December 13, 2017

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
United States House of Representatives
Washington, D.C. 20515

The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
United States House of Representatives
Washington, D.C. 20515

The Honorable Brett Guthrie
Chairman
Subcommittee on Higher Education and
        Workforce Development
United States House of Representatives
Washington, D.C. 20515

The Honorable Susan Davis
Ranking Member
Subcommittee on Higher Education and
        Workforce Development
United States House of Representatives
Washington, D.C. 20515

Dear Chairwoman Foxx, Ranking Member Scott, Chairman Guthrie and Ranking Member Davis:

This letter is submitted on behalf of the 22 undersigned members of the Postsecondary Data (PostsecData) Collaborative, in response to the introduction of the Promoting Real Opportunity, Success, and Prosperity Through Education Reform (PROSPER) Act (H.R. 4508) to reauthorize the Higher Education Act of 1965. This letter addresses the bill as it was introduced on December 1, 2017 – we will submit additional comments at a later date, based on legislative revisions and amendments. PostsecData comprises organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

Some of the provisions outlined in the PROSPER Act recognize how access to high-quality data helps students and families, state and federal policymakers, and institutions make informed decisions about higher education. The bill proposes small improvements, but we need comprehensive policy changes – including overturning the current ban on a federal student-level data network – to equip stakeholders with the decision-making information they need. Significant gaps in our current national information make it difficult for consumers and policymakers to determine which postsecondary programs provide an adequate return on investment for which students. Students and taxpayers have a right to know what they can expect in return for their college investment, and institutions need the data to assess their programs and drive improvement. Unfortunately, existing policies still leave us with insufficient and incomplete answers to many basic questions, such as:

- How many low-income, adult, transfer, and part-time students earn a postsecondary certificate or degree from a particular institution?
- How much do students borrow from federal, state, and private sources, and to what extent do they repay loans?
- How long does it take students to complete at a specific college, on average?
- How many non-completers from a particular college never reenroll, and how many transfer to finish their degree at another institution?
- Which students go on to succeed in the workforce?
- How do college access, affordability, and completion vary by race, ethnicity, and income?

Consistent and complete answers to these questions would help students and families across the country choose programs that demonstrate strong outcomes, while helping policymakers and educators to implement policies and practices that help more students succeed. For the higher education marketplace to function effectively, all these

stakeholders need access to high-quality information that reflects all types of students and can measure outcomes across state lines. The federal government—with its access to existing data, including on employment and earnings—is uniquely positioned to compile that information, while reducing institutional reporting burden.

Reauthorization of the Higher Education Act provides the ideal opportunity to enact policy that comprehensively improves the quality and availability of higher education data, but the PROSPER Act fails to fully reform our nation's postsecondary data systems. However, the Act does take a few positive steps by enhancing data on the student loan portfolio, increasing researcher access to data, and calculating and publishing program-level data on debt and post-college earnings for some students.

First, by requiring the Office of Federal Student Aid (FSA) to calculate and release aggregate metrics, the PROSPER Act seeks to increase transparency about the performance of the student loan portfolio. Publishing these aggregate statistics on a routine basis will help inform and improve policymaking. Furthermore, the bill requires FSA to make de-identified data on student loans available to researchers, recognizing the immense value of student-level data in answering policy-relevant questions.

We appreciate the PROSPER Act's attention to the need to use existing data effectively. However, we are concerned about the bill's elimination of Cohort Default Rates (CDRs). CDRs provide institutions and policymakers critical information needed to identify and reduce the risk of default—the unequivocally worst outcome for student loan borrowers—and protect student and taxpayer interests. We support—in concept—a calculation and reporting of program-level Loan Repayment Rates (LRRs), however repayment rates are not perfect substitutes for CDRs because they each measure different outcomes, both of which are important.

Additionally, the bill creates a consumer-tested College Dashboard website and populates it with previously unavailable program-level data on debt and earnings for students who receive Title IV aid. Knowing, by program, the average debt of borrowers at graduation and the average salary of students five and ten years after graduation will certainly help students and families make better decisions about programs based on expected outcomes. However, by failing to count all students in these calculations, the bill leaves major gaps in available information, hampering students' ability to make fully informed decisions. For example, limiting earnings data to only those students who receive Title IV federal student aid omits 30 percent of students and therefore does not provide a clear or accurate picture of the post-graduation outcomes students can expect.[1]

In order to fully meet the data needs of education stakeholders, any reauthorization of the Higher Education Act should include the creation of a secure, privacy-protected federal student-level data network (SLDN), a policy solution advanced by the bipartisan, bicameral College Transparency Act. More than 130 organizations representing students, institutions, employers, and veterans support this commonsense reform that would modernize our nation's data systems. The National Center for Education Statistics would leverage the SLDN to generate and report aggregate statistics, while the underlying student-level data would remain secure. An SLDN would provide the flexibility to calculate currently-unavailable metrics—also not included in the proposed Dashboard—including post-college earnings for *all* students, comprehensive transfer outcomes, and persistence and completion disaggregated by multiple key student characteristics, such as race/ethnicity and income. An SLDN would provide more complete answers to the above questions while:

- Securing student data by adhering to industry best practices and federal laws;
- Protecting student privacy by minimizing the data collected and limiting how data can be used;

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[1] Roberson, A.J., Rorison, J., & Voight, M. (2017). *A blueprint for better information: Recommendations for a federal postsecondary student-Level data network*. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/blueprint

- Replacing the student components of the Integrated Postsecondary Education Data System (IPEDS);
- Uncovering equity gaps so institutions can change policies and practices to better serve underrepresented students;
- Providing states with more complete information about student outcomes; and
- Aligning education with labor market demand and helping employers identify programs that are effectively preparing students for the workforce.

The bipartisan, bicameral, Congressional support for the College Transparency Act, alongside the strong field support for the bill, demonstrates that there is strong agreement among students, colleges and universities, employers, and policymakers that a secure, privacy-protected student-level data network is the best way to give students all of the information they need to make informed college choices. By leaving in place an outdated ban on the secure collection of student-level data, the PROSPER Act fails to capitalize on this momentum and misses an important opportunity to enact meaningful policy changes that can lead to improved student outcomes and a more equitable higher education system.

We urge policymakers to incorporate provisions into the PROSPER Act to create a well-designed and secure SLDN that could fill current information gaps and solve outstanding data quality challenges. An SLDN would provide more robust and useful information than the PROSPER Act offers on college access, progression, completion, cost, and post-college outcomes, information that can help students, policymakers, and institutions make better decisions about higher education. The PROSPER Act's limited approach to data improvements will leave many students and policymakers continuing to struggle with questions that have remained unanswered for decades.

Improved data that target student success will enable students and their families to make thoughtful, informed decisions about where to attend college, what to study, and how to finance their education. With high-quality data, policymakers and institutions can implement policies and practices that help students—especially students of color, low-income students, and first-generation students—overcome barriers to college success. This success is crucial for meeting our country's future workforce needs and driving our economy forward. We look forward to working with you to advance policies that make our postsecondary data more transparent, comprehensive, and efficient. If you have any questions about these comments, please contact Mamie Voight, vice president of policy research at the Institute for Higher Education Policy (mvoight@ihep.org or 202-587-4967).

Sincerely,

Advance CTE
American Educational Research Association
Association for Career and Technical Education
Association of Public Data Users
Campaign for College Opportunity
Center for Law and Social Policy
Council for Adult and Experiential Learning
Council for Community and Economic Research
Data Quality Campaign
Education Commission of the States
George Washington Institute of Public Policy
Institute for Higher Education Policy

Jobs for the Future
Knowledge Alliance
NASPA - Student Affairs Administrators in Higher Education
National Center for Higher Education Management Systems
New America Higher Education Initiative
The Education Trust
The Institute for College Access & Success
uAspire
Veterans Education Success
Workforce Data Quality Campaign