INSTITUTE FOR HIGHER EDUCATION POLICY

October 24, 2025

The Honorable Bill Cassidy
Chair
Senate Committee on Health, Education, Labor and Pensions (HELP)
United States Senate
Washington, DC 20510

Re: Increasing College Cost and Value Transparency for Students and Families

Dear Chair Cassidy,

Thank you for the opportunity to respond to your request for information (RFI) about college cost and value transparency. Our comments address value transparency, the second policy goal outlined in the RFI.

The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit research, policy, and advocacy organization. We believe that all people—regardless of background—should have the opportunity to participate and succeed in postsecondary education and beyond. We lead the Postsecondary Data Collaborative, a coalition of organizations advocating for the collection and responsible use of high-quality postsecondary data. We also served as managing partner of the Postsecondary Value Commission and continue conducting research and developing policy recommendations focused on measuring and improving the value postsecondary education can provide to students, their families, the workforce, and society.

To help students make informed choices about where to apply and which colleges to attend, Congress should require the Secretary of Education to maintain the College Scorecard. We offer the following recommendations to further improve the College Scorecard:

1. Include the post-college earnings of students who did not receive federal financial aid.
2. Publish earnings outcomes of students who leave school without a credential.
3. Disaggregate metrics by race and ethnicity.
4. Improve warning flags for colleges that are subject to greater scrutiny, to help students identify potential risk.

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5. Revisit the privacy suppression protocols for program-level debt and earnings data.
6. Regularly update the data elements.
7. Conduct consumer testing of the College Scorecard.

We also recommend the following policy changes to improve the quality of data on college value that are available to prospective students and their families:

1. Pass your College Transparency Act (CTA) and create a federal student-level data network.
2. Urge ED to implement the Financial Value Transparency (FVT) framework in a timely manner and make the data available to the public.
3. Require ED to administer a nationally representative longitudinal study that tracks students' experiences and outcomes through their postsecondary enrollment and after college, as well as a longitudinal study of students who complete their programs.
4. Require ED to maintain the frequency of the National Postsecondary Student Aid Study (NPSAS).
5. Enact legislative changes to expand the allowable uses of federal tax information (FTI) from the FAFSA, to better support consumer choice and college affordability.
6. Provide sufficient funding for ED to support value transparency and consumer choice.

Our detailed recommendations are below.

College Scorecard

The U.S. Department of Education's College Scorecard has many strengths as a tool for higher education transparency. It provides crucial data on college outcomes, affordability, student debt, and value to prospective college students, institutions, researchers, and policymakers. Students and families rely on the College Scorecard to inform their choices about where to apply and enroll. Students deserve to know the colleges and programs of study that deliver a strong return on investment, support students to completion, and prepare graduates for success in the workforce. This information empowers students to find the college pathway that best aligns with their goals. Policymakers, institutions, and researchers also leverage College Scorecard data to better understand postsecondary education outcomes, including the colleges that serve students well and those that do not.

In addition to presenting data from the Integrated Postsecondary Education Data System (IPEDS) in a consumer-friendly format, the College Scorecard includes valuable data on programs and institutions that aren't available elsewhere, such as median earnings after college, cumulative student loan debt, and repayment rates. By providing standardized metrics, the College Scorecard allows for apples-to-apples comparisons of colleges in all 50 states. The College Scorecard's data are made available to the public for free through the web tool as well as through downloadable data files and application processing interface (API). The web tool includes student-friendly features, such as the ability to search for colleges using filters, compare colleges and fields of study side by side, and compare metrics to national averages to help students contextualize the numbers for their selected college or field of study. The College Scorecard's API enables software developers and researchers to use the data to develop their own tools and analyses. The Department of Education (ED) provides API documentation to help developers understand and use the data, as well as detailed methodology documentation to help researchers and others in the field accurately interpret the data.

We urge Congress to require the Secretary of Education to maintain the College Scorecard. As part of that maintenance, we offer the following recommendations to address the College Scorecard's current weaknesses and improve its ability to help prospective students and their families make informed decisions about college:

1. **Include the post-college earnings of students who did not receive federal financial aid.** As mentioned in the RFI, the College Scorecard currently excludes earnings for students who do not receive federal financial aid. This category of omitted students includes those who are supported by taxpayer funds like workforce training programs (WIOA), military or veterans' benefits, or tuition tax credits. Nearly one in three students nationwide fall into this category,[1] and the share is even higher at community colleges.[2]

   Federally aided students differ in key ways from students who do not receive federal financial aid, so they are not a representative subset of all students. For example, undergraduates who receive federal aid generally have lower family incomes, are less likely to attend public two-year colleges, and are more likely to be the first in their family to attend college, compared to undergraduates who do not receive federal aid.[3]

[1] Calculations by the Institute for Higher Education Policy (IHEP) using data from the U.S. Department of Education's National Postsecondary Student Aid Study (NPSAS:20). This estimate represents the share of undergraduate students enrolled in 2019–20 who never received a federal student loan or Pell Grant. Note that this calculation estimates the share of undergraduates who never received federal student loans or Pell Grants at any point during their enrollment. This RFI cites a different figure that assesses whether first-time, full-time freshmen received federal aid in a single year.

[2] In California, more than 80 percent of community college students did not receive Pell Grants in 2022–23, and only about 1 percent borrowed federal loans, based on IHEP calculations using data from the California Community Colleges Chancellor's Office Datamart. https://datamart.cccco.edu/.

[3] Calculations by IHEP using data from the U.S. Department of Education's National Postsecondary Student Aid Study (NPSAS:20).

Additionally, a 2021 Census Bureau analysis shows that while short-term earnings appear similar between aided and non-aided students, the differences grow substantially over time and the long-term earnings outcomes for Title IV students are significantly lower than for non-aided students. [4] Ten years after graduation, program rankings can shift by ten percentile points or more when all students are included versus only those with federal aid.

Including all students in the earnings data would allow the College Scorecard to provide a more complete picture of students' outcomes. All students deserve accurate, representative information when deciding where to attend college and what to study. Additionally, institutions need more complete data to improve the value they provide to all of their students. This improvement would be best achieved by passing the College Transparency Act (CTA), which is discussed below.

2. **Publish earnings outcomes of students who leave college without a credential.** Completion significantly impacts a student's future earnings. Publishing data on earnings outcomes for students who leave without a credential would provide a more complete view of the value of an education. Currently in the College Scorecard, the earnings for "entry cohorts" (students who started college at the same time) combine completers and non-completers into a single metric. Meanwhile, only completers are included in the earnings data for "exit cohorts" (students who completed their credentials at the same time), at both the institution and program-level.[5] ED should explore how to include earnings data for noncompleters. While there are methodological challenges related to reporting program-level outcomes for non-completers, ED could establish a technical working group to assess how to best report earnings for this population by field of study and credential level.

3. **Disaggregate metrics by race and ethnicity.** Disaggregated data help students and their families understand the outcomes different students typically have after college and help institutions and policymakers ensure that all students obtain strong outcomes and economic opportunity from their higher education experience, no matter their background. Without disaggregation, averages covering broad populations can obscure key disparities in affordability and outcomes that persist across different student groups. Breaking out metrics by race and ethnicity would help prospective students

[4] Andrew Foote, Comparing Earnings Outcome Differences Between All Graduates and Title IV Graduates, Center for Economic Studies, August 2021, https://www2.census.gov/ces/wp/2021/CES-WP-21-19.pdf.

[5] In the College Scorecard, earnings data for entry and exit cohorts are available at the institution level. At the program (field of study) level, only data for exit cohorts are available.

identify the likely outcomes for students with similar demographic backgrounds, helping them make better informed decisions about where to apply and where to enroll. Starting in 2024-25, the Free Application for Federal Student Aid (FAFSA) began collecting race and ethnicity data from all applicants. Those race and ethnicity data should be used to disaggregate metrics on the College Scorecard, such as earnings, student debt, and student loan repayment outcomes.

4. **Improve warning flags for colleges that are subject to greater scrutiny**, to help students identify potential risk. Currently, consumers only see caution flags for colleges that are on ED's Heightened Cash Monitoring (HCM) 2 status, which indicates financial or federal compliance issues. Caution flags should be added for colleges facing adverse actions from accreditors (e.g., probation) and those that are subject to federal and state investigations, lawsuits, and settlements. Some of these flags are already provided in the VA's GI Bill Comparison Tool.

5. **Revisit the privacy suppression protocols for program-level debt and earnings data**, to explore if more data can be made available while protecting student privacy. While the College Scorecard earnings data cover most students who receive federal financial aid, many programs do not have data available, as the RFI mentions. To make more data available, ED could consider combining programs and years of data in ways that will increase the number of students whose outcomes are included.

6. **Regularly update the data elements**, so students and families can access more timely data to inform their decisions about college**.** While some data elements are updated at least annually, the earnings data from the Internal Revenue Service (IRS) haven't been updated since June 2024. This means the most recent institution-level data on students' post-college earnings are from calendar years 2020 and 2021. Given the economic disruption of those pandemic years, prospective students and families would benefit from more recent data on students' earnings after college.

7. **Conduct consumer testing of the College Scorecard.** Consumer testing will help ensure that the website meets the needs of students and their families. This practice should include students from low-income backgrounds, first-generation students, and other groups of students that could especially benefit from College Scorecard information.

Other policy changes

In addition to the College Scorecard recommendations above, we recommend the following policy changes to improve the quality of data on college value that are available to prospective students and their families:

1. **Pass your College Transparency Act (CTA) and create a federal student-level data network.** For too long, students, families, and policymakers have relied on fragmented data to assess the value of a college education. That's because existing federal postsecondary data are incomplete, making it difficult to access timely and accurate information about student access, success, costs, and outcomes. To address those challenges and increase value transparency, we urge lawmakers to pass CTA, a bipartisan, bicameral policy solution that addresses these information gaps and strengthens our nation's data systems. CTA would create a federal student-level data network (SLDN) that connects and leverages existing federal and institutional data to ensure that complete data about student outcomes are available to the public.

   This SLDN would improve our existing federal data by counting all students and all outcomes, even as students transfer between colleges or move between the workforce and postsecondary education and training. As mentioned earlier, current federal data do not provide a complete picture of students' outcomes because they exclude earnings for students who do not receive federal financial aid. To better reflect today's learning ecosystem, it is especially important to include and connect all postsecondary education and workforce training programs, given new policies like Workforce Pell. A federal SLDN would fill in those gaps and provide crucial information to prospective students and families, as well as provide aggregate data back to states and institutions so they can develop and implement targeted, data-informed strategies aimed at supporting student success.

   To ensure that all students, families, and policymakers can access critical, reliable data about college programs and student outcomes, we urge lawmakers to pass CTA as is. CTA has been through a careful legislative drafting process, with extensive consideration to maximizing the benefits of improved higher education data while protecting privacy and upholding security. Other policy options fail to achieve the comprehensive approach needed to accurately inform students, families, and policymakers. We strongly support the bill as drafted.

2. **Urge ED to implement the Financial Value Transparency (FVT) framework in a timely manner and make the data available to the public.** The FVT regulations currently in effect are broadly supported by field leaders, including our Postsecondary Data Collaborative, because FVT will empower students and families to make more informed decisions about where to enroll and what to study, support institutional improvements, and support evidence-based policymaking. FVT will provide students, policymakers, institutions, and researchers with more information than ever before about program costs and outcomes at all institutions. Prospective students and their families will benefit from the unique and important insights FVT can provide, which are not available from other sources like the College Scorecard and IPEDS. FVT will provide clear, consistent information on key metrics, including program costs, program length, student debt, student earnings after graduation, debt-to-earnings ratios, and an earnings premium measure that evaluates whether program graduates are likely to earn more than a typical high school graduate.

   Many of these program-level data elements will be available for the first time across all sectors and levels of higher education. For example, institutions currently do not report program-level cost data on tuition, fees, books, supplies, and equipment for all of their programs to IPEDS, and that program-level data is part of the FVT data reporting. Additionally, the FVT data would allow for more detailed and precise net prices by program, giving students a clearer picture of their out-of-pocket costs for pursuing a particular educational pathway. The Department could share detailed program-level cost and outcomes information directly with students and families via the College Scorecard, the FAFSA, or new tools. Along with their earnings after college, students' investments in college (such as tuition, fees, and other costs of attendance) are a crucial part of assessing their returns on investment from postsecondary education. Finally, for the first time, these data will include programs reported at the 6-digit Classification of Instructional Programs (CIP) code level – a level of detail previously not available via the College Scorecard or the data produced for the 2022 rulemaking on Gainful Employment. This will allow students and families to assess costs and outcomes at more specific programs, rather than broad program categories.

   The FVT framework requires information from institutions as well as federal agencies. Institutions have already reported FVT data for the 2024 and 2025 cycles; those reporting deadlines were September 30 and October 1, 2025, respectively. The next steps for ED include providing draft lists of program completers to institutions for review (for the 2025 cycle), obtaining earnings data from another federal agency, and calculating the metrics. After calculating the metrics, ED should publish a comprehensive data file that includes all the program-level FVT and GE information available, including the data reported by institutions, pulled from ED data systems, or obtained from other federal agencies. This will allow students, families, researchers, institutions, and policymakers to access the FVT data before ED creates the program information website required in the regulations.

3. **Require ED to administer a nationally representative longitudinal study that tracks students' experiences and outcomes through their postsecondary enrollment and after college, as well as a longitudinal study of students who complete their programs.** The postsecondary longitudinal studies administered by the National Center for Education Statistics (NCES) offer unique and valuable insights about student experiences, progress in college, degree completion, employment outcomes, and other outcomes after college. By following the same group of students through their college enrollment and beyond, NCES's longitudinal studies allow researchers, states, and policymakers to better understand students' trajectories through higher education and the workforce, as well as examine how different factors affect students' likelihood of persisting and succeeding.

   The federal government is uniquely situated to lead and produce these longitudinal studies. Stitching together existing state systems cannot provide a national picture of student outcomes. While many states have statewide longitudinal data systems (SLDSs) that provide important information about education and workforce pathways, those state systems vary widely in depth and scope, as well as in definitions and technical specifications. SLDSs often exclude data about private institutions and many systems cannot track outcomes if a student moves to another state. Moreover, states vary in their data governance policies and it would be immensely challenging to address the governance protocols required for all 50 states to share data with each other. Private data collections also cannot replicate the scale, data elements, and public transparency of NCES data collections. For longitudinal studies that follow students through college and into the workforce, the federal government provides a more sustained funding source than a privately funded initiative where funding comes and goes in short timeframes. Longitudinal studies require sustained funding to avoid disruptions and to ensure data comparability over time. Private data collections would also be unable to link data shared by colleges and students with federal data, such as earnings, federal loan borrowing amounts, and FAFSA data. Furthermore, unlike the federal government, private data collections often charge a fee to access their data, making them out of reach for many stakeholders in the field.

The Beginning Postsecondary Students longitudinal study (BPS) has historically tracked students' experiences and outcomes through their postsecondary enrollment and after college. BPS is the only source of information about how students' affordability gaps shape their completion, loan repayment, and wages. Additionally, BPS provides insights on the experiences of specific student populations that are not captured in other data sources, such as the outcomes of veterans and first-generation students. NCES has already conducted the three-year follow-up study for students who started college in 2019-20. Though the "First Look" report on that study (BPS:20/22) was released in September 2024, the data are still unavailable to the public. ED should release these data. Additionally, ED should reinstate the contract for the 2025 follow-up study (BPS:20/25), so policymakers and researchers can follow the outcomes of those students as they leave college and enter the workforce.

In addition to directing ED to administer a longitudinal study of students through their college enrollment and beyond, Congress should require that ED administer a longitudinal study of students who complete their programs. This new longitudinal study would replace the Baccalaureate and Beyond longitudinal study (B&B), which has been discontinued. While B&B was limited to bachelor's degree recipients, this new study should include completers at all credential levels. Given the growth of sub-baccalaureate credentials and the expansion of Pell Grant eligibility to short-term workforce programs, it is imperative that Congress and other stakeholders are kept informed about the post-college outcomes of students who complete any undergraduate credential, from short, medium, and long-term certificates to associate's and bachelor's degrees. At a time when state and federal policymakers are demanding more information about the return on investment of postsecondary education, NCES must strengthen data collections that help states, institutions, researchers, and other stakeholders answer critical questions about graduates' post-college outcomes.

When developing these studies, NCES should explore options for leveraging administrative data, such as earnings and student loan repayment. However, it is essential to also maintain a student survey component to examine important issues that are not captured in administrative data. For example, the B&B study included survey questions on employment characteristics, family status, homeownership decisions, financial security, and teaching experience.

4. **Require ED to maintain the frequency of the National Postsecondary Student Aid Study (NPSAS).** As a large, nationally representative study, NPSAS provides crucial insights on affordability, student enrollment, and other aspects of students' postsecondary education and training experiences. NPSAS fulfills statutory requirements for NCES to collect and disseminate statistics on access to and opportunity for postsecondary education, including financial aid, and to survey federal financial aid recipients at least every four years. The study's large sample sizes, incorporation of administrative data (including FAFSA data that's only available from the federal government), and collection of student interview data enable analyses that are not possible via other data sources. Other institution-level data can't convey what students can afford, whether they can cover tuition and living expenses, or which students face the greatest financial barriers. NPSAS data have been used to inform state legislation supporting student parents, federal policy around FAFSA simplification, and other topics.

   Additionally, NPSAS provides the "base-year sample" for NCES's postsecondary longitudinal studies, such as BPS. This means that the frequency of NPSAS administration affects the timeliness of longitudinal studies that examine student outcomes and the value they receive from their postsecondary education. Those studies help inform evidence-based decision-making among policymakers, ultimately enabling students to reap greater benefits from their postsecondary investment.

   To best support the needs of students, states, institutions, researchers, and policymakers, NCES should continue administering the full NPSAS study every four years and an administrative data collection between the full collections. The full study would include student surveys in addition to administrative data. Congressional appropriators from both sides of the aisle have supported NPSAS and directed NCES to maintain the NPSAS collection frequency through language in the fiscal year 2024 funding law. Collecting NPSAS data less often than every four years would weaken our understanding of student experiences in higher education. Ever-evolving student experiences in higher education, such as pandemic-related disruptions and recent changes to the financial aid process, make maintaining the current NPSAS data collection frequency vital.

5. **Enact legislative changes to expand the allowable uses of federal tax information (FTI) from the FAFSA, to support consumer choice and college affordability.** In addition to helping millions of students access the financial aid they need to attend college, the FAFSA has historically provided privacy-protected data to key stakeholders in order to support student success efforts. Under rigorous privacy protocols, colleges, states, and

ED could securely access and use applicants' financial data to understand and improve postsecondary experiences and outcomes, as well as make aggregated data available in public tools. Financial data from the FAFSA were also used by practitioners to connect students to means-tested benefits to improve affordability and to support services that help students succeed.

However, legislative changes aimed at simplifying the aid application process created new limitations on the usage of certain financial information collected through the FAFSA. Some data submitted through the FAFSA are now considered Federal Tax Information (FTI), which is statutorily prohibited from being used in the same ways that FAFSA data have been historically used. Left unchanged, this will have significant, unintended consequences on institutions', states', researchers', and policymakers' ability to support students, conduct research on college experiences and outcomes, and enact data-driven policies to improve college affordability, outcomes, and value.

The new data restrictions may also impact students' ability to compare college outcomes when using the College Scorecard to decide where to apply and attend. The College Scorecard includes median post-college earnings for students with different family incomes. Those family income data are pulled from the FAFSA and are not available from other data sources. When those income data are transferred directly from the IRS to ED, they are considered FTI and subject to strict data limitations. While ED's recent guidance clarifies that FTI can be used for mandatory reporting related to aid administration, like IPEDS, it does not mention the College Scorecard. Additionally, restrictions on using FTI will impede vital federal, state, and institution-based research, program evaluations, and data collections. For example, NPSAS and BPS utilize FAFSA data to capture how students with different family incomes pay for college and how students' incomes change over time as they progress through college.

Beyond data and research, FTI usage limitations hinder students' access to scholarships, means-tested benefits, and student support services. Those data restrictions have already impacted data sharing with scholarship providers, adding hurdles that limit students' access to crucial aid for college. The FTI restrictions also limit the use of income and other tax return information to identify students potentially eligible for federal means-tested benefits programs, such as SNAP, and student support services, such as the federally-supported TRIO programs. TRIO programs help students from low-income backgrounds, first-generation college students, and individuals with disabilities progress to and through postsecondary programs. FTI can be used to identify students for TRIO grant eligibility, but not for non-monetary support services and resources. This could lead to significant disruptions in administering and managing TRIO programs and leave students without the support they are eligible to receive.

Ultimately, legislative changes, beginning with the Higher Education Act (HEA), are necessary to restore the allowable uses of FTI to evaluate programs, conduct research, and support student success. These modifications can be made while protecting applicants' privacy and preserving the strides made to simplify the application process. Even without the Internal Revenue Code restrictions for FTI, FAFSA data are subject to privacy laws and practices, including FERPA, that safeguard applicants' information. Those same laws previously protected tax return information that had been provided via the IRS Data Retrieval Tool. In October 2024, we and the Council for Opportunity in Education (COE) led a coalition of 14 organizations to urge Congress to take legislative action to address limitations on the use of FTI from the FAFSA.

6. **Provide sufficient funding for ED to support value transparency and consumer choice.** To improve the College Scorecard, create a federal student-level data network, implement the Financial Value Transparency framework, administer the postsecondary longitudinal studies, and enact the other changes described above, ED needs resources and staffing. This includes funding for the Institute of Education Sciences (IES) and the National Center for Education Statistics (NCES).

   Historically, NCES has had a relatively small staff compared to other statistical agencies like the U.S. Census Bureau and the Bureau of Labor Statistics. However, after recent layoffs, only three employees remain out of 100 at NCES. None of the staff positions supporting NCES's postsecondary data collections have yet been restored. To ensure that NCES can effectively provide data to support consumer choice and evidence-based policymaking, it must be sufficiently staffed and funded.

Thank you again for the opportunity to provide information on college cost and value transparency. If you have any questions about this letter, please contact Kelly Leon, Vice President of Communications and Government Affairs at the Institute for Higher Education Policy (kleon@ihep.org) or Diane Cheng, Vice President of Policy (dcheng@ihep.org).

Sincerely,
Institute for Higher Education Policy

CC: The Honorable Bernie Sanders, Ranking Member, Senate Committee on Health, Education, Labor and Pensions