

February 1, 2018

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 Collaborative (PostsecData), in response to 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 is in response to the bill as amended by the Committee on December 11, 2017.

As stated in our [December 13, 2017 letter](#), some provisions of the initial PROSPER Act recognized the importance of access to high-quality data. However, the bill proposed only small improvements and ultimately fell short of making the comprehensive policy changes – including overturning the current federal ban on the collection of student-level data – that would improve the quality of information available to students and families, state and federal policymakers, and institutions. The Committee markup process offered an opportunity to address the bill’s shortcomings, but the amendments adopted by the Committee last month do not offer any substantive improvements with respect to data and transparency.

Representative Guthrie’s adopted [amendment in the nature of a substitute](#) calls for a review of current data collection and a feasibility study of improved data collection. These provisions only delay the real policy changes necessary to equip stakeholders with the information they need to make informed decisions about higher education. Auditing current data collections under the Higher Education Act would reinforce what extensive research already has shown – our current data systems produce important, useful information, but these systems are also disconnected, duplicative, and incomplete. In 2016, experts published [11 papers](#) exploring existing postsecondary data systems, including recommendations for improvements. Additionally, existing resources, including the Institute for Higher Education Policy’s [Mapping the Postsecondary Data Domain: Problems and Possibilities](#) and [Toward Convergence: A Technical Guide for the Postsecondary Metrics Framework](#), evaluate the adequacy of key postsecondary data on college access, progression, success, affordability, and outcomes.

Furthermore, a time-consuming feasibility study is unnecessary and lags current conversations in the field. Indeed, the National Center for Education Statistics (NCES) already conducted a [feasibility study](#) more than a decade ago, and 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. And the federal government is best positioned to ensure SLDN access and participation by all institutions, and to solicit guidance from experts across the higher education sector on metrics and data use through NCES’ Technical Review Panel process. The creation of a federal SLDN – a policy solution advanced by the bipartisan, bicameral College

Transparency Act – would provide information that would help students and families across the country choose programs that demonstrate strong outcomes, while helping policymakers and institutions to develop and implement policies and practices that can facilitate student success.

More than [130 organizations](#) representing students, institutions, employers, and veterans support this commonsense reform. NCES would leverage the SLDN to generate and report aggregate statistics, while the underlying student-level data would remain secure and privacy-protected. An SLDN would provide the flexibility to calculate new metrics that without an SLDN, would remain unavailable for use in the proposed Dashboard – including post-college earnings for all students, comprehensive transfer outcomes, and persistence rates disaggregated by multiple key student characteristics, such as race/ethnicity and income. A federal SLDN is capable of:

- 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;
- 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
- Better aligning education with labor market demand and helping employers identify programs that are effectively preparing students for the workforce.

The PROSPER Act as amended by the Committee does not reflect the growing and robust support for establishing an SLDN. In its current form, the bill falls short of enacting policy changes that can lead to improved student outcomes and a more equitable higher education system. We commend Representative Polis for introducing [an amendment to repeal the prohibition on a federal student-level data network](#), as well as the 17 committee members who voted in support of this amendment, and the 30 cosponsors of the H.R. 2434, the College Transparency Act.

As the PROSPER Act continues to make its way through Congress, we urge policymakers to incorporate provisions that will create a well-designed and secure federal SLDN that could fill current information gaps and solve outstanding data quality challenges. 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
Association for Career and Technical Education
Association of Public and Land-grant Universities
Association of Public Data Users (APDU)
Campaign for College Opportunity
Council for Adult and Experiential Learning
Council for Community and Economic Research (C2ER)
Education Commission of the States
George Washington Institute of Public Policy, GWU
Higher Learning Advocates
Institute for Higher Education Policy
Jobs for the Future

Knowledge Alliance
NASPA – Student Affairs Professionals in Higher Education
National Center for Higher Education Management Systems
New America’s Education Policy Program
Southeast Asia Resource Action Center (SEARAC)
The Education Trust
The Institute for College Access & Success (TICAS)
uAspire
Veterans Education Success
Workforce Data Quality Campaign