

April 19, 2023

Chairman Bernie Sanders
Ranking Member Bill Cassidy
United States Senate
Committee on Health, Education, Labor, and Pensions
Washington, DC 20510

Dear Chairman Sanders and Ranking Member Cassidy:

We write in response to your request for input regarding the reauthorization of the Education Sciences Reform Act (ESRA), the Educational Technical Assistance Act, and the National Assessment of Education Progress Authorization Act. 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).

In the more than two decades since the last reauthorization of ESRA, the higher education landscape has changed dramatically. Today, sixty-four percent of learners are working, 24 percent are parents, 40 percent attend part time, and nearly half are financially independent¹. With more than 39 million Americans having some college credit but no degree, our nation's post-secondary institutions are not meeting learner needs². This mismatch between system and learner 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 students³. It is essential that ESRA is updated so that data collected on postsecondary education, and how it is reported, reflects who today's learners are.

Congress should also consider how students are pursuing higher education and how that can be reflected in postsecondary data collection. Learners are increasingly interested in short-term credentials in lieu of a college degree, and they are seeking flexible models that allow them to continue to work while earning postsecondary credit. Currently, ESRA focuses on student access

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/#:~:text=This%20data*%20shows%20that%20slightly,of%20roughly%2018%20percentage%20points

to postsecondary programs, which Congress should expand to cover data on student persistence and completion rates. As learners seek out higher education options that work for them, data collected, and subsequent reporting should be timely and actionable to inform prospective students and the institutions aiming to serve them.

The following comments directly respond to questions raised by your information request.

5. How could Congress ensure better coordination among all Federal agencies conducting education research outside of the Institute of Education Sciences (IES)?

Learners 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 a mid-career adult who needs an additional credential to achieve their next promotion, or an underemployed parent looking for a program that fits into their busy schedule to change careers. Workforce needs around the country are also evolving, informing which higher education programs are most relevant to economic demands.

With the career goals of higher education learners and workforce trends in mind, IES should collaborate with other relevant federal statistical agencies, including the Bureau of Labor Statistics (BLS) and the Department of Commerce to help prospective students understand their likely career outcomes from fields of study and higher education programs. When possible, this information should be linked to regional data to show metrics like employment rates in a program's field of study, average earnings, and expected occupational growth, or decline.

10. How could the Federal government and IES provide more flexibility to the field of education research to pursue innovative solutions to the challenges we face in education?

While the learners served by higher education have changed dramatically, the higher education system has struggled to adapt to their evolving needs. To address this, some institutions have been engaging with new models and adjusting their program delivery but there is currently no effective way to measure how successful those strategies are in improving student success or means to share successful practice. To support responsible innovation in higher education, Congress gave limited waiver authority to the Department of Education that is known as the Experimental Site Authority. This authority has been used to provide some flexibility within Higher Education Act Title IV financial aid to test different ways to disperse financial aid, including for competency-based education programs, short-term credentials, and other emerging higher education delivery structures. Due to lack of sufficient data and reporting, little is known about student outcomes under the experimental site authority.

In 2018, New America released recommendations to improve experimental sites to ensure that they are used as intended⁴. In October 2022, the Inspector General released a report outlining

⁴ <https://www.newamerica.org/education-policy/policy-papers/putting-experiment-back-experimental-sites-initiative/>

the failure of the experimental site authority⁵. To help address these failings, Senators Young and Hassan introduced the Innovations Zone Act to update the experimental site authority so that this waiver authority can continue to support innovation in higher education while also informing broad higher education policy changes going forward⁶.

We encourage Congress to explore ways for ESRA to help ensure that the outcomes of higher education institutions trying new things to meet the needs of today's learners inform longer-term changes to higher education. Congress may consider directing the Department of Education to use data collected through ESRA to improve the existing experimental site authority, creating a new authority through ESRA to collect and report the outcomes of innovative models tested by higher education institutions, or updating the experimental site authority as proposed in the Innovation Zone Act.

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?

Capturing Data on and Meaningful to Today's Learners

Until recently, the National Center for Education Statistics (NCES) focused its postsecondary graduation rate and outcomes measures data collection on first-time, full-time students. We are pleased NCES annual surveys have been expanded to include non-first-time and part-time students and believe Congress should consider requiring this level of data going forward. It is also important that data continue to be collected by demographic and be cross tabulated whenever possible barring privacy concerns. Congress should also consider the modality that postsecondary learners are accessing higher education and consider how institutions of higher education should report if students are attending programs in person, hybrid, or fully online so that prospective students can understand outcomes by delivery systems.

Research Priorities

Throughout ESRA, NCES is directed to study postsecondary access and opportunity. While access to postsecondary education is incredibly important, it is essential that data captures institutions of higher education where students are persisting to complete their degree and credential, as well as where they are more likely to stop-out. We think Congress should clearly direct NCES to look at postsecondary persistence and completion in the statute, including leading and lagging indicators of each.

⁵ <https://www2.ed.gov/about/offices/list/oig/auditreports/esi-reporting-req.pdf>

⁶ <https://www.congress.gov/bill/117th-congress/senate-bill/733/text>

Students with Disabilities

Data on the enrollment of students with disabilities is explicitly missing from postsecondary reporting. While we appreciate the work NCES has done to shed some light on how students with disabilities access higher education, we recommend Congress require that institutions of higher education report the number of students with disabilities alongside other demographic information, such as ethnicity, gender, and age. A 2016 NCES sample survey found that 19 percent of students in higher education have a disability, but how individual institutions of higher education enroll students with disabilities, and where they are more likely to persist, and graduate is unknown. Institutions are also required to report the percentage of students served through their accommodations office but based on an NCES report that found many students with disabilities do not receive accommodations in higher education, we believe this metric underrepresents the number of enrolled students with disabilities. Like other demographic groups, students with disabilities should be able to understand which institutions they are most likely to receive the support that they need to be successful and graduate.

Thank you for your consideration and for seeking information on this important matter. We look forward to staying in touch as ESRA moves through the legislative process.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Fasteau". The signature is written in black ink and is positioned above the printed name and title.

Jamie Fasteau
Executive Director