

November 13, 2017

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington DC 20202

Dear Madam Secretary:

The Institute for Higher Education Policy (IHEP) submits the following comments to help inform the U.S. Department of Education's (ED's) efforts to establish a set of supplemental priorities for grant programs. IHEP is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, with a special focus on underserved populations. IHEP develops innovative research to guide policymakers and education leaders in addressing our nation's most pressing education challenges. Furthermore, IHEP leads the Postsecondary Data Collaborative (PostsecData), comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

These supplemental priorities will provide incentives for grant programs that the Department of Education administers and, as such, have the potential to shape our education system. It is critical that ED maintain its focus on establishing incentives in favor of the public good, and construct supplemental priorities with that role in mind. In comparing the Department of Education's proposed list of priorities with past priorities, IHEP has identified and provided recommendations on three areas that we request the Department revisit and further prioritize:

- **Data and evidence.** The proposed priorities refer to evidence-based strategies, but do not explicitly acknowledge the central role of data in evidence-building. We recommend that the priorities include clear references to the importance of data collection, data security, and appropriate data-use to inform evidence-based strategies.
- **Postsecondary access and success.** Past priorities have recognized the pivotal role of higher education—and the need to ensure that all Americans can not only access higher education, but that all college-bound students can afford an education and have some reasonable expectation of a successful outcome. Our society and our economy depend on an efficient and effective postsecondary system. We recommend that the priorities include a postsecondary access and success component.
- **Diversity and equity.** Fundamentally, the United States is a diverse nation, but barriers persist for historically disadvantaged individuals and groups within our society. We embrace a vision in which all people, regardless of background or circumstance, can reach their full potential. We were dismayed to see the proposed priorities place little emphasis on diversity and equity in education. We recommend making this a priority.

Each of these areas of concern is explored in further depth for your consideration below.

Data and evidence

The Department's new supplemental priorities and background information refer to evidence-based strategies and the importance of building evidence of what works in education. By leading the PostsecData partners, sharing best practices and establishing consensus around postsecondary data issues, IHEP has become a leading voice for data and evidence to support postsecondary access and success, college affordability, evidence-based policymaking, and consumer information and transparency for American higher education. In May of 2016, IHEP and PostsecData partners released an 11-paper series on ways to improve the national postsecondary infrastructure, which addressed—among other issues—leveraging



employment data to measure labor market outcomes, improvements to the Integrated Postsecondary Education Data System, and understanding data privacy and security in higher education.¹

Because high-quality data are critical to building evidence of what works in education, we urge the Department to further enhance the agency's focus on evidence and to consider the addition of a priority that highlights the necessity of collecting, securing, and using data to improve education. Just this past September, the final report of the Commission on Evidence-based Policymaking highlighted the fundamental role of data in strengthening federal evidence-building capacity.² All of ED's grant programs should incorporate data features that will be useful to consumers and the public when considering each program's impact and whether it helps students most in need. Doing so will lead to better policymaking and oversight, because the effectiveness and efficiency of these programs will be measurable and transparent.

Postsecondary access and success

While ED's proposed priorities highlight the necessity of postsecondary credentials for today's job market, and the array of choices that are theoretically available to prospective college students, absent is any priority specifically geared toward increasing postsecondary access and success for all Americans. Previous iterations of ED's priorities have acknowledged widespread concerns about college affordability, and the importance of getting more students both into and through college successfully. Addressing these issues has been and will continue to be essential to improving Americans' lives and driving our national economy forward into the future.

Again, the use of high-quality data is necessary to identify the areas where students most need help.³ It is vital to the success of our students that we be prepared to identify and support them at every step of the process, from college readiness to enrollment and completion, if we are to collectively succeed as a country. Colleges are key to driving intergenerational mobility in the United States,⁴ which is foundational to the idea that all Americans should be free to forge their own path, regardless of their social or economic background. While we have made progress, low-income students only enroll in college at roughly the same rate that high-income students did in 1973,⁵ and lower proportions of Black and Hispanic Americans enroll in college than their White peers.⁶ Black and Hispanic students also complete their

¹ Postsecondary Data Collaborative. (2016, May 18). Envisioning the national postsecondary infrastructure in the 21st century [paper series]. Institute for Higher Education Policy. Retrieved from <http://www.ihep.org/postsecdata/mapping-data-landscape/national-postsecondary-data-infrastructure>

² Commission on Evidence-based Policymaking. (2017). *The promise of evidence-based policymaking: Report of the Commission on Evidence-based Policymaking*. Retrieved from <https://www.cep.gov/content/dam/cep/report/cep-final-report.pdf>

³ Institute for Higher Education Policy. (2014). Driving toward greater postsecondary attainment using data. Retrieved from http://www.ihep.org/sites/default/files/uploads/docs/pubs/luminacpa_final_data_primer_fact_sheet_interactive.pdf

⁴ Chetty, R., Friedman, J.N., Saez, E., Turner, N., & Yagan, D. (2017). Mobility report cards: The role of colleges in intergenerational mobility. The Equality of Opportunity Project. Retrieved from http://www.equality-of-opportunity.org/assets/documents/coll_mrc_summary.pdf; Greenstone, M., Looney, A., Patashnik, J., & Yu, M. (2013). *Thirteen economic facts about social mobility and the role of education*. Brookings Institution. Retrieved from

http://www.hamiltonproject.org/assets/legacy/files/downloads_and_links/THP_13EconFacts_FINAL.pdf; U.S. Department of the Treasury. (2012). *The economics of higher education*. Retrieved from http://www.treasury.gov/connect/blog/Documents/20121212_Economics%20of%20Higher%20Ed_vFINAL.pdf

⁵ Comparison of U.S. Department of Education data for 2017 and 2010 *Condition of Education* reports. Retrieved from <https://nces.ed.gov/pubs2017/2017144.pdf> and <https://nces.ed.gov/pubs2010/2010028.pdf>

⁶ Cahalan, M., Perna, L.W., Yamashita, M., Ruiz, R., & Franklin, K. (2017). *Indicators of higher education equity in the United States: 2017 historical trend report*. Pell Institute for the Study of Opportunity in Higher Education, Council for Education Opportunity and Alliance for Higher Education and Democracy, University of Pennsylvania. Retrieved from [http://pellinstitute.org/downloads/publications-Indicators of Higher Education Equity in the US 2017 Historical Trend Report.pdf](http://pellinstitute.org/downloads/publications-Indicators%20of%20Higher%20Education%20Equity%20in%20the%20US%202017%20Historical%20Trend%20Report.pdf)

degrees at lower rates,⁷ and—even among students with similar academic profiles—wealthier students are more likely to graduate from college.⁸

IHEP's work around college affordability further demonstrates that low- and moderate-income students, working class and middle-class Americans, have far fewer affordable college choices than it might seem.⁹ These issues of postsecondary access, college affordability, and student outcomes should be square in the sights of education policymakers, just as they are for everyday Americans. These challenges reveal systemic flaws in our higher education system, far beyond the choices any individual citizen can make, and they demand intervention from policymakers. Focusing on choice when so many choices are out of reach for good students from low-income and minority backgrounds, without addressing deeper concerns, rings hollow to hard-working Americans who are struggling to get by.

Diversity and equity

The Civil Rights Act, the Equal Education Opportunities Act, and the Americans with Disabilities Act outlaw discrimination by race, sex, and disability but alone do not sufficiently address the ways in which our country has fallen short of our aspiration to be the land of opportunity. The Education Department's proposed priorities do not maintain sufficient emphasis on diversity in education, instead focusing narrowly on diversity among educators only and restricting efforts to create educational opportunities for minorities to science, technology, engineering, and mathematics (STEM) programs.

Similarly, priorities that highlight disparities in disciplinary practices between different groups of students, and emphasize the benefits of educational opportunities for justice-involved youth, do not feature among ED's updated list. We know that entry into the juvenile justice system is associated with factors that seriously inhibit academic achievement, and it is crucial that policymakers, educators, and child-serving agencies work collaboratively to ensure that the unique educational needs of youth at risk of entering—and those currently involved in—the justice system are adequately addressed.¹⁰ Postsecondary opportunities for incarcerated individuals are crucial, given their positive impact on successful re-entry. For instance, research shows that recidivism rates drop significantly for those who earn postsecondary degrees while incarcerated.¹¹ Educational opportunities make these individuals more productive members of their families and communities upon release, helping them obtain employment and avoid cycling back into the criminal justice system.

Furthermore, specific equity-minded terms that previously featured in ED's priorities are unfortunately absent from the latest proposal. Take "High-need students" as an example, defined as follows:

⁷ Shapiro, D., Dundar, A. Huie, F., Wakhungu, P., Yuan, X., Nathan, A., & Hwang, Y.A. (2017). A national view of student attainment rates by race and ethnicity: fall 2010 cohort. National Student Clearinghouse Research Center. Retrieved from <https://nscresearchcenter.org/wp-content/uploads/Signature12-RaceEthnicity.pdf>

⁸ Baum, S., MA, J., & Payea, K. (2013). *Education pays 2013*. The College Board. Retrieved from <https://trends.collegeboard.org/sites/default/files/education-pays-2013-full-report-022714.pdf>; Carnevale, A.P. & Strohl, J. (2010). How increasing college access is increasing inequality, and what to do about it. In Kahlenberg, R.D. (Ed.), *Rewarding strivers: Helping low-income students succeed in college (71–190)*. The Century Foundation. Retrieved from <http://tcf.org/assets/downloads/tcf-CarnevaleStrivers.pdf>

⁹ Institute for Higher Education Policy. (2017). Limited means, limited options: College remains unaffordable for many Americans. Retrieved from http://www.ihep.org/sites/default/files/uploads/docs/pubs/limited_means_limited_options_summary.pdf

¹⁰ Farn, A. & Adams, J. (2016). *Education and interagency collaboration: A lifeline for justice-involved youth*. Center for Juvenile Justice Reform, Georgetown University. Retrieved from http://cjjr.georgetown.edu/wp-content/uploads/2016/08/Lifeline-for-Justice-Involved-Youth-August_2016.pdf

¹¹ Davis, L.M., Bozick, R., Steele, J.L., Saunders, J., & Miles, J.N.V. (2013). *Evaluating the effectiveness of correctional education: A meta-analysis of programs that provide education to incarcerated adults*. RAND Corporation. Retrieved from https://www.bja.gov/Publications/RAND_Correctional-Education-Meta-Analysis.pdf

High-need students means students who are at risk of educational failure or otherwise in need of special assistance and support, such as students who are living in poverty, who attend High-minority Schools, who are far below grade level, who have left school before receiving a Regular High School Diploma, who are at risk of not graduating with a diploma on time, who are homeless, who are in foster care, who have been incarcerated, who have disabilities, or who are English learners.

While the definition for "children or students with high needs" features in the proposed priorities, and some of these underserved populations feature under *Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs* (proposed priority #1), the elimination of this language appears to signal that the current administration does not place as high a priority on these persons' needs. While student choice is fundamental to a robust higher education marketplace, the Department of Education plays a central role in ensuring that meeting the needs of these underserved individuals in our society is properly incentivized within our education system.

We encourage the Department to address these oversights by prioritizing diversity and equity in education, sending a message that schools must serve low-income students and students of color just as well as their peers, providing the same opportunities, and not unfairly disciplining disadvantaged students in need. The Department should further clarify that both leadership diversity and curricula that integrate diversity efforts also provide value to students and schools. Additionally, the Department should review its list of terms and definitions to ensure that high-need populations are still recognized and prioritized appropriately.

We look forward to continuing to serve as a resource to the Department and providing further input that can facilitate equity, transparency, access, success, and choice in the higher education marketplace. If you have any questions about these comments, please contact IHEP president Michelle Asha Cooper (mcooper@ihp.org or 202-861-8224).

Sincerely,

Michelle Asha Cooper
President
Institute for Higher Education Policy