

January 26, 2018

Jennifer Hong  
Executive Director  
National Advisory Committee on Institutional Quality and Integrity  
400 Maryland Avenue SW, Room 6W250  
Washington, DC 20202

Dear Ms. Hong:

This letter is submitted on behalf of the 22 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), regarding the February 2018 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

As noted in the Federal Register, the NACIQI will continue a discussion next month on the availability and accessibility of data to inform its policy recommendations and review of accreditation agencies.<sup>1</sup> As the committee develops its recommendations, and as federal lawmakers consider reauthorization of the Higher Education Act, we urge the NACIQI to express support for the creation of a much-needed secure, privacy-protected, federally held student-level data network (SLDN). More than 130 organizations representing students, institutions, employers, and veterans already support this commonsense reform that would modernize our nation's data systems.<sup>2</sup>

The NACIQI has previously highlighted the importance of data to guide accreditation decisions and taxpayer investments.<sup>3</sup> PostsecData applauds the committee's efforts to encourage better data use among accreditors through its pilot project to strengthen accreditation's focus on outcomes, and the pilot's adoption as standard practice for accreditor review.<sup>4</sup> The accreditor data dashboards developed during the pilot program bring data to bear on conversations with accreditors, and they include numerous indicators of institutional health, student success, and diversity drawn from existing federal datasets, such as the Integrated Postsecondary Education Data System (IPEDS), the College Scorecard, and the Federal Student Aid (FSA) Data Center.<sup>5</sup>

Unfortunately, significant gaps still exist in the available information, making it more difficult for consumers, policymakers, and accreditors to determine which programs and institutions provide an adequate level of quality for which students. The existing Graduation Rates data from IPEDS are limited to first-time, full-time students who represent only 47 percent

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<sup>1</sup> U.S. Department of Education. (2018, January 3). National Advisory Committee on Institutional Quality and Integrity meeting, 83 Fed. Reg. 358. Retrieved from <https://www.gpo.gov/fdsys/pkg/FR-2018-01-03/pdf/2017-28406.pdf>

<sup>2</sup> Institute for Higher Education Policy. (updated 2017, October 31). Postsecondary Data Collaborative and Workforce Data Quality Campaign applaud bipartisan, bicameral College Transparency Act. Retrieved from <http://www.ihep.org/press/opinions-and-statements/postsecondary-data-collaborative-and-workforce-data-quality-campaign>

<sup>3</sup> Studley, J. (2012). *Report to the U.S. Secretary of Education: Higher Education Act reauthorization accreditation policy recommendations*. National Advisory Committee on Institutional Quality and Integrity, U.S. Department of Education. Retrieved from <https://sites.ed.gov/naciqi/files/naciqi-dir/2012-spring/teleconference-2012/naciqi-final-report.pdf>

<sup>4</sup> National Advisory Committee on Institutional Quality and Integrity. (2017). *Annual report to the Secretary of Education and Congress: Fiscal year 2017 annual report, committee activities fiscal year 2016*. U.S. Department of Education. Retrieved from <https://sites.ed.gov/naciqi/files/2017/09/Report.pdf>

<sup>5</sup> National Advisory Committee on Institutional Quality and Integrity. (2017). *Recognized institutional accreditors: Federal postsecondary education and student aid data*. U.S. Department of Education. Retrieved from <https://www2.ed.gov/admins/finaid/accred/accreditor-dashboards.pdf>

of new undergraduates each fall,<sup>6</sup> while the earnings data from the College Scorecard exclude approximately 30 percent of postsecondary graduates because they are limited only to students who receive federal student aid.<sup>7</sup> Ultimately, we are left with insufficient and incomplete answers to many basic questions about the schools that accreditors review and approve, such as:

- How many low-income, adult, transfer, and part-time students earn a postsecondary certificate or degree from a particular institution?
- How much do students borrow from federal, state, and private sources, and to what extent do they repay loans?
- How long does it take students to complete a degree or certificate at a specific college, on average?
- How many non-completers from a particular college never re-enroll, and how many transfer and finish at another institution?
- From which programs do students go on to succeed in the workforce?
- How do college access, affordability, and completion vary by race/ethnicity and income?

Consistent and complete answers to these questions would help students and families across the country choose programs that demonstrate strong outcomes, while helping policymakers and educators—accreditors and the NACIQI included—implement policies and practices that help more students succeed. For the higher education marketplace to function effectively, all stakeholders need access to high-quality information that reflects all students and can measure outcomes across state lines. Quality data would be essential to implementing a risk-informed model of accreditation such as the one recommended by the NACIQI subcommittee draft paper on regulatory relief.<sup>8</sup> Some of the accrediting agencies already using data to inform their evaluations collect data directly from programs and institutions in an effort to overcome existing data limitations. But a federal SLDN could reduce the reporting burden for accreditors and institutions alike, while producing higher-quality information that could be reported back to them in aggregate for their use.

The bipartisan, bicameral College Transparency Act (CTA) would create this type of data network. It would provide the flexibility to calculate metrics that are currently unavailable, including post-college earnings for all students, comprehensive transfer outcomes, and persistence and completion rates disaggregated by multiple key student characteristics such as race/ethnicity and income. The National Center for Education Statistics would leverage the SLDN to generate and report aggregate statistics while the underlying student-level data would remain secure. This network would provide more complete answers to the above questions while at the same time:

- Securing student data by adhering to industry best practices and federal laws;
- Protecting student privacy by minimizing the data collected and limiting how data can be used;
- Replacing the student data components of the Integrated Postsecondary Education Data System (IPEDS) to reduce reporting burden;
- Uncovering equity gaps so institutions can change policies and practices to better serve underrepresented students;
- Providing states and accreditors with more complete information about student outcomes; and
- Better aligning education with labor market demand, and helping employers identify programs that are effectively preparing students for the workforce.

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<sup>6</sup> Analysis of 2015 IPEDS data by the Institute for Higher Education Policy.

<sup>7</sup> U.S. Department of Education. (2017). *Using federal data to measure and improve the performance of U.S. institutions of higher education*. Retrieved from <https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf>

<sup>8</sup> National Advisory Committee on Institutional Quality and Integrity. (2018, January 10). NACIQI Committee on Regulatory Relief draft. U.S. Department of Education. Retrieved from <https://sites.ed.gov/naciqi/files/2018/01/NACIQI-Subcommittee-Report-FINAL-DRAFT1.11.18.pdf>

Students and taxpayers deserve to know what to expect in return for their college investment, and accreditors need high-quality data to safeguard those investments, while institutions need the data to assess their programs and drive improvement. With high-quality data, policymakers, accreditors, and institutions can implement policies and practices that help students—especially students of color, low-income students, and first-generation students—overcome barriers to college success. This success is crucial for meeting our country's future workforce needs and driving our economy forward. Because of its existing access to data, including employment and earnings data, the federal government is uniquely positioned to compile that information.

We need comprehensive policy changes to equip stakeholders with the decision-making information they require. Congress must overturn the current ban and advance the creation of a secure, privacy-protected, federally held SLDN. Bipartisan, bicameral Congressional support for CTA—together with [widespread support](#) for the bill in the field—demonstrates consensus among students, institutions, employers, and policymakers that this is the best way to meet the data needs of education stakeholders, and to provide the information they need to make informed choices about higher education while reducing reporting burden. The NACIQI should add its voice to the call for a student-level data network.

We look forward to seeing postsecondary data become more transparent, comprehensive, and efficient with your support. If you have any questions about these comments, please contact Mamie Voight, vice president of policy research at the Institute for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

Advance CTE

Association for Career and Technical Education (ACTE)

Association of Public & Land-grant Universities (APLU)

The Campaign for College Opportunity

Council for Adult and Experiential Learning (CAEL)

Education Commission of the States (ECS)

The Education Trust

Georgetown University Center on Education and the Workforce

Institute for Higher Education Policy (IHEP)

Jobs for the Future (JFF)

Knowledge Alliance

NASPA – Student Affairs Administrators in Higher Education

National Association of Student Financial Aid Administrators (NASFAA)

National Center for Higher Education Management Systems (NCHEMS)

National Skills Coalition

New America Education Policy Program

Student Veterans of America (SVA)

The Institute for College Access & Success (TICAS)

Third Way

Veterans Education Success (VES)

Workforce Data Quality Campaign (WDQC)

Young Invincibles