

June 20, 2019

Janice Kelly-Reid
Project Director
RTI International
701 13th Street NW, #750
Washington DC 20005

Dear Ms. Janice Kelly-Reid:

This letter is submitted on behalf of the 20 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to the request for comments on recommendations from the College Scorecard Technical Review Panel (TRP) 2: Program-Level Measures and Institutional Comparisons.ⁱ PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. We recognize the vital role that the College Scorecard plays in keeping students informed about their college options, through direct use of the online tool as well as the apps and analyses that researchers and developers produce to help students navigate the postsecondary landscape.

We are pleased to see the Department of Education's (ED) continued commitment to the Scorecard, including the addition of program-level data on student debt, a first step toward giving students a complete picture of student outcomes by program. PostsecData commends ED for recently strengthening this data element in the consumer tool. We urge ED to continue to add additional program-level data, especially on post-college earnings, to the College Scorecard to inform student choice of major. Institution-level data provide important signals about performance and outcomes, and program-level data—earnings in particular—are also necessary to help students decide not only where to attend college, but what to study.

PostsecData supports ED's effort to improve the College Scorecard and to build on this work and recommends that ED:

1. Reinstate the earnings threshold metric in the consumer facing tool, while also maintaining the median earnings measure.
2. Reinstate the display of national medians to provide students and other users with context regarding schools' outcomes on net price, graduation rates, repayment rates, and earnings.
3. Report disaggregated earnings data at least at one and 10 years after graduation for each program of study.
4. Improve repayment rate measures to ensure the data are most relevant and understandable to students and families.
5. Continue working toward increased data quality on certificates in the College Scorecard.

The College Scorecard provides the most complete and detailed information about student's postsecondary experiences and the institutions that serve them. When comprehensive data is made available, students, higher education institutions, state and federal policymakers, and the postsecondary research community are empowered to make informed decisions about college choice and postsecondary policies.

1. Reinstate the earnings threshold metric in the consumer facing tool, while also maintaining the median earnings measure.

Information about the median earnings of recent students is valuable to prospective students, but as a single data point it does not tell the whole story. To better help users understand earnings information, ED has historically included a threshold earnings measure in the College Scorecard consumer site, which shows the share of former students earning above a baseline measure of success (\$25,000 in previous iterations, \$28,000 in the latest data release). The use of an earnings threshold is particularly effective at conveying clearly the share of students who meet a minimum threshold of economic security. For example, a program where half of students went on to earn \$100,000 while half earned \$0 would have the same median earnings as one where all students went on to earn \$50,000. However, using a threshold of \$28,000, the threshold earnings rate for these schools would be 50 and 100 percent, respectively.

While students need information on median earnings to make informed decisions about where to invest their time and financial resources, providing median earnings without the additional context of an earnings threshold signals to students comparing institutions that higher earnings are necessarily better. And it severely limits the ability of students to tell whether such earnings are better or worse than a standard baseline. The earnings threshold measure, on the other hand, recognizes that some valuable fields may pay less on average, but students should expect their institutions to prepare them to earn at *least* this basic wage.

Since the earnings threshold establishes a minimum earnings bar, it creates a more level playing field for schools with differing institutional missions while still conveying to prospective students the likelihood that their investments will pay off. In contrast, an institution's median earnings generally rise in proportion to the number of bachelor's degrees awarded by a school, given earnings premiumsⁱⁱ related to educational attainment. This means that schools specializing in sub-baccalaureate credentials may appear to offer relatively lower earnings compared to four-year institutions.

We recognize that additional thresholds and benchmark information may also be appropriate and provide students with useful information about the relative payoff of enrolling in college. However, in the time it takes for ED to improve the data it provides on the College Scorecard website, students should not be left without *any* needed contextual information. We urge ED to restore the previous benchmark to inform students and policymakers while it considers additional or alternative contextualizing information. Furthermore, ED should ensure that any future changes to the threshold are understandable to students and contextualized to convey useful information about their expectations for a reasonable

payoff. Consumer testing the message sent by the threshold earnings will be critical for assessing how students perceive, understand, and use the information provided.

2. Reinstate the display of national medians to provide students and other users with context regarding schools' outcomes on net price, graduation rates, repayment rates, and earnings.

The College Scorecard update in Fall 2018 also eliminated comparisons of school-level outcomes to the national median and indicators of whether the institution's outcomes fell in the top, middle, or bottom third of all institutions on that measure. Research indicates that contextual information such as the national medians previously included in the College Scorecard can help individuals make better decisions under complex circumstances, and that these contextual cues are particularly important for low-income and first-generation students.ⁱⁱⁱ Such context is a key source of information for prospective students in evaluating the school-level data on each measure. Removing the context for each data point eliminates students' ability to understand whether the expected outcomes should be considered high or low, potentially distorting students' perceptions of particular schools.

For instance, the average graduation rate among four-year schools is just under 60 percent.^{iv} Yet some prospective students with experience only in high schools, where graduation rates tend to be much higher, may assume a 60 percent graduation rate is an indicator of poor quality. Returning students may also benefit from this context, particularly students who have been away from school for an extended period, or those who are hoping to transfer schools. Similarly, without the context provided by national medians, a school with below-average outcomes might seem to offer misleading impressions of quality, especially if compared only to schools that also have low success rates.

Additional contextual information, such as median outcomes by primary credential level offered or admissions policies and factors related to location or cost of living, also holds potential value and should come in addition to rather than in place of national medians. Along these lines, as program-level information becomes available, ED should incorporate program-specific medians to provide reference points for different degree types.

3. Report disaggregated earnings data at one and 10 years after graduation for each program of study.

The TRP report requests recommendations on how current key institution-level measures should be presented as comparison points on the consumer tool. Once made available, we recommend that the median earnings of undergraduate degree or certificate completers should be reported at least at one and 10 years after exit for each program of study, and further disaggregated by race/ethnicity, gender, and Pell Grant receipt status. Reporting outcomes at these intervals and for different subgroups of students—rather than the current 10 years after program entry—would provide more consistent, understandable information for students, policymakers, and institutions. Including additional shorter-term earnings measures after college completion would offer a broader view by providing information on both long- and short-term earnings after

graduation. Adding short-term earnings would also be more consistent with outcomes measured in the Workforce Innovation and Opportunity Act (WIOA).

4. Improve repayment rate measures to ensure the data are most relevant and understandable to students and families.

The TRP report discusses possible definitions of repayment rate, including borrower-based rate, a dollar-based rate, and the median percentage paid down over a set number of years among borrowers in the cohort. Repayment data are essential to understanding how students fare in paying down their debt. It is critical that the measure is designed and presented in a way that adequately reflects successful repayment and is understandable to students and families. Currently, the repayment rate used in the Scorecard measures the percentage of students who did not default and paid down at least \$1 of principal within either one, three, five, or seven years.^v We encourage ED to also include in the College Scorecard a borrower-based repayment rate that shows the share of borrowers actively paying down principal (as described above), supplemented with the share in other categories of repayment, like default, delinquency, and those who are actively making payments through income-driven repayment but are not paying down principal. These data points, disaggregated by program and student characteristics like race/ethnicity, gender, and Pell Grant receipt status, would provide more clarity for students, institutions, and policymakers to make informed decisions.

5. Continue working toward increased data quality on certificates in the College Scorecard.

The latest update of the College Scorecard added information on 2,100 non-degree granting institutions that only award certificates. Many of these institutions and programs enroll primarily low-income students and students of color. We appreciate this update that equalizes the information available for all institutions so students are able to make more informed decisions about where to attend. It is imperative that policymakers and the field also understand how these programs are serving students and their post-college outcomes to ensure that the system equitably serves them.^{vi}

We urge ED and institutions to continue working on improving the quality of data on certificates. Having meaningful information on these programs will better help students understand student outcomes for certificate degrees and programs. For example, students entering these programs should know their likely post-graduate earnings compared to bachelor's degree recipients.

We are encouraged by ED's persistence in evaluating the wealth of data at its disposal and commend its commitment to transparency in support of student success. We hope to see the information that was removed returned to the Scorecard and encourage ED to continue to engage experts as they explore the program-level measures in more depth. 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
Advance CTE
Association for Career and Technical Education
Boston Centerless
Campaign for College Opportunity
Center for Law and Social Policy (CLASP)
Complete College America
Corporation for a Skilled Workforce
Eastern Carolina Workforce Development Board, Inc.
Georgetown University Center on Education and the Workforce
Global Resource Management, Inc.
Institute for Higher Education Policy
NASPA - Student Affairs Administrators in Higher Education
National Association for College Admission Counseling
New America Higher Education Initiative
Nexus Research and Policy Center
Public Insight Data Corporation
The Education Trust
The Institute for College Access & Success (TICAS)
Third Way

ⁱ Recent TRP Summaries Open for Comment. Retrieved from https://edsurveys.rti.org/cs_trp/index.aspx

ⁱⁱ Carnevale, A., Rose, S., & Cheah, B. (2011). *The College Payoff: Education, Occupations, Lifetime Earnings*. Georgetown University Center on Education and the Workforce. Retrieved from <https://cew.georgetown.edu/cew-reports/the-college-payoff/>

ⁱⁱⁱ Whisett, H. & Allison, T (May 2015). College Information Design and Delivery – Insights from the Cognitive Information Processing Literature. Young Invincibles. Retrieved from:

<http://younginvincibles.org/wpcontent/uploads/2017/04/college-information-design-5.28.2015-FINAL.pdf>

^{iv} U.S. Department of Education National Center for Education Statistics. (October 2016). Digest of Education Statistics Table 326.10. Retrieved from: https://nces.ed.gov/programs/digest/d16/tables/dt16_326.10.asp

^v U.S. Department of Education. (2019). Data documentation for College Scorecard. Retrieved from <https://collegescorecard.ed.gov/assets/FullDataDocumentation.pdf>

^{vi} Wright, J. (2015). Improving the College Scorecard for community colleges and all of higher ed. Retrieved from <https://www.economicmodeling.com/2015/10/29/improving-the-college-scorecard-for-community-colleges-and-all-of-higher-ed/>