

May 31, 2018

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

Dear Madam Secretary:

This letter is submitted on behalf of the 38 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity. PostsecData recognizes the vital role that the College Scorecard plays in keeping students informed about their college options, through direct use of the online tool as well as the apps and analyses that researchers and developers produce to help students navigate the postsecondary landscape.

As advocates for data transparency and consumer information that promote informed choices in the higher education marketplace,<sup>1</sup> we are encouraged by and appreciate continued updates to the Scorecard data and consumer tool. Based on our collective experience and expertise working with postsecondary data systems, PostsecData has provided recommendations to the technological community regarding the College Scorecard in the past,<sup>2</sup> and would like to take the opportunity to provide the Department of Education (ED) with an updated list of suggested improvements. The recommendations are numbered in order of priority and grouped into five categories:

- A. ***Disaggregate key data elements in the College Scorecard.*** Publishing data on different types of students (e.g., completers, low-income students, students of color) and programs of study is essential to helping students understand which colleges and programs will serve them best.
- B. ***Include more comprehensive data on completion and post-college outcomes in the College Scorecard.*** Data on completion and workforce outcomes are vital to helping students, their families, and their advocates understand the return on their substantial investments in higher education and inform their postsecondary choices.
- C. ***Improve flags on the College Scorecard for institutions subject to greater scrutiny.*** Students deserve to know if an institution is under increased scrutiny by the Department or an accreditor, so the Scorecard should more clearly and comprehensively convey areas for which caution is warranted at institutions to help students understand potential risk.
- D. ***Upgrade the usability of the College Scorecard dataset for developers, policy analysts, and researchers.*** Making the data easy to access, understand, and use ensures their value can spread far beyond the students who use the consumer tool. Developers, analysts, and researchers can use the underlying data to present information to students and the public in new, compelling ways.
- E. ***Continue testing, maintenance, and public access to the College Scorecard.*** The Scorecard can provide immense value to students, and the Department should continue to maximize that value via regular testing and updates, and work to increase visibility of the tool and data updates.

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<sup>1</sup> Postsecondary Data Collaborative. (2017, March 29). Letter addressed to Secretary of Education Betsy DeVos. Institute for Higher Education Policy. Retrieved from

[http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postseec\\_transparency\\_letter\\_-\\_march\\_2017.pdf](http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postseec_transparency_letter_-_march_2017.pdf);

Postsecondary Data Collaborative. (2015, September 23). Statement commending Department of Education for data transparency. Institute for Higher Education Policy. Retrieved from [http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecdata\\_statement\\_on\\_college\\_scorecard\\_1.pdf](http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecdata_statement_on_college_scorecard_1.pdf)

<sup>2</sup> Postsecondary Data Collaborative. (2016, March 23). Letter/statement addressed to the technological community. Institute for Higher Education Policy. Retrieved from [http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/scorecard\\_api\\_tech\\_provider\\_joint\\_letter\\_march\\_2016\\_-\\_final.pdf](http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/scorecard_api_tech_provider_joint_letter_march_2016_-_final.pdf)

This priority-ranked series of recommendations aims to make the College Scorecard as useful as possible to facilitate informed college choices. Each recommendation is further supplemented by the following information:

- **Application** indicates whether the recommendation applies to the downloadable College Scorecard dataset, the online consumer tool, or would take another form.
- **Coordination** outlines whether the recommendation would require coordination with multiple offices in the Department of Education or between the Department and another agency of the federal government.
- **Value** communicates the level of worth the implementation of a particular recommendation would provide to consumers of the Scorecard data.

Note that this series of prioritized recommendations would require varying degrees of coordination and effort, but all would provide moderate-to-high value to students, families, and their advocates as well as to researchers, institutions, and other consumers.

#### A. *Disaggregate key data elements*

It is essential that students are able to identify an institution or program that fits them and is best suited to serve them well throughout their postsecondary career. Outcomes often vary by student demographics, program of study, and whether a student completed their credential or not. Some programs at a given institution may have a stronger track-record, or some institutions might demonstrate more success with certain types of underserved students. Those students deserve to know how those who came before them fared at that college or in that program.

For example, while Black students graduate at lower rates than White students on average due to a number of systemic barriers, there are institutions where Black students graduate at the same or higher rates than White students.<sup>3</sup> Similarly, low-income Pell Grant recipients graduate at rates equal to their peers at about 1 in 5 institutions, despite being economically disadvantaged.<sup>4</sup> Students should know which institutions are most likely to support students like them and help them succeed. A student with high unmet need who is deciding between two college programs with vastly different debt and earnings outcomes should have those data readily available, regardless of what they ultimately choose for themselves.

Recommendation	Application	Coordination	Value
1. Disaggregate existing earnings and cumulative debt measures by program of study	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	Yes— <ul style="list-style-type: none"> <li>• Office of Federal Student Aid</li> <li>• Department of the Treasury</li> </ul>	High—Just as outcomes vary by institution, they also vary by program within institution, especially workforce outcomes. House Education & Workforce Committee Chairwoman Virginia Foxx (R-NC) called for program-level earnings data in the PROSPER Act, <sup>5</sup> and ED started collecting program-level data in 2012. <sup>6</sup>

<sup>3</sup> Nichols, A.H. & Evans-Bell, D. (2017). *A look at Black student success: Identifying top-and bottom-performing institutions*. The Education Trust. Retrieved from <https://edtrust.org/wp-content/uploads/2014/09/A-Look-at-Black-Student-Success.pdf>

<sup>4</sup> Nichols, A.H. (2015). *The Pell partnership: Ensuring a shared responsibility for low-income student success*. The Education Trust. Retrieved from [https://1k9gl1yevnfp2lpq1dhrqe17-wpengine.netdna-ssl.com/wp-content/uploads/2014/09/ThePellPartnership\\_EdTrust\\_20152.pdf](https://1k9gl1yevnfp2lpq1dhrqe17-wpengine.netdna-ssl.com/wp-content/uploads/2014/09/ThePellPartnership_EdTrust_20152.pdf)

<sup>5</sup> H.R. 4508—115th Congress (2017–19). Retrieved from <https://edworkforce.house.gov/uploadedfiles/bills-115hr4508ih.pdf>

<sup>6</sup> U.S. Department of Education. (updated January 2017). *Using federal data to measure and improve the performance of U.S. institutions of higher education*. Retrieved from <https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf>

2. Disaggregate existing graduation rates by <ul style="list-style-type: none"> <li>- Race/ethnicity</li> <li>- Pell Grant receipt</li> </ul>	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	No—Graduation rates by race/ethnicity and Pell Grant receipt available in IPEDS	High—Students of color and low-income students deserve to know how individuals like them fare at a given institution. Such disaggregates are key to promoting educational equity.
3. Disaggregate current NSLDS-derived completion and transfer rates by Veteran status	<ul style="list-style-type: none"> <li>• Dataset</li> </ul>	Yes—Department of Veteran Affairs	High—Students who have served in the U.S. Armed Forces also deserve to know how other veterans fare at a given institution.
4. Disaggregate existing median earnings and percentage of graduates earning above \$25,000 metrics by <ul style="list-style-type: none"> <li>- Completion status</li> <li>- Pell Grant receipt</li> </ul>	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	Yes— <ul style="list-style-type: none"> <li>• Office of Federal Student Aid</li> <li>• Department of the Treasury</li> </ul>	High—Earnings outcomes vary based on whether a student attained a degree or not, but current Scorecard data combine completers and non-completers, and Pell data would show outcomes for low-income students.

**B. Include more comprehensive student outcomes data**

Nearly 85 percent of college freshmen go to college to get a good job, almost 78 percent go to college to get training for a specific career, and over 61 percent plan to earn a graduate degree.<sup>7</sup> Publishing more comprehensive outcomes data about completion, advanced education, and earnings would give students a more complete picture of the expected return on their investments. The Scorecard should include new federal Outcomes Measures data because they capture completion for part-time and non-first-time students, while the traditional graduation rates currently in the College Scorecard only represent about 47 percent of students nationwide,<sup>8</sup> and might paint a potentially misleading picture of completion rates.<sup>9</sup> Because these metrics are new, ED should host a technical review panel to discuss the best way to incorporate them into the Scorecard. Also, data on enrollment in advanced education and additional timeframes and earnings thresholds on the earnings measures could provide students a more comprehensive snapshot of expected post-college outcomes.

Recommendation	Application	Coordination	Value
5. Add newly available Outcome Measures data on completion and transfer for full-time, part-time, first-time, and transfer students disaggregated by Pell Grant receipt	Consumer tool only—already available in the dataset	No—Available in IPEDS	High—Provides more complete information about student completion than the current graduation rate. These data are new, so ED should consider hosting a technical review panel of experts to determine how

<sup>7</sup> Eagan, K., Stolzenberg, E.B., Zimmerman, H.B, Aragon, M.C., Sayson, H.W., & Rios-Aguilar, C. (2017). *The American freshman: National norms, fall 2016*. Higher Education Research Institute at University of California, Los Angeles. Retrieved from <https://www.heru.ucla.edu/monographs/TheAmericanFreshman2016.pdf>

<sup>8</sup> Analysis of 2015 IPEDS data by the Institute for Higher Education Policy.

<sup>9</sup> Itzkowitz, M. (2018, February 21). New data further cements completion crisis in higher education. *Third Way*. Retrieved from <https://www.thirdway.org/memo/new-data-further-cements-completion-crisis-in-higher-education>

			Outcome Measure data can best be integrated into the Scorecard.
6. Add post-graduation enrollment rates (i.e., bachelor's after associate's and graduate school after bachelor's) and disaggregate by <ul style="list-style-type: none"> <li>- Pell Grant receipt</li> <li>- Gender</li> </ul>	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	Yes—Office of Federal Student Aid	High—Provides information about educational outcomes to supplement earnings information, painting a more complete picture of post-college opportunities.
7. Add graduate earnings for first calendar year following graduation, and 10 years following graduation	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	Yes— <ul style="list-style-type: none"> <li>• Office of Federal Student Aid</li> <li>• Department of the Treasury</li> </ul>	High—Current data show earnings 10 years after college enrollment but including additional shorter-term earnings measures after college <i>completion</i> would offer a broader view by providing information on both long- and short-term earnings after graduation. Adding short-term earnings would also be more consistent with outcomes measured in the Workforce Innovation and Opportunity Act (WIOA).

**C. Enhance flags for institutions subject to greater scrutiny**

Indicators of institutional health and quality can help students identify potential risk, and make more informed choices. A similar online student consumer tool, the Department of Veterans Affairs [GI Bill Comparison Tool](#), provides clear information about a range of school circumstances of which students should be aware. Students should be provided clear indicators for a wider range of areas of concern in order to heighten consumer awareness in the higher education market.

Recommendation	Application	Coordination	Value
8. Add flags for institutions facing an adverse action (e.g., probation or show cause) from an accreditor	<ul style="list-style-type: none"> <li>• Dataset</li> <li>• Consumer tool</li> </ul>	Yes—Office of Postsecondary Education and/or Office of Federal Student Aid	High—helps consumers evaluate quality or related concerns in the marketplace. Consistent with GAO recommendations for ED to expand use of these data.

**D. Upgrade usability for developers, policy analysts, and researchers**

A number of changes and additions to the College Scorecard data and consumer tool would help data experts and student advocates better examine and understand meaningful patterns in postsecondary data and facilitate more informed consumer choice. Small tweaks to institutional identifiers and data labels would help clarify insights for students and advocates alike, and better statistical information would provide substantial benefit to researchers. With additional effort, immense value would come with designing a new tool for Scorecard data that follows in the footsteps of the IPEDS Data Center, which would increase overall accessibility of the data and bridge the gap between a fully consumer-facing tool and raw data available for download.

Recommendation	Application	Coordination	Value
9. Add most-recent year for data elements to the API	Application programming interface (API) only	No	Medium—Allows users to easily identify the most recent data for each element without requiring additional research into each element's source year, which can vary.
10. Create a new data tool like the IPEDS Data Center that allows for easier data download	New tool	No	High—Data would be more user-friendly for researchers if accessible using a more advanced tool.
11. Add more statistical features for data experts <ul style="list-style-type: none"> <li>- interquartile ranges</li> <li>- standard deviation</li> <li>- consistency between using median or mean</li> </ul>	Dataset	Yes—Office of Federal Student Aid	Medium—Helps researchers and data experts understand data quality and reliability.

#### E. *Continue testing, maintenance, and public access*

Potential for improvements aside, the College Scorecard currently provides vital information to students in the higher education marketplace and maintaining both the online platform and public dataset is critical. The Scorecard boasts approximately 1.5 million users to date, and over 600 developers have accessed the Application Programming Interface (API).<sup>10</sup> Reports that have evaluated the College Scorecard have understandably found areas for improvement but still praise its power to unlock information for students, including the best available comparative data on post-college earnings across institutions nationwide.<sup>11</sup> Similarly, analysis from the Treasury Department has acknowledged that the Scorecard offers the most comprehensive and reliable data on students post-graduation, going so far as to call it a "breakthrough."<sup>12</sup>

In addition to maintaining the dataset and consumer tool, the Department of Education should continue testing the Scorecard with consumers. In the process of making updates, policymakers and Scorecard experts should focus not only on how the data can best be calculated and categorized but also on using consistent terminology and making the College Scorecard language easy for students to understand, particularly for students of color and those who are the first in their family to go to college.<sup>13</sup> Finally, getting the word to more students about this key resource in creative ways, such as by presenting relevant Scorecard data within the Free Application for Federal Student Aid (FAFSA), will help empower students to maximize the educational benefit of their financial aid.

<sup>10</sup> U.S. Department of Education. (2016, September 14). Fact sheet: Obama administration announces release of new Scorecard data. Retrieved from <https://www.ed.gov/news/press-releases/fact-sheet-obama-administration-announces-release-new-scorecard-data>

<sup>11</sup> Miller, B. (2016). *Scoring the College Scorecard: What's good and what needs improvement*. Center for American Progress. Retrieved from <https://cdn.americanprogress.org/wp-content/uploads/2016/02/10085654/ScoringScorecard-report.pdf>

<sup>12</sup> Looney, A. (2017, January 19). A comparison between the College Scorecard and Mobility Report Cards [Blog post]. *Treasury Notes*. Retrieved from <https://www.treasury.gov/connect/blog/Pages/A-Comparison-between-the-College-Scorecard-and-Mobility-Report-Cards.aspx>

<sup>13</sup> Morgan, J.M. & Dechter, G. (2012). *Improving the College Scorecard: Using student feedback to create an effective disclosure*. Center for American Progress. Retrieved from <https://cdn.americanprogress.org/wp-content/uploads/2012/11/CollegeScorecard-4.pdf>

Recommendation	Application	Coordination	Value
12. Continue testing new and existing features with consumers, especially students of color, low-income students, and first-generation college students	Consumer tool only	No	High—Essential to maintain usability of the Scorecard.
13. Provide College Scorecard data on the FAFSA for institutions students list when filing	FAFSA	Yes—Office of Federal Student Aid	High—Improving visibility of the Scorecard tool is essential to empower federal aid applicants with information to make decisions about where to spend those dollars. ED has begun to develop this FAFSA link already.

The undersigned members and partners of PostsecData applaud the Department of Education for developing and maintaining the College Scorecard, promoting data transparency, and keeping higher education consumers informed in ways never before possible. We further recognize the many challenges of providing quality data under the current infrastructure, which is why we ultimately hope to see the creation of a federally-held, privacy-protected, secure student-level data network (SLDN) that would be the best option for getting answers to important postsecondary questions that the current data simply cannot provide.<sup>14</sup> In the absence of legislation that would make an SLDN possible, however, we wish to acknowledge and advance this opportunity for continuous improvement in data quality and availability with existing data. The above recommendations are framed around providing maximum value to students who need high-quality postsecondary data to make informed choices in the higher education marketplace.

We look forward to seeing postsecondary data become more transparent, comprehensive, and efficient with your support. If you have any questions about these comments, please contact Mamie Voight, vice president of policy research at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

- Achieve Atlanta
- Advance CTE
- Alloy Engineering Co., Inc.
- Association for Career and Technical Education
- California EDGE Coalition
- Center for Law and Social Policy
- Colorado Center on Law and Policy
- Education Commission of the States
- Excelencia! in Education
- Georgetown University Center on Education and the Workforce
- Higher Learning Advocates
- Institute for Higher Education Policy

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<sup>14</sup> Institute for Higher Education Policy. (2017, May 23). Postsecondary Data Collaborative and Workforce Data Quality Campaign applaud bipartisan, bicameral College Transparency Act. Retrieved from <http://www.ihep.org/press/opinions-and-statements/postsecondary-data-collaborative-and-workforce-data-quality-campaign>

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Women Employed  
Workforce Data Quality Campaign  
Young Invincibles

Cc: James Blew  
Frank Brogan  
Matthew Greene