

April 19, 2023

United States Senate
Committee on Health, Education, Labor, and Pensions
428 Senate Dirksen Office Building
Washington, DC 20510

RE: Request for Information on Reauthorization of the *Education Sciences Reform Act*

Dear Chairman Sanders and Ranking Member Cassidy,

We are pleased to respond to the Senate, Health, Education, Labor, and Pensions Committee Request for Information about policies the Committee should consider during the reauthorization of the Education Sciences Reform Act (ESRA), the Educational Technical Assistance Act, and the National Assessment of Education Progress Authorization Act.

The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit research, policy, and advocacy organization committed to promoting postsecondary access and success for all students, regardless of race, background, or circumstance. We provide timely, evidence-based, and student-centered research to inform policy decisions with a particular focus on improving racial and socioeconomic equity, postsecondary value, and postsecondary data quality.

IHEP's recommendations are informed by our research into how high-quality, complete, accessible, and disaggregated postsecondary data can promote student access and success and close opportunity and outcome gaps. Better data is an essential building block for evidence-driven policymaking, and arms policymakers and institutions with information to improve student outcomes. Improved data and transparency would also help students and families make well-informed choices about which colleges and programs to attend.

We recognize the importance of the Institute of Education Sciences' (IES) data collections and studies in helping policymakers and researchers understand national trends in higher education and student outcomes, including enrollment, completion, affordability, and post-college success. Our recommendations respond to Question 1 and Question 12 listed in the Request for Information and detail specific actions for IES to enhance its research in ways that advance equity. We also underscore the importance of deepened support for state longitudinal data systems and highlight legislative solutions, including the College Transparency Act, that would increase understanding and transparency around postsecondary student outcomes.

We are pleased to serve as a resource to the HELP Committee throughout the ESRA reauthorization process and are available to meet with Committee staff to discuss IHEP's comments. Please contact Kelly Leon at kleon@ihep.org or Diane Cheng at dcheng@ihep.org for continued discussion or additional information.

Respectfully,

Mamie Voight
President
The Institute for Higher Education Policy

IHEP ESRA Request for Information Responses

Question 1: What specific changes could Congress make to improve the efficiency and effectiveness of Federal education research and statistics programs carried out by the Institute of Education Sciences (IES)-including the four National Education Centers, the National R&D Centers, the Statewide Longitudinal Data Systems program, and the Regional Educational Laboratories-to ensure IES provides research and evidence back to schools and institutions of higher education in a timelier manner to help improve teaching and learning, and postsecondary access and success?

Strengthen Support for State Longitudinal Data Systems

The State Longitudinal Data Systems (SLDS) grant program is a key element of our nation's data and transparency infrastructure and states undertaking this work need robust financial support. Federal investment in the SLDS program has helped enable states to develop more robust education and workforce data systems to answer locally relevant questions about postsecondary outcomes. IHEP urges the Committee to deepen funding for the SLDS program. Increased funding will help states build, maintain, modernize, and protect these data systems so they can meet changing education, workforce, and other needs and serve as important resources for state policymakers, researchers, and the public.

Question 12: How could IES improve postsecondary data alignment, review of evidence-based practices and reforms, and utility of research reports and products to provide more transparency around student outcomes related to postsecondary access and completion and interventions that support addressing disparities of such outcomes?

Include the College Transparency Act to Increase Transparency around Student Outcomes

The College Transparency Act (CTA) would create a secure, privacy-protected federal Student-Level Data Network (SLDN) to count all students, answer key questions about student outcomes, and streamline and improve our data infrastructure. We commend Ranking Member Cassidy for his ongoing commitment to championing this bipartisan, bicameral legislation.ⁱ CTA is also supported by nearly 170 organizations and in the 117th Congress, the bill passed the U.S. House of Representatives as an amendment to the America COMPETES Act of 2022 (H.R. 4521).ⁱⁱ

CTA is needed because our current postsecondary data infrastructure is incomplete, duplicative, and inefficient, leading to gaps in understanding how our education system serves students. For example, publicly available data on post-college earnings at the institutional and program level cover only those students who receive federal financial aid, leaving out roughly 30 percent of college students nationwide.ⁱⁱⁱ CTA would create an SLDN that includes outcomes for all students and allows for more data disaggregation, which would make it possible to identify gaps between students of color, students from low-income backgrounds, and their peers. This SLDN would streamline data reporting and leverage data already collected or

reported by institutions and other federal agencies to answer critical questions in higher education. It would provide accurate, timely, and high-quality aggregate data for students and families, policymakers, institutions, and employers to empower college decisions and craft evidence-based policies. And it would do this by deploying leading industry practices in data security, such as regular audits and compliance with Federal Information Processing Standards (FIPS), as well as strong privacy protections, such as limiting data disclosures, prohibiting the sale of data, and safeguarding personally identifiable information.

There is a clear connection between ESRA and CTA. ESRA “provide[s] for improvement of Federal education research, statistics, evaluation, information, and dissemination” and governs the National Center for Education Statistics (NCES), a statistical agency with a strong record of safeguarding student-level data.^{iv} Furthermore, the NCES section of ESRA requires data collection around student participation in secondary and postsecondary vocational and technical education by specific program area, and includes duties around “access to, and opportunity for, postsecondary education, including data on financial aid to postsecondary students.”^v CTA is designed to improve the statistics and information available about postsecondary education—including measures of access, opportunity, completion, and financial aid—through a data system housed at NCES.

Additionally, ESRA notes that data collected by IES should be made available to the public and used to inform educational decision-making and policymaking. CTA would accomplish this precise objective by requiring aggregate information be made publicly available through a user-friendly website. The website would include summary information about college costs, financial aid, enrollment, persistence, completion, and post-college employment. The website would also provide an analytical tool that allows users to customize and filter information by institutional and student characteristics, as well as build summary aggregate reports comparing multiple institutions and programs—meeting the informational needs of policymakers, researchers, and students.

IHEP urges the Committee to amend ESRA by adding the CTA bill text as an additional section to Title II, Part C (ESRA, P.L. 107-279).

Enhance Data Disaggregation to Improve Outcomes for All Students

Postsecondary institutions that have narrowed equity gaps and increased student success have done so through an intentional use of data.^{vi} To provide more transparency around student access and outcomes, identify inequities and support these institutional efforts, IES should prioritize enhanced disaggregation of federal data, especially by race, ethnicity, and economic status. These data can help drive program improvement and inform evidence-based and targeted interventions to improve access and outcomes for students from underrepresented communities. To begin, IES should conduct an audit of all data collections to identify

opportunities to better capture the experiences of students of color and students from low-income backgrounds. Examples include:

- Implementing policies to promote further disaggregation of Asian American and Native Hawaiian/Pacific Islander (AANHPI) student groups in postsecondary data collections, by disaggregating AANHPI race/ethnicity data based on the categories utilized in the decennial Census and the American Community Survey: Chinese; Filipino; Asian Indian; Vietnamese; Korean; Japanese; Native Hawaiian; Samoan; Chamorro; Other Asian; and Other Pacific Islander.^{vii}
- Disaggregating Federal Student Aid and College Scorecard data—including measures such as student aid receipt, borrowing rates, debt levels, repayment rates, default rates, and post-college earnings—by race/ethnicity once those demographic data are available through the Free Application for Federal Student Aid (FAFSA).

Expand Researcher Access to Federal Student Aid Data and Outcomes

Federal Student Aid’s (FSA) data systems host a wealth of critical information on the impact and outcomes associated with federal financial aid and student borrowing. However, much of these data are inaccessible to researchers, limiting their utility to inform policies and practices aimed at improving federal student aid and student outcomes.

We urge the Committee to require IES and FSA to expand transparency of student aid data and outcomes by providing researchers access to a privacy-protected version of the existing statistical abstract for the National Student Loan Data System (NSLDS). This statistical abstract – the Cost Estimation and Analysis Division’s Statistical Abstract – is currently used by ED to estimate the cost of student aid programs. If not already included, this sample should also incorporate flags for loan servicer and student characteristics like age, income or Pell Grant receipt, completion status, and other relevant demographic indicators. And FSA should publish all routinely produced oversight and monitoring data files related to student loan servicing, portfolio analysis, and debt collection.

Employ Multiple Research Methods

IES should, when practicable, fund a combination of evaluations, data collections, and data analysis with various research methodologies that are appropriate to the research questions being studied. We urge the Committee to include this requirement in ESRA. Employing various methodologies is likely to 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 Clearinghouse 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, making them valuable for improving program, policy, and practice design. But 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.

Expand Research and Data Dissemination

Wide dissemination and transparency are necessary to accelerate knowledge development and ensure that decision-makers, including policymakers, program administrators, and students, can leverage research and evaluation findings to make informed decisions. IES should make publicly available data and key findings from research and evaluations to promote transparency. Additionally, IES should proactively disseminate findings to stakeholders and the public at large, per the White House Office of Science and Technology guidelines that ensure free and equitable access to federally funded research.^{viii}

Strong dissemination plans may include:

- Developing a plain language brief that clearly explains key findings and actionable takeaways (where appropriate) so practitioners, policymakers, community members, and other stakeholders can meaningfully engage with the research.
- Ensuring all data—including all underlying data used for evaluative purposes, as data privacy limits allow—are accessible through data.gov and other publicly available means.
- Partnering or subcontracting with community leaders and organizations, communication firms—especially small or minority-owned businesses—and/or K-12 schools and higher education institutions to facilitate a widespread promotion campaign to ensure practitioners and other stakeholders are made aware of research findings.
- Providing training or technical assistance to institutions, states, and other stakeholders to implement relevant policy or practice changes.

Engage Proximate Leaders in Research and Evaluations

Centering equity in policymaking decisions 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.^{ix} IES should ensure that proximate leaders—those whose identity, experience, or community are systemically marginalized—are substantively involved in the development, execution, analysis, and interpretation of research and evaluations. More specifically, IES should embed the following strategies when developing requests for proposals

(RFPs) to prioritize applicants who are themselves proximate leaders or who engage substantively with proximate leaders:

- Include equity as an evaluation criterion. IES should incentivize proposals that center equity throughout the research and design process by making equity an evaluation factor. For example, IES should consider and assign points for diverse hiring practices, when evaluating proposals. Leveraging language used in ED’s 2022 Education Innovation and Research Notice of Funding Availability, IES should consider the extent to which respondents to RFPs encourage “applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability,” alongside the “qualifications, including relevant training and experience, of key project personnel.”^x Additionally, IES should consider and assign points to factors like how respondents propose substantively engaging small and minority-owned businesses—specifically community-based organizations—and proximate leaders in the research and dissemination process, or the equity focus of their research questions and proposed methodology.
- Include proximate leaders in technical working groups (TWG). Specify in RFPs that TWGs must include individuals with expertise in equity-centered research and evaluation and who identify with or have prior experience working with marginalized communities as researchers or practitioners.
- Ensure review panels are diverse across race/ethnicity, gender, economic status, and methodological expertise. Review panels should include proximate leaders who identify with or have prior experience working with impacted and marginalized communities as well as researchers with varied methodological expertise.
- Widely disseminate information about IES contracting opportunities. For example, IES should share contracting opportunities with new potential contractors and local evaluators, including by leveraging existing networks like participants and alumni from IES’s Early Career Mentoring Program for Faculty at Minority Serving Institutions.
- Leverage requests for information (RFI) to engage proximate leaders. IES should use RFIs as a means of engaging with community members and researchers who are proximate leaders on broad topics.

The Institute for Higher Education Policy supports the reauthorization of ESRA, which has helped policymakers and researchers understand national trends in higher education and student outcomes. Our recommendations aim to enhance these efforts in ways that support the development of policy solutions that improve outcomes for all students, especially students and communities who remain underserved in our education systems and institutions. We are available to serve as a resource to the Committee and answer questions as reauthorization discussions proceed.

ⁱ Politico. (2023, March). Cassidy gears up to fight Biden’s student debt relief. <https://www.politico.com/newsletters/weekly-education/2023/03/20/cassidy-gears-up-to-fight-bidens-student-debt-relief-00087805>

ⁱⁱ Institute for Higher Education Policy. (2022, February). IHEP Celebrates House Passage of College Transparency Act in the America COMPETES Act. <https://www.ihep.org/press/americancompetes-act/>

ⁱⁱⁱ Calculations by IHEP using data from the U.S. Department of Education, National Postsecondary Student Aid Study (NPSAS). In 2015-16, the most recent year of data available, 29% of undergraduate students never received a federal loan or Pell Grant.

^{iv} Act of November 5, 2002 (P.L. 107-279; 116 Stat. 1940). <https://www.govinfo.gov/content/pkg/STATUTE-116/pdf/STATUTE-116-Pg1940.pdf>

^v Act of November 5, 2002 (P.L. 107-279; 116 Stat. 1958). <https://www.govinfo.gov/content/pkg/STATUTE-116/pdf/STATUTE-116-Pg1940.pdf>

^{vi} Rorison, J., & Voight, M. (2016), Leading with data: How senior institution and system leaders use postsecondary data to promote student success. Institute for Higher Education Policy. Retrieved from: <http://www.ihep.org/research/publications/leading-data-how-senior-institution-and-system-leaders-use-postsecondary-data>

^{vii} Byon, A. (2020), Everyone deserves to be seen: Recommendations for improved federal data on Asian Americans and Pacific Islanders (AAPI). Institute for Higher Education Policy and Southeast Asia Resource Action Center. Retrieved from: https://www.ihep.org/wp-content/uploads/2020/11/ihep_aapi_brief.pdf

^{viii} 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>

^{ix} Flores, S., & Voight, M. (2022, January). *“Opening the promise”: The five principles of equitable policymaking*. IHEP. <https://www.ihep.org/publication/opening-the-promise/>

^x U.S. Department of Education (2022, April). Federal Register Vol. 87, No. 81: Applications for New Awards; Education Innovation and Research (EIR) Program—Early Phase Grants. <https://www.federalregister.gov/documents/2022/04/27/2022-09084/applications-for-new-awards-education-innovation-and-research-eir-program-early-phase-grants>