April 19, 2023

Senator Bernard Sanders  
Chairman, Committee on Health, Education, Labor, and Pensions  
United States Senate

Senator Bill Cassidy, MD  
Ranking Member, Committee on Health, Education, Labor, and Pensions  
United States Senate

Submitted electronically

Re: Request for Input, Education Sciences Reform Act Reauthorization

Dear Chairman Sanders and Ranking Member Cassidy:

I write on behalf of The Institute for College Access & Success (TICAS) in response to your recent request for input on policies that the HELP Committee should consider during the reauthorization process for the Education Sciences Reform Act (ESRA). TICAS is a nonprofit, nonpartisan research and advocacy organization working to advance affordability, accountability, and equity in higher education. We offer a set of recommendations for consideration that center racial and economic equity. Our recommendations reflect our goal to improve postsecondary outcomes for all students – especially Black, Latino, Indigenous, and underrepresented Asian American and Pacific Islander (AAPI) students, as well as students from low-income backgrounds. Specifically, we provide responses to aspects of the following questions:

- How could [the] Institute of Education Sciences (IES) support innovative research methods, including more implementation research, to identify how and why interventions are effective or not across varying contexts?
- How could the Federal government better communicate and disseminate findings of education research and build capacity of institutions of higher education and education systems to identify and implement evidence-based practices in ways that support continuous improvement?
- How could IES improve postsecondary data alignment, review evidence-based practices and reforms, and utility of research reports to provide more transparency around student outcomes
related to postsecondary access and completion, and interventions that support addressing disparities of such outcomes?

Improvements to data are essential for policymakers and higher education leaders to better understand and more effectively address longstanding inequities in college access and completion, postsecondary attainment, and outcomes for students from racially, ethnically, and economically marginalized backgrounds. Across the country, students from marginalized communities have faced disproportionate challenges to pursuing and remaining in college during the pandemic. Total fall 2021 college enrollment, both undergraduate and graduate, fell short of pre-pandemic enrollment levels, with overall declines of 5.8% -- nearly one million students, and the largest decline in the last 50 years.¹

_Covid-related enrollment declines_ most heavily affect low-income adults and people of color, as they were more likely to face financial hardship and COVID-related health disruptions. This precipitous enrollment drop will have longstanding ramifications for students, their families, and regional and national economies if left unaddressed. Students from marginalized populations must receive the targeted, evidence-backed support they need to get back on track and complete postsecondary programs.²

**Fund Grants to Institutions Implementing Evidence-Based College Completion Programs**

We support the U.S. Department of Education’s new proposal to create a Postsecondary Education Advancement Technical Assistance Center to build evidence on what works for multiple settings (i.e., rural and urban areas, as well as different regions and resource levels), as what works for students varies across regional and institutional contexts. A Technical Assistance Center will foster collaboration between nonprofits and institutions, development, and expansion of Comprehensive Approaches to Student Success (CASS) models to drive continued learning about best practices. The center should also fund rigorous evaluation of the models’ impact. CASS programs help students from low-income backgrounds, students of color, first-generation students, and other marginalized students attain a postsecondary degree or a credential at much higher rates than they do currently.³

Comprehensive student success initiatives offer a clear formula for policymakers and higher education leaders to use in order to scale these approaches. This evidence-based model can enable and empower nonprofit organizations that have proven successful at increasing postsecondary completion rates for students from marginalized backgrounds.

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students from low-income communities, and they have the capacity to provide technical assistance to help other institutions replicate their models.

**CASS programs** combine academic, non-academic, and employment advising with some combination of tuition waivers and other financial assistance. They also help students identify assistance programs to address non-academic hardships they may be experiencing such as childcare, housing, food insecurity assistance, and transportation. As an example, community colleges across the country have sought to replicate the CASS initiative **CUNY ASAP**, originally launched at the City University of New York. Bachelor’s degree-granting institutions have sought to replicate CUNY’s Accelerate, Complete, and Engage (ACE) program.

Additionally, similar CASS programs **across the country** include InsideTrack, MAAPS, One Million Degrees, Project QUEST, and Stay the Course.™ Rigorous evaluations have found all these programs, to varying degrees, substantially improve student success, including higher rates of graduation, retention, job placement, and/or student earnings. Institutional leaders are increasingly coalescing around CASS approaches to address the vexing problem of low completion rates, and expanding What Works Clearinghouse criteria and practice guides to include these evidence-based practices would provide frameworks for higher education leaders to replicate similar models.

New research depends on the development of high-quality, disaggregated postsecondary data. In the absence of this data, policymakers cannot fully address the systemic inequities that disproportionately affect Black, Latino, Indigenous, and underrepresented AAPI students, as well as students from low-income backgrounds. To ensure that students, institutions, policymakers, and researchers have the information they need to make informed decisions and understand how institutions serve students, we urge the committee to consider the recommendations presented below in the reauthorization process.

**Expand Existing Federal Data Collection to Center Racial Equity**

The Department of Education should expand existing collections to add targeted disaggregation for specific data elements that could provide immediate improvement in data availability, while placing minimal burden on colleges already required to report data to the federal government. These additions include the following currently collected data elements **disaggregated by race and ethnicity** and economic status separately, as well as a combination of both: fall enrollment, distance education enrollment, net price, completion rates, cumulative debt, loan repayment rates, and cohort default rates.

These data points, along with the FAFSA’s new race and ethnicity data (under provisions of the FAFSA Simplification Act) will bring added clarity to where equity gaps exist, allowing state officials and institutional leaders to better target policies to close those gaps. In addition, the Pell Grant is targeted to students with the greatest financial need, and many policymakers find the Pell Grant a useful policy lever for promoting access and success for students from lower- and moderate-income backgrounds. Although policymakers often use Pell eligibility to allocate resources and hold colleges accountable for
their outcomes, basic information about Pell access and completion is not well documented in policy research.

Support States to Develop Robust Statewide Longitudinal Data Systems (SLDS)

Since 2005, the U.S. Department of Education has awarded grants through the Statewide Longitudinal Data Systems (SLDS) Grant Program to help states collect and analyze P-20 and workforce data. Since the program’s inception, nearly every state (49 of 50) has received at least one SLDS grant. However, not all states link their P-12, postsecondary, and workforce data systems. Further, the types of data collected and the links between data differ by state, limiting the utility and effectiveness of these systems to inform decisions and change as the country emerges from the COVID-19 pandemic, coupled with the twin economic and health crises it created.

States should continue to build out data systems that effectively integrate workforce data to provide policymakers and other stakeholders with reliable information to explore student outcomes and address students’ needs to successfully navigate education and workforce systems. According to a State Higher Education Executives Officers Association Strong Foundations survey from 2020, 43 states linked or planned to link postsecondary data to workforce data, while 34 states were able to access both K-12 and workforce data elements. The federal government and state leaders must prioritize and continue to provide funding for stronger incentives and requirements for state longitudinal data systems.

Include the College Transparency Act to Increase Student Outcomes Transparency

Passing the College Transparency Act (CTA) would be the most significant action that federal policymakers could take to improve the federal postsecondary data system. We applaud the work that Senator Cassidy has done to champion this legislation to ensure students and families have clear and understandable information as they compare higher education opportunities. This bipartisan, bicameral bill boasts more than 50 House sponsors and 33 Senate sponsors. More than 150 organizations – including student advocates, civil rights organizations, business groups, policy experts, and colleges – also support this legislation. The CTA would address the gaps in the current system by creating a new, privacy-protected, federal student-level data network to ensure that consumers have clear, comparable, and transparent data on institution- and program-level outcomes.

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By linking federal data sources, the CTA would enable policymakers to track outcomes for students from initial enrollment to employment after college. This legislation would enable decision-makers to better identify trends and equity gaps in college costs, financial aid, enrollment, completion, and earnings -- and inform policy solutions to address them. The CTA would streamline existing federal reporting requirements for postsecondary institutions while providing more robust data. Without this federal reform, information about important measures of student success and student debt, including key disaggregated information by race and ethnicity, will remain out of reach for both students and policymakers. Public data will continue to fall short of reflecting all students. We support efforts to make data more accessible and transparent with disaggregated data by race/ethnicity, gender, and Pell status while protecting student privacy.

Thank you for the opportunity to provide input on any prospective reauthorization of ESRA, as well as for your ongoing leadership. For additional information or any points of clarification, please contact me directly at jchandler@ticas.org.

Sincerely,

Jhenai Chandler, Ph.D.
Director of College Completion