



January 18, 2017

Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave., SW
LBJ Building, Room 216-32
Washington, D.C. 20202-4537

RE: Comments on New Information Collection: ED-2017-ICCD-0113

To Whom It May Concern:

Thank you for the opportunity to comment on Federal Student Aid's (FSA) plans for data collection from institutions participating in its experiments under the Experimental Sites Initiative, as published in the Federal Register on September 7, 2017 and published again on December 19, 2017 (ED-2017-ICCD-0113). This data collection presents a significant opportunity to ensure that FSA is measuring the outcomes of students in these experiments, analyzing information about the programs, and transparently publishing its findings, both interim and final. Our additional or revised questions, informed by our research and our extensive work with the field on many of these issues, will help to better describe the results of these experiments and drive future policy changes.

We submitted comments on the first round of the public comment period, and were disappointed to see that none of our comments--or indeed, any of the comments submitted by individuals and organizations interested in the experiments--were accepted in any form. That is particularly disheartening given that the current data collection procedures have been haphazard and highly limited.¹ As we wrote along with Andy Feldman, an expert in evidence-based policymaking, in *The Hill* recently, the Experimental Sites Initiative has failed to fulfill its promise to learn what works and what does not in federal financial aid policy.² That is in no small part because the Department of Education has placed too little emphasis on the importance of evaluations and even descriptive data analysis. The Department's rejection of our comments only furthers that impression.

¹ Barrett, Ben and Amy Laitinen. "Off Limits: More to Learn Before Congress Allows Colleges to Restrict Student Borrowing." *New America*. May 2017: <https://na-production.s3.amazonaws.com/documents/Off-Limits.pdf>.

² Feldman, Andy, Clare McCann, and Amy Laitinen. "The government has a useful tool to help more Americans go to college." *The Hill*. 22 November 2017: <http://thehill.com/opinion/education/361496-the-government-has-a-useful-tool-to-help-more-americans-go-to-college>.

Specifically, the Department noted in response to our comments that “[m]any of the specific suggestions will be addressed by the proposed data collection, however, (sic) FSA determined the size, scope, and evaluation design to fit the available resources.” We do not believe this constitutes a sufficient review of our comments, which entail 59 individual suggestions across eight separate experiments. Many of these suggestions would require little additional work on the part of the Department, minimal additional tracking on the part of the school, and would provide valuable information that could inform future policy. Given the urgency of learning about the Department’s experiments--for instance, several of the policies currently in the experimentation phase were proposed in a recent House of Representatives bill that has already passed out of committee--we strenuously urge the Department to take these recommendations and its obligation to consider comments from the public seriously.

Finally, it is essential that any data collected through the experiments be collected comprehensively and published in a timely manner. That includes publishing interim results; completing and making public the required biennial report to Congress on the status of the experiments; and using the most rigorous methodology possible (particularly for the loan counseling experiment, which was designed for a rigorous evaluation). Given that many of these experiments are already ongoing, we also urge the Department to collect data going back at least one year, to provide a longer timespan for the data collection.

Our comments below include suggested revisions and additions to the proposed data collection for each of the currently running experiments, as well as our consideration of the Department’s own responses to these comments. Please do not hesitate to reach out if you have further questions or wish to discuss these comments in greater detail. You may reach us at laitinen@newamerica.org and mccann@newamerica.org.

Thank you for your consideration of these comments.

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Prior Learning Assessment

Prior learning assessments may offer students critical opportunities to earn credit for their experience and knowledge and to complete college more quickly and at a lower cost. However, relatively little is known about the current landscape of prior learning assessment (PLA); and this experiment represents the best opportunity for policymakers to study how PLA is being implemented at school and how it could be supported through the federal financial aid system. To inform those efforts, we propose to add several additional questions.

- What was the cost of each prior learning assessment used?
- What was the institution's policy for determining the amount to include in a student's COA for the cost of a prior learning assessment? What costs did the institution include in COA (e.g. test preparation, tutoring, etc.)?
- What percentage of students passed the PLA on their first attempt? What percentage required additional time and/or costs to pass the assessment and earn the credit available to them?
- What percentage of students who received federal aid for PLA costs were still enrolled one year later? What percentage had completed? What percentage of students who did not receive federal aid but received credit through PLA (in the cohort prior to the experiment's launch and/or in the same year but who did not participate in the experiment) had these outcomes?

Limited Direct Assessment

The draft data collection document includes data points that will result in answers to a number of useful questions about direct assessment programs participating in the federal financial aid system through this experiment. However, without additional context about the nature of the programs and how they are being implemented, policymakers will largely be flying blind as they determine new federal policy. These suggestions are also included in the comments from the Competency-Based Education Network (C-BEN); we support and reiterate those recommendations here.

- Describe how competencies are packaged in the direct assessment program conducted under this experiment (standalone competencies; multiple competencies in course-like units; or other arrangement).
- How many competencies are included in the direct assessment program conducted under this experiment?
- How are terms defined in the direct assessment program in this experiment?
- Are students in this direct assessment program able to adjust their pace of completion of each unit?
- To what extent are direct assessment students in this program allowed to work in multiple competencies (or courses) simultaneously?

- Are students charged using a subscription model, per-unit charge, or other pricing structure?
- How were the program's individual competencies determined and validated as the appropriate set of competencies for the credential being earned?
- How do institutional transcripts communicate competencies to enable transfer, admission to other institutions, and/or employment?

Competency-Based Education

Competency-based education programs allow students to set an appropriate pace for their educational experience, and high-quality competency-based programs ensure students have truly earned their credentials by requiring them to demonstrate they have truly learned the material before advancing. However, policymakers still know relatively little about competency-based programs and how they may interact with the federal financial aid system if formally incorporated into the law. Rigorous testing of these programs is needed to identify the potential of CBE programs, assess its implementation, and evaluate its implications for students' financial aid dollars. To that end, we recommend adopting additional data elements. These suggestions are also included in the comments from the Competency-Based Education Network (C-BEN); we support and reiterate those recommendations here.

- Describe how competencies are packaged in the CBE program conducted under this experiment (standalone competencies; multiple competencies in course-like units; or other arrangement).
- How many competencies are included in the CBE program conducted under this experiment?
- How are terms defined in the CBE program in this experiment?
- Are students in this CBE program able to adjust their pace of completion of each unit?
- To what extent are CBE students in this program allowed to work in multiple competencies (or courses) simultaneously?
- Are students charged using a subscription model, per-unit charge, or other pricing structure?
- How were the program's individual competencies determined and validated as the appropriate set of competencies for the credential being earned?
- How do institutional transcripts communicate competencies to enable transfer, admission to other institutions, and/or employment?

EQUIP

The partnerships established by institutions through EQUIP are first of their kind for most institutions of higher education. To understand how institutions were able to successfully establish such partnerships, and to investigate their complexities, the Department needs to

ask more questions about the nature of those partnerships, about the programs institutions are offering, and about the outcomes students experience within them.

- What percentage of the program was offered by the non-traditional provider, and what percentage was offered by the institution?
- What are the faculty/training provider credentials for the non-traditional provider?
- What student support services, if any, did the institution and non-traditional provider each offer?
- What process did the institution's accreditor follow in signing off on the creation of the new program (i.e., substantive change review, other)?
- What input measures/quality assurance did the QAE look at prior to the program's launch?
- Please provide the data collected and analysis conducted (by the QAE) related to inputs or program design for the program conducted under the experiment.
- How did the QAE benchmark the program's student outcomes to ensure adequate thresholds were set?
- How did the QAE validate the student outcomes data collected under the experiment?

Second Chance Pell

Research shows that educational programs offered to prisoners while they are incarcerated dramatically decrease the rate of recidivism and help formerly incarcerated individuals find work after leaving school.³ A rigorous evaluation of the Second Chance Pell experiment could provide additional evidence about the types of programs that are most effective, the value of providing Pell Grants to incarcerated individuals, and the long-term payoff. However, even in the absence of a rigorous evaluation, descriptive statistics and qualitative information like those outlined in this information collection request could help inform future efforts. In addition, we propose to include several other questions about the programs in question.

- What percentage of the students enrolled in the program during the last award year are eligible for release within five years?
- If applicable, what percentage of students released from prison before completing the program during the last award year re-enrolled afterwards? What percentage of those students later completed their program of study?
- If applicable, what percentage of students who completed the program and then were released from prison have found a job? What percentage are working in the field for which they trained?

³ Davis, Lois M., Robert Bozick, Jennifer L. Steele, Jessica Saunders and Jeremy N. V. Miles. "Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of Programs That Provide Education to Incarcerated Adults." Santa Monica, CA: RAND Corporation, 2013:
https://www.rand.org/pubs/research_reports/RR266.html.

Dual Enrollment

Dual enrollment programs are well-founded on an evidence base that suggests they increase the rates of college enrollment, credit accumulation, and retention.⁴ Yet students in dual enrollment programs are not currently eligible for federal Pell Grants, generating questions about the implications of opening the federal aid programs to these types of programs. A rigorous evaluation of the dual enrollment experiment could provide critical information about the effects of providing Pell Grants to high school students, the outcomes of students in dual enrollment programs, and the benefits for particular subgroups of students, such as low-income students. However, even in the absence of a rigorous evaluation, descriptive statistics can provide important hints at answers to these questions and suggest areas for future research. To that end, we propose collecting more detail on those programs participating in the dual enrollment experiment. Many of these recommendations reiterate those of the College in High School Alliance.

- What are the credentials of teachers in the dual enrollment program under this experiment?
- What professional development opportunities are offered to dual enrollment educators participating in the program, if any?
- Is the program offered at the high school or at the college?
- What process did the accreditor follow in approving the program under this experiment?
- What, if any, articulation agreements does the college providing credit under this experiment have with other colleges and universities?
- What, if any, admissions standards did the college establish for students to participate in the dual enrollment program?
- Are students who do not meet academic readiness standards in a particular area of study given access to remediation opportunities not funded by federal Pell Grants? If so, how are students identified for remediation, and how and by whom is remediation delivered?
- What, if any, guidance did the college and the high school offer as students selected coursework? Please include a copy of any standardized written materials offered to students via email, handout, or other means.
- What level of students did you accept? (Seniors only; seniors and juniors; all high school grades)
- What, if any, limits are placed on courses or programs of study that dual enrollment students can enroll in? How, and by whom, are those courses and programs of study selected for inclusion in approved course catalogue for dual enrollment?

⁴ Karp, M, and Hughes, K. (2008). Study: Dual Enrollment Can Benefit a Broad Range of Students. *Techniques: Connecting Education and Careers* (J1) 83.7, 14-17; An, B. P. (2012). "The Impact of Dual Enrollment on College Degree Attainment: Do Low-SES Students Benefit? *Educational Evaluation and Policy Analysis*, 35, 57-75; and Karp, M. M., Calcagno, J. C., Hughes, K. L., Jeong, D. W., & Bailey, T. R. (2007). *The Achievement of Participants in Dual Enrollment: An Analysis of Student Outcomes in Two States*. Saint Paul, MN: University of Minnesota, National Research Center for Career and Technical Education.

- What legal or other restrictions or requirements are in place regarding dual enrollment?
- Describe the systems you have had to implement to administer federal financial aid for students in the experiment.
- Describe the strategies needed to offer the required student advising and supports to students in the experiment.
- Describe the dual enrollment degree pathways provided to students in the experiment.
- Describe any STEM and/or workforce alignment programs for students in the experiment.

Loan Counseling

The Department is already requesting much of the most useful information to inform a future evaluation of the loan counseling experiment. To support a timely evaluation with an appropriate methodology, the Department should work to establish its plans for a rigorous evaluation of the loan counseling experiment as quickly as possible. Moreover, the evaluator may require additional information from institutions to facilitate the necessary analysis. In the interim, we believe these additional items can provide additional needed context as to the implementation of the experiment at institutions and its implications for federal policymaking.

- If the counseling approach used was developed by the institution, please detail the main components of its curriculum, the expected amount of time required to complete the counseling, and any personalized information presented to students (e.g., showing students their NSLDS portal to look at their current loan amounts).
- How much additional staff time was required to conduct annual counseling for all students in the treatment group?
- What is the amount of time required for students to complete the counseling (predicted and actual)?
- What is the word count of the counseling conducted, if not using the Department of Education's FACT? How many minutes of video and/or audio are included?
- If applicable, please provide pre-test and post-test score distributions for students who complete the counseling.

Limiting Unsubsidized Loans

The Department of Education launched the loan limits experiment in 2011, but to date, little information of value to policymakers and the public has been made available.⁵ While

⁵ Barrett, Ben and Amy Laitinen. "Off Limits: More to Learn Before Congress Allows Colleges to Restrict Student Borrowing." *New America*. May 2017: <https://na-production.s3.amazonaws.com/documents/Off-Limits.pdf>.

the draft information collection request would collect some useful information, more detail could provide a clearer sense of how this policy change would be implemented on the ground and on any consequences or benefits to students and to the institutions. To that end, we recommend collecting the information below in addition to the elements included in the notice already.

- How did the institution determine the subset of students for which it would reduce loan limits (e.g., data analysis of defaulters, financial aid office determination of the highest-risk borrowers, etc.)?
- Please describe any other methods through which the institution has attempted to curb student borrowing outside of the reduced loan limits through this experiment (e.g., improvements to mandatory loan counseling, changes to award packaging, behavioral nudges, etc.)
- How much did the institution return in unearned Title IV funds (R2T4) during the most recently completed award year?

Student-Level Data Collection

The existing student-level data points will provide for useful analysis by the Department, and the agency should commit to producing a range of data elements for each of the experiments and publishing the results for the public. Such data elements, particularly those around students' outcomes, will help policymakers to assess the success of the experiments and inform future reforms. For instance, the data points already included in the information collection request will enable the Department to study the percentage of Pell Grant lifetime eligibility used by students through the experimental program; the typical time to completion and cost to students of competency-based programs; and the debt, default, and delinquency outcomes of students in the limiting unsubsidized loans experiment. However, we also believe that more detail could enable deeper study without requiring substantial additional burden from schools. We have outlined each of the student-level questions that should be added below, along with the names of the applicable experiments for each [in brackets].

- How many credits did the student transfer into the program? [PLA, LDA, CBE, EQUIP, Limiting Unsubsidized Loans]
- What, if any, prior degrees does the student hold? [PLA, LDA, CBE, EQUIP, SCP]
- Did the student take on any private student loans for the most recently completed award year? If so, what amount? [Limiting Unsubsidized Loans]
- What is the student's date of entry to the program? [PLA, LDA, CBE, EQUIP, SCP, Dual Enrollment, Limiting Unsubsidized Loans]
- What is the student's date of completion from the program? [PLA, LDA, CBE, EQUIP, SCP, Dual Enrollment, Limiting Unsubsidized Loans]
- What is the student's date of completion from high school? [Dual Enrollment]

- How many credits/hours did the student attempt in the most recent award year?
[PLA, LDA, CBE, EQUIP, SCP, Dual Enrollment]
- How many credits/hours did the student complete in the most recent award year?
[PLA, LDA, CBE, EQUIP, SCP, Dual Enrollment]

Additionally, many of these experiments are designed to improve students' chances of success in the labor market. To that end, the Department should use the student-level information already collected here to calculate aggregate program-level earnings information. That will require the Department to establish a data matching agreement (or utilize an existing one) with IRS, SSA, or Census, which hold the most comprehensive, valid, and reliable data on income statistics. This requires no additional collection from schools, but can provide the kind of useful, apples-to-apples information for which colleges themselves are looking.