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Mr. John English
U.S. Department of Education
400 Maryland Ave., SW
Room 6W306
Washington, DC 20202

Docket ID # ED-2022-OPEPD-0155

To Whom It May Concern:

Thank you for the opportunity to comment in response to the Department of Education's request for information regarding pooled evaluation under the Higher Education Act. (Docket ID # ED-2022-OPEPD-0155.) Arnold Ventures is a philanthropy dedicated to tackling some of the most pressing problems in the United States. For the past six years, we have invested in research, policy development, litigation, and advocacy to end predatory behavior in higher education and increase the return on investment of higher education for both students – especially students who have been historically marginalized – and taxpayers. Should you have further questions regarding these comments, we welcome the opportunity to discuss them further.

Higher education can offer a critical opportunity for economic mobility, helping millions of low-income and historically disadvantaged students move into well-paying jobs and middle-class careers. However, simply enrolling in postsecondary education is not enough. For too many students, their time in higher education results in leaving school before earning a degree or credential – and often bearing student loan debt they wouldn't otherwise have held. For instance, only three in five students graduate within six years. What's worse, students who leave school with debt but no degree are three times more likely to default on their loans.

The good news is that many schools and research organizations have undertaken serious efforts to identify practices that can help students to succeed in higher education and stay enrolled through to graduation day. The most promising of these practices have been shown to produce statistically significant positive effects on important outcomes such as postsecondary degree completion or workforce earnings in one or more well-conducted randomized controlled trial (RCT) studies. For instance, the Accelerated Study in Associate's Programs (ASAP) initiative that began at the City University of New York (CUNY) has been shown to dramatically increase college completion rates. A program launched by Project QUEST to provide comprehensive supports to students has demonstrated an increase in annual earnings for those who received the benefits of the program. And enhanced student advising conducted through Bottom Line have led to increases in four-year college enrollment and retention.¹

¹ "Effective Student Success Practices," Arnold Ventures, accessed February 2023, available at: <https://www.arnoldventures.org/work/research-into-student-success-programs>.

AV has helped to support these and other research efforts over the years in the interest of building a robust and rigorous body of evidence about what works to promote college completion in the interest of increasing the effectiveness of social spending. Most recently, AV launched a request for proposals in September 2022 inviting grant applicants to conduct rigorous impact evaluations of programs and practices that promote college success.² We also recently published AV's higher education policy research agenda outlining AV's policy research areas of interest which include assessing and refining accountability structures and evaluating how the student loan program functions and affects student and institutional behavior. This research agenda invites researchers to help build the evidence to drive return on investment for students and taxpayers in higher education policy. Both the RFP and the higher education research agenda are attached to these comments.

We are thus excited about the Department's newest opportunity to engage in research about student success in higher education, drawing on the authority recently granted by Congress for FY 2022 and FY 2023. This pooled evaluation authority will enable the Department to build high-quality evidence, support the effectiveness of its programs and grantees, and invest in leaders who are dedicated to reforming and improving the postsecondary education system to work better for more individuals, especially low-income students and students of color.

As the Department moves forward in implementing the authority for those fiscal years and beyond, we urge the Department to maximize the amount of funding it pools from available programs to ensure the best possible opportunity to drive the field toward better by identifying more evidence-based interventions that can help to address the huge challenges that students – particularly low-income students and students of color – face in finding success. We also urge the Department to focus its efforts on the best possible opportunities to identify effective interventions that support student success. Our enclosed comments contain more specific suggestions for how the Department can move forward.

We welcome the opportunity to discuss these comments further as the Department develops its plans for use of the pooled evaluation authority. Should you have any questions regarding these comments, please contact us at kmcmamus@arnoldventures.org, jtaketa@arnoldventures.org, and cmccann@arnoldventures.org.

Sincerely,

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² The RFP is available at: https://craftmediabucket.s3.amazonaws.com/uploads/Student-Success-RFP_Final.pdf.

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Introduction

For too many students, the promise of higher education goes unrealized as they invest their time and money in credentials that don't pay off. Often, that is because students leave school without the degree they enrolled to earn, frequently bearing student loan debt and sometimes even worse off for having enrolled. Students from historically underserved backgrounds face especially significant challenges, leaving students of color and low-income students less likely to graduate or to graduate on time.

The federal government invests billions each year in higher education through the student aid programs, grants to institutions, and other programs – all designed to help these students earn a degree and succeed in higher education. But another critical role for the Education Department should be to ensure institutions have access to rigorous, high-quality research about what works to support student success. In fact, the Foundations for Evidence-Based Policymaking Act, passed with bipartisan support several years ago, requires that federal agencies prioritize rigorous evaluation and the dissemination of evidence.³

The pooled evaluation authority recently granted to the Department will provide critical resources to support such efforts. Under this authority, the Department can engage more deeply in collecting and analyzing data, with the help of federally funded institutions, to further the development of a rich, robust body of evidence. The Department will be able to support additional evaluation efforts that will ensure federal programs are successful – that student aid and other higher education dollars are invested with purpose and that they lead to students' success on college campuses across the country.

To that end, we urge the Department to maximize the utility of this authority. That includes pooling as much funding as is feasible in future years, setting aside the full 0.5 percent at the outset of the fiscal year (even when full-year appropriations have not yet been settled). We propose that the Department prioritize rigorous evaluations of the types of programming and interventions that are likeliest to improve postsecondary students' odds of successfully staying in school and making it to Graduation Day. We welcome the opportunity to provide comments on the areas where evaluation will be most successful, and we hope that you find these comments useful as you carefully and thoughtfully consider the best uses of these dollars going forward.

Utilize the Most Rigorous Studies Appropriate

A key question for the Department will be what type of evaluation it uses under the pooled evaluation authority. We urge the Department to use the most rigorous type of analysis available, accounting the circumstances of a particular intervention – i.e., employing random assignment designs, when feasible, or other research methods that allow for the strongest possible causal inferences when random assignment is not feasible. Rigorously establishing the causal impact of policies or programs will provide the most useful information to the field. Through such

³ *Foundations for Evidence-Based Policymaking Act of 2018*, P.L. 115-435, available at <https://www.congress.gov/bill/115th-congress/house-bill/4174/text>.

evaluations, the Department can have the biggest impact and the greatest likelihood of moving the needle to improve students' outcomes.

Unfortunately, few rigorously-evaluated social programs are found to produce the hoped-for effects, making it all the more important for the Department to focus its efforts on identifying the investments backed by rigorous evidence that they truly will improve the lives of students and their families.⁴ Randomized controlled trials are widely considered the most reliable method of evaluating a program's effectiveness.⁵ Unique among evaluation methods, an RCT's process of randomly assigning a sizable number of people to either a treatment group that receives an program, or a control group that does not, ensures there are no systematic differences between the two groups in observable characteristics (such as income, gender, age) or unobservable characteristics (such as motivation, psychological resilience, family support). Because it is an apples-to-apples comparison, any difference in outcomes between the two groups can confidently be attributed to the program and not to other factors. While RCTs have often been perceived as prohibitively expensive or burdensome for practical use in most areas, in recent years, RCTs have become much more feasible thanks to the availability of administrative data (which reduces or eliminates the need for expensive original data collection) and the ability to embed random assignment in new or ongoing programs, for example, by using a lottery process. In a complex and interconnected policy environment, RCTs remain the best way to provide the clearest and most conclusive evidence possible to inform practitioners and policymakers.⁶

To ensure the Department is able to produce high-quality evidence, we recommend the Department consider appropriate standards for randomized controlled trials, and ensure that evaluators have considered critical factors for producing high-quality evidence. For instance, Arnold Ventures has produced a guide to some of these key study design elements, including procedures for appropriately carrying out the random assignment; considerations for determining the most appropriate outcome measures; and requiring that impact evaluation designs and analysis methods be pre-specified and publicly registered. By using these types of factors, and consulting closely with evaluation experts in the Institute of Education Sciences and elsewhere, we are confident the Department will produce high-quality evaluations that can meet What Works Clearinghouse standards and result in valuable information for the field.⁷

In cases where causal impact studies may not be available or appropriate, the Department should instead seek to lay the groundwork for more rigorous analysis in the future, such as through pilot projects, feasibility studies, and robust data collection and analysis of outputs and outcomes. While these studies cannot determine program effectiveness, they can provide a useful foundation for future research that can apply higher-quality standards and greater levels of rigor.

⁴ "Evidence-Based Policy: A Path to Progress on Major U.S. Social Programs," Arnold Ventures, available at: <https://craftmediabucket.s3.amazonaws.com/uploads/AVEvidenceBasedPolicyOne-Pager-v2-1.pdf>.

⁵ "Which Study Designs Are Capable of Producing Valid Evidence About a Program's Effectiveness?," Coalition for Evidence-Based Policy, October 2014, <https://craftmediabucket.s3.amazonaws.com/uploads/Which-Study-Designs-are-Capable-of-Producing-Valid-Evidence-of-Effectiveness-October-2014.pdf>.

⁶ Buck, Stuart and Josh McGee, "Why Government Needs More Randomized Controlled Trials: Refuting the Myth," July 2015, https://craftmediabucket.s3.amazonaws.com/uploads/PDFs/RCT_FINAL.pdf.

⁷ "Key Items to Get Right When Conducting Randomized Controlled Trials of Social Programs," Arnold Ventures, February 2016, <https://craftmediabucket.s3.amazonaws.com/uploads/PDFs/Key-Items-to-Get-Right-When-Conducting-Randomized-Controlled-Trials-of-Social-Programs.pdf>.

Prioritize the Evaluation of Higher Education Interventions

As the Department considers how to use the funds for effective evaluation, it should consider how to have the greatest possible impact. In particular, we recommend that the Department seek to study *interventions* rather than whole *programs* funded by the Department. Too often, when the federal government has commissioned large RCTs to evaluate the effectiveness of entire Congressionally-authorized federal programs, they have been found to be ineffective.⁸ However, most of these federal programs are actually broad funding streams that allow funding recipients great flexibility in how to spend their funds, resulting in a heterogeneous set of program services. Although these RCTs found that the programs' *average* effects were insignificant, it is likely that a subset of activities were indeed effective, but that their impact was diluted by others that were ineffective or even harmful.

Student success interventions may include improvements to and increased frequency of student advising, available financial support, academic reforms to student hurdles like developmental education, and other strategies to help students stay in school and ultimately graduate. These types of interventions — for which a research base often exists but where the implementation and contexts will differ considerably across college campuses — are most likely to have a broad impact on higher education, since all leaders can use this research to improve the outcomes for their own students.

Of course, these evaluations could be conducted within a higher education program. For instance, institutions with a Child Care Access Means Parents in School (CCAMPIS) grant may have a lengthy wait list of student parents waiting to enroll their students in on-campus child care facilities or to access vouchers; the Department could assess the feasibility of randomizing which students are moved off of the wait list in order to assess the impact of child care access on the postsecondary retention and success of student parents, within an institution or across institutions that are using comparable models of child care assistance.⁹ In this way, the Department can assess not just the impact of the CCAMPIS program, but of the intervention itself of providing additional financial support to student parents in the form of child care assistance.

However, such programmatic evaluations are not the only way to effectively use pooled evaluation dollars. An institution, system, or coalition of institutions could agree to implement and test a similar intervention of, for instance, expanding access to a model of proactive student advising that seeks to help students take an appropriate course load, access campus services, and earn the credits they will need to graduate on time. While pooled evaluation dollars could support the

⁸ “When Congressionally-authorized federal programs are evaluated in randomized controlled trials, most fall short. Reform is needed”, Arnold Ventures, June 2018, <https://www.straighttalkonevidence.org/2018/06/13/when-congressionally-authorized-federal-programs-are-evaluated-in-randomized-controlled-trials-most-fall-short-reform-is-needed/>

⁹ Additional work to improve the data infrastructure between child care and higher education systems, as well as to determine appropriate models for evaluation, may be needed to accomplish a rigorous evaluation like this one. For more information, see, Reichlin Cruse, Lindsey, Lashawn Richburg-Hayes, Amanda Hare, and Susana Contreras-Mendez, “Evaluating the Role of Campus Child Care in Student Parent Success,” Institute for Women’s Policy Research, IWPR #C506, October 2021, https://iwpr.org/wp-content/uploads/2021/10/Evaluating-the-Role-of-Campus-Child-Care_FINAL.pdf.

evaluation of this intervention, institutions could be invited to use other federal dollars — such as Title III and V dollars, for instance, or Title IV revenue received by the institution — to implement the intervention itself.

We also note that the Department should consider this pooled evaluation funding as a source of funding for any future experiments conducted under the Experimental Sites Initiative. While the Department is not currently running any experiments that are ripe for evaluation,¹⁰ the Biden-Harris Administration has commented that, for future experiments, it will commit to principles that include “ensuring impact evaluations and policy-relevant data wherever possible.”¹¹ Should the Department opt to start new experiments, securing evaluation funding upfront — including potentially through the pooled evaluation funds — will be essential to carrying out the agency’s commitment to those principles, and the Department must not cite further excuses for failing to conduct rigorous evaluations of these experiments.

The Department should also seek to identify other points of connection between Department initiatives and the pooled evaluation authority; these intersections may help to boost the effective use of other taxpayer dollars. For instance, the Department recently awarded roughly \$5 million in postsecondary student success grants to invest in evidence-based reforms to support retention, transfer, and completion; another \$45 million were appropriated for the program for Fiscal Year 2023, meaning another competition under the program will be forthcoming.¹² Despite the small amount of funding available for the program, supplemental funding to support evaluation efforts could help to magnify the impact of those several grants to provide useful information to the field and ultimately see more campuses adopt effective interventions.

While we urge the Department to use the pooled evaluation funds for the most rigorous forms of research available — including causal impact studies, where feasible — we note that even robust data analysis may provide useful insights to the public. For instance, the Department could access a portion of the available funds to invite researchers into the Department to analyze student aid data, connect those data with other federal and state data systems, and produce high-quality research. The addition of a Chief Economist role at the Department has begun to lay the groundwork for such a program; by building on that position, the Department and the Chief Economist may be able to help advance the field by overcoming some of the most significant limitations in higher education data and connecting those data with other useful resources. Wherever possible, we urge the Department to combine data analysis with experimentation — for instance, by conducting communications studies with defaulted loan borrowers using behavioral science principles to randomly assign different messaging approaches — to help identify the best

¹⁰ The Second Chance Pell experiment is expected to be wound down in the coming years as the new Pell Grant for Prison Education Program regulations come into effect, and the Department reports that it has “notified institutions that it will end several of the experiments that were not designed to support rigorous evaluation.” See: “The Department’s Compliance with Experimental Sites Initiative Reporting Requirements,” U.S. Department of Education, Office of Inspector General, October 31, 2022, <https://www2.ed.gov/about/offices/list/oig/auditreports/esi-reporting-req.pdf>.

¹¹ Ibid.

¹² “Department Awards Grants to Improve Opportunities and Outcomes for Nation’s Postsecondary Students,” U.S. Department of Education, Press Release, January 20, 2023, <https://www.ed.gov/news/press-releases/department-awards-grants-improve-opportunities-and-outcomes-nations-postsecondary-students>

opportunities and strategies to improve outreach and drive better outcomes for students and borrowers.

Focus on Areas Most Likely to Improve Retention and Completion

As the Department considers the most valuable opportunities to promote better outcomes, we suggest that the Administration look to its college completion agenda. Last summer, Secretary Cardona spoke to a room full of postsecondary leaders, noting the “cruel irony” that “the institutions that serve the most students, with the most to gain from a college degree, have the fewest resources to invest in student success.”¹³ He promised that the Department, together with leaders in the field, would “write a new playbook for inclusive student success.” The pooled evaluation authority provides one critical opportunity to deliver on that promise by ensuring the resources made available through this program can help to design that playbook for success in promoting retention and completion, particularly for low-income students and students of color. By ensuring effective strategies to promote those outcomes for underserved students are front and center as the Department invests in evaluation, its college completion agenda can have a much larger impact.

More specifically, the Department should look to other available resources to help guide its investments. For instance, within the federal government, the Office of Evaluation Sciences works with federal agencies to help them build and use evidence.¹⁴ Additionally, Arnold Ventures has already issued a Request for Proposals to identify and scale effective practices that improve student success and address equity gaps in higher education; through that RFP, applicants can seek funding to evaluate promising practices or under-researched but more widely used interventions. Examples of the latter include mentoring and advising programs, guided pathways reforms, and summer bridge programs.¹⁵

Another resource the Department should consider is a recent report from MDRC, synthesizing two decades of its research into community college interventions.¹⁶ According to that report, the strongest evidence supports interventions that are most comprehensive (i.e., that include not just one component of an intervention, but that tie together multiple student supports) and those that encourage full-time and summer enrollment so students progress more quickly through their programs. Some evidence exists, though less consistently, for interventions specific to advising, tutoring, and financial support for students. This research can help to form a basis for the Department to determine where additional evidence-building would be most useful to the field, and where evaluations are most likely to produce positive results that can help institutions to move the needle on student success.

¹³ “Raise the B.A.R. Bold + Action + Results in College Excellence and Equity,” U.S. Department of Education, Speech by Secretary Miguel Cardona, August 11, 2022, <https://www.ed.gov/news/speeches/raise-bar-bold-action-results-college-excellence-and-equity>.

¹⁴ For more, see oes.gsa.gov.

¹⁵ “Request for Proposals: Rigorous Impact Evaluations of Student Success Programs and Practices in Higher Education,” Arnold Ventures, November 2022, <https://craftmediabucket.s3.amazonaws.com/uploads/Student-Success-RFP-Final.pdf>.

¹⁶ Weiss, Michael J. and Howard S. Bloom, “What Works? for Community College Students? A Brief Synthesis of 20 Years of MDRC’s Randomized Controlled Trials,” MDRC, June 2022, https://www.mdrc.org/sites/default/files/THE-RCT_Synthesis_Brief.pdf.

Finally, the Department should consider the populations of students it seeks to target in building evidence about what works in higher education. As the MDRC study notes, many of the most effective interventions have required or strongly encouraged students to enroll full-time as a condition of participation – yet some part-time students who are unable to make that commitment are simply unable to participate, leaving a gap in the research.¹⁷ With more than 6 million part-time undergraduate students – nearly two in five undergraduates – that is a gap that warrants further research.¹⁸

Additionally, given that students of color and low-income students often have lower completion rates than their white and higher-income peers, the imperative to evaluate interventions that are effective for those underserved students is particularly urgent. For instance, just 27 percent of Black students, 27 percent of American Indian/Alaska Native, and 38 percent of Hispanic students pursuing a bachelor's degree graduate on time, compared with 51 percent of white students.¹⁹ For students at two-year institutions, just one in four Black students and one in three Hispanic students graduate within 150 percent of the expected time to graduation, compared with 37 percent of white students.²⁰ These equity gaps in student outcomes often exacerbate already yawning gaps in outcomes for adults of color, particularly for students who take on debt but leave school without a degree.

As the Department seeks to evaluate the needs of students of color, it should also consider opportunities to conduct evaluations on the campuses with a specific mission of serving those populations: Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and Minority-Serving Institutions (MSIs). Too often, support for research is around interventions that are happening on the campuses of predominantly white institutions. The Department could help to support more equitable research efforts by specifically seeking to invest in evaluations on the campuses of HBCUs, TCUs, and MSIs, and in researchers from those campuses.

The Department has a significant opportunity to help institutions change their students' trajectories and address serious divisions in the outcomes of our higher education system, and this pooled evaluation authority can help to facilitate real change. We urge the Department to use the pooled funding to support the most rigorous evaluate methods to identify promising, focused interventions that will improve postsecondary retention and completion, particularly for underserved students.

¹⁷ Ibid.

¹⁸ "Table 303.60: Total Fall Enrollment in Degree-Granting Postsecondary Institutions... 2020," U.S. Department of Education, National Center for Education Statistics, November 2021, https://nces.ed.gov/programs/digest/d21/tables/dt21_303.60.asp?current=yes.

¹⁹ "Table 326.10: Graduation Rate from First Institution Attended for First-Time, Full-Time Bachelor's Degree Seeking Students at 4-Year Postsecondary Institutions... 1996 Through 2014," U.S. Department of Education, National Center for Education Statistics, October 2021, https://nces.ed.gov/programs/digest/d21/tables/dt21_326.10.asp?current=yes.

²⁰ "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.... 2000 Through 2017," U.S. Department of Education, National Center for Education Statistics, October 2021, https://nces.ed.gov/programs/digest/d21/tables/dt21_326.20.asp?current=yes.