



April 19, 2023

Committee on Health, Education,
Labor, and Pensions
United States Senate
Washington, D.C. 20510

Comments on Education Sciences Reform Act

To Whom It May Concern:

Thank you for the opportunity to comment on the Education Sciences Reform Act (ESRA) and opportunities for Congress to make improvements to federal higher education research and data. Arnold Ventures is a philanthropy dedicated to tackling some of the most pressing problems in the United States. We invest in research, policy development, litigation, and advocacy to increase the return on investment of higher education for both students — especially students who have been historically marginalized — and taxpayers.

Additionally, we work to identify, evaluate, and scale exceptional social programs that produce important improvements in people's lives, including in higher education, particularly by investing in rigorous evaluations. In fact, AV's Higher Education and Evidence-Based Policy initiatives are currently requesting proposals to conduct rigorous impact evaluations of promising or understudied efforts to improve key student success outcomes like persistence, completion, and post-college earnings.¹ We applaud the Committee for beginning work on ESRA reauthorization, which we believe can spark more and better research to improve equitable outcomes in higher education and strengthen return on investment for both students and taxpayers.

As an organization whose education work focuses primarily on postsecondary education, our comments address Question #12 in the Committee's Request for Information, regarding improvements to postsecondary data, evidence-based practices, and student outcomes, as well as other questions to the extent we see opportunities for improvements in higher education.²

Our nation faces a crisis in college completion: Fewer than two-thirds of bachelor's degree-seeking students graduate within 150 percent of the expected time to completion, and only one-third of

¹ "Request for Proposals: Rigorous Impact Evaluations of Student Success Programs and Practices in Higher Education," Arnold Ventures, published November 2022, <https://craftmediabucket.s3.amazonaws.com/uploads/Student-Success-RFP-Final.pdf>.

² Letter from Sens. Bernard Sanders and William M. Cassidy, M.D., regarding policies that the Senate Health, Education, Labor, and Pensions Committee should consider during the reauthorization of the Education Sciences Reform Act, April 5, 2023, https://www.help.senate.gov/imo/media/doc/esra_rfi_letter.pdf.

students at two-year schools hit that mark.³ Disproportionately, students who drop out with debt but no degree default on their loans.⁴ Even when students do graduate, too often it is with a credential that holds little value in the labor market; in hundreds of postsecondary programs, the typical graduate is no better off than they would have been with just a high school diploma, according to their earnings several years after completion.⁵ Students of color, low-income students, and first-generation students are at the greatest risk of enrolling in these subpar programs where they may struggle to complete. These results are unacceptable.

We believe ESRA will provide a critical opportunity for Congress to drive improved outcomes for students and borrowers, and to invest in the research infrastructure necessary to ensure institutions are providing for the success of their students. We welcome the opportunity to discuss these comments further or to provide technical assistance as needed. If you would like to have further discussion, please contact us at kmcmanus@arnoldventures.org and jmilner@arnoldventures.org.

Sincerely,

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³ “Table 326.10: Graduation Rate from First Institution Attended for First-Time, Full-Time Bachelor’s Degree-Seeking Students at 4-Year Postsecondary Institutions” and “Table 326.20: Graduation Rate from First Institution Attended Within 150 Percent of Normal Time for First-Time, Full-Time Degree/Certificate-Seeking Students at 2-Year Postsecondary Institutions,” Digest of Education Statistics, National Center for Education Statistics, October 2021,

https://nces.ed.gov/programs/digest/d21/tables/dt21_326.10.asp?current=yes and

https://nces.ed.gov/programs/digest/d21/tables/dt21_326.20.asp?current=yes.

⁴ Sattelmeyer, Sarah and Tia Caldwell, “In Default and Left Behind: How Higher Education and the Student Loan System Are Failing the Most Vulnerable Borrowers,” New America, November 30, 2022, <https://www.newamerica.org/education-policy/reports/in-default-and-left-behind/>.

⁵ “Overview of the Gainful Employment Information Rates,” U.S. Department of Education, Session 3: March 14-18, 2022,

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/geoverviewinforates.pdf>.

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Elevate and Secure the Role of the Institute of Education Sciences

The Institute of Education Sciences (IES), established by the Education Sciences Reform Act and charged with funding and disseminating research on education programs and practice, has served an invaluable role in promoting evidence-based policy. This role has extended to higher education, where tens of billions of federal dollars every year are invested in supporting access to postsecondary education, sometimes with disappointing results.

As Congress considers opportunities to build and improve upon the work authorized through ESRA, it must keep the role of IES at the forefront of work on evidence-based education policy. IES brings a commitment to scientific research principles, and has served as a leader and a coordinating figure in helping to increase higher education's focus on improving student outcomes and increasing return on investment both for students and taxpayers.

To ensure this critical role continues, and to maximize the opportunities for improvement in higher education, we recommend that Congress require through ESRA that other offices within the Department consult and coordinate with IES in designing and implementing Department grant competitions and other program initiatives (such as the Experimental Sites Initiative⁶) that may use evidence-based priorities and/or incorporate requirements for rigorous evaluations. In many cases, IES has already served in this role informally. By codifying its role as a required step of the process, lawmakers can ensure that IES's strong expertise and commitment to rigorous research is brought to bear in the design and distribution of programs supporting tens of billions of dollars in higher education alone.

Additionally, we recommend that Congress foster the greatest possible usefulness of research conducted and reviewed by the Education Department. IES has played an important role in funding, conducting, and reviewing research related to education, including higher education. It has held a high bar for the quality of research, and has sought to promote both the production and dissemination of high-quality research. To ensure lawmakers benefit from this level of quality research, Congress should designate IES as the lead agency for all Congressionally authorized evaluations of Education Department programs and initiatives. By codifying this requirement, lawmakers will strengthen the Education Department's commitment to rigorous research, as well as help to streamline the Department's evaluation work in a single office to avoid potential duplication of effort or wasted resources.

In order to ensure this research continues to meet a high bar for rigor, quality, and utility, lawmakers must maintain the existing strong definitions of “scientifically based research standards,” “scientifically valid education evaluation[s],” and “scientifically valid research” in Secs. 102(a)(18), (19), and (20) of ESRA. The history of rigorous program evaluations shows that surprisingly few interventions produce the hoped-for improvements in participants' lives; this is

⁶ McCann, Clare, Amy Laitinen, and Andrew Feldman, “Putting the Experiment Back in the Experimental Sites Initiative,” *New America*, January 23, 2018, <https://www.newamerica.org/education-policy/policy-papers/putting-experiment-back-experimental-sites-initiative/>.

a pattern that occurs in higher education and social policy more generally, as well as other fields such as medicine and business.⁷ However, exceptional interventions that produce important improvements in people’s lives do exist, including in higher education. Rigorous evaluations, including high-quality randomized controlled trials (RCTs), can be used to identify exceptional interventions that produce meaningful, sustained effects on student outcomes. These definitions have served as the strong foundation for IES’s contributions to the literature on postsecondary education research. Any dilution of the standards or weakening the language would greatly undermine the commitment to science and practical knowledge-building that IES has exemplified since its founding.

We also believe that lawmakers can build on the utility of one of IES’s signature products: the What Works Clearinghouse (WWC). The WWC serves as an online source of research about higher education, including filtering out lower-quality research and emphasizing the highest-quality research. However, the WWC can be improved in some ways. For starters, studies can take a significant amount of time to be reviewed and added to the Clearinghouse, limiting the WWC’s utility as a source of timely and relevant information. Additionally, the WWC continues to lag in its inclusion of higher education-related research, with the vast majority of included studies related to K-12 education. Congress should consider codifying the operation and maintenance of the WWC or a successor website in ESRA, and should encourage IES to provide equal weight to higher education in its efforts by incorporating references to postsecondary education throughout ESRA. After all, more of the Department of Education’s dollars disbursed annually are to higher education.

With this expanded role will come additional responsibilities – and an additional need for resources. IES, like some other offices within the Department,⁸ already struggles to find the necessary resources to keep up with a large and growing workload. Particularly if it is asked to take on additional responsibilities through ESRA, and especially as IES’s role in promoting research activity in higher education as well as K-12 increases, IES will require additional staff resources and evaluation dollars. We urge Congress to provide the necessary funds.

Incorporate and Fund the Postsecondary Student Success Grants Program

The Postsecondary Student Success Grants (PSSG) program, also known as the College Completion Fund (CCF), has been funded by Congress for the last two years to provide grants to institutions for promising and proven practices to improve postsecondary retention and completion rates. That commitment is of critical importance: Fewer than two-thirds of bachelor’s degree-seeking students graduate within one-and-a-half times the expected time to completion;

⁷ Citations to the relevant literature in social policy, medicine, and business are contained in “How to Solve U.S. Social Problems When Most Rigorous Program Evaluations Find Disappointing Effects (Part One in a Series),” Straight Talk on Evidence, Arnold Ventures, March 21, 2018, <https://www.straighttalkonevidence.org/2018/03/21/how-to-solve-u-s-social-problems-when-most-rigorous-program-evaluations-find-disappointing-effects-part-one-in-a-series/>.

⁸ Namely, the Office of Federal Student Aid is struggling to meet its responsibilities and priorities, given level-funding of the Student Aid Administration account in fiscal year 2023. For more, read Guerrero, Cynthia, “Defunding Borrower Trust,” Interview with Sarah Sattelmeyer, Arnold Ventures, March 10, 2023, <https://www.arnoldventures.org/stories/defunding-borrower-trust>.

and only one-third of students at two-year schools do.⁹ These results are unacceptable, especially when rigorous research has identified strategies demonstrated to significantly, and consistently, close the gap in college completion. For instance, as we wrote last year, “In a rigorous, well-conducted randomized control trial, students participating in Bottom Line were 23% more likely to graduate from college within four years of high school, compared with the control group. Similarly, CUNY ASAP nearly doubled community college graduation rates at both CUNY and in replication sites, and early outcomes of the four-year adaptation, ACE, show that the proportion of students on track to graduate is 16 percentage points higher than the comparison group.”¹⁰ A more recent evaluation of several Ohio community colleges’ adaptation of CUNY ASAP found that not only did the program increase graduation rates by 50 percent, but it also increased the earnings of ASAP students by 11 percent, even during the pandemic.¹¹

In fiscal year 2022, Congress appropriated just \$5 million to support grants to test and expand these types of efforts on campuses across the country. In fiscal year 2023, it increased that amount to \$45 million. Critically, Congress also required that the Department follow a tiered evidence structure akin to the K-12 Education Innovation and Research (EIR) program, with the smallest grants available for programs supported by promising evidence, the largest grants available for expansion of interventions supported by strong evidence, and grant sizes in between available to interventions backed by moderate evidence.¹²

In considering modifications to ESRA, Congress should codify the Postsecondary Student Success Grants program in ESRA, including the tiered evidence structure lawmakers adopted in FY 2023, to ensure that research is not just conducted but used by colleges across the country. Additionally, we urge Congress to back this authorization with increased funding. As the program gains traction and more colleges apply for support than the program can fund, Congress has a timely opportunity to push higher education institutions to use programs that work to address the millions of college students stopping out without first earning a credential.

Affirm the Education Department’s Pooled Evaluation Authority for Higher Education

For years, Congress has allowed the Education Department to set aside a small percentage of K-12 funds (0.5 percent of each program) to accumulate the necessary funding to conduct

⁹ “Table 326.10: Graduation Rate from First Institution Attended for First-Time, Full-Time Bachelor’s Degree-Seeking Students at 4-Year Postsecondary Institutions” and “Table 326.20: Graduation Rate from First Institution Attended Within 150 Percent of Normal Time for First-Time, Full-Time Degree/Certificate-Seeking Students at 2-Year Postsecondary Institutions,” Digest of Education Statistics, National Center for Education Statistics, October 2021,

https://nces.ed.gov/programs/digest/d21/tables/dt21_326.10.asp?current=yes and

https://nces.ed.gov/programs/digest/d21/tables/dt21_326.20.asp?current=yes.

¹⁰ McManus, Kelly, “How the Education Department’s College Completion Fund Gets It Right,” Arnold Ventures, September 8, 2022, <https://www.arnoldventures.org/stories/how-the-education-departments-college-completion-fund-gets-it-right>.

¹¹ “Ohio Programs Based on CUNY’s Accelerated Study in Associate Programs (ASAP) Boost Earnings During the Pandemic,” MDRC, April 11, 2023, <https://www.mdrc.org/news/press-release/ohio-programs-based-cuny-s-accelerated-study-associate-programs-asap-boost>.

¹² “Report of the Committee on Appropriations,” U.S. House of Representatives, Report 117-403, July 5, 2022, <https://www.congress.gov/117/crpt/hrpt403/CRPT-117hrpt403.pdf>, page 292 of PDF.

evaluations of such federal programs. Until last year, the Department did not have the same authority with respect to higher education dollars. In the fiscal year 2022 and 2023 appropriations bills, Congress provided that the Education Department could reserve up to 0.5 percent of higher education funds—except for the Pell Grant program—for the evaluation of any HEA program.¹³

This authority has yet to be fully exercised; the Department issued a request for information seeking comments and suggestions on how best to utilize the dollars reserved in FY 2023.¹⁴ However, we are confident that this authority, when fully exercised, will provide the Department with important opportunities to support a more effective, data-driven, and research-based higher education system.

The same authority has now been provided for two consecutive fiscal years through the appropriations process. However, it has not yet been incorporated into the law more permanently. This may create challenges for the Department, since the agency lacks predictability about whether the authority will be provided again (especially when appropriations are provided through shorter-term or delayed continuing resolutions rather than full-year spending bills) and whether any new conditions or restrictions will be placed on either the types of funds that are pooled or the types of evaluations it may support. Thus, we urge Congress to incorporate this authority into ESRA, allowing the Department to make the reservation every year.

We also note that, in contrast to the K-12 pooled evaluation authority, there are no specifications about the involvement of IES or the level of rigor required for evaluations funded using the reserved amounts. Lawmakers could improve the language by ensuring that the Director of IES is involved in the development of an evaluation plan and by encouraging the strongest possible research designs, including random assignment where feasible, in funded evaluations.

Pass the College Transparency Act

For too long, students and families have been expected to select a college—to make one of the most consequential financial decisions of their lives—without knowing what they can expect after enrolling in the program. While the headlines promise that students will earn, on average, over \$1 million more over their lifetimes,¹⁵ the reality is that students' return on investment varies considerably from college to college and program to program. Key questions about how students fare in terms of college completion, debt, repayment, and post-college workforce outcomes—

¹³ “Report of the Committee on Appropriations,” U.S. House of Representatives, Report 117-403, July 5, 2022, <https://www.congress.gov/117/crpt/hrpt403/CRPT-117hrpt403.pdf>, page 304 of PDF.

¹⁴ For comments on the Department's use of pooled evaluation authority from Arnold Ventures, see: McManus, Kelly, Jessica Taketa, and Clare McCann, Comments regarding Pooled Evaluation, Docket ID # ED-2022-OPEPD-0155, February 17, 2023, <https://craftmediabucket.s3.amazonaws.com/uploads/Arnold-Ventures%E2%80%99Comments-to-the-Department-of-Education-on-Pooled-Evaluation.pdf>. Among other specific recommendations, we urged the Department to utilize the most rigorous studies appropriate; prioritize the evaluation of higher education interventions, which could be applicable to other campuses; and to focus on areas that are most likely to improve college retention and completion.

¹⁵ For instance, see Carnevale, Anthony P., Stephen J. Rose, and Ban Cheah, “The College Payoff,” The Georgetown University Center on Education and the Workforce, 2011, <https://cew.georgetown.edu/cew-reports/the-college-payoff/>.

particularly for different categories of students, like part-time students, students of color, and low-income students—cannot be reliably answered by the data that are already collected.

The College Transparency Act (CTA), a bicameral, extremely bipartisan bill, would correct this unacceptable information imbalance. CTA would establish a secure, privacy-protected student-level data network within the National Center for Education Statistics (NCES) to accurately answer these types of questions and provide key information to students and taxpayers about the outcomes of programs receiving federal financial aid. It would also allow NCES to leverage data that are already held by other federal agencies to match data and calculate aggregate information – like matching higher education data with service member and veteran information held by the Departments of Defense and Veterans Affairs to better understand which institutions are serving student veterans and military members especially well, and which are falling short.

Congress cannot achieve its goals with ESRA of supporting high-quality, evidence-based research and practices without good data to drive that work and determine where our system is currently failing students. We urge lawmakers to include the College Transparency Act within Title II of ESRA, forming a foundation of reliable, comprehensive information that will support the broader efforts of the Institute of Education Sciences and provide students the opportunity to make smarter, more informed decisions about where they go to school.

Expand Researcher Access to Higher Education Data

Already, IES provides a robust program to ensure secure access to data like the sample surveys run by the National Center for Education Statistics (NCES) for well-qualified researchers. However, many answers to critical questions about the federal financial aid programs—like the extent to which student loan outcomes vary by the borrower’s income, loan type, and repayment plan, or the rates at which different categories of borrowers pay back their loans—are impossible to answer based on currently available data.

Congress should direct the Education Department to develop secure, privacy-protected ways to release key information about the federal financial aid programs. For instance, that could include releasing information from the Cost Estimation and Analysis Division’s Statistical Abstract (CEAD-STAB) to researchers.¹⁶ It could also include offering researchers affiliated with or employed by other federal agencies access to federal financial aid data to conduct research that would support postsecondary student success.¹⁷ Other agencies have established much more robust public-private partnerships to promote high-quality research and ensure transparency into key questions; lawmakers should ensure the Education Department does not continue to lag behind.

Importantly, it is not just external researchers who require broader access to analyze and use higher education data. Congress should also consider opportunities to promote access to data for

¹⁶ Libassi, CJ, “U.S. Department of Education Must Release Loan Data to Protect Students and Taxpayers,” Center for American Progress, October 25, 2016, <https://www.americanprogress.org/article/u-s-department-of-education-must-release-loan-data-to-protect-students-and-taxpayers/>.

¹⁷ “Fact Sheet: Supporting Student Aid Data Access and Transparency,” U.S. Department of Education, Fact Sheet, January 12, 2017, <https://www2.ed.gov/documents/press-releases/student-aid-data-access-transparency.pdf>.

internal, Department of Education researchers. For instance, the Department now has its first-ever Chief Economist, a role fulfilled by the highly qualified labor economist Jordan Matsudaira.¹⁸ Lawmakers acknowledged last year that they supported “the Office of the Chief Economist’s mission to conduct rigorous research in postsecondary education” and to “produce regular working papers that present meaningful original research on the Department’s postsecondary data,” where legislators acknowledged the Department had fallen short. In particular, lawmakers expressed interest in understanding the rapid growth in graduate student borrowing and its impact on borrowers and the economy more broadly.¹⁹ While the Office of the Chief Economist is well-suited to answer those questions, codifying the office in law, providing resources to support its staff, and ensuring researchers employed or affiliated with that office have ready access to data including NCES sample surveys and federal financial aid data, as well as data exchanged with other federal agencies consistent with other data privacy and security laws, would go a long way to supporting its mission.

Invest in High-Quality Data Systems that Include Higher Education Data

Since ESRA was put into place, Congress has provided grant funds to states to establish their Statewide Longitudinal Data Systems (SLDS). Over the years, many states have received multiple grants through the program, steadily building out their data systems and incorporating new information to make the systems more usable.

However, states’ systems still fall across a range of usability, particularly when it comes to higher education data. Many states include only limited higher education and workforce data in their systems; only about half report having links to postsecondary data, and even those that do include data from institutions of higher education often exclude private nonprofit and for-profit institutions in the state.²⁰

We urge Congress to update and make increased investments in reforms to the SLDS program. In particular, we recommend that funding focus on ensuring stronger linkages of postsecondary and workforce data, enabling states to focus on measuring the outcomes of their residents in and after college and to provide high-quality consumer information to prospective students and their families.²¹ Congress should also seek to build out these systems more efficiently by clarifying to state agencies that administer or participate in statewide longitudinal data systems that they may share data currently constrained by a lack of guidance, such as wage and employment records. It should also allow these agencies lawful and appropriate access to data available from federal systems, like postsecondary enrollment, completion, and financial aid data.

¹⁸ Kvaal, James, “Announcing the First-Ever Chief Economist at ED,” U.S. Department of Education, June 8, 2022, <https://blog.ed.gov/2022/06/announcing-the-first-ever-chief-economist-at-ed/>.

¹⁹ “Report of the Committee on Appropriations,” U.S. House of Representatives, Report 117-403, July 5, 2022, <https://www.congress.gov/117/crpt/hrpt403/CRPT-117hrpt403.pdf>, page 283 of PDF.

²⁰ “50-State Comparison: Statewide Longitudinal Data Systems,” Education Commission of the States, December 14, 2021, <https://www.ecs.org/state-longitudinal-data-systems/>.

²¹ For instance, see: Letter to Sens. Patty Murray, Susan Collins, Tammy Baldwin, and Shelley Moore Capito, Data Quality Campaign, March 23, 2023, <https://dataqualitycampaign.org/wp-content/uploads/2023/04/SLDS-FY24-Appropriations-Letter-Senate-FINAL.pdf>; and “The Next Administration Must Invest in Data to Solve Our Nation’s Biggest Challenges: Recommendations,” Data Quality Campaign, November 2020, https://dataqualitycampaign.org/wp-content/uploads/2020/11/DQC_Memo-to-New-Administration-11-23-20.pdf.