

May 5, 2022

Dr. Erin Velez
Education Research Analyst
RTI International

Dear Dr. Velez;

This letter is submitted on behalf of these 16 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData). PostsecData is a nonpartisan coalition 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 (Scorecard) plays in informing students' college choices, through direct use of the online tool as well as the apps and analyses researchers and developers produce to help students navigate the postsecondary landscape.

As champions for high-quality postsecondary data that promotes student success and empowers students and families to make informed college choices, PostsecData is encouraged by the Department of Education (ED)'s continued maintenance and improvement of the Scorecard data and consumer tool. This includes the reinstatement of institution-level earnings outcomes; the addition of disaggregated median earnings by family income, dependency status, and gender; cumulative loan debt measures and borrower-based repayment rates; additional outcomes for Pell Grant recipients; and more. PostsecData would like to take the opportunity afforded by the recent Technical Review Panel on "College Scorecard Earnings Calculations and Other Metrics" to provide ED relevant comments on earnings measures in the Scorecard, additional input on 2022 updates to the dataset and tool, and other suggested improvements. The recommendations are grouped into the following categories:

- A. Improve earnings measures by using an exit-cohort, and separately report earnings for students who do not complete a credential.**
- B. Expand upon the existing earnings threshold measure by measures that explore a fuller scope of postsecondary value.¹**
- C. Add new critical data elements and disaggregate existing data by demographic characteristics.**
- D. Upgrade the usability of the College Scorecard dataset for developers, policy analysts, and researchers and continue testing, maintenance, and public access to the College Scorecard.**

This series of recommendations aims to make the Scorecard as useful as possible to facilitate informed college choices. Each recommendation is further supplemented by detailed tables containing the following information:

- **Application:** indicates whether the recommendation applies to the downloadable Scorecard dataset, the online consumer tool, or would take another form.
- **Coordination:** defines whether the recommendation would require coordination with multiple offices in ED or between the Department and another agency of the federal government.
- **Priority:** communicates the level of importance and urgency for the implementation of a particular recommendation.

¹ In this letter, we draw on [The Postsecondary Value Commission's](#) definition of value, which is defined as when students are provided equitable access and support to complete quality, affordable credentials that offer economic mobility and prepare them to advance racial and economic justice in our society.

- **Timing:** outlines how quickly the recommendation could feasibly be implemented. We include this only when there are extenuating circumstances that would prevent ED from implementing a recommendation at this time, but otherwise we encourage ED to implement these recommendations as soon as possible.

A. Improve earnings measures by using an exit-cohort, and separately report earnings for students who do not complete a credential.

Recommendation	Application	Coordination	Priority
1. Measure earnings for completers using exit-cohorts by field of study and institution.	Dataset Consumer tool	Yes Department of the Treasury	High – Publishing earnings data for completers using exit-cohorts gives users a more complete view of the value of their education.
2. Publish overall earnings outcomes or students who leave school without a credential, including disaggregated data on outcomes for non-completers by race/ethnicity, gender, and family income whenever possible, and establish a technical working group to assess how to best report earnings for this population by field of study.	Dataset Consumer tool	Yes Office of Federal Student Aid Department of the Treasury	High – Completion has a significant impact on a student’s future earnings. Defining and publishing data on earnings outcomes for students who leave without a credential provides a more complete view of the value of an education. Earnings outcomes of non-completers also vary substantially by race, gender and family income, and understanding these patterns is critical to unpacking differences in the value of postsecondary education across demographic groups. However, assessing earnings outcomes for non-completers at the program level is crucial but poses methodological difficulty.

1. To equip users with the most complete information on the value of a postsecondary education and the value of specific credentials, **ED should publish data about earnings outcomes of students by institution and program of study, based on an exit-cohort of students who finish their program in a given year.** Currently, the Scorecard uses an entry-cohort model to calculate institutional earnings outcomes, publishing data on earnings for students who enter postsecondary institutions in the same year. Using an entry-cohort model does not factor in the time it takes to finish a degree, thus at the time the ten-year earnings outcome is measured, work experience of former students can vary widely. In particular, the average student attending a two-year institution would have more years of work experience to account for than their peers who attended a four-year institution. Combining students with different levels of workforce experience can ultimately make it difficult to [accurately and consistently compare earnings outcomes](#). ED should also publish disaggregated earnings outcomes by race/ethnicity as the necessary data becomes available to calculate these outcomes. In defining programs of study, ED should use the Classification of Instructional Programs (CIP) with the greatest level of detail possible while still adhering to all privacy

protocols—students should be assigned to programs at the six-digit CIP code level whenever possible and combined into four- or two-digit CIP codes when sample sizes become too small.

Furthermore, [completion has been shown to directly impact a students' earnings outcomes](#), yet because institution-level data displayed on the consumer tool currently reports combined earnings measures for completers and students who leave without a credential (non-completers) in a single cohort, earnings increases for program completers are obscured. By using an exit-cohort to measure earnings outcomes, Scorecard data could better reflect the return on investment of students who pursue a specific degree program and demonstrate variation in outcomes by completion status.

2. The Scorecard also already uses an exit-cohort in the program-level earnings outcomes, but this data only reports earnings outcomes for program completers. Students and other Scorecard users deserve to know the expected earnings outcomes for non-completion—in some cases, [students may experience labor market value from specific coursework even without a completing a formal degree](#), however, many other programs do not meaningfully improve students' labor market outcomes without a credential. Thus, publishing figures for non-completers is crucial to help students and families, policymakers, and institutions better understand the expected outcomes for non-completers, and by extension the impact of completing a credential.

We urge ED to publish earnings outcomes for non-completers at the institution-level and to publish disaggregated earnings data for non-completers by income and gender as soon as possible. ED should also include disaggregated outcomes by race/ethnicity for both groups once the data becomes available from the upcoming changes to the Free Application for Federal Student Aid (FAFSA) through the [Consolidated Appropriations Act, 2020](#). **We also recommend that ED establishes a technical working group that will assess how to best report earnings outcomes for non-completers by field of study and credential level**, in order to overcome the methodological challenges specific to reporting program-level outcomes for students who leave school without a degree. This working group should also address the appropriate CIP code level with which to record outcomes for non-completers.

B. Expand upon the existing earnings threshold measure by measures that explore a fuller scope of postsecondary value.

Recommendation	Application	Coordination	Priority
3. Use the Postsecondary Value Commission’s Threshold 0 (minimum economic returns) as an additional threshold metric that shows the share of students who are earning at least as much as a high school graduate plus enough to recoup their total net price within ten years.	Dataset Consumer tool	Yes Department of the Treasury	High – Including this threshold metric signals to users and stakeholders whether students can expect, at minimum, to leave their postsecondary education better off financially than if they had not attended.
4. Use the Postsecondary Value Commission’s Threshold 3 (economic mobility) as an additional threshold metric that shows the share of students earning enough to enter the fourth income quintile regardless of field of study.	Dataset Consumer tool	Yes Department of the Treasury	High – Including this threshold metric signals to users and stakeholders whether students can expect their degree to support their upward economic mobility, regardless of what they studied.

PostsecData applauds ED’s decision to restore the threshold earnings metric to the consumer site, reporting the portion of students who earn at least as much as the typical high school graduate. This threshold metric is a critical measure to signal to users whether students receive baseline levels of value for their investment in higher education. However, we urge ED to consider implementing additional thresholds that reflect higher and more ambitious levels of postsecondary value, which could incorporate the cost to students of their investment in higher education and/or measure economic mobility of students at a particular school.

PostsecData recommends [using two additional thresholds](#) based on the work of the Postsecondary Value Commission, that would achieve each of these goals:

- 3. Threshold 0², builds upon the existing Scorecard earnings threshold, using median earnings of a high school graduate in the state where an institution is located, plus the cumulative net price³ of the institution, spread over a ten-year period.** This benchmark reflects the potential return on investment the typical student at a specific institution is likely to experience. Threshold 0 is purposefully named the minimum economic return because it is the minimum that we should expect of institutions—that students should leave postsecondary education at least better off financially than if they had not attended. The inclusion of Threshold 0 provides useful information to students about if their investment in higher

² Threshold 0 is derived from the median earnings of workers with positive earnings in the same state the institution is located and with a High School Degree (or GED) as their highest level of educational attainment, plus yearly amortized total cost of obtaining the credential (existing data only allows for institution-level analysis of cost).

³ The cumulative net price is estimated from IPEDS data using an expanded methodology different from official net price estimates. For more information about measuring the cumulative net price of a degree, please see: <https://equity.postsecondaryvalue.org/methodology>

education is worth the cost. The high school earnings threshold, combined with Threshold 0, both offer transparency to students and the field around what postsecondary outcomes students can expect.

4. **The Scorecard should also include the percentage of students meeting the Postsecondary Value Commission's Threshold 3, which measures the share of an institution's graduates whose earnings place them in the top two highest quintiles (at least the 60th percentile).** Threshold 3 indicates that the institution offers an opportunity for students to achieve economic mobility regardless of field of study. Economic mobility is a clear, straightforward concept that resonates strongly with students and users. The addition of Threshold 3 to the Scorecard, offers a more nuanced view of institutional performance and the success its graduates are experiencing. This threshold should be used in addition to the current earnings threshold metric, which measures the share of students earning more than a high school graduate, a standard the majority of students across the vast majority of institutions are already meeting⁴. Because of the complexity and nuance inherent in postsecondary value, the use of multiple threshold measures helps students and other users better understand the bigger picture of how particular institutions' students fare post-school.

⁴ Based on analysis of College Scorecard data.

C. Add new critical data elements and disaggregate existing data by demographic characteristics.

Recommendation	Application	Coordination	Priority
5. Disaggregate debt, financial aid, earnings, and earnings threshold metrics by race and ethnicity categories utilized by the Census.	Dataset Consumer tool	Yes Office of Federal Student Aid Department of the Treasury	High – Disaggregated data can help policymakers identify where inequities exist within institutions and provide students and their families with clear information on what outcomes different students typically face post-college. Timing: We recognize that while this is a high priority, ED does not currently have the ability to disaggregate by race and ethnicity and that data for earnings indicators and loan outcomes take time to measure due to their lagged nature. However, federal aid and debt metrics should be disaggregated as soon as possible once race and ethnicity data collected through the FAFSA becomes available.
6. Establish a process and clear timeline for collecting private and institutional loan data through IPEDS, COD, or NSLDS and publish the results on the Scorecard .	Dataset Consumer tool	Yes Office of Federal Student Aid National Center for Education Statistics	High – Students deserve to be informed of typical borrowing amounts, inclusive of private loans. Incurring private loan debt to finance one’s higher education aspirations comes with many risks.
7. Aggregate multiple years of data, where necessary, to allow for further disaggregation and, prioritize disaggregation by race/ethnicity, income, and gender before any other disaggregates.	Dataset Consumer tool	Yes Office of Federal Student Aid Department of the Treasury	High – The aggregation of multiple years of data allows for users to have the ability to view data that both reflects demographic characteristics of students and maintains overall student privacy.

<p>8. Include the 10th, 25th, 75th and 90th percentiles for all disaggregated earnings metrics by gender and income, and race/ethnicity as data becomes available.</p>	<p>Dataset Consumer tool</p>	<p>Yes Department of the Treasury</p>	<p>Medium – The inclusion of the 10th, 25th, 75th and 90th percentiles help users better compare and comprehend which institutions set them up for success.</p> <p>Timing: While disaggregated data by race and ethnicity is not yet available, ED can immediately include the 10th, 25th, 75th and 90th percentiles by gender and income.</p>
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5. Disaggregated data is critical for Scorecard users to identify where inequities exist and for students to be able to recognize which institutions and programs best suit their academic endeavors and position them for future success. Ensuring that disaggregated data are included is highly beneficial for all Scorecard users, as institutions are then able to demonstrate how they are contributing to equity within the workforce and society. In turn, students have the critical information they need for the college search process, and policymakers can use data and research to inform decision-making. **It is crucial that ED disaggregate key data elements by gender, income, and (when data becomes available) race/ethnicity in the dataset and tool, including median earnings and earnings thresholds at the institution and program level, cumulative and annual borrowing, and loan repayment measures.**

While the Scorecard currently includes median earnings and debt outcomes by gender and family income, disaggregating these elements by race/ethnicity has not previously been possible. However, the upcoming changes to the FAFSA provide an opportunity to deliver clear, transparent information to policymakers and students alike by disaggregating Scorecard data by race and ethnicity. Including these disaggregates in the Scorecard highlights whether and how institutions and programs are delivering equitable value to Black, Latinx, Indigenous, and Asian American and Pacific Islander (AAPI) students, students from low-income backgrounds and women, in comparison to their peers.

6. Additionally, **ED should provide consumers with [comprehensive data](#) on the annual and cumulative amounts borrowed from institutional and private sources, in addition to data on federal student loans.** Data on private and institutional loans and debt is not currently available annually through a federal source. Students should be made fully aware of the risks associated with incurring private and institutional loan debt and its impact on their post-college outcomes, thus we urge ED to develop a reasonable timeline and process for how to collect data on private loans through IPEDS or NSLDS and to publish the data on the Scorecard. The timeline for collection of this data should be balanced enough that it provides ED enough time to capture this data effectively and expedites providing these critical data points to students.



7. Data privacy and security protections are paramount to maintaining student confidentiality when disaggregating key data elements. **Thus, we recommend ED employ effective data protections that both safeguard student privacy and provide the essential data that Scorecard users deserve.** Such privacy practices should include combining data across multiple years to increase sample sizes when necessary to meet reporting standards and allow for further disaggregation along race/ethnicity, gender, and income lines. Moreover, ED should prioritize disaggregation by race/ethnicity, income, gender, and completion status before disaggregating along any other characteristics. We encourage ED to continue to engage in conversations with experts in the field to determine other characteristics to prioritize in disaggregation.

8. We appreciate the recent addition of median earnings outcomes for students from different gender and income subgroups to the Scorecard, and encourage **ED to also include earnings at least at the 10th, 25th, 75th and 90th percentiles to provide additional context on the distribution of earnings outcomes beyond medians alone.** Doing so would shed light on the range of earnings outcomes and differences for men, women, and students from high- and low-income backgrounds. Once data becomes available to do so, ED should also include the 10th, 25th, 75th and 90th percentile earnings outcomes by race/ethnicity.

D. Upgrade the usability of the College Scorecard dataset for developers, policy analysts, and researchers and continue testing, maintenance, and public access to the College Scorecard.

Recommendation	Application	Coordination	Priority
9. Continue accessibility testing and maintenance of the tool and translate the Scorecard into multiple languages.	Consumer tool	No	High – Increasing the accessibility of the Scorecard provides critical information to underserved populations who are in most need of clear, digestible information.
10. Assess whether users can accurately interpret the information presented on the Scorecard.	Consumer tool	No	High - Understandability of the tool is vital to ensure the Scorecard meets its mission of equipping students with information to inform their decisions.

The Scorecard delivers vital information for students who are entering or are already in the higher education marketplace, offering the most comprehensive and reliable data on students post-graduation. Maintaining and improving upon this essential tool’s accessibility and readability is paramount to ensure that students have the necessary information needed to make informed college choices.

9. **ED should focus on ensuring that the wealth of information the Scorecard offers is both accessible and easily understandable for consumers, particularly Black, Latinx, Indigenous, and underrepresented AAPI students, students from low-income backgrounds, and first-generation students.** This means employing creative outreach tactics to students and intermediaries to ensure awareness of the resources available for students. In addition, **ED should invest in translating the valuable resources offered by the Scorecard into multiple languages to meet the needs of the [increasing number of English language learners in K-12](#).**
10. **Scorecard experts must also ensure that students are empowered with Scorecard resources and interpret the available information well in advance of when users are making critical college decisions.** This includes using [consistent terminology](#) on the consumer tool that all users, particularly students from low-income backgrounds and first-generation students, can easily interpret, as well as conducting user-testing geared towards understanding how users make meaning of the data contained in the Scorecard. It is crucial that users can accurately interpret the information and data points highlighted on the consumer tool. Any outreach efforts will be nullified if students misinterpret what the Scorecard is trying to convey, leaving the possibility for unintended harm to be caused to a students’ college choice decision. ED must dedicate resources to understand the student experience using the Scorecard in its current form and assess what changes should be made to the consumer tool in order to improve their user experience and encourage its utilization.

PostsecData appreciates the administration’s focus on ensuring that the data included in the College Scorecard is robust, accessible, and continuously improved—it is only through better data that we will realize more equitable postsecondary systems and policies. We look forward to seeing postsecondary data become more transparent,



comprehensive, and efficient with your support. If you have any questions about this request, please contact Amanda Janice Roberson, director of research and policy at the Institute for Higher Education Policy (ajroberson@ihep.org or 202-861-8243).

Sincerely,

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