



November 12, 2018
The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Madam Secretary:

This letter is submitted on behalf of the 34 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData), in response to recent changes to the included metrics and overall presentation of data made available through the consumer-facing version of the Department of Education's (ED) College Scorecard. 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. PostsecData recognizes the vital role that the College Scorecard plays in keeping current and prospective students informed about their college options, through direct use of the online tool as well as the applications and analyses that researchers and developers produce to help students navigate the postsecondary landscape.

The availability of comprehensive data on colleges and universities is vital for students, higher education institutions, state and federal policymakers, and the postsecondary research community. Currently, the College Scorecard provides the most complete and detailed information about students' postsecondary experiences and the schools that serve them. The continued maintenance of the College Scorecard, the provision of timely updates to the data components, recent improvements to data accessibility, and planned expansions to incorporate program-level and graduate-program information all improve the availability of data that can help students navigate the complex decision-making process of enrolling in postsecondary education.

However, in the interest of ensuring the best information reaches students, we encourage ED to reevaluate several recent changes to the College Scorecard's consumer tool. Specifically, ED should:

1. Reinstate the earnings threshold metric in the consumer facing tool, while also maintaining the median earnings measure.
2. Reinstate the display of national medians to provide students and other users with context regarding schools' outcomes on net price, graduation rates, repayment rates, and earnings.

PostsecData recognizes that key information that was recently removed from the consumer-facing website is critical for helping students contextualize the information presented in the consumer tool. Such context is critical for helping the College Scorecard fulfill its promise of helping prospective students make informed choices about their postsecondary experiences.

1. Reinstate the earnings threshold metric in the consumer facing tool, while also maintaining the median earnings measure.

Information about the median earnings of recent students is valuable to prospective students, but as a single data point does not provide any context for that information. To better help users understand earnings information, ED has historically included a threshold earnings measure in the College Scorecard consumer site, which shows the share of former students earning above a baseline measure of success (\$25,000 in previous iterations, \$28,000 in the latest data release). The use of an earnings threshold is particularly effective at conveying clearly the share of students who meet a minimum threshold of economic security.

While students need information on median earnings to make informed decisions about where to invest their time and financial resources, providing median earnings without the additional context of an earnings threshold sends a signal to students comparing institutions that higher earnings are necessarily better and severely limits the ability of students to tell whether such earnings are better or worse than a standard baseline. The earnings threshold measure, on the other hand, recognizes that some valuable fields may pay less on average, but students should expect their institutions to prepare them to earn *at least* a reasonable wage.

In addition, since the earnings threshold instead establishes a minimum earnings bar, it creates a more level playing field for schools with differing institutional missions while still conveying to prospective students the likelihood that their investments will pay off. In contrast, an institution's median earnings generally rise in proportion to the number of bachelor's degrees awarded by a school, given earnings premiums¹ related to educational attainment. This means that schools specializing in subbaccalaureate credentials may appear to offer relatively lower earnings compared to four-year institutions.

ED has said that it removed the threshold earnings measure from the consumer-facing tool due to concerns over how the \$25,000 earnings threshold was set.² Specifically, because the

¹ Carnevale, A., Rose, S., & Cheah, B. (2011). *The College Payoff: Education, Occupations, Lifetime Earnings*. Georgetown University Center on Education and the Workforce. Retrieved from <https://cew.georgetown.edu/cew-reports/the-college-payoff/>

² U.S. Department of Education. (September 28, 2018). *College Scorecard Data Change Log*. Retrieved from <https://cew.georgetown.edu/cew-reports/the-college-payoff/> and U.S. Department of Education. (September 28,

threshold comparison is based on median earnings of adults between 25 and 34 years old who indicated a high school diploma as their highest level of education, some of these students have substantial workforce experience that increases their annual earnings. However, it is also true that many prospective college students also have significant workforce experience: the average first-year undergraduate starting school in the 2015–16 school year was 25 years old, the average first-year student at community college was 26 years old, and the average first-year student at proprietary colleges was 28 years old.³ Since earnings thresholds are measured 6-, 8- or 10-years after enrolling in school, many of these students would have similar work experience as the high school graduate comparison group.

We recognize that additional thresholds and benchmark information may also be appropriate and provide students with useful information about the relative payoff of enrolling in college. However, in the time it takes for ED to improve the data it provides on the College Scorecard website, students should not be left without *any* needed contextual information. We urge ED to restore the previous benchmark while it considers additional or alternative contextualizing information. Furthermore, ED should ensure that any future changes to the threshold are understandable to students and contextualized to convey useful information about their expectations for a reasonable payoff. Consumer testing the message sent by the threshold earnings will be critical for assessing how students perceive, understand, and use the information provided.

2. Reinstate the display of national medians to provide students and other users with context regarding schools' outcomes on net price, graduation rates, repayment rates, and earnings.

The recent College Scorecard update also eliminates comparisons of school-level outcomes to the national median and whether the institution's outcomes fell in the top, middle, or bottom third of all institutions on that measure. Research indicates that contextual information such as the national medians included in the College Scorecard can help individuals make better decisions under complex circumstances, and that these contextual cues are particularly important for low-income and first-generation students.⁴ Such context is a key source of information for prospective students who may need context for the school-level data on each measure. Removing the context for each data point eliminates students' ability to understand whether the expected outcomes should be considered high or low, distorting students'

2018). *Data Documentation for College Scorecard*. Retrieved from <https://collegescorecard.ed.gov/assets/FullDataDocumentation.pdf>.

³ Institute for Higher Education Policy calculations from the 2015-16 National Postsecondary Student Aid Study, accessed from the Institute for Education Statistics Data Lab.

⁴ Whisett, H. & Allison, T (May 2015). *College Information Design and Delivery – Insights from the Cognitive Information Processing Literature*. Young Invincibles. Retrieved from: <http://younginvincibles.org/wp-content/uploads/2017/04/college-information-design-5.28.2015-FINAL.pdf>

perceptions of particular schools. For instance, the average graduation rate among four-year schools is just under 60 percent.⁵ Yet some prospective students with experience only in high schools, where graduation rates tend to be much higher, may assume a 60 percent graduation rate is an indicator of poor quality. Returning students may also benefit from this context, particularly students who have been away from school for an extended period, or those who are hoping to transfer schools. Similarly, without the context provided by national medians, a school with below-average outcomes might seem to offer misleading impressions of quality, especially if compared only to schools that also have low success rates.

Additional contextual information, such as median outcomes for similar schools, also holds potential value and should come *in addition to* rather than in place of national medians. Along these lines, as program-level information becomes available, ED should incorporate program-specific medians in order to provide reference points for different degree types.

The undersigned members and partners of PostsecData commend the Department of Education for developing, maintaining, and regularly updating the College Scorecard with the most recent data – efforts which all promote data transparency, and help keep higher education consumers informed. Ensuring the information provided by the College Scorecard’s consumer tool includes robust information about earnings outcomes as well as appropriate contextual information is integral to successfully promoting the use of consumer information in college-going decisions. In addition, as ED continues to work towards greater transparency to help inform consumer choice in postsecondary education, the quality and completeness of the information provided to students will continue to be critical.

We look forward to continuing to work with ED to promote and improve the College Scorecard data and consumer tool. 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 or 202-587-4967).

Sincerely,

AccessLex Institute
Achieve Atlanta
Association of College Unions International
Aspen Institute College Excellence Program
California EDGE Coalition
Colorado Center for Law and Policy
Consumer Action
Council for Opportunity in Education

⁵ U.S. Department of Education National Center for Education Statistics. (October 2016). *Digest of Education Statistics Table 326.10*. Retrieved from: https://nces.ed.gov/programs/digest/d16/tables/dt16_326.10.asp

Data Quality Campaign
Georgetown University Center on Education and the Workforce
George Washington University Institute of Public Policy
Higher Learning Advocates
Indiana Institute for Working Families
Institute for Higher Education Policy (IHEP)
Knowledge Alliance
Lehman College of the City University of New York
National Association for College Admission Counseling
National College Access Network
New America's Higher Education Initiative
Ohio State University Office of Institutional Research and Planning
Postsecondary Analytics
Pretty Good Consulting, Inc.
Public Insight
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Sargent Shriver National Center on Poverty Law
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