



April 27, 2015

The Honorable Lamar Alexander
Chairman
U.S. Senate Committee on Health, Education, Labor and Pensions
428 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Alexander:

Thank you for the opportunity to comment on the Senate Health, Education, Labor, and Pensions (HELP) Committee paper *Federal Postsecondary Data Transparency and Consumer Information Concepts and Proposals*. The Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU) appreciate the HELP Committee's recognition of the significance of postsecondary data and willingness to consider strategies for increasing its relevancy and utility without undue burden on institutions. We submit the following comments and recommendations to address the five problems outlined in the paper for your consideration.

1. Federal data collections should be purposeful and provide appropriate value to higher education stakeholders – including institutional leaders, state leaders, and researchers.

Access to clear, meaningful data has become increasingly important to answer questions and provide essential information for higher education stakeholders – for student and families to make more informed decisions about where to attend college and for policymakers to determine allocations of public resources and evaluate institutional effectiveness. Access to national, comparable data is also of significant value for higher education leaders and researchers to benchmark institutional/state performance, to drive innovation, and to improve student outcomes. These key stakeholder groups should not be overlooked or discounted.

2. Federal data systems should be revamped to better reflect today's students and institutions – with a particular focus on student progress, completion, and outcomes.

Given the high mobility of current students within the high education system, it is essential that any data reforms be able to more accurately capture the progress and completion of all

students across institutions. The cross-sector [Student Achievement Measure \(SAM\)](#) project has aptly demonstrated the benefits of a more comprehensive measure that focuses on the student success across institutions and highlighted the significant number of additional student outcomes that could be included with such an approach.

It is also important that data be available on key post-college outcomes to more concretely demonstrate the value of a college education for career and life opportunities, and that the money invested by students, families, and taxpayers yields an appropriate return. In addition to appropriate, realistic measures of student progress and completion, information on student debt levels and repayment rates should be available for those students who borrow.

Other important post-college outcomes include employment shortly after graduation and longer-term employment, enrollment in advanced education, and participation in military/national service. We recognize there is interest by students, families, university administrators, and external stakeholders to have access to short- and long-term earnings by program. Interpretation and comparison of any earnings metrics for programs must be done with care - recognizing that some highly valuable fields have lower earnings potential and acknowledging differences in regional economic wage conditions.

To build appropriate and meaningful metrics on student progress, completion, and outcomes, some data would need to be available at the student level rather than the institution level as is currently collected for most data through IPEDS. Several approaches could be used to compile the data necessary to calculate and report student level metrics including – 1) the creation of a targeted student level record system at the federal level, e.g. employment information, 2) exploring collaborations with other federal agencies to create appropriate data linkages, and 3) utilizing third-party data not collected by the federal government, such as the Student Achievement Measure. These approaches are not mutually exclusive but could be used in combination. Whatever the approach, assembling data at the student level should be limited to what is absolutely necessary to provide meaningful information to consumers, policymakers, and institutional leaders. High levels of security are a necessity as well as keen attention to privacy concerns and safeguards against inappropriate use or linkages.

3. Reduce institutional burden/unnecessary collections

Federal data collections and disclosures have become an increasing burden for institutions. The data collected should be as parsimonious as possible. It is not simply the volume of data but also the quality; there are inconsistent definitions and duplicate reporting across federal (and state) agencies.

Before adding other data elements or instituting disclosures at the federal level, the question of what data elements to remove should be considered as well as what information is already reported through other avenues such as state dashboards or national voluntary systems (e.g., the [Voluntary System of Accountability](#)) or within other federal systems.

Based on experience with state longitudinal data systems, it is very likely that a limited collection of student level data that could be used to calculate the desired metrics would lessen the institutional reporting burden over the long term.

Removing data elements from the current data collections – IPEDS in particular – is more difficult than it initially appears as much of the data is mandated through legislation or regulation, beyond the scope of the Higher Education Act, or used by other agencies. Because of these constraints, the typical Technical Review Process used by NCES is not sufficient. Congress could facilitate the process by establishing a commission with sufficient authority to recommend changes to data elements, regardless of their origins.

4. Review, consolidate, and target federal consumer information tools.

There is a vast array of both government and non-government tools available for prospective students during their college search process. It is wise to consider where the assortment of federal consumer information tools fit into this mix. What information or tools could be provided by the federal government that cannot be obtained elsewhere? Are there groups of potential students who are not being reached or served? Rather than duplicating existing sites/tools, one approach would be for the federal government to provide a limited set of key indicators that focus on access, affordability, progress/completion, outcomes – allowing (appropriate) comparisons across postsecondary institutions. As noted earlier, it will be important to assure that these key indicators are appropriately capturing and reflecting today's student population. This federal site could then link to institution websites or other trusted resources so that prospective students could easily find more detailed information.

Once those questions are answered, the array of federal data and tools should be consolidated so that students can access all the information through one entry point. As we learned through our experience with the VSA, it is not enough to simply display data or metrics on a webpage. It is also crucial that an appropriate dissemination strategy be created for the target audience as well as a plan for educating users on what the data means and how it can be used. All of these items should be pilot tested with potential users.

5. Federal data and methods used for institutional accountability should be transparent.

It is vital that any federal data used to hold institutions accountable be recognized as trustworthy and non-biased and the methods used be open and fair. Data that is adjusted or manipulated after the fact to benefit one set of institutions over another does not meet this standard. However, it is important to draw a distinction between data that is purposefully altered or manipulated behind the scenes to advantage one or more institutions; and data that is statistically adjusted through a clear and open process so that comparison and judgments can be made that are fair and reasonable. For example, statistically adjusting graduation rates based on entering student characteristics is a fair and reasonable approach to compare institutional performance. This is, in fact, a technique regularly used by educational researchers. What would not be fair or reasonable is compare the unadjusted

graduation rates of an open-admission, urban university with a highly selective, research university and then penalize the open-admission schools because their rates are significantly lower. Generally data must be processed in order for it to be interpreted and made valuable. In each instance, however, the procedures used and the justification for those procedures have to be made clear to all users of the results.

Finally, we believe the Department of Education, in broad consultation with the higher education community, should continue to have the flexibility to modify data collections and create metrics without legislation to better meet the needs of consumers, policymakers, and institutions and to respond to changes in the higher education context. The timeline for many changes is already lengthy.

We appreciate the opportunity to provide feedback and look forward to working with you and your colleagues as this important authorization moves forward. Please feel free to contact us with any questions.

Sincerely,



Peter McPherson
President, APLU



Muriel A. Howard
President, AASCU