Jennifer Engle, PhD
U.S. Department of Education
400 Maryland Avenue SW, Room 5C136
Washington, DC 20202

Dear Dr. Engle,

Thank you for the opportunity to inform the design and measurement of the inaugural Student Success Recognition Program. As the Department outlines in its Request for Information (RFI), completion is a critical component of student success, and is a prerequisite to ensure economic mobility for all students no matter their academic, social, or economic backgrounds. Completion is a particularly important consideration for students who stop out of college with student loan debt. On behalf of the Institute for College Access & Success (TICAS), I write to respond to the Department’s request for information regarding developing a Postsecondary Student Success Award Program for Institutions of Higher Education, specifically the following two questions:

1. **What metrics should the Department use and how should the Department measure performance on those metrics to determine both which institutions should be eligible to apply for and which should be selected to receive the award?**

   The Department should prioritize metrics that can measure institutions’ commitment to enrolling, retaining, and graduating students of color and low-income communities by considering enrollment, retention, and completion rates of students of color, Pell-eligible, and first-generation college students as main metrics. Additionally, it is appropriate for the Department to consider post-graduate outcomes, including earnings and employment.

   For-profit colleges disproportionately offer programs that do not lead to earnings sufficient for students to repay their debts, and therefore should be excluded from eligibility to apply. Additionally, these institutions have disproportionately enrolled students, particularly students of color and from low-income backgrounds into programs that do not lead to meaningful wages or economic value.

2. **How should applicant institutions demonstrate they are using data to drive success for all students while enrolling a student body reflective of the communities they serve, including underserved populations?**

   The use of data and data systems are necessary to implement proactive and data-driven completion strategies and student support. TICAS has found that the most successful programs, including those in
the CASS community of practice, use real-time data systems to provide students with a comprehensive suite of support that addresses their academic, financial, and personal needs. However, it is critical to be attentive to the ways that historically under-resourced institutions such as community colleges, MSIs, and rural-serving institutions might have limited data capacity and infrastructure. Therefore, the Department should look beyond technological advancements and consider accessibility and application of student-level data such as:

- How often institutional staff and leaders disaggregate data by race, income, and related demographic factors to identify barriers to completion, and proactively support students.
- If the institution has tools and systems to communicate student outcomes with stakeholders, current, and prospective students.
- How the college monitors students’ progress and uses data to proactively intervene to help students maintain academic moment.

TICAS eagerly anticipates the future development of the Postsecondary Student Success Award Program for Institutions of Higher Education. We anticipate that this effort will foster greater parity for institutions that support students of color and those from low-income backgrounds, ensuring that these institutions receive the recognition they deserve for their vital work.

Sincerely,

Jhenai Chandler, PhD
Senior Director for College Completion Policy