



September 22, 2023

Michelle L. Paczynski  
Office of Policy Development and Research  
Employment and Training Administration  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Docket No: ETA-2023-0002

Dear Ms. Paczynski:

We write in response to the U.S. Department of Labor’s Request for Information (RFI) on the Confidentiality and Disclosure of State Unemployment Compensation (UC) Information. Specifically, we are writing to address the questions regarding access and use of UC data by private, postsecondary institutions of higher education. We appreciate the Department’s attention to this topic and believe access to such data will support improved postsecondary programs and their relevance, lead to better decision-making by institutions on program offerings and institutional improvement, and better inform learner decisions on courses of study and degrees. 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, 64 percent of students are working, 24 percent are parents, 40 percent attend part time, and nearly half are independent students.<sup>1</sup> With more than 40 million Americans having some college credit but no degree or credential, our nation’s postsecondary institutions are not meeting learner needs.<sup>2</sup> 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, such as 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.

Higher education plays a crucial role in driving economic and social mobility. However, many institutions lack access to real-time or recent labor and postsecondary outcomes data that could both help inform learners’ education and career pathways based on their region and interest and help institutions create, improve, or close programs based on that data. Regionalized information about a program’s career trajectory, including potential earnings, job openings, and unemployment rates would provide a tangible vision into a learner’s future potential if they

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<sup>1</sup> <https://higherlearningadvocates.org/policy/todays-students/>

<sup>2</sup> <https://nscresearchcenter.org/some-college-no-credential/>

enroll. While some of these outcomes are outside of institutions' control, greater access to labor and employment metrics could better inform some institutional decisions and provide students valuable information to choose a program that is best for themselves, their families, and their community.

Prospective students want to know how a higher education program will benefit them after graduation, including employment outcomes where they live and work. While the UC data in question in the Department of Labor's RFI would not provide a full picture of the labor and employment data that would be useful, the UC data would be a great step towards supporting students as well as institutional and program improvement, including program development aligned with in demand and high earning occupations.

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

**16. Should private postsecondary educational institutions be given access to confidential UC information? Why or why not?**

Yes, private postsecondary education institutions should be able to access UC information. Public and private non-profit institutions increasingly have a multi-state reach through online programs. Yet, currently, institutions lack access to the critical and timely regionalized labor and employment data that would help inform program creation, growth, improvement, and in some cases closure. Additionally, they lack the localized data that could help better inform academic and career advising around a learner's education and career pathway choices.

Additionally, institutions of higher education receiving federal Title IV and state higher education funding are subject to federal and state privacy laws that require protection of personally identifiable information. With the receipt of public funding, private institutions are subject to the same requirements as public institutions and their private status should not be a determining factor in accessing critical data, including state UC information.

**17. For what purpose would a private postsecondary educational institution request confidential UC information?**

Institutions of higher education would utilize UC information for a range of reasons. Broadly, this data would help institutional and program continuous improvement and better advise learners on their own education and career pathways. With this information, institutions could link course content and students' learning journey with their post-graduation outcome, which would further help improve programs and make them more relevant for current and future workplace demands. Institutions could also use this information to better understand workforce trends to inform program creation, improvement, or closure. Such data could help inform institutional understanding on: employment and unemployment rates in the program's field of study; rates of underemployment in the program's field of study; understanding salary trajectories for average annual salaries of graduates, including salary growth; program alignment with in-demand occupation(s); and better understanding trends in in-demand job growth and/or decline.

This information would be particularly useful at the regional level, enabling learners to seek out programs that align with in demand and high earning occupations where they live. Additionally, this data could help institutions understand such information for learners of color and other historically underserved populations, as well as have a clearer understanding of earnings for graduates and non-graduates.

While there is existing data for learners on institutional and program choice, it is not well utilized. This lack of use comes from the relevancy of the data to learner decisions and that most learners do not feel like they have many choices. Access to UC data for an institution could help bring more real-time and relevant data to students that is specific to their course of study, personal goals, and region. Importantly, increasing the relevance of the program of study and the learner's decision to undertake a particular program could improve persistence and increase return on learners' educational investment.

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

Sincerely,

A handwritten signature in cursive script that reads "Jamie Fasteau". The signature is written in black ink and is positioned below the word "Sincerely,".

Jamie Fasteau  
Executive Director