CHEPP The Center for Higher Education Policy and Practice

February 10, 2023

James Kvaal
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Docket ID ED-2022-OUS-0140

Dear Under Secretary Kvaal:

We write in response to the U.S. Department of Education's ("Department") request for information (RFI) Regarding Public Transparency for Low-Financial-Value Postsecondary Programs. Higher education institutions play a crucial role in social mobility, and we appreciate the Department working to determine what makes a higher education program valuable to the students it serves. The Center for Higher Education Policy and Practice (CHEPP) is a non-partisan higher education research, policy, and advocacy organization grounded in the experiences of higher education learners and practitioners, affiliated with Southern New Hampshire University (SNHU).

Today, sixty-four percent of students are working, 24 percent are parents, 40 percent attend part time, and nearly half are independent students[1]. With more than 39 million Americans having some college credit but no degree, our nation's post-secondary institutions are not meeting learner needs[2]. This mismatch between system and student experience has also perpetuated significant gaps in racial equity and college completion. Roughly half of Black and Latino students earn a degree after six years, compared to nearly 70 percent of white students[3]. It is imperative that higher education policy, including determinations of value, is informed by and responds to the evolving needs of learners to access and succeed in post-secondary education.

Increasing transparency on program value could provide improved information for students to make informed decisions about seeking post-secondary education. However, learners need to see themselves and their education and career goals in such data for it to be of value. Learners

[1] https://higherlearningadvocates.org/policy/todays-students/
[2] https://www.studentclearinghouse.org/blog/more-than-39-million-americans-have-some-college-no-credential-according-to-new-research/
[3] https://edtrust.org/resource/graduation-rates-dont-tell-the-full-story-racial-gaps-in-college-success-are-larger-than-we-think/

pursue higher education for many reasons, most often career driven. They can be seeking higher education to start a career, change careers, or advance in their careers. Students who are recent high school graduates have very different expectations, needs from their higher education program, and earnings trajectories than mid-career adults who need additional credentials to achieve their next promotion, or underemployed parents looking for programs that fit into their busy schedules to change careers.

Additionally, learners find value in, and seek out programs where they can succeed given their lived experience. Some learners want programs where their prior credits will transfer so they do not have to start over. Others need to know that a program is flexible enough to succeed in while working and/or caregiving. They want to know whether they can navigate admissions standards or other barriers to credit granting programs. They want to know whether other learners, faculty, and staff have similar lived experience and whether the investment of their time and other resources will be worth it. While there is perceived choice in post-secondary institutions and programs, these are limiting factors for too many learners in accessing and succeeding in programs, and therefore impact value.

While data transparency is important to inform learner decision-making and program improvement, creating lists or effectively rankings of low-value programs have limited value and use. We agree that reporting and data-driven program improvement are critical. However, indexing data in this way can diminish the complexity of information that learners are seeking by combining multiple data points into a single output. Such lists or ranking systems have been implemented in both K-12 education and early childhood education systems with limited value for users, verses reporting, transparency, and improvement on clear leading and lagging indicators.

To achieve the Department's stated goal of program improvement, data utilized in the "low financial value" model, should be actionable for institutions and improvement plans from institutions should be informed by program health metrics. Regionalized information about a program's career trajectory, including potential earnings, job openings, and unemployment rates will present a tangible vision into a learner's future potential if they enroll. While some of these outcomes are outside of institutions' control, these employment metrics should inform some institutional decisions and provide students valuable information to choose a program that is best for themselves and their families. Lastly, increasing the quality and use of data for learners, institutions, and policymakers through improved data systems and data sharing across agencies, as outlined in the College Transparency Act, would enhance better and informed decision-making and program improvement.

The following comments respond directly to questions raised by the Department in the RFI.

Measures and Metrics

For all measures and metrics, where possible, data should be disaggregated by age, race, ethnicity, national origin, gender, veteran or service member status, and disability status. Data should be reported for students by career starter, career changer and career advancer, where possible, to reflect the most accurate information for students on programs for their own education goals. Additionally, where feasible, working students, students with a dependent, students who are financially dependent and first-generation student status should be reported. This disaggregation will help prospective students to better understand if a program will meet their individual needs. Additionally, data should be regionalized to account for local economic demands to drive wages and job openings in a field of study, as well as account for cost of living.

1. **What program-level data and metrics would be most helpful to students to understand the financial (and other) consequences of attending a program?**

To capture student program cost, we urge the Department to use measures institutions can control and that can be compared across institutions, such as tuition and fees. For example, metrics such as cost of attendance or net price are predictive and informative for students of costs, depending on a range of factors; they were not, however, developed for use as actual cost metrics, as outlined in this RFI. Such data points should include:

- Tuition and fees
- Average graduate earnings and debt-to-earnings
- Student aid eligibility

Prospective students want to know how a higher education program will benefit them after graduation, including employment outcomes by region. Understanding that institutions may struggle to access occupational and economic information directly, the Department should work with the U.S. Departments of Labor and Commerce to compile regionalized data to include in the reporting system directly. Such data points should include:

- Employment and unemployment rates in the program’s field of study
- Rates of underemployment in the program’s field of study
- Average annual salary of graduates, including salary growth over 10+ years
- Program alignment with in-demand occupation(s)
- Expected occupational growth, or decline

2. **What program-level data and metrics would be most helpful to understand whether public investments in the program are worthwhile? What data might be collected uniformly across all students who attend a program that would help assess the nonfinancial value created by the program?**

Public resources are limited and should be directed towards programs that best meet student needs, particularly those who have been historically underserved. Showing the following data points by demography would help identify program achievement gaps, and where additional investment would be most valuable. Such data points should include:

- Graduation rates, including year-over-year persistence rates
- In-demand occupations by region
- Average time-to-completion, including:
  - Year-over-year persistence to track program improvement
  - By full-time and part-time enrollment
  - By students who have stopped out and those who persisted
- Average course evaluation score
- Average faculty evaluation score

3. In addition to the measures or metrics used to determine whether a program is placed on the low-financial value program list, what other measures and metrics should be disclosed to improve the information provided by the list?

These data points are important to capture that some programs meet unique geographical needs, align with in-demand occupations with low pay, and what we understand about persistence related to student experience and belonging. Such data points should include:

- Admissions rates
- Current student enrollment
- Institution entry requirements and program prerequisites
- Modality that students attend, including online, hybrid, asynchronous
- Average number of accepted credits transferred, or gained from prior learning, by program
- Geographic reach to student population, including whether programs are geographically isolated or serve geographically isolated populations
- Alignment with local in-demand career occupational requirements, including whether employment in these occupations require graduate degrees
- Funding invested in student support services
- Funding invested in career services
- Established workforce partner relationships
- Measures to inform student belonging, including:
  - Advisor ratios
  - Average class sizes
  - Faculty & staff demographics
  - Perceived student satisfaction
  - Campus climate data

List Structure

5. **Should the Department produce only a single low financial-value program list, separate lists by credential level, or use some other breakdown, such as one for graduate and another for undergraduate programs?**

The primary goal of this process must be that students can understand and use these lists. Students are more likely to understand and apply information if a list is categorized by institution and degree type so they can focus on the types of programs they are most interested in pursuing. Categorizing lists by institution type and credential level will also help ensure that this accountability system will help fuel continuous program and institutional improvement.

Data Elements

6. **What additional data could the Department collect that would substantially improve our ability to provide accurate data for the public to help understand the value being created by the program? Please comment on the value of the new metrics relative to the burden institutions would face in reporting information to the Department.**

As noted above, where possible, data should be disaggregated by age, race, ethnicity, national origin, gender, veteran or service member status, and disability status. Data should be reported for students by career starter, career changer and career advancer, to reflect the most accurate information for students on programs for their own education goals. Where feasible, working students, students with a dependent, students who are financially dependent and first-generation student status should be reported. We believe the benefits of this data outweigh the burden on institutions because institutions are already collecting a fair share of this data on their student populations and graduates.

As stated previously, we have concerns about a single index oversimplifying the value measures of a program for students and institutions. Transparency on a broader set of data would help students understand a program in the context of their own lives and career goals.

Public Dissemination

7. **What are the best ways to make sure that institutions and students are aware of this information?**

Institutions could provide links to such data on their websites and in their prospective student admissions pages. Additionally, the Department of Education should engage in regularized reviews of use of such data for learners and institutions.

Despite the rising debate of the significance of a college degree, evidence consistently shows that individuals who obtain a college degree or credential beyond high school have better financial outcomes, higher social mobility, and contribute to the next generation's success. Learners choose programs that align with their career goals, fit into their work and family obligations, where they find peers and belonging, and are regionally accessible – reasons difficult, if not impossible, to capture in a value index. We urge the Department to keep the needs and values of prospective students at the center of this new value measure.

Thank you for your consideration and for seeking information on this important matter.

Sincerely,

Jamie Fasteau

Jamie Fasteau
Executive Director