July 27, 2018

Karen Dunn Kelley, Under Secretary for Economic Affairs
Department of Commerce
Docket Number USBC-2018-0011
Leveraging Data as a Strategic Asset Phase 1 Comments

Dear Under Secretary Kelley:

This letter is submitted on behalf of these 38 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to all four questions in the open call for comments and suggestions by the Federal Data Strategy as it sets priorities for leveraging data as a strategic asset, as part of the President's Management Agenda. PostsecData is a nonpartisan coalition of organizations representing students, higher education institutions, states, employers, and privacy and security experts that seeks to advance the use of high-quality data to improve student success and educational equity. We strongly believe that high-quality data are a prerequisite to improving student outcomes, addressing racial and socioeconomic gaps in educational opportunity, and giving all postsecondary stakeholders the information they need to make important decisions related to postsecondary education. This letter includes the following recommendations for federal data stewardship and strategic data use:

1. Maintain and improve the College Scorecard, an important tool developed by the Department of Education (ED).
2. Expand researcher access to federal data sets to facilitate responsible data use by researchers and analysts working toward evidence-based policies.
3. Continue to enhance secure data matches across agencies and with states to answer critical stakeholder questions, while protecting privacy.
4. Build Application Programming Interfaces (APIs) for more data sets to increase data accessibility.

PostsecData supports the goal of leveraging federal data as an asset to promote transparency and effectively steward the federal government's critical investments in higher education. Partners agree that the federal government plays a key role in collecting and reporting consistent, comprehensive postsecondary data in ways that promote student success and educational equity.

1. Maintain and improve the College Scorecard, an important tool developed by the Department of Education (ED).
PostsecData advocates for data transparency and consumer information that promote informed choices in the higher education marketplace and applauds the continued updates to the College Scorecard data and consumer tool by ED.[i] The Federal Data Strategy is another opportunity to continuously improve data quality and availability, by leveraging existing data resources, like the College Scorecard. Through our collective experience and expertise working with postsecondary data systems, PostsecData previously provided recommendations for improving the Scorecard and facilitating its use.[ii] The below recommendations for the College Scorecard should also be considered in the Federal Data Strategy to improve the use of postsecondary data for decision-making for students and families:

A. <u>Include more comprehensive data on completion and post-college outcomes in the College Scorecard to best leverage existing government data assets.</u> Data on completion and workforce outcomes are vital to ensuring that students, their families, and their advocates understand the return on their substantial investments in higher education and inform their postsecondary choices. The Scorecard online tool should include new federal Outcomes Measures data because they capture completion for part-time and non-first-time students, while the traditional graduation rates currently in the College Scorecard only represent about 47 percent of students nationwide.[iii] Also, data on enrollment in advanced education and additional timeframes and thresholds on the earnings measures could provide students a more comprehensive snapshot of expected post-college outcomes.

B. <u>Continue testing, maintenance, and public access to the College Scorecard to enable students to effectively and efficiently access and use it.</u> The College Scorecard currently provides vital information to students in the higher education marketplace. Maintaining both the online platform and public dataset is critical. The Scorecard boasts approximately 1.5 million users to date, and over 600 developers have accessed the Application Programming Interface (API).[iv] Reports evaluating the College Scorecard have understandably found areas for improvement but still praise its power to unlock information for students, including the best available comparative data on post-college earnings across institutions nationwide.[v] The Department should continue to maximize that value via regular consumer testing and updates, and work to increase visibility of the tool and data updates.

C. <u>Disaggregate key data elements in the College Scorecard.</u> Publishing data on different types of students (e.g., completers, low-income students, students of color) and programs of study is essential to helping students understand which colleges and programs will serve them best. Outcomes often vary by student demographics, program of study, and whether a student completed their credential or not. Some programs at a given institution may have a stronger track record, or some institutions might demonstrate more success with certain types of underserved students. Those students deserve to know how those who came before them fared at that college or in that program.

D. <u>Improve flags on the College Scorecard for institutions subject to greater scrutiny to provide students with high-quality, timely information to inform decisions.</u> Indicators of institutional health and quality can help students identify potential risk and make more informed choices. A similar online student consumer tool, the Department of Veterans Affairs (VA) GI Bill Comparison Tool, provides clear information about a range of school circumstances of which students should be aware. For example, students should be provided clear indicators for a wider range of areas of concern in order to heighten consumer awareness in the higher education market. Students deserve to know if an institution is under increased scrutiny by the Department or an accreditor, and the Scorecard online tool should more clearly and comprehensively convey areas for which caution is warranted at institutions to help students understand potential risk.

2. **Expand researcher access to federal data sets to facilitate responsible data use by researchers and analysts working toward evidence-based policies.**
Research plays an essential role in informing postsecondary policy, consumer choice, and institutional improvement, meaning that researchers are key users of federal data. We are pleased to see that research is recognized by the Federal Data Strategy as a vital, productive use of federal data and appreciate the attention to advancing the public use of government data.

POSTSEC DATA
1825 K Street, NW, Suite 720
Washington, DC 20006
(T) 202 861 8223
(F) 202 861 9307
www.IHEP.org
@PostsecData | @IHEPTweets

ED's National Center of Educational Statistics' (NCES) longitudinal studies are an important example of quality data use. NCES provides researchers with differing levels of access to data, applying appropriate safeguards for each level of access while allowing researchers to study critical issues like college access, success, affordability, and equity. For example, researchers are granted public access through the NCES data tool, PowerStats, to conduct aggregate analyses with no access to underlying student data. Qualified researchers conducting more in-depth analyses can apply for access to datasets with individual-level data if they adhere to strict privacy and security protocols, including being subject to random security checks. The Federal Data Strategy can continue to support appropriate researcher access through the following:

A. <u>Release a privacy-protected version of data from the National Student Loan Data System (NSLDS)</u>. Much analysis of Federal Student Aid (FSA) data conducted by ED's budget office and the Congressional Budget Office is done using a statistical extract from NSLDS, known as the Cost Estimation and Analysis Division's Statistical Abstract (CEAD-STAB). ED could release a privacy-protected version of the CEAD-STAB, or something similar, to better leverage existing data to inform decision-making.

B. <u>Publish all routinely produced oversight and monitoring data files related to student loan servicing, portfolio analysis, and debt collection.</u> The Department has made great strides in publishing more information about the federal aid portfolio, but there is still a lot of information the public cannot access. ED could substantially increase transparency by releasing the data already calculated in the course of its normal business practices, at the institution-level when possible. For example, FSA already produces monthly Operation Services Portfolio Reports for student loan servicers and provides information to servicers about their success in turning around borrower applications, processing paperwork, and other key indicators of servicer volume management. The agency also conducts a quarterly review of the portfolio. Given the time already invested in putting together such documents, releasing them to the public should not take much additional effort, but it would contribute to the understanding of the federal student aid portfolio and enhance transparency.[vi]

3. **Continue to enhance secure data matches across agencies and with states to answer critical stakeholder questions, while protecting privacy.**

The Federal Data Strategy should leverage and securely link existing administrative data to inform the decisions of policymakers, institutions, and students. When limited, existing data from federal agencies like ED, the Census Bureau, Department of the Treasury, the Social Security Administration (SSA), the Department of Defense (DoD), and VA, are linked, they can produce valuable information on important subgroups of students, including Pell Grant recipients, student loan borrowers, and student veterans. By creating a singular identifier system for postsecondary institutions across ED and other federal agencies like the VA and DoD, the Federal Data Strategy could facilitate efficient data matching and more effectively leverage existing data as a strategic asset.

For example, ED has built data matches with the Department of Treasury to report employment outcomes for the two-thirds of college students who receive federal financial aid. These aggregate data on workforce outcomes are available on the College Scorecard to help students evaluate the expected return on their investment when making college choices. Similarly, the University of Texas (UT) System has built a partnership with the U.S. Census Bureau to use existing data on UT students' post-college earnings outcomes to build a consumer-facing dashboard to inform students' college decisions.[vii] Through this

POSTSEC DATA
1825 K Street, NW, Suite 720
Washington, DC 20006
(T) 202 861 8223
(F) 202 861 9307
www.IHEP.org
@PostsecData | @IHEPTweets

partnership, UT is able to provide students with earnings outcomes that include students who work in Texas or in another state, whereas without the Census partnership, UT data would be limited to students who stay in Texas after leaving college.

This user-based, tiered approach to data access secures the data, protects the privacy of the students included in the data set, and allows stakeholders to access aggregate data to use for decision-making and policymaking purposes. The Federal Data Strategy should lift up these promising examples of thoughtful data use and work to expand them. For example, the results from the ED-Treasury matches would be more representative of institutional outcomes if they were not limited to only federal financial aid recipients, and the Census partnership could expand to other states to benefit more students. Further, the Federal Data Strategy could improve the information feedback loop to states from ED by creating a matching program so states have access to data for state policy- and decision-making.

Data privacy and security are critical components of data matching. PostsecData supports the Federal Data Strategy in its endeavor to streamline federal data collections and data systems in ways that centralize the importance of privacy, security, and confidentiality. Federal standards under the Federal Information Security Management Act (FISMA) and the Family Educational Rights and Privacy Act (FERPA), as well as those set by the National Institute of Standards and Technology (NIST), should be reviewed and incorporated, where appropriate, when implementing data matches, building data systems, or providing data access. It is imperative that all data collections and matches are limited to those metrics that have a specific and valuable purpose in meeting administrative, policymaking, consumer choice, or institutional improvement needs. These efforts also should prioritize robust reporting functions that return data back to colleges for benchmarking and improvement purposes, adding value for the data providers.

4.   Build Application Programming Interfaces (APIs) for more data sets to increase accessibility.
In September 2015, ED released an API which makes all of the institution-level data used to build the Scorecard – plus additional data elements – publicly accessible. The aggregate, non-identifiable information allowed developers, analysts, and researchers to build consumer-facing products for students, parents, and school counselors. As policy experts, we believe there is room for more innovative tools that help translate information in user-friendly ways for students, especially low-income students and students of color who are less likely to access data in other ways. The Federal Data Strategy can support the creation of new, private-sector tools to increase data access and transparency by building APIs across other federal data sets, like the FSA Data Center, the Integrated Postsecondary Education Data System (IPEDS), and workforce databases like the National Directory of New Hires (NDNH) or Census's LEHD, similar to the College Scorecard API. All APIs, particularly for those originating at the Department of Education, should include clear descriptions and instructions on how to access and use the included data.

Thank you for your focus on improving the structure and utility of national data resources. We hope that this letter serves as a resource to guide the development of a comprehensive long-term Federal Data Strategy and look forward to seeing postsecondary data become more transparent, comprehensive, and efficient with your support. Ultimately, thoughtful use of high-quality postsecondary data can spur change by identifying postsecondary trends, shining a light on racial and socioeconomic inequities, and informing decision-making at all levels. If you have any questions about these comments then please contact IHEP's vice president of policy research, Mamie Voight (mvoight@ihep.org or 202-587-4967).

POSTSEC DATA

1825 K Street, NW, Suite 720   (T) 202 861 8223   www.IHEP.org
Washington, DC 20006   (F) 202 861 9307   @PostsecData | @IHEPTweets

Sincerely,

Advance CTE
Alloy Engineering Co., Inc.
Association for Career and Technical Education (ACTE)
California EDGE Coalition
Center for Law and Social Policy (CLASP)
College Now Greater Cleveland
Complete College America
Connecticut Association for Human Services
Corporation for a Skilled Workforce
Council for Opportunity in Education
Data Quality Campaign
Education Commission of the States
The Education Trust
Georgetown University Center on Education and the Workforce
Institute for Higher Education Policy
Knowledge Alliance
Lehman College, The City University of New York
NASPA - Student Affairs Administrators in Higher Education
National College Access Network (NCAN)
National Association for College Admission Counseling
National Center for Higher Education Management Systems (NCHEMS)
New America
Nexus Research and Policy Center
NIRSA: Leaders in Collegiate Recreation
NYATEP: New York Workforce Development Association
Office of Institutional Research & Planning, The Ohio State University
Public Insight
R4Workforce
Results for America (R4A)
uAspire
Southeast Ministry
Southwest Ohio Region Workforce Investment Board
Stephen DesJardins
The Institute for College Access & Success (TICAS)
Veterans Education Success
Women Employed
Workforce Data Quality Campaign
Young Invincibles

---

[i] Postsecondary Data Collaborative. (2017, March 29). Letter addressed to Secretary of Education Betsy DeVos. Institute for Higher Education Policy. Retrieved from
http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postseec_transparency_letter_-_march_2017.pdf;

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

[ii] Postsecondary Data Collaborative. (2016, March 23). Letter/statement addressed to the technological community. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/scorecard_api_tech_provider_joint_letter_march_2016_-_final.pdf

Postsecondary Data Collaborative. (2018, May 31). Letter addressed to Secretary of Education Betsy DeVos. Institute for Higher Education Policy. Retrieved from http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postsecdata_recommendations_for_college_scorecard_may_2018.pdf

[iii] Analysis of 2015 IPEDS data by the Institute for Higher Education Policy.

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

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

[vi] Letter to the Department of Education on Federal Student Aid Data (25 October, 2016). Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/finaldraftfsaletter.pdf

[vii] See the seekUT website for more information: https://seekut.utsystem.edu/

POSTSEC DATA

1825 K Street, NW, Suite 720
Washington, DC 20006

(T) 202 861 8223
(F) 202 861 9307

www.IHEP.org
@PostsecData | @IHEPTweets