



May 2, 2022

The Honorable Bobby Scott  
Chairman  
Committee on Education and Labor  
U.S. House of Representatives  
2176 Rayburn House Office Building  
Washington, DC 20515

The Honorable Virginia Foxx  
Ranking Member  
Committee on Education and Labor  
U.S. House of Representatives  
2101 Rayburn House Office Building  
Washington, DC 20515

The Honorable Patty Murray  
Chair  
Committee on Health, Education,  
Labor and Pensions  
U.S. Senate  
Washington, DC 20510

The Honorable Richard Burr  
Ranking Member  
Committee on Health, Education,  
Labor and Pensions  
U.S. Senate  
Washington, DC 20510

Dear Chairs Scott and Murray and Ranking Members Foxx and Burr:

As your respective chambers meet to reconcile differences between the Senate-passed United States Innovation and Competition Act (USICA) and the House-passed America COMPETES Act (COMPETES), I write to convey our endorsement of the College Transparency Act (or CTA, S. 839/H.R. 2030) and urge the inclusion of the CTA language currently in COMPETES in any final conference measure.

Enactment of the CTA would have a disproportionate, positive impact on students, institutions, policymakers and taxpayers. The CTA would plug troubling holes that exist in federal higher education data and would aggregate individual-level data into comprehensive and useful information that will empower students and families to make informed decisions on institutions and academic programs. It will allow researchers and policymakers to use comprehensive data to inform policy and track performance across broad ranges of student and institutional categories, resulting in better targeted and more effective laws and regulations. Finally, it will give colleges and universities new tools to assess their programs and identify areas of success to build on, as well as areas to target for improvement, allowing institutions to better serve students and boost student success.

For these reasons, we strongly believe that the CTA is in the interest of our nation, its students, and the colleges and universities that serve them. The U.S. Department of Education under Republican and Democratic administrations has made significant efforts to expand the postsecondary education information available in order to shine a light on higher education outcomes. These efforts are laudable but fall short of what is needed and only federal legislation can fully address the vast shortcomings in higher education data. For

example, much of the data on the College Scorecard only accounts for recipients of Title IV federal student aid, failing to include the outcomes of nearly 40 percent of college students. This gap is particularly pronounced at the nation's community colleges. For example, in 2016-17 within the California Community College System, only 18.4 percent of students received Pell Grants and 1.5 percent of students received federal loans. Thus, nearly four in five California community college students are excluded from existing federal data.

The CTA would also provide critical aggregate information at the institutional- and programmatic-level on graduation rates, student debt levels, and employment outcomes for important demographic criteria. This would allow for much better data on the outcomes of first-generation and Pell students, student veterans, distance education students and part-time students. In addition, disaggregation by race will help colleges and universities identify and close possible equity gaps. As Congress considers extending Pell eligibility to short-term programs, the CTA would provide much more robust information on such programs while minimizing data collection burdens on institutions as are envisioned in other, extremely onerous, proposals.

Given the scope of American higher education, and the diversity of existing institutional systems, there will necessarily be initial implementation challenges at many institutions. This isn't a reason not to move forward, but is an important factor that Congress and the Administration should address. Smoother implementation will result in faster adoption and more accurate data across all institutions, and for this reason we believe Congress and the Administration should consider ways to provide financial and logistical support for low-resourced institutions such as Historically Black Colleges and Universities, Tribal Colleges and Universities, Hispanic-Serving Institutions and other Minority-Serving Institutions as they adapt their systems. Similarly, given the importance of ensuring privacy and security of student-level data in the system, every appropriate effort must be made to safeguard these data. The CTA already includes robust measures to protect privacy and security of data, which build on the protocols in place within the National Center for Education Statistics and federal data minimization standards developed by the National Institute of Standards and Technology. These provisions can be enhanced by specifying the inclusion of independent experts with experience in data security and privacy protection as part of the design, implementation and management of the system.

As Congress considers this important legislation to enhance American competitiveness, and strengthen our technological edge, it is important that the final conference bill includes language that will have a wide-ranging impact on affordability and transparency in higher education. We thank you for your attention to this letter and look forward to working with Congress and the Administration to see this language enacted and implemented.

Sincerely,



Ted Mitchell  
President

Support for College Transparency Act in USICA/COMPETES  
May 2, 2022

On behalf of:

American Association of Community Colleges  
American Association of State Colleges and Universities  
American Council on Education  
Association of American Universities  
Association of Public and Land-grant Universities