



January 7<sup>th</sup>, 2019

Kate Mullan  
Acting Director  
Information Collection Clearance Division  
U.S. Department of Education  
550 12<sup>th</sup> Street SW  
PCP, Room 9086  
Washington, DC 20202-0023

Dear Ms. Mullan,

The undersigned 38 members of the Postsecondary Data Collaborative (PostsecData) submit this letter in response to the Department of Education's (ED) proposed changes to the Gainful Employment (GE) disclosure template.<sup>1</sup> PostsecData is a nonpartisan coalition of organizations representing students, higher education institutions, states, employers, and privacy and security experts committed to using high-quality postsecondary data to improve transparency, increase student success, and reduce educational inequity.

ED's intention to increase transparency and promote the availability, quality, and usefulness of postsecondary data has long held widespread support. Indeed, when announcing ED's intention to overhaul GE, Secretary DeVos said, "students deserve useful and relevant data when making important decisions about their education post-high school."<sup>2</sup> In keeping with this stated commitment, we urge ED to ensure the GE disclosure templates allow students who are considering career programs to make informed decisions by providing relevant information about typical costs and outcomes.

The proposed changes to the GE disclosure templates would dramatically reduce the data available and we are concerned these proposed changes will severely limit students' ability to make informed college decisions. The existing GE disclosure rules require programs to provide specific data points to students, including on-time graduation rates, program costs, student debt, and employment outcomes alongside a warning when debt-to-earnings ratios indicate that a typical graduate is likely to have difficulties repaying their federal loans. Together, these variables

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<sup>1</sup> "Agency Information Collection Activities; Comment Request; Gainful Employment Disclosure Template". 83 FR 55703. (November 7, 2018). *Federal Register: The Daily Journal of the United States Government*. Retrieved from: <https://www.federalregister.gov/documents/2018/11/07/2018-24382/agency-information-collection-activities-comment-request-gainful-employment-disclosure-template>.

<sup>2</sup> United States Department of Education. August 2018. "U.S. Department of Education Proposes Overhaul of Gainful Employment Regulations". (Washington, DC). Retrieved from: <https://www.ed.gov/news/press-releases/us-department-education-proposes-overhaul-gainful-employment-regulations>.

help students to make more informed decisions regarding which programs are best in line with their education and career goals. For students taking on debt, this information is particularly critical, because students who fail to complete are much less likely to be able to repay their loans.<sup>3</sup> Greater transparency across career programs also has meaningful equity implications, since low-income and underrepresented students of color are more likely to attend programs that fall under GE disclosure regulations. These students are also more likely to borrow greater amounts while in school, and to struggle with student loan repayment.<sup>4,5,6,7</sup>

ED's newly proposed disclosure template would only require schools to display the anticipated program length, the tuition and fees charged with no information on living expenses, if and where it meets licensure requirements, and if the debt-to-earnings ratios of former students failed GE standards. While these are all worthy inclusions, the new template would no longer contain graduation rates, the share of students who borrow and their median debt after leaving school, job placement rates, and typical occupations after graduation. The proposed changes also would not provide information on full costs including living expenses, or graduates' typical median earnings after finishing the program—both of which ED removed in early 2018. In order to ensure that students can make informed decisions about whether to enroll in a particular program, ED should ensure that each of the following metrics are included in the template:

- **Estimated program length and on-time graduation rate:** A significant portion of the economic value of a postsecondary credential is conferred only upon completion.<sup>8</sup> Publishing not only the estimated program length, but the percentage of students who complete within that timeframe, is essential for helping a student to securely plan for their future because it illustrates not only *when* a student should be expected to finish a

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<sup>3</sup> Itzkowitz, Michael. 2018. "Want More Students to Pay Down Their Loans? Help Them Graduate." (Third Way: Washington, DC). Retrieved from: <https://www.thirdway.org/report/want-more-students-to-pay-down-their-loans-help-them-graduate>.

<sup>4</sup> Deming, David. J., Claudia Goldin, and Lawrence F. Katz. 2012. "The For-Profit Postsecondary School Sector: Nimble Critters or Agile Predators?" *Journal of Economic Perspectives* 26(1): 139–164.

<sup>5</sup> "Gainful Employment: A Civil Rights Perspective". 2015. (UnidosUS – Formerly: National Council of La Raza: Washington, DC). Retrieved from: <https://www.unidosus.org/publications/gainful-employment-a-civil-rights-perspective>.

<sup>6</sup> Grinstein-Weiss, Michal, Dana Perantie, Samuel Taylor, Shenyang Guo, and Ramesh Raghavan. 2016. "Racial Disparities in education debt burden among low- and moderate-income households". (Brookings Institute: Washington, DC). Retrieved from: <https://www.brookings.edu/research/racial-disparities-in-education-debt-burden-among-low-and-moderate-income-households-2/>.

<sup>7</sup> Miller, Ben. 2017. "New Federal Data Show a Student Loan Crisis for African American Borrowers." (Center for American Progress: Washington, DC). Retrieved from: <https://www.americanprogress.org/issues/education-postsecondary/news/2017/10/16/440711/new-federal-data-show-student-loan-crisis-african-american-borrowers/>.

<sup>8</sup> Whitmore Schanzenbach, Diane, Lauren Bauer, and Audrey Breitwieser. April 2017. "Eight Economic Facts on Higher Education". (Brookings Institute: Washington, DC). Retrieved from: <https://www.brookings.edu/research/eight-economic-facts-on-higher-education/>.

given program, but *if* they are likely to finish. It also provides added context for other key metrics such as debt-to-earnings rates—which only measure the outcomes for students who successfully complete their program.

- **Program costs including living expenses:** The proposed template would include information on tuition, fees, books, and supplies, but these represent only a fraction of the total cost of higher education.<sup>9</sup> Students need to plan for housing, food, and transportation costs in making their enrollment decisions.<sup>10</sup> Furthermore, living costs may vary widely by location. Listing these expenses reminds students that costs extend beyond the classroom and should be factored into any enrollment decision.
- **Job placement rates, median earnings, and typical occupations:** These measures are essential for helping students to determine if attending a program is worth the investment of time and resources. If: 1) students are unlikely to acquire a job; 2) will struggle to find a job in the occupations for which they are preparing; or 3) the earnings premium associated with the program does not justify their investment—then it is likely that an alternative program or pathway would be more valuable for the student and for the economy-at-large
- **Borrowing rate and median debt:** Borrowers are required to make student loan payments regardless of whether they complete their program. Students should know how likely they are to need loans while in the program, and how much they are likely to owe after they leave school. When compared alongside median earnings to produce debt-to-earnings ratios, these variables make risk assessment far easier. This has the added benefit of protecting taxpayers from the costs associated with loan default and delinquency by discouraging students from taking on high debt levels for programs with poor economic returns.

Transparent and accessible postsecondary data make a real difference for students. Former students say that more data, such as the information that ED is proposing to remove, would have helped them make more informed choices about their own programs of study and costs associated with attending especially pertaining to student debt. Bridget, a graduate who faced significant long-term underemployment and low wages after completing her degree, said, “Transparency and accountability provided through higher education data would arm students with information to help them make the informed decision that I could not.”<sup>11</sup> Then, a first-

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<sup>9</sup> College Board. 2018. “Trends in College Pricing, 2018”. (The College Board: New York, NY). Table 7. Retrieved from: <https://trends.collegeboard.org/college-pricing/figures-tables/average-net-price-over-time-full-time-students-sector>.

<sup>10</sup> For a detailed analysis of college students’ struggles with housing, food, and living expenses, see: Goldrick-Rab, Sarah, Jed Richardson, Joel Schneider, Anthony Hernandez and Clare Cady. April 2018. “Still Hungry and Homeless in College”. (The HOPE Lab: Madison, WI). Retrieved from: <https://hope4college.com/wp-content/uploads/2018/09/Wisconsin-HOPE-Lab-Still-Hungry-and-Homeless.pdf>.

<sup>11</sup> “What You Don’t Know Will Hurt You: A Lack of College Program Data Can Land Students in Deep Debt”. April 2016. (Young Invincibles: Washington, DC). Retrieved from: <http://younginvincibles.org/millennial-voices/dont-know-will-hurt-lack-college-program-data-can-land-students-deep-debt/>.

generation college student said, “While we know we need to take the reins of our own success, we need to be empowered to do so, and it is clear that there is a lot of information that needs to be made available before students can make a decision that will impact the rest of their lives and those close to them.”<sup>12</sup> It is clear that students desperately want to have access to as much information as possible before they make one of the most significant, impactful, and expensive decisions of their lives.

There is widespread bipartisan support for transparency that can make a real difference for how students make choices regarding which college and degree program is the right fit. Recently, ED noted “data such as debt levels, expected earnings after graduation, completion rates, program cost, accreditation, and consistency with licensure requirements are important to consumers.”<sup>13</sup> We agree, and are concerned that ED’s most recent proposal does not reflect this stated belief about the value of these data. The undersigned members of the PostsecData Collaborative urge ED to ensure that the GE disclosure templates provide students seeking career education opportunities with the information they need to make these critical decisions.

We look forward to continuing to work with ED to promote and improve the GE disclosure requirements and templates. 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](mailto:mvoight@ihep.org) or 202-587-4967).

Sincerely,

Achieve Atlanta  
Advance CTE  
Alloy Engineering, Inc.  
The Aspen Institute College Excellence Program  
Association for Career and Technical Education  
Association for Public and Land Grant Universities  
Boston Centerless  
California EDGE Coalition  
Center for Law and Social Policy  
Colorado Center for Law and Policy  
Democrats for Education Reform  
The Education Trust  
Georgetown Center for Education and the Workforce  
Higher Learning Advocates

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<sup>12</sup> “Why First-Generation Students Need Data”. April 2016. (Young Invincibles: Washington, DC). Retrieved from: <http://younginvincibles.org/millennial-voices/first-generation-students-need-data/>.

<sup>13</sup> U.S. Department of Education. August 2018. “U.S. Department of Education Proposes Overhaul of Gainful Employment Regulations”.

Institute for Higher Education Policy  
Pretty Good Consulting, Inc.  
Public Insight Corporation  
Lehman College-City University of New York  
National Association for College Admission Counseling  
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