

Roberto Rodriguez, Assistant Secretary, Office of Planning, Evaluation, and Policy Development
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Docket ID ED-2022-OPEPD-0155

This letter is submitted on behalf of the 38 undersigned in response to the U.S. Department of Education's (ED) Request for Information (RFI) soliciting input from the field on potential evaluation, data collection, and analysis activities that would increase knowledge about, and improve the administration of, programs authorized under the Higher Education Act (HEA), and build evidence of effective practices to improve student outcomes. This letter offers three recommendations to help inform ED's decision-making regarding how to use its evaluation set-aside authority first included in the Consolidated Appropriations Act, 2022 and maintained in the Consolidated Appropriations Act, 2023:

1. Prioritize evaluating HEA-funded interventions to develop widely applicable lessons that support the continuous improvement of HEA programs and maximize the impact of taxpayer dollars.
2. Fund a combination of equity-focused evaluations, data collection, and data analysis to produce a well-rounded evidence base from which to make policy and practice decisions.
3. Set aside the full 0.5 percent of funds and pool these funds to be distributed across research studies according to opportunity and need.

Fully leveraging this set-aside authority would be an important and necessary step toward understanding how to improve interventions and programs to better support students' postsecondary success. While higher education can offer students and their families a better living and a better life, for too many students—particularly Black; Latinx and/or Hispanic; Indigenous; and Asian American, Native Hawaiian, and Pacific Islander (AANHPI) students as well as those from low-income backgrounds—structural barriers to equitable access, persistence, completion, and post-college outcomes prevent that dream from becoming a reality. This set-aside authority to fund evaluations and analysis could advance long-term equity-focused, student-centered, and evidence-based policy and practice change by building additional evidence about what interventions (meaning approaches, practices, and supports to promote higher education success) work, for whom, and under what circumstances.

Recommendations

- 1. The Secretary should evaluate HEA-funded interventions with the goal of identifying practices that most effectively support equitable outcomes for all students, especially Black, Latinx and/or Hispanic, Indigenous, and AANHPI students as well as students from low-income backgrounds. Lessons learned from these evaluations should be used to improve HEA programs and maximize the impact of taxpayer dollars.**

Historically, there have been insufficient financial resources and a lack of staff capacity to support rigorous evaluation of the interventions—or approaches, practices, and supports—funded by the HEA.¹ The set-aside authority included in the FY 2022 Consolidated Appropriations Act and maintained in the FY 2023 Consolidated Appropriations Act represents an important opportunity for ED to invest in comprehensive and equity-focused higher education evidence-building.

ED should use funds for data collection, data analysis, and rigorous evaluations of interventions that can contribute to the field's understanding of challenges with college persistence and completion, particularly based on racial and socioeconomic inequities, and identify policy and practice solutions for remedying them. Conducting program evaluations of HEA programs would unnecessarily narrow this authority's impact, due to wide variation among programs. Instead, to increase impact, ED should evaluate cross-cutting, equity-focused interventions relevant to multiple HEA programs. This approach would inform the continuous improvement of HEA program design and implementation, as well as help expand effective interventions to more institutions and programs, impacting the lives of more students.

Evaluations should contribute to our understanding of which interventions most effectively:

- Support equitable access to higher education for all students, especially for students of color and students from low-income backgrounds as well as first-generation students, students with disabilities, students with caregiving responsibilities, and other marginalized student populations.
- Address enrollment declines, particularly among people of color, men, and students from low-income backgrounds.
- Promote completion for currently enrolled or stopped-out students who are close to earning a credential.
- Advance the retention and completion of returning adult learners as well as students who are caretakers.
- Facilitate transfer students' credit accumulation and transition between postsecondary institutions.
- Support all students' transition between postsecondary education and high-quality jobs.

In the near term, ED should use the funds to evaluate interventions aimed at improving equitable outcomes for students who have historically been excluded from the higher education system, especially those enrolled at minority serving institutions (MSIs) and community colleges. In alignment with ED's strategic priority of increasing postsecondary value,² wherever possible, interventions should seek to improve and evaluations should examine post-college outcomes such as employment rates, median earnings, and student loan default rates.

By researching and evaluating interventions—and supporting the data collection and analysis necessary to understand the impact of those interventions—ED can better identify practices that have the potential to promote equitable college and post-college outcomes for historically excluded students. Findings from such evaluations, especially should they uncover strong evidence of the efficacy of an intervention, could be broadly applied to support the continuous improvement of HEA programs and our higher education system.

- 2. The Secretary should fund a combination of evaluations, data collection, and data analysis with varying research methodologies to support the continuous improvement of HEA programs such that they better serve students, especially those from historically marginalized groups, immediately and into the future.**

Building an evidence base that can support equity-focused practices and policymaking requires evaluations, data collection, and data analysis that produce results that help key decision-makers

implement policy and practice changes to better serve all students, and especially Black, Latinx and/or Hispanic, Indigenous, and AANHPI students, students from low-income backgrounds, and the intersectional identities within and across these groups.

To inform practice and policy that supports continuous improvement, the Secretary should use this authority to:

- a. Fund equity-focused research activities and evaluations. Equity-centered research and evaluation is crucial to understanding the outcomes for students across race/ethnicity and income. Data collection, data analysis, and evaluations funded through this authority should adhere to the IES Standards for Excellence in Education Research’s (SEER) Equity Standard, which states: “Researchers who are designing and testing interventions must clearly demonstrate how those interventions address education inequities, such as by improving learners’ outcomes and/or their access to resources and opportunities.”³
- b. Collect and disaggregate data by race/ethnicity and income, as well as by other demographic factors like gender, age, enrollment status, geographic region, caregiving status, disability status, and language. Through the set-aside authority, the Secretary should prioritize opportunities to collect data that would deepen ED’s understanding of how HEA-funded interventions are serving specific subgroups of students, while maintaining student privacy and security. Limitations with current data—for example, the need for finer-grained data to understand outcomes for AANHPI students,⁴ as well as small sample sizes that often lead to suppressed data for American Indian/Alaska Native students⁵—hamper the ability of decision-makers to make fully informed decisions about how to best serve students historically excluded and marginalized by the higher education system. This authority represents an opportunity to build an equity-focused evidence base that is more inclusive of those students’ postsecondary experiences and outcomes and reflects their intersectional identities.
- c. Fund evaluations with methodology appropriate to the research question being studied. Equity-focused questions about the postsecondary outcomes of students, especially historically excluded students, should inform decisions about research and evaluation design and methodology. An openness to employing various methodologies should result in a well-rounded and timely evidence base on which to make informed decisions. Randomized controlled trials (RCTs) and other experimental methodologies eligible for the highest rating by the What Works Clearinghouse⁶ offer crucial information about programs and program interventions. When well designed and well executed, such evaluations provide decision-makers with high levels of confidence that the intervention studied caused the observed effect,⁷ making them valuable for improving program, policy, and practice design.

However, not all program interventions lend themselves to such evaluations because of practical and ethical challenges, including the time and cost required to conduct an RCT or the lack of a control group option. Implementation, replication, and descriptive studies, which include qualitative research, can offer insight into fundamental questions about program design, delivery, and scalability. For example, they can show how current funding is being used, students’ experiences, inequities in access and outcomes for certain student groups, and the generalizability of findings. Descriptive studies are also useful for informing policy decisions in shorter time frames because they can produce immediately actionable results. A

well-rounded evidence base should incorporate lessons derived from a variety of methodologies.

- d. Make publicly available and widely disseminate data and key findings from research and evaluations funded through this authority in such a way that promotes transparency while maintaining privacy. Wide dissemination and transparency are necessary to ensure that decision-makers, including policymakers, program administrators, and students, can leverage evaluation findings to make informed and equity-focused decisions. Research and evaluations funded through this authority should adhere to IES's SEER which encourages making findings, methods, and data open by ensuring final manuscripts are publicly available and providing access to final research data, while maintaining privacy and confidentiality.⁸ We also recommend that ED take a more proactive approach to disseminating final evaluation findings to the public as per the recent White House Office of Science and Technology guidelines that ensure free and equitable access to federally funded research.⁹ For example, ED should ensure final reports and briefs are publicly accessible (e.g., on the What Works Clearinghouse website) and leverage existing channels to widely disseminate findings to relevant stakeholders.

ED should also require partners and evaluators to include a thorough dissemination plan in their responses to Requests for Proposals. Strong dissemination plans may include developing a plain language brief that clearly explains key findings and actionable takeaways (where appropriate) so HEA program grantees, practitioners, policymakers, community members, and other stakeholders can meaningfully engage with the research. They may also include partnering or subcontracting with community leaders and organizations, communication firms—especially small or minority-owned businesses—and/or higher education institutions to facilitate a widespread promotion campaign to ensure HEA program grantees, practitioners, and other stakeholders are made aware of research findings.

3. The Secretary should maximize the authority granted by Congress by setting aside the full 0.5 percent of funds and pooling these funds to be distributed across research studies according to opportunity and need.

We recognize that the full 0.5 percent of funds will not be available to pool in FY 2022, since many program expenditures were already obligated before the set-aside authority was granted. Given these circumstances, we commend ED for setting aside all available funds in FY 2022 (\$6,904,996).¹⁰ To fully maximize this authority and increase the likelihood that interventions equitably benefit underserved students, in FY 2023—and in the future should this authority continue to be maintained—the Secretary should set aside the maximum allowable percentage. Pooling the funds in this way would support effective research and evaluations that can lead to continuous improvement without arbitrarily limiting the availability of vital resources.

Conclusion

The undersigned thank ED for using this RFI to solicit input from the field, including researchers, practitioners, and community members who are proximate leaders (those whose identity, experience, or community are systemically marginalized), on how to implement the set-aside authority.¹¹ The research and evaluations funded through this authority represent a key component of the policymaking process—building the evidence base on which to make policy decisions about how the federal government supports

students across the country, particularly those who have been historically excluded. By utilizing the RFI to engage proximate leaders, ED has taken an important step to center equity in policymaking decisions, which requires that impacted communities are actively engaged, that those communities remain the focal point of the process, and that they are supported by the outcome.¹²

The authority granted to the Secretary in the Consolidated Appropriations Act, 2022 to set aside funds for the purpose of data analysis, data collection, and rigorous evaluations presents an important opportunity for ED to strengthen the evidence base that supports continuous improvement within higher education. The above recommendations are intended to serve as a resource for ED as it considers how best to use the set-aside authority to drive equitable postsecondary outcomes for all students, with a particular focus on Black, Latinx and/or Hispanic, Indigenous, AANHPI students, and students from low-income backgrounds.

If you have any questions, please contact Eleanor Eckerson Peters, Director of Research and Policy at the Institute for Higher Education Policy (epeters@ihep.org).

Sincerely,

Alabama Possible
America Forward
American Association of State Colleges and Universities
Arnold Ventures
Association for Career and Technical Education
Association of Public and Land-grant Universities
Braven
Campaign for College Opportunity
Center for Law and Social Policy (CLASP)
Colorado Equitable Economic Mobility Initiative (CEEMI)
Community College Research Center
Complete College America
Data Foundation
Data Quality Campaign
Education Reform Now
Excelencia in Education
Generation Hope
HCM Strategists
Higher Learning Advocates
Institute for Higher Education Policy
Latinos for Education
LeadMN - College Students Connecting for Change
NASPA - Student Affairs Administrators in Higher Education
National College Attainment Network
National Student Clearinghouse
New America Higher Education Program
Results for America
RTI International
Sova Solutions
The Charles A. Dana Center

The Education Trust
The Institute for College Access & Success
The Young Invincibles
Third Way
Today's Student Coalition
UnidosUS
WCET (WICHE Cooperative for Educational Technologies)
Westat Insight

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- ¹ U.S. Department of Education. (2022, July). *Fiscal years 2022–2026 strategic plan*. <https://www2.ed.gov/about/reports/strat/plan2022-26/strategic-plan.pdf>
- ² U.S. Department of Education. (2022, July). *Fiscal years 2022–2026 strategic plan*. <https://www2.ed.gov/about/reports/strat/plan2022-26/strategic-plan.pdf>
- ³ Institute of Education Sciences. (2022, June 16). Standards for excellence in education research: Equity. <https://ies.ed.gov/seer/equity.asp>
- ⁴ Byon, A., & Roberson, A. J. (2020, May). Everyone deserves to be seen. Recommendations for improved federal data on Asian Americans and Pacific Islanders (AAPI). IHEP. <https://www.ihep.org/publication/everyone-deserves-to-be-seen-recommendations-for-improved-federal-data-on-asian-americans-and-pacific-islanders-aapi/>
- ⁵ Falkenstern, C., & Roachat, A. (2021, February). Better data for supporting American Indian/Alaska Native Students. Western Interstate Commission on Higher Education. <https://www.wiche.edu/resources/wiche-insights-better-data-for-supporting-american-indian-alaska-native-students/>; Lumina Foundation. (2021, February). *Changing the narrative on student borrowers of color*. <https://www.luminafoundation.org/wp-content/uploads/2021/02/borrowers-of-color-2.pdf>
- ⁶ Randomized control trials (RCTs), regression discontinuity designs (RDDs), and single-case designs (SCDs) are the designs eligible for the research rating, “Meets WWC Standards Without Reservations” because researchers and administrators exercise strong control over participant assignment. All three of these designs are considered to be “experimental,” according to the U.S. Department of Education’s evidence definitions (34 CFR, Part 77).
- ⁷ What Works Clearinghouse. (2022, August). *What Works Clearinghouse: Procedures and standards handbook, version 5.0*. U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance (NCEE). <https://ies.ed.gov/ncee/wwc/Handbooks>
- ⁸ Institute of Education Sciences. (2021, June). Standards for excellence in education research: Make findings, methods, and data open. https://ies.ed.gov/seer/open_data.asp
- ⁹ Executive Office of the President, Office of Science and Technology. (2022, August). Memorandum for the heads of executive departments and agencies. <https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>
- ¹⁰ U.S. Department of Education. (2022, December). Request for information regarding Higher Education Act (HEA) pooled evaluation (Docket ID ED-2022-OPEPD-0082). <https://www.govinfo.gov/content/pkg/FR-2022-12-19/pdf/2022-27474.pdf>
- ¹¹ The Institute for Higher Education Policy and Results for America, along with leading experts in evaluation and higher education policy, developed additional recommendations for developing Requests for Proposals that prioritize equity-minded applicants who are themselves proximate leaders or who engage substantively with proximate leaders. Those recommendations can be found here: <https://www.ihep.org/publication/setaside/>.
- ¹² Flores, S., & Voight, M. (2022, January). *“Opening the promise”: The five principles of equitable policymaking*. IHEP. <https://www.ihep.org/publication/opening-the-promise/>