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Senator Lamar Alexander
Chairman
Committee on Health, Education, Labor and Pensions
United States Senate
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chairman Alexander:

On behalf of the undersigned associations, we write to offer our comments on the Committee's white paper on Federal Postsecondary Data Transparency and Consumer Information. The federal government's support for higher education, particularly through its significant investment in the Title IV student aid programs, makes it essential that both consumers and policymakers have accurate and meaningful data related to its investment.

We believe federal data and information for postsecondary education must serve three distinct purposes.

First, it must help students and their families review options for postsecondary education and select the one that best meets their needs. The Department of Education possesses a significant amount of comparative data on postsecondary education institutions, which should be made available to students who might find the information useful when considering their postsecondary education choices. At present, however, the government makes a huge array of consumer information tools available—College Navigator, White House College Scorecard, Know Before You Owe/Financial Aid Shopping Sheet, College Affordability and Transparency Center, and the administration's expected college ratings system—and such a surfeit of related but different data sets is likely to confuse rather than clarify. We believe that streamlining these information sources should be an important goal of reauthorization.

The extraordinary diversity of students that colleges enroll—the 18-22 year old undergraduate who transitions directly to college from high school is no longer the norm—as well as their educational missions and program offerings require flexible consumer information tools that allow students to make appropriate and meaningful comparisons using federal data. Consideration should be given to providing links to college and university websites or other non-federal data sources for more qualitative and nuanced information, although this is no substitute for adequate federal data.

Second, federal data about higher education should permit analysis and research into public policy questions involving the broad sweep of postsecondary education. This means that federal information sources must, at a minimum, allow national comparisons about providers of postsecondary education, identification and evaluation of trends in areas such as student enrollment and completion, and the analysis of the impact, operation and success of federal programs. Researchers need to be able to identify the challenges facing higher education and to propose solutions, and this can only be done by having extensive and robust information sources. The Department's National Center for Education Statistics collects and makes widely available the national data needed to support many of these activities.

Third, information and data collected by the federal government must be sufficient to ensure that public funds are properly spent and support efforts to hold institutions accountable. The principal goal of the data bases maintained by the Department's Federal Student Aid office is to support these important functions.

In short, the discussion of postsecondary data needs and transparency can be divided into three broad categories: consumer information for students and parents, policy analysis and research, and institutional accountability for receipt of public funds.

All sectors of higher education are working toward improving the consumer-focused information about their campuses as well. Several higher education organizations have developed voluntary consumer information and accountability systems that many institutions are using, including the University and College Accountability Network (UCAN), the Voluntary System of Accountability (VSA), the Voluntary Framework of Accountability (VFA), and the Student Achievement Measure (SAM). Colleges and universities are not opposed to providing additional data to the government as long as those data have demonstrated utility. Thus the upcoming reauthorization of the Higher Education Act should provide for a framework for the Department's data collection activities, including cost-benefit analyses and notice and comment opportunities.

I. Consumer Information

Developing the "right" set of consumer-oriented information to be provided by colleges and universities ought to include clear evidence of what consumers want and need. Too often, we make assumptions about the nature and type of information that the public wants when, in fact, there is very little demand for such data.

Some information is basic—the size of the institution, the programs offered, cost of attendance, financial aid, student progress and completion rates—which all institutions disclose under federal law.

However, colleges and universities are currently required to provide far more information than students likely want or need. Indeed, the official Department of Education summary of the consumer disclosures that colleges and universities are required to make available under federal law is 31 pages long. If a summary takes this long to describe, one can only imagine how voluminous the actual information is once it is assembled.

By giving students so much information we may divert them from using the information that is most critical to their educational goals. Consider student loan debt. Under federal loan counseling requirements, colleges give students a great deal of federally mandated data and information, including, for example, a description of all seven available federal student loan repayment options. However, recent research by Elizabeth Akers and Matthew Chingos at the Brookings Institution makes clear that many students lack a good understanding of even the most basic information on their level of indebtedness. Just 30 percent of first-year undergraduate students can estimate their education debt within $1,000. Indeed, according to Akers and Chingos, 14 percent of first-year federal loan borrowers do not even realize that they have federal student loans.

We believe that further discussion and analysis are needed, ideally involving focus groups of a wide range of college students and their families to identify the most important information that they want and need. The emphasis should be on ensuring that students have a reasonable understanding of this information and know where they can get more detailed elements if they want it. As the Committee considers mandatory campus disclosures, we strongly urge them to evaluate suggestions by asking what is essential, what is valuable, and what is, simply, nice to know. We believe the emphasis should be on giving students what is essential.

One largely untapped resource that might provide useful, if somewhat limited, consumer information is available from administrative records maintained by the Department's Federal Student Aid (FSA) office. These data include institution-specific program output measures such as numbers of and characteristics of Pell grant and student loan recipients.

Historically these data have been of little use as program outcome measures, for example, degree and program completions among an institution's Title IV students. But several years ago FSA began requiring institutions to report additional information for their Title IV recipients including student outcome data relevant to their educational programs. The Department should explore making better use of this information for better understanding of student behavior for those receiving Title IV aid, but it must be understood that this partial information about an institution's student body could provide misleading impressions.

II. Policy Analysis

The primary purpose of the FSA administrative data systems is to ensure the proper accounting for federal student aid program funds. In addition, nearly thirty years ago Congress recognized the need for better federal policy analysis tools and authorized periodic surveys of enrolled college students that were not restricted to federal financial aid recipients.

The responsibility for these surveys was not assigned to a program office within the Department but rather to the agency's statistical arm—the National Center for Education Statistics (NCES)—in order to establish transparency and consistent data collection. This has allowed researchers to assist policymakers in considering likely outcomes—in terms of

student and family characteristics—of policies that would increase student access and success.

Today, these surveys include longitudinal components that allow researchers to examine important public policy questions of access and persistence by all students, traditional and nontraditional, and post-graduation outcomes including pursuing further education, family formation, and labor market participation.

In addition to the sample surveys, NCES conducts an annual census of all Title IV participating colleges and universities. The Integrated Postsecondary Education Data System (IPEDS) collects aggregate institution-specific information on, among other categories, revenues from tuition and other sources, categories of expenses including general and education expenditures, educational debt, endowment assets, student body composition in terms of gender, race/ethnicity, enrollment intensity, educational level (undergraduate, graduate, and first professional), scholarships and grants, facilities, and faculty and staff, including tenure status and salaries.

IPEDS provides policymakers with valuable long-term information on higher education. It also provides data that helps inform compliance efforts beyond the Title IV programs, for example, enforcement of various civil rights laws affecting colleges and universities and their students by the Department's Office of Civil Rights. Other executive branch agencies, including the Departments of Justice and Health and Human Services, have relied on institution-specific information resident in IPEDS.

In short, the utility of the NCES surveys and data systems extends well beyond the administration and evaluation of the Title IV programs. IPEDS and the NCES sample surveys provide a useful source of data for institutions and researchers. As the characteristics of higher education students and institutions evolve and change, the data collected should be regularly evaluated for its utility, coverage, and weighed against the burden on institutions. The Department should not be collecting data simply because someone might find it useful at some future time. The Department's data collection activities need to reflect genuine national needs and articulated purposes.

In this regard, we recommend that Congress establish a commission or oversight board to examine the NCES data collection activities in detail and make recommendations for streamlining such collections and reducing institutional burden.

III. Institutional Accountability

Fifty years ago the Higher Education Act established programs expressly to provide the opportunity to attend college to otherwise capable students who lacked the financial means to do so. Since that time access to higher education has been the primary focus of the federal student aid programs. Consequently, the normative judgments underpinning the existing array of institutional accountability measures related to Title IV program participation were developed in consideration of and continue to address access issues. As noted above, FSA's Title IV administrative systems contain both student- and institution-level information that are currently used to help manage program compliance

and ensure institutional accountability. Using data on these aid recipients could provide further information of value, but, again, it must be kept in mind that at many institutions only a minority of students receive federal aid. Said a bit differently, while the Title IV programs cover a large number of enrolled students at many colleges and universities, program-specific accountability measures cannot provide an accurate or complete campus picture for every institution.

While we support better student outcome information, including efforts to improve the federal data on graduation and program completion rates, specific ways to reach this goal are a source of disagreement and controversy within higher education. For example, there are several proposals to create a federal unit record database of all postsecondary enrollments. These proposals are complex from an operational perspective and have proven controversial with the public and some policymakers. Indeed, the higher education community itself is divided on the feasibility and desirability of a unit record system. Nonetheless, ideas such as this ought to receive full and careful consideration as part of reauthorization.

Thank you for the opportunity to comment, and we look forward to working with you to reauthorize the Higher Education Act.

Sincerely,

Molly Corbett Broad
President

On behalf of:

ACT, Inc.
American Association of Colleges of Nursing
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American College Personnel Association
American Council on Education
American Dental Education Association
American Indian Higher Education Consortium
APPA, Leadership in Educational Facilities
Association of American Medical Colleges
Association of American Universities
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities

Comments on Data Transparency and Consumer Information White Paper
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Association of Public and Land-grant Universities
Council for Christian Colleges and Universities
Council of Independent Colleges
EDUCAUSE
Hispanic Association of Colleges and Universities
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
UNCF
University Professional and Continuing Education Association