



July 2, 2021

Shalanda Young, Acting Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Federal Register Number 2021-09109

Dear Acting Director Young:

This letter is submitted on behalf of these 14 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.

We applaud the administration's commitment to assessing whether agency policies and actions equitably serve all eligible individuals and communities, particularly those who are historically underserved, and taking necessary steps to build more equitable and just federal policies and programs. This action is necessary to ensure everyone in the nation can reach their full potential, regardless of race, ethnicity, income, or background. Amid the health and economic crisis of the past year that highlighted and exacerbated longstanding racial and socioeconomic inequities, there is an urgent need and important work to be done to ensure equitable access to programs and outcomes.

A postsecondary education is one of the most important and expensive investments of time, money, and resources that many people will make in their lifetime. For those students who attain a credential, a quality education promises returns in the workforce and in social and economic mobility. However, these returns vary widely with stratified access to education and unequal outcomes by race, ethnicity, economic status, and gender. Policymakers and postsecondary institutions need better, disaggregated data to illuminate and diagnose these inequities and to devise policies, programs, and processes that ensure value for students, particularly Black, Latinx, Indigenous, underrepresented Asian American and Pacific Islander students, students from low-income backgrounds, and women.

In postsecondary education and beyond, we believe that high-quality, disaggregated data should undergird and inform the development of new policies and refinement of existing ones. In the absence of these data, federal agencies cannot fully address the systemic inequities that disproportionately impact Black, Latinx, Indigenous, and Asian American and Pacific Islander (AAPI) students and students from low-income backgrounds. For this reason, it is essential that federal agencies collect, report, and use inclusive and complete data through their equity assessments, strategies, impact measurements, and everyday practices (Areas 1 and 2) by:

1. Prioritizing disaggregated data, especially by race, ethnicity, and economic status.
2. Conducting equity impact assessments for all proposed policy changes.
3. Streamlining existing data between federal agencies to reduce duplication and ensure greater utility.

PostsecData is heartened to see the interest in evidence-based equity assessments and encourages agencies to require the use of data and evidence in the development of programs and investments.

1. **Prioritizing disaggregated data, especially by race, ethnicity, and economic status.** Federal agencies should prioritize enhanced disaggregation of federal data, especially related to postsecondary access and outcomes, to reveal inequities inherent in our systems. For the Department of Education (ED), these data will reveal inequities that exist in college access, completion, and outcomes; drive institutional and program improvement; and inform evidence-based, equity-driven interventions. We encourage ED and other agencies to proactively begin an equity audit of all data collections to identify opportunities to better capture the experiences of students of color and students from low-income backgrounds, in alignment with the goals of the Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.ⁱ For example, these efforts should:
 - a. Disaggregate Federal Student Aid and College Scorecard data—including measures such as student aid receipt, borrowing rates, debt levels, repayment rates, default rates, and post-college earnings—by race/ethnicity once the demographic data are available through the Free Application for Federal Student Aid (FAFSA), which was amended through the Consolidated Appropriations Act, 2021 to begin collecting race/ethnicity data.
 - b. Proactively implement policies to promote greater disaggregation of AAPI student groups in postsecondary data collections, by disaggregating AAPI race/ethnicity data based on the nine categories utilized in the decennial Census and the American Community Survey (ACS).ⁱⁱ

Additionally, these aggregate data should be made transparent and publicly available through tools like the College Scorecard and other machine-readable formats to ensure that students, policymakers, and researchers alike have access to the data for decision-making.

2. **Conducting equity impact assessments for all proposed policy changes.** To clearly center equity and evidence in decision-making about policies, programs, and processes, the Administration should require agencies to use available data to assess who would benefit from policy changes and by how much, in terms of dollars and outcomes—disaggregated by at least race/ethnicity and income level. In the same way that the Congressional Budget Office (CBO) scores bills on their budget impact, the Office of Management and Budget (OMB) can measure the equity impact of different policies, particularly around resource allocation and distribution.ⁱⁱⁱ The federal government will continue to need better data for these assessments and should work with researchers, advocates, and community members to inform the evaluation methods.
3. **Streamlining existing data between federal agencies to reduce duplication and ensure greater utility.** Our federal postsecondary data infrastructure is incomplete, duplicative, and inefficient, leading to gaps in understanding how our education system is serving students.^{iv} Federal agencies should prioritize creating and entering into data sharing agreements with one another to leverage existing data to answer critical questions about student pathways through postsecondary education and help deliver key aid to students. The federal government has

made strides over the past few years to address data deficiencies and should continue to support evidence-focused initiatives. For example, the Commission on Evidence-Based Policymaking released recommendations, including the creation of a National Secure Data Service which is the focus of recent legislation,^v and the Federal Data Strategy which examines government use of data as a strategic asset as part of the President’s Management Agenda.^{vi}

While ED has data sharing agreements with agencies like the U.S. Department of Treasury for student earnings outcomes and the Federal Data Strategy has prompted more internal analysis of data use, there is room to overhaul systems to modernize them and maximize their utility. For instance, the bipartisan, bicameral College Transparency Act (CTA) —supported by a diverse array of more than 150 organizations—would create a secure, privacy-protected student level data network to count all students, answer key questions about student outcomes, and streamline and improve our data infrastructure.^{vii}

In addition, the Consolidated Appropriations Act, 2021 expanded student eligibility for certain federal benefits, including temporarily expanding eligibility for Supplemental Nutritional Assistance Program (SNAP) benefits, creating emergency broadband benefits, and expanding childcare benefits. However, ensuring that all eligible students are able to receive these and other benefits for which they are eligible without unnecessary burden or delay will require enhanced coordination across federal agencies.^{viii} These types of data sharing and service improvements stand to directly benefit students of color and students from low-income backgrounds, as well as arm policymakers and institutions with needed information to improve transparency and programming.

PostsecData appreciates the administration’s focus on ensuring that federal agencies’ policies and practices work to disrupt longstanding racial and socioeconomic disparities and the opportunity to provide recommendations. Disaggregated data and the ability to leverage data across the federal government are essential to achieving these goals and should inform and guide policymaking. If you have any questions about this request, please contact Mamie Voight, interim president at the Institute for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

AccuRounds

AMT - The Association For Manufacturing Technology

Association for Career and Technical Education

Corporation for a Skilled Workforce

Data Quality Campaign

Excelencia in Education

Georgetown University Center on Education and the Workforce

Institute for Higher Education Policy (IHEP)

Julia W. Carpenter-Hubin, retired, Ohio State University

New America Higher Education Program

Public Insight Data Corporation

Third Way

The Institute for College Access and Success (TICAS)

uAspire

ⁱ For more information, see: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

ⁱⁱ For more information on disaggregating postsecondary data by AAPI status, see: Byon, A. (2020, May). “Everyone Deserves to be Seen: Recommendations for Improved Federal Data on Asian Americans and Pacific Islanders”. Institute for Higher Education Policy. Retrieved from: https://www.ihep.org/wp-content/uploads/2020/11/ihep_aapi_brief.pdf

ⁱⁱⁱ Perry, A.M. & Hamilton, D. (2021, January 25). “Just as we score policies’ budget impact, we should score for racial equity as well”. Brookings Institution. Retrieved from: <https://www.brookings.edu/blog/the-avenue/2021/01/25/just-as-we-score-policies-budget-impact-we-should-score-for-racial-equity-as-well/>

^{iv} Roberson, A.J., Rorison, J., & Voight, M. (2017 October). A Blueprint for Better Information: Recommendations for a Federal Postsecondary Student-Level Data Network”. Institute for Higher Education Policy. Retrieved from: <https://www.ihep.org/publication/a-blueprint-for-better-information-recommendations-for-a-federal-postsecondary-student-level-data-network/>

^v U.S. Commission on Evidence-Based Policymaking. Bipartisan Policy Center. Retrieved from: <https://bipartisanpolicy.org/commission-evidence-based-policymaking/>; Data Coalition (2021, May 13). “Fact Sheet: National Secure Data Service Act Advances Responsible Data Sharing in Government”. Retrieved from: <https://www.datacoalition.org/fact-sheet-national-secure-data-service-act-advances-responsible-data-sharing-in-government/>

^{vi} For more information on the Federal Data Strategy, see: <https://strategy.data.gov/overview/>

^{vii} “IHEP and 148 Organization Applaud the Reintroduction of the College Transparency Act” (5, April 2020). Retrieved from: <https://www.ihep.org/press/college-transparency-act-2021-support/>

^{viii} For more information, see: https://higherlearningadvocates.org/wp-content/uploads/2021/02/HLA_Letter-to-OMB_-_Agencies-Coordination_Feb.-21.pdf