measures and metrics, ED should be fully transparent about its process and any technical adjustments, as well as the implications of those adjustments. The Department should also maintain clear communication lines with the public and Congress. ED already engages extensively with the field using Technical Review Panels (TRPs), through which higher education representatives provide input into potential data collection changes. Amendments to IPEDS also go through a public comment period as part of the Office of Management and Budget (OMB) approval process to evaluate reporting burden, and ED has opened other tools, such as the College Scorecard, up for public comment as well.

As noted earlier in this letter, Congress and ED can reduce data burdens on institutions by strengthening data systems and streamlining collections, while not putting the entire onus on Congress to legislate and

[7] Net price income bands defined in statute are: $0-30,000; $30,001-48,000; $48,001-75,000; $75,001-110,000, and $110,001 and more.

update data and metrics collected and reported. The system must remain nimble enough to meet the changing needs of consumers, policymakers, institutions, employers, and researchers, while ensuring that institutions are not overburdened with data collections, that privacy is protected, and that the right metrics are being used. This need for responsiveness requires a balance between the role of Congress and the role of the Executive Branch.

Thank you for spotlighting the importance of data in postsecondary education policy and for the opportunity to comment on the HELP Committee's white paper. If you have questions or would like to discuss these issues further, please contact Mamie Voight, Director of Policy Research at the Institute for Higher Education Policy (mvoight@ihep.org, 202-587-4967). To learn more about the Postsecondary Data Collaborative, visit our website at www.ihep.org/postsecdata.

Sincerely,

Association for Career and Technical Education (ACTE)
Association of Community College Trustees (ACCT)
Association for Institutional Research (AIR)
California Competes
The Campaign for College Opportunity
Center for Law and Social Policy (CLASP)
Complete College America
Consumer Action
Council for Opportunity in Education (COE)
The Education Trust
Equal Justice Works
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy (IHEP)
National Association for College Admission Counseling (NACAC)
National Association of State Directors of Career Technical Education Consortium (NASDCTEc)
National Association of Student Financial Aid Administrators (NASFAA)
National Center for Higher Education Management Systems (NCHEMS)
National Council of La Raza (NCLR)
New America
Scholarship America
Southern Education Foundation (SEF)
State Higher Education Executive Officers Association (SHEEO)
The Institute for College Access and Success (TICAS)
U.S. Chamber of Commerce
Veterans Education Success
Workforce Data Quality Campaign (WDQC)
Young Invincibles