Memorandum

To: President-Elect Donald Trump and Presidential Transition Team
From: Postsecondary Data Collaborative
Date: December 14, 2016
Re: Recommended Policy Actions to Improve Postsecondary Education Data Quality

Executive Summary

Each year, students, families, and taxpayers make critical investments in higher education that support student access and success. These investments are made with the expectation that significant personal, economic, civic, and societal gains will follow. Robust outcomes data are critical to understanding returns on investment in higher education, especially in a global economy in which postsecondary education has become ever more important for economic competitiveness. Policymakers and institutions need these data to inform efforts to pinpoint necessary improvements and target interventions in support of student success, and students and families need these data to make informed decisions about where and what to study in college.

The Postsecondary Data Collaborative (PostsecData) strongly believes that high-quality data are a prerequisite to improving student outcomes and giving all postsecondary stakeholders the information they need to make important decisions related to postsecondary education. PostsecData has developed an agenda to guide President-Elect Trump’s administration’s efforts to support student success through improved postsecondary data—particularly for students who continue to be underserved by our education system. This agenda is guided by five core recommendations:

1. Count all postsecondary students and outcomes through a federal student-level data system that protects student privacy.
2. Improve currently existing data on student outcomes.
3. Increase public transparency of data that are already being collected.
4. Strengthen the current postsecondary data infrastructure through existing opportunities and policy windows.
5. Throughout all efforts, protect data security and student privacy.

To support these recommendations, we have developed a series of administrative actions for the first 100 days as well as strategies for the longer term. With an upcoming reauthorization of the Higher Education Act, understanding and improving outcomes should be at the forefront of policy and legislative discussions regarding postsecondary education. Many of the higher education interests of President-elect Trump’s campaign—including developing effective risk-sharing policies, improving transparency around student outcomes, and strengthening our higher education system—require better data.

What is the Postsecondary Data Collaborative?

The Postsecondary Data Collaborative is an initiative led by the Institute for Higher Education Policy (IHEP) that advocates for the use of high-quality postsecondary data to promote student success. The PostsecData Working Group includes a diverse set of more than three dozen organizations committed to this goal.
What is missing from current data systems and why does it matter?

In today’s economy, access to good jobs increasingly depends on getting a college degree or certificate. Yet not all college programs are created equal and deciding which college program to pursue is one of the most important choices Americans will make in their lifetimes. We need high-quality postsecondary data that count all students and measure meaningful outcomes, such as college graduation rates and post-college earnings, to accurately inform the decision-making of all stakeholders in higher education—students and their families as well as policymakers and institutional leaders. Policymakers can use quality data to shepherd the federal student aid investment and to develop informed policies that promote equitable student access and success. Institutions can use data to revise policies and practices on their campuses to enhance student access, outcomes, and equity. Students and families can use quality information to help them decide where and what to study in college.

Our current data systems do not meet our contemporary needs: They do not answer many basic questions about college access, outcomes, or costs, nor do they reflect the trends and behaviors of today’s students. They are not capable of measuring nuanced outcomes in ways that demonstrate the full value of a degree or credential, or how outcomes can vary between institutions or programs. The Trump administration can—and must—play a pivotal role in improving the availability of high-quality postsecondary data. It will require strong leadership and strategic thinking to advance ambitious—but necessary—reforms. The White House should work with the U.S. Secretary of Education, the Under Secretary of Education, and other top leaders in the U.S. Department of Education (ED) to implement the recommendations that we put forward in this document, and work with key federal policymakers to gain bipartisan support for each of them.

How can the new administration act to improve our postsecondary data?

There are several opportunities for the incoming administration to improve postsecondary data, with the first 100 days providing ample opportunity for the next president to take immediate action, making a clear statement on the importance of better data and transparency in higher education. PostsecData encourages the Trump administration to consider policies that would set up early wins, maintaining and building momentum around postsecondary data while also working steadfastly toward broader and longer-term reform. We recommend a set of impactful presidential actions, which will both immediately improve data and set the stage for future efforts.

1. **Count all postsecondary students and outcomes through a federal student-level data system that protects student privacy.**

   **IMMEDIATE ACTION:** Leverage bully pulpit to advocate for congressional action to overturn the student-unit record ban.

   Congress’ 2008 amendment to the Higher Education Opportunity Act banned the creation of a federal unit record system and restricted the federal government from collecting and reporting information students and families need to inform their college-going journeys. Those who supported the ban expressed concerns with privacy and security of data as well as the potential for federal overreach; however, those apprehensions can be addressed through proper safeguards and should not be an excuse for denying students and families better information.

   In order to strengthen current and future data collections, we must include metrics that better explain student performance. Drawing on lessons learned from a decade of efforts to collect and use better data to drive postsecondary student success, IHEP analyzed metrics and definitions
used by institutional and state initiatives, along with specifications in national data collections, to identify points of consensus. The resulting framework provides the new administration with a list of metrics that institutions should collect and report, to provide a full understanding of how all students fare in our postsecondary institutions. These metrics fall into three major categories:

- **Performance** metrics measure institutional performance related to student access, progress, completion, cost, and post-college outcomes.
- Driven by increased interest in college costs and affordability, **efficiency** metrics consider how resources impact college completion.
- **Equity** metrics include all students and accurately represent the higher education experience of populations that are underserved and may have been "invisible" in other data collections.

A limited federal postsecondary student-level record system with comprehensive coverage of students, programs, and institutions will allow calculation of these metrics and will produce more accurate portraits of student enrollment patterns, progression, completion, and post-collegiate outcomes than the data that are currently available. Such a system will assist with national priorities including consumer transparency, institutional improvement, and analysis of federal aid programs. A student-level data system will provide more accurate, complete, and customizable information for students and families as they make the critical decision of which college or university is the right fit for them. Furthermore, a limited federal postsecondary student-level record system will allow for number of significant benefits, including:

- **Increased Data Accuracy.** The student-related information included in the current Integrated Postsecondary Education Data System (IPEDS) collection could be calculated or aggregated from the student-level data more reliably and consistently across institutions.
- **Reduced Data Reporting Burden.** A student unit record system would streamline and reduce duplicative reporting burdens on institutions of higher education by collecting data in a format better aligned with their own systems.
- **Increased Data Flexibility with Reduced Costs.** The collection of student-level data provides flexibility and responsiveness as information and data needs evolve over time in response to changes in postsecondary education. Adding new surveys to IPEDS is expensive to the federal government and postsecondary institutions in terms of both time and money, while adding elements to a student-level data system allows for creating new metrics more quickly.
- **Additional Student Outcomes with Linked Data.** A student-level data system would also allow for linkages between postsecondary education data and other federal data systems such as Treasury (for earnings) or Veterans Affairs (for veterans’ progress and outcomes rates).

Legislation to create a postsecondary student-level system should be tailored to generate the data necessary to answer the most relevant questions while avoiding federal overreach. Furthermore, the legislation should include resilient safeguards and protocols that ensure the data are secure, privacy is protected, and the information is used only for its intended purpose by people with a legitimate reason to access it. A straightforward, simplified approach is advantageous on both substantive and political grounds.

In the absence of a federal student-level data system, there are multiple opportunities for the Trump administration to enhance currently existing data systems to maximize their capability to produce better student outcomes data. In fact, even with the creation of a federal student-level data system, existing
data systems can have great utility. We recommend a number of actions to improve our current data infrastructure, leverage data that are already being collected but not reported, and seize existing opportunities and policy windows to produce quality data.

2. Improve currently existing data on student outcomes.

**IMMEDIATE ACTION: Prioritize support of recent NCES proposals to accurately measure the outcomes of Pell Grant recipients in IPEDS.**

Higher education stakeholders are interested and invested in the publicly reported outcomes of Pell Grant recipients. These data provide students, policymakers, and institutions with information on how outcomes for low-income students compare with the outcomes of more well-resourced classmates as well as how those outcomes vary between institutions. We applaud ED’s new proposals to include Pell recipient data in the Graduation Rates (GR) and Outcome Measures (OM) surveys of the Integrated Postsecondary Education Data System (IPEDS) for 2016–17 and 2017-18, respectively. PostsecData submitted thorough comments on possible approaches to including these data in future collections, and we encourage swift action to implement the proposed recommendations and release guidance for institutions.

**ONGOING STRATEGY: Work with NCES to develop a plan to streamline student outcomes in IPEDS.**

With the goal of working toward a more comprehensive and cohesive strategy to understand student outcomes, the Postsecondary Data Collaborative supports efforts to streamline the data collection and reporting in GR, GR200 (200% Graduation Rates), and OM. These measures of college completion provide insights into postsecondary student success but are currently limited in their scope. For instance, GR only covers first-time and full-time undergraduates. OM includes full-time, part-time, first-time, and transfer students, but only those who attend degree-granting institutions. As such, neither GR nor OM offers a complete picture of student success. Further complicating matters, GR and OM differ in their reporting periods, making comparisons difficult. The new administration should encourage more timely and consistent reporting of student outcomes, inclusive of all students and institutions in the data, to provide a more accurate picture of who completes college.

3. Increase public transparency of data that are already being collected.

**IMMEDIATE ACTION: Issue an executive order to routinize the annual release of College Scorecard data.**

In September 2015, ED released a wealth of never-before-seen data as part of the redesigned College Scorecard, incorporating them into a new consumer facing tool. Most importantly, the data were made available for download, so that non-governmental organizations can convert them into additional user-friendly tools. While the new data offer a much-needed step toward transparency in higher education, which can help advance quality outcomes for all students, it is also imperative to continuously improve the quality and types of data moving forward. The creation of a federal student-level data system would supply all of the necessary data for a consumer tool, but even in its absence, stronger linkages between federal data sets would strengthen future data releases.

Moreover, it is essential that the new administration formalizes the annual update and release of these data, in the interest of better understanding college access, costs, and outcomes. To increase the utility of these data, the Trump administration should also develop strategies for better dissemination of College Scorecard data to students, through events, messaging campaigns, and
direct work with secondary school administrators. Recent research indicates that the vast majority of high school students surveyed for the project had not heard about or used the College Scorecard before the survey. After introduction to the tool, 86% of students found it easy to use and well designed. Further, 70 percent of students either “Strongly Agree” or “Agree” that the Scorecard would help them in the college search process. Introducing high school students and families to these resources will strengthen their ability to make more informed decisions about college.

ONGOING STRATEGY: Increase transparency of data from the Office of Federal Student Aid (FSA), in order to learn more about student loan outcomes.

As student loan debt and borrowers’ outcomes comprised much of the higher education discussions this campaign, leveraging existing data runs on student loan servicing, portfolio analysis and debt collection is a clear way to better understanding the student loan portfolio. Furthermore, many current risk-sharing proposals rely on better data regarding student borrowing outcomes. Improving public data around federal student aid need not entail the production of entirely new items or increased burden on FSA staff. ED could substantially increase transparency by releasing the data already calculated in the course of its normal business practices. FSA already produces monthly Operation Services Portfolio Reports for student loan servicers, and provides information to servicers about their success in turning around borrower applications, processing paperwork, and other key indicators of servicer volume management. The agency has also said that it conducts a quarterly review of the portfolio. These data could easily be made available in the FSA Data Center and used for analysis by researchers and policymakers to drive decisions around student loan borrowing.

Some have raised questions around how servicers share important repayment plan and other information with borrowers and the impact on student loan outcomes. The lack of consistent, market-wide federal standards for student loan servicing creates an inhospitable atmosphere for struggling student borrowers. There is currently little publicly available data on the success of servicers; we encourage the Trump administration to use FSA data to inform policy related to student loan servicer accountability and to make those data publicly available. Specific metrics could include: Servicer-level data by loan status, servicer-level data by repayment plan, loan status by servicer and institution type, and enhancements to the existing “Servicer Portfolio by Repayment Plan” spreadsheet in the FSA Data Center.

4. Strengthen the current postsecondary data infrastructure through existing opportunities and policy windows.

IMMEDIATE ACTION: Advance the work of the Commission on Evidence-Based Policymaking.

In March 2016, Congress passed the Evidence-Based Policymaking Commission Act of 2016, led by Speaker Paul Ryan and receiving wide bipartisan support. This legislation established a commission to make recommendations on government data that may be linked and leveraged to evaluate federal programs and federal investments. The Commission on Evidence-Based Policymaking’s examination of federal administrative and survey data provides an exceptional opportunity to address the management and use of data for measuring postsecondary education and workforce outcomes. The Commission’s findings and impact could lead to more inclusive, aligned and market relevant data systems to help educators, students, employers, workers and policymakers all make more informed decisions. We encourage President-elect Trump to raise the importance of the committee’s work around federal data linkages and to ardently support the current appointees to the Commission.
ONGOING STRATEGY: Increase federal investment in State Longitudinal Data Systems (SLDS).

Investment of time and money in SLDS by the federal government has strengthened data linkages across sectors in the state and contributed to improved data for K-12, postsecondary and workforce data systems. Research shows that states are able to share lessons learned from building, expanding, and utilizing these systems, which serve as centers for state data improvement and use. Continued federal investment in these systems—with substantial involvement of the postsecondary and workforce communities in design and implementation—will allow states to conduct research across the education and workforce pipeline to evaluate the impact of policies and programs, and promote student success. It can also provide students and employers with the information they need to make informed decisions. To ensure that the results of this research benefit all relevant stakeholders, we encourage the federal government to prioritize funding based upon the usefulness of a state’s research. Furthermore, the federal government should support growing efforts to capture mobility across state lines through state-to-state data exchanges and appropriate access to national-level data sets that enable states to better understand outcomes of transient residents.

5. Throughout all efforts, protect data security and student privacy.

All conversations about postsecondary data—including plans to implement the above recommendations—must include a critical examination of and plans to address data privacy and security. Data security is the first line of defense against data breaches and cyberattacks. It should be noted that the U.S. Department of Education’s National Center of Education Statistics (NCES) has an excellent track-record with data security. Indeed, NCES takes great care to protect its data, and requires researchers to meet strict guidelines for data security. The PostsecData Collaborative encourages continued commitment to the security of education data as a prerequisite for its collection and use.

It is also essential to safeguard privacy in more traditional and fundamental ways. For instance, it is standard in many fields of research to de-identify data whenever possible, to remove specific personally identifiable or sensitive information—such as a name or Social Security Number—when storing data. Furthermore, good data governance is key. To ensure data are used to benefit rather than harm students, clear guidelines should govern policies and procedures, such as how long data can be stored, who can access it, and for what purposes. It also is best practice to collect only the data necessary to answer specific questions, rather than any and all conceivable data elements. PostsecData strongly advocates for these data privacy considerations, in addition to strong data security measures.

Thank you for the opportunity to share our recommendations in this exciting transition period. These recommendations are supported by the partner organizations listed below. If you have questions or would like to discuss these issues further, please contact Mamie Voight, Vice President of Policy Research at the Institute for Higher Education Policy at (202) 587-4967 or mvoight@ihep.org.

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