



College Transparency Act of 2019

The American Association of Community Colleges (AACC) strongly supports the College Transparency Act (CTA), which has been reintroduced on a bipartisan basis in both chambers of Congress. The Senate legislation is sponsored by Sens. Bill Cassidy (R-LA) and Elizabeth Warren (D-MA) and has already gained 17 co-sponsors. Original House sponsors include Reps. Paul Mitchell (R-MI), Raja Krishnamoorthi (D-IL), Elise Stefanik (R-NY), and Josh Harder (D-CA).

The CTA would create a postsecondary federal data system that would collect and generate accurate, comprehensive information on student progress and success. The absence of such a system leaves a gaping hole at the center of American higher education, impacting prospective and current students, policymakers, and the public.

Community colleges have a particular stake in this legislation. One reason is their role in preparing students for transfer. Almost as many community college students transfer to another institution as complete a credential at the original college within the standard, “150% of normal time” graduation measurement used by the federal government. This bill would capture transfers on a comprehensive basis, which is not currently occurring.

Equally important, the legislation would allow students and institutions to know how college completers fare in the job market. Students consistently state that their primary reason for attending college is related to employment. The absence of information on this key outcome undermines the ability of students to make appropriate choices about which institution, program, and credential to pursue.

The legislation also would save money for institutions and, by extension, students. The federal data collection and disclosure framework created by this legislation would eliminate the need for numerous overlapping state, private, and institutional collection efforts. Its comprehensive nature would foster numerous efficiencies.

Other features of the legislation require the U.S. Department of Education (ED) to:

- Issue reports based on accurate student information including, but not limited to, enrollment, education costs and financial aid, progression, completion and post-collegiate outcomes, which would be sent back to states and institutions to inform strategies to improve student success.
- Provide information disaggregated by race, ethnicity, and gender, as well as federal aid recipients, intended to identify inequities in student achievement.
- Require development of a website that can be accessed by multiple users – students, parents, employers, researchers, policymakers, etc. – for multiple purposes.

There are many misunderstandings about the proposed unit record data system. In addressing this issue, policymakers should consider the following:

A federal college unit record data system is not qualitatively different from other federal data collection efforts.

There are numerous federal collections of individual data. The Social Security Administration, IRS, and Census Bureau all collect important data on individuals. ED currently collects student-level data for millions of students' Title IV aid each year, representing more than 80% of all undergraduate students. The CTA explicitly prohibits the collection and reporting of the most sensitive personal information, including health data, citizenship status, discipline records, elementary and secondary education data, course grades, and religion. The current URDS ban prevents a full picture of completion rates that account for transfer students, outcomes disaggregated by key student characteristics, and students' knowledge of program-level earnings.

There are no viable alternatives to collecting these data at the federal level.

Only the federal government can provide comprehensive data on postsecondary institutions that are accurate, complete, and consistent across states and regions. Furthermore, the federal government is the only entity with nationwide data on employment and earnings.

The data can be kept securely.

The CTA requires data collection to be led by the National Center for Education Statistics (NCES), a statistical agency with strong protocols for securing data and protecting student privacy. NCES is already required by law to develop and enforce standards to protect individual-level data collected as part of sample surveys, including a cross-agency Disclosure Review Board. As added protection, the Act requires NCES to institute the latest federal data security standards developed by the National Institute of Standards and Technology.

Information on students who do not receive federal student aid is needed.

Students deserve quality information about how well institutions are serving all students, regardless of whether they receive federal aid. At some institutions, large shares of the student body do not receive Title IV assistance. Excluding these students leads to incomplete, non-representative, and possibly even misleading outcomes. Furthermore, establishing a federal unit record data system is an entirely appropriate role for the federal government, given its tremendous investment in federal student aid.

AACC believes that this legislation is long overdue and urges all members of Congress to support it, as part of the ongoing Higher Education Act (HEA) reauthorization.

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