



February 23, 2022

Dr. Miguel Cardona, Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20024

Dear Secretary Cardona:

This letter is submitted on behalf of the 20 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

PostsecData recognizes the vital role that the College Scorecard (Scorecard) plays in keeping students informed about their college options, through direct use of the online tool, as well as the applications and analyses that researchers and developers produce using the underlying data to help students and policymakers navigate the postsecondary landscape. Further, these data are essential to institutions and policymakers as they seek to implement and refine programs, policies, and investments.

The College Scorecard represents the single best source for important information about the economic outcomes of students by institution and field of study for all colleges nationwide. PostsecData appreciates the recent addition of several key data elements, which will add considerable value to students and their families, policymakers, researchers and advocates, and more.

In particular, we would like to thank the Department to Education (ED) for making the following data elements available through the College Scorecard, aligned with [previous PostsecData recommendations](#):

- Institution-level median earnings measures, which contextualize program-level measures like earnings and debt, and provide a longer time horizon to understand student outcomes than currently available program-level earnings
- The earnings threshold metric, which shows the share of former students whose earnings exceed those of the typical high school graduate, demonstrating the extent to which institutions provide a baseline level of economic return for their students
- The addition of median earnings outcomes disaggregated by gender, income, and dependency, which can demonstrate inequities in earnings of former students. These disaggregated median earnings will enable the field to evaluate returns to higher education for different groups, as proposed by the [Postsecondary Value Commission's Equitable Value Framework](#)
- Three-year repayment rates at the institution-level, as well as cumulative debt outcomes by institution and field of study
- The incorporation of national midpoints to the earnings, graduation rates, and other outcomes displayed in the consumer tool, to help students and other users contextualize the outcomes for specific institutions

These changes are specific and tangible ways that ED has made its data more useful and impactful for students and the field of postsecondary education, and we appreciate the effort made to refine the College Scorecard in this way. Further, we hope that ED will consider further disaggregation of earnings, debt, and repayment outcomes, including by race/ethnicity, as the data to do so become available.

We look forward to continuing to work with ED to promote and improve the College Scorecard and appreciate your thoughtful and detailed approach to these data improvements. If you have any questions, please contact Mamie Voight, President & CEO at the Institute for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

AccuRounds
Achieve Atlanta
Advance CTE
Association for Career and Technical Education
Braven
Commission on Accreditation of Healthcare Management Education
GW Institute of Public Policy, George Washington University
Georgetown University Center on Education and the Workforce
Guild Education
Higher Learning Advocates
Institute for Higher Education Policy (IHEP)
National Association for College Admission Counseling (NACAC)
National Center for Higher Education Management Systems (NCHEMS)
New America
Optimax Systems, Inc.
Skills2Compete Colorado
The Education Trust
The Institute for College Access & Success (TICAS)
Third Way
uAspire

(cc)

James Kvaal – Under Secretary of Education
Donna Harris-Aikens – Senior Advisor for Policy and Planning, Office of the Secretary
Michelle Asha Cooper – Acting Assistant Secretary for Postsecondary Education
Jordan Matsudaira – Deputy Under Secretary, Office of the Under Secretary
Clare McCann – Special Assistant, Office of the Under Secretary