

**Commission on Evidence-Based Policymaking—Public Hearing  
Friday, October 21, 2016**

Comments submitted by:  
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Abstract: The current postsecondary data infrastructure is fragmented and incapable of answering a number of important questions about how our students fare in the higher education system. Key stakeholders, including policymakers, institutions, researchers, and the students themselves, need better information about college access, progression, completion, and post-college outcomes. Given the federal government’s substantial investment in postsecondary education, it is imperative that existing data – at the institutional, state, and federal levels – are leveraged to answer these critical questions. By fostering these data linkages and removing existing legal barriers, the Commission can create a system where data drive efforts to increase postsecondary success and close equity gaps.

Oral and Written Statement: Chairman Abraham, Co-Chair Haskins, and commissioners: thank you for the opportunity to address the Commission on Evidence-Based Policymaking on the importance of a cohesive postsecondary data infrastructure and its impact on evidence-based policymaking.

My name is Amanda Janice Roberson and I am a research analyst with the Institute for Higher Education Policy. IHEP is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, with a focus on students who have been underserved by our postsecondary system. Based here in Washington, D.C., we believe that all people, regardless of background or circumstance, have the opportunity to reach their full potential by participating and succeeding in higher education.

In support of this goal, IHEP leads the Postsecondary Data Collaborative (PostsecData), a partnership between more than 35 organizations committed to the responsible use of high-quality postsecondary data to improve student outcomes. PostsecData partners represent a broad range of constituents, including groups that represent students, postsecondary institutions, the workforce community, and state and federal policy influencers and researchers.

Since 2014, IHEP has spearheaded research on which data should be collected, how metrics should be defined, and through which mechanisms our currently disconnected, duplicative, and incomplete data systems can work together to create a cohesive postsecondary data ecosystem. IHEP supports the mission of this Commission to analyze and make recommendations for streamlining federal data and data systems. We suggest the following actions to improve the landscape of postsecondary data for use by policymakers, students and families, institutions, and researchers.

- **Promote best practices in privacy and security for interconnected data systems.** Recommendations by the Commission for data linkages should address the importance of privacy, security, and confidentiality. As institutional practices and changing laws at the state level have led to confusion around when it is permissible to share or link data, policies and procedures from the Commission should be transparent, consult with data security experts to implement field-recognized best practices, and ensure that all publicly reported, aggregate data are stripped of personally identifiable information.

- **Leverage existing data to decrease burden, streamline reporting, and answer critical questions.** Data from sources like the U.S. Department of Education (which houses the National Student Loan Data System [NSLDS] and Integrated Postsecondary Education Data System [IPEDS]), Social Security Administration (SSA), the Department of Defense (DoD) and Department of Veterans Affairs (VA), among others, should be linked and leveraged to create a more complete picture of the higher education landscape. These sources provide valuable data on important subgroups of students who are often overlooked, including Pell grant recipients, student loan borrowers, and student veterans. If linked, these data would produce valuable information about enrollment and completion rates, and post-college employment and earnings. The Commission should consider ways to increase capacity and funding available to streamline processes and link data, as these are the primary challenges for state and local level data linkages.
- **Expand access to wage and labor market information for postsecondary outcomes.** In an era of scarce resources, the value of a postsecondary degree has never been greater, and post-college outcomes are increasingly important to policymakers and students. Now, data and metrics on employment and earnings are limited to voluntary initiatives, like College Measures, state dashboards, and the College Scorecard, revamped in September 2015. The Commission should explore datasets, like the Census Bureau’s Longitudinal Employer Household Dynamics (LEHD) program or the National Directory of New Hires (NDNH), which both utilize state Unemployment Insurance (UI) wage records, or the Social Security Administration and Internal Revenue Service tax records, to understand the return on personal investment of students and families and federal investment in higher education.
- **Align definitions and metrics across federal laws.** Establishing common definitions for data metrics across federal laws like the Higher Education Act, the Workforce Innovation and Opportunity Act, and the Perkins Career and Technical Education Act could reduce administrative burden and create comparable outcomes across federal programs. Common and consistent metric definitions in the postsecondary ecosystem would make it much easier to link data between local, state, and federal sources and allow for accurate comparisons.
- **Recommend that Congress overturn the ban on a federal student-level data system.** The statutory ban on a federal student unit record system stifles the ability of policymakers to answer questions about our postsecondary system, limits the information available to consumers, and imposes unnecessary burden onto institutions. The Commission should recommend to overturn the ban and direct the U.S. Department of Education to engage with the higher education community to design and implement a student-level data system. This system would create a nationwide, inclusive data set that shows how students move through higher education and their post-college outcomes. This system would allow for disaggregation by key student characteristics, like Pell Grant receipt, race/ethnicity, and others, and illuminate evidence for future policymaking around closing equity gaps and the federal investment in higher education and postsecondary programming. Given the sensitive nature of record level data, the Commission should also recommend rigorous data privacy and security policies to govern this system.

Thank you for your time and the opportunity to provide a statement to the Commission. I look forward to answering any questions.