

April 22, 2015

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

Dear Chairman Alexander,

Thank you for the opportunity to comment on the Health, Education, Labor and Pensions (HELP) Committee's white paper on federal postsecondary data transparency and consumer information. CLASP is a national non-profit organization that seeks to improve the lives of low-income people by developing and advocating for federal, state and local policies to strengthen families and create pathways to education and work. In this paper, we respond to several of the "concepts up for debate" mentioned in the white paper.

**"Eliminate data collection or disclosures unrelated to the needs of federal program management or consumer information."**

While federal program management and consumer information are important, there are a number of other purposes for data collection and use that are just as important. Monitoring student access and providing crucial data to states, postsecondary education institutions, and researchers are important roles for federal collection of data and aggregated national statistics, beyond items directly related to student financing, success, or safety.

For example, information on access, especially for low-income and underprepared students, is important for the federal government to collect in order to gauge the success of this important policy objective. Also, federal postsecondary data should be available to other key users, not just federal policymakers, prospective students and families. States, institutions, and researchers all need access to the data generated by national data collection systems to further their mission of helping students receive the best education possible. Leaders of institutions and state officials need to be able to compare their institutions with others that are similar, including those in other states.

Last, the idea that new data elements should be determined only by Congress undermines the important role that stakeholders play in the existing processes of data system review and improvement that are now in place at the Department of Education. Transparency in the procedure for changes to data collection requirements can be satisfied without the restrictive policy envisioned in the white paper.

**"Increase data quality and transparency for federal program management and for informed consumer decision making"**

The new Outcome Measures Integrated Postsecondary Education Data System survey is important, particularly because it will help capture information on more non-first-time, non-full-

time students, including those who are likely to be working adults supporting families who need additional education to move ahead in careers. The proposal to wait to implement lessons learned through this process seems short-sighted because those lessons could be built into ongoing work. The proposal to “redefine federal student data to be more reflective of the broad demographics of those enrolled at higher education institutions” appears to refer to using regression-based adjustment models to take into account institution mission and student characteristics differences at various levels of institutions, as proposed by the Department of Education’s draft framework of a college ratings system. The idea of adjusting performance targets has been used in federal workforce development programs for decades. CLASP supports appropriate adjustments to institution-level goals or targets, but not adjusting the actual outcomes of students. Given that there does not seem to be interest in setting individual targets for individual institutions, the idea of adjustment in this circumstance seems misplaced.

The proposal to “determine what data can be collected as statistically representative samples” rather than collecting data on all students may reduce the ability to learn about subgroups of the population that are important for policy purposes. For example, subgroups of first-generation students deserve careful study so that we can increase the success of first-generation students in the future. A representative sample might be unlikely to disaggregate results for first-generation students by race, ethnicity, income, and other breakdowns important to learning about first-generation students.

#### **“Make federal data useful and usable for consumers”**

We agree that federal data should be useful and usable for consumers. The proposals, categorized as either “usefulness” or “usability,” make an important distinction.

The proposal to use existing Bureau of Labor Statistics data to provide average regional salaries for professions should to be broken down by program of study if it is to have any real meaning for students. Many students do not end up in professions related to their majors or programs of study. What students most need to know is what level of subsequent earnings are associated with different programs of study and specific degree levels. An associate’s degree in English is very different from a Ph.D. in English.

CLASP supports the next suggestion, allowing the Department of Education to collaborate with other agencies to create data linkages across restricted databases, with appropriate safeguards, in order to obtain post-college outcomes. As noted above, data at the program of study and degree level is most relevant when discussed in terms of students’ actual salaries, rather than generic BLS data for a region, although regional variation in labor market returns would also be an important factor.

CLASP also supports creating a student unit record system (SURS) at the federal level, which would provide important benefits, including reducing reporting burden on institutions. Congress should reverse the statutory ban on a student unit record system in this reauthorization effort. In the opposite direction, the proposed national graduate survey to voluntarily collect information from students regarding their post-graduation careers would be unlikely to provide a true view of all graduates, because those with better outcomes would self-select to complete the

voluntary survey. Selection bias would be very hard, if not impossible, to overcome with a voluntary survey. Validity would also be a problem because self-reporting is subject to human error and possibly overstatement of earnings.

CLASP supports another proposal listed under “usability”: conducting extensive consumer testing on how data should be presented. This is especially important for low-income and underprepared students, who may be least likely to seek out such information. Similarly, we support the proposal to create a universal net-price calculator, especially one that could level the information playing field for low-income and underprepared students. Net-price calculators are supposed to be easy to find on institutions’ websites, yet advocates and researchers have found that net-price calculators are often not prominently displayed, easy to locate, or even posted at all.<sup>i</sup>

#### **“Constraining the federal role. Protecting privacy and preventing abuse”**

Keeping the federal ban on student-level data in place would constrain the federal role, but it would not necessarily protect privacy better than the current systems. We agree with the concept noted in the sub-bullet point, regarding supporting collaboration between Federal Student Aid and the Social Security Administration to determine earnings outcomes.

#### **“Preventing the misuse of data and top down accountability”**

Three proposals here require any new data collections to be authorized by law, prohibit the Department from creating new metrics without authorization from Congress, and prohibit the Department from regulating to create new metrics without authorization. Congressional approval for every one of these decisions would be overly cumbersome. The Department of Education is well-suited to make these types of decisions, within existing law, because of its extensive work with stakeholders and data experts.

Thank you for the opportunity to respond to your white paper. If you have questions, please contact me at [acielinski@clasp.org](mailto:acielinski@clasp.org).

Sincerely,

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<sup>i</sup> Kevin Carey and Andrew Kelly, “The Truth Behind Higher Education Disclosure Laws,” Education Sector, 2011, [http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure\\_RELEASE.pdf](http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure_RELEASE.pdf).