

**Advisory Committee on Student Financial Assistance Hearing
Consumer Information and Data Transparency
Friday, September 11, 2015**

Comments provided by:
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Chair Dr. Harper-Marinick, Vice Chair Ms. Johnson, committee members, and staff – thank you for the opportunity to speak this afternoon about the importance of high-quality postsecondary data in supporting student success. My name is Mamie Voight, and I am director of policy research at the Institute for Higher Education Policy. For over two decades, IHEP has been committed to promoting access and success within higher education for all students, particularly students who have been underserved by our postsecondary system. IHEP leads the Postsecondary Data Collaborative (PostsecData), a partnership between more than 30 organizations committed to the responsible use of high-quality postsecondary data to improve student outcomes. PostsecData partners represent a broad range of constituents, including groups like the U.S. Chamber of Commerce, Young Invincibles, the State Higher Education Executive Officers, and the Association of Public and Land-grant Universities.

Quality data, when used effectively and with respect for student privacy, security, and institutional reporting burden, can and should inform decisions made by students, families, federal and state policymakers, employers, and colleges and universities. Thoughtful use of data on college access, success, cost, and outcomes can enhance educational opportunities for all students – especially low-income and underrepresented students. With better information about individual institutions and programs:

- Policymakers can better direct resources and make informed policy decisions,
- Students can make more informed choices about where to go to college, what to study, and how to pay for it, and
- Colleges and universities can identify and address roadblocks to student success.

To maintain trust in data, systems and collections must prioritize usability, privacy and security, and careful management of reporting burden to provide stakeholders with the information they need to answer critical questions and improve policy and practice.

We are encouraged by the recent policy focus on postsecondary data quality through today’s hearing, the Department of Education’s (ED’s) forthcoming consumer information tool, and the Senate HELP Committee’s hearing and white paper on consumer information. In response to the HELP Committee’s white paper, 27 PostsecData partners agreed “that the federal government plays a key role in collecting and reporting consistent, comprehensive postsecondary data in ways that promote student success...[and] that the current system is not as effective as it could be if systems were streamlined in

ways that reduce burden and protect student privacy.”¹ Existing data cannot fully answer critical questions like:

1. How many low-income and underrepresented students enroll in and graduate from college?
2. Do students who do not graduate at their first institution transfer to other colleges, and graduate or do they drop out?
3. How much debt do students accumulate, and can they repay it?
4. Are students getting jobs in their field after graduation, and how much do they earn?
5. How much are students learning in college, and how are they contributing to society?

Based on our work with a community of PostsecData experts, we offer the following recommendations to improve data systems to better answer critical questions like these about higher education:

1. Count all students, all institutions, and all outcomes to illuminate student pathways more clearly and give institutions credit for the full breadth of student outcomes.
2. Create a student level data collection at the federal level, including protocols for ensuring the privacy and security of student data.
3. Leverage existing federal data and publicly report aggregate results.

First, data systems should **count all students, all institutions, and all outcomes**. Postsecondary data collections should include all students (e.g. first-time, transfer, full-time, part-time, federally aided, and non-federally-aided), all institutions (e.g. public, private nonprofit, and for-profit), and all outcomes (e.g. graduation, transfer, and workforce outcomes). The Integrated Postsecondary Education Data System (IPEDS) offers a wealth of useful information on student enrollments, completions, costs, and institutional characteristics, but it remains incomplete. IPEDS’ frequently used graduation-rate measure does not include part-time or transfer students, does not disaggregate by economic status (e.g. Pell receipt), and does not account for transfer – a key outcome for many community college students. To truly reflect the breadth, depth, and diversity of our higher education system, core metrics like graduation rates must be expanded to include all students and all outcomes. We offer detailed recommendations on improving the IPEDS Outcome Measures in PostsecData’s 2014 comments.²

Furthermore, current data do not allow examination of a population of critical policy interest – low-income students. Institutions are required to disclose graduation rates for Pell Grant recipients upon request, but research has found that they often do not comply.³ In what amounted to a year-long, labor-intensive endeavor, The Education Trust recently compiled these data from approximately 1,100

¹ Postsecondary Data Collaborative letter to Senate HELP Committee in response to white paper on consumer information, April 24, 2015, http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postsecdata_collaborative_help_response.pdf

² Postsecondary Data Collaborative comments on IPEDS Outcome Measures, December 8, 2014, http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf.

³ Kevin Carey and Andrew P. Kelly, “The Truth Behind Higher Education Disclosure Laws,” Education Sector, 2011, http://www.aei.org/wp-content/uploads/2011/11/-truthhigherredisclosurelaws_185621335060.pdf.

colleges.⁴ Ed Trust’s efforts will provide invaluable information to the field, but the truth is, we should not have to rely upon a private organization to hunt down such important data through hundreds of phone calls and e-mails. These data should be a mandatory element in the IPEDS data collection or incorporated into a student level data collection, which brings me to our second recommendation.

Create a student level data collection at the federal level, including protocols for ensuring the privacy and security of student data. The statutory ban on a federal student unit record system stifles the ability of policymakers to answer critical questions about our postsecondary system, limits the information available to consumers, and imposes unnecessary burden on institutions. Twenty-seven organizations signed PostsecData’s letter to the HELP Committee to recommend overturning this ban and directing the Department of Education to engage with the higher education community to design and implement a student level data collection that is managed, secured, and protected by the federal government.⁵ In fact, as noted in an IHEP report released just this week – *Weighing the Options for Improving the National Postsecondary Data Infrastructure* – 78 percent of survey respondents agreed that “creating a federal student unit record data system (SURDS) would be the most effective strategy for generating the measures and metrics necessary to meet data needs at the national level.”⁶ A unit level collection could be more comprehensive, flexible, and adaptable to changing needs and increasing student mobility, and would reduce institutional reporting burden in the long-term—all while keeping data secure and protecting student privacy.

This system should build upon existing government data held by the Office of Federal Student Aid, the Social Security Administration (SSA), and the Departments of Defense and Veterans Affairs and should replace the student-level components of IPEDS. It should include aided and non-aided students to ensure data are comprehensive and representative of all students and all institutions. The collection should place utmost priority on data security and student privacy, leveraging the National Center for Education Statistics’ strict security policies and procedures, including penalties for violations. This system should *not* be a mechanism to collect any and all data elements under the sun, but rather, should include key elements identified by a wide array of stakeholders. Access to the student level data should be limited, but the Department of Education should publish aggregate institution and program-level statistics on core metrics, such as those identified in IHEP’s 2014 report, *Mapping the Postsecondary Data Domain*.⁷

⁴ Andrew Nichols, “Pell Grants Provide Access; Institutions Must Support Completion,” The Education Trust, August 20, 2015, <http://edtrust.org/the-equity-line/pell-grants-provide-access-institutions-must-support-completion/>.

⁵ Postsecondary Data Collaborative letter to Senate HELP Committee in response to white paper on consumer information, April 24, 2015, http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postsecdata_collaborative_help_response.pdf

⁶ Jamey Rorison and Mamie Voight, “Weighing the Options for Improving the National Postsecondary Data Infrastructure.” Institute for Higher Education Policy, September 2015, http://www.ihep.org/sites/default/files/uploads/docs/pubs/weighing_the_options_for_improving_the_national_postsecondary_data_infrastructure_-_september_2015.pdf

⁷ Mamie Voight, Alegneta A. Long, Mark Huelsman, and Jennifer Engle, “Mapping the Postsecondary Data Domain: Problems and Possibilities,” Institute for Higher Education Policy, March 2014, <http://www.ihep.org/research/publications/mapping-postsecondary-data-domain-problems-and-possibilities>

We understand the political challenges of creating a student level data collection, and recommend that – whether or not such a system is created – the federal government should **leverage existing federal data and publicly report aggregate results**. For example, ED should compile FSA data into a data warehouse to allow for internal evaluation and analysis and a separate public access tool to provide external analysts with access to the aggregate data, similar to NCES’ PowerStats tool. Using data in this warehouse, the Department of Education should calculate and publicly report data on student loan volume, cumulative student debt disaggregated by completion status, and the status of outstanding loans annually at the institution and/or program level. By linking NSLDS data with SSA earnings data, the Department also could publish employment and earnings information at the institution and/or program level for the 57 percent of students who do receive federal financial aid. All of these new data elements could be incorporated into IPEDS and College Navigator for public use.

Over the coming year, IHEP and other PostsecData partners will be refining detailed proposals to strengthen the national postsecondary data infrastructure. We recognize that the safe and thoughtful use of data can support student success, identify and shrink opportunity and achievement gaps, promote efficiencies, and enhance learning and employability for all students. I encourage you to visit our website at www.ihep.org/postsecdata for more details, including full text of PostsecData comments on the Senate HELP Committee white paper on consumer information and recommendations for IPEDS Outcome Measures improvements. Thank you for the opportunity to engage in today’s discussion.