



April 19, 2023

The Honorable Bernie Sanders  
Chair  
United States Senate Committee on Health,  
Education, Labor, & Pensions

The Honorable Bill Cassidy  
Ranking Member  
United States Senate Committee on Health,  
Education, Labor, & Pensions

Dear Chairman Sanders and Ranking Member Cassidy:

The American Association of Community Colleges (AACC) appreciates the opportunity to provide feedback ahead of the reauthorization of the Education Sciences Reform Act (ESRA). AACC is the primary advocacy organization for the nation's 1,038 community colleges and more than 10 million students.

As you work to reauthorize ESRA, we urge the Committee to focus first and foremost on improving the comprehensiveness of the federal government's postsecondary data collections. Regrettably, significant improvement in this respect is still needed. More complete, accurate, and timely data on certain key aspects of higher education is needed to optimize postsecondary offerings and drive student success. Community colleges and other stakeholders are utterly dependent on federal data collections in this work. The reauthorization of ESRA gives Congress a chance to make key improvements in this area.

### **The College Transparency Act**

AACC strongly supports the bipartisan, bicameral College Transparency Act (CTA). The CTA would create a secure, privacy-protected student-level data network within the National Center on Education Statistics (NCES). This long-overdue legislation would have a transformative impact on American higher education, because it would ensure that the most essential data allowing educators and policymakers to evaluate institutions would be available on for all students in all institutions of higher education. In addition, it would improve the quality of post-college outcomes measures, decrease institutional burden, duplication, and inefficiencies, and therefore reduce costs. It would allow students and families to choose a college or program that best fits their goals. It would also drive institutional improvement, align workforce-oriented programs with community needs, and invest in evidence-based policies and practices. Therefore, we urge the Committee to advance this legislation as it works to reauthorize ESRA and strengthen our federal education data infrastructure.

### **Outcomes Measures in IPEDS**

AACC also urges the Committee to better capture success at community colleges through improved outcomes measures reporting. For too long, our federal data system was designed around what was once called a "traditional student" – a first-time, full-time student who starts in the fall, completes their

degree or credential within 150 percent of normal time, and does not transfer. The standard federal Graduation Rate (GR) reinforces this assumption. The Integrated Postsecondary Education Data System (IPEDS) later introduced two additional measures of success: the Graduation Rate 200% (GR200), which measures first-time, full-time students' completion status at 100 and 200 percent of "normal time," (a statutory requirement) and Outcome Measures (OM), which measures all degree-seeking students' highest credential achieved 4, 6, and 8 years after entry. We commend the creation of the outcomes measures, which were implement under current regulatory authority.

While the Department of Education has recently adopted the 8-year OM as the default measure of success on the College Scorecard, the more limited 150 percent GR continues to serve as the default for many federal education statistics resources and significantly limits the accuracy and utility of this data to inform research, policy, and institutional improvement. Also, the government consistently excludes transfers from completion rates, despite the fact that the Higher Education Act (HEA) specifically defined completion as including transfer.

This issue is particularly significant for community colleges, as the standard GR excludes a large share of their students, including those who enroll part-time, enroll in the spring or summer, and transfer or reenroll in higher education institutions. As stated, it ignores a key success measure for two-year institutions by not including upward transfer or students' degree attainment after they transfer to another institution. Finally, the GR fails to acknowledge the realities facing the community college students who complete their programs after 150 percent of normal time because they are working, parenting, and navigating other responsibilities.

The bipartisan Graduation Reporting for Accuracy and Decision-Making (GRAD) Act would modify the existing graduation rates to better reflect community college students' pathways to degree completion. The GRAD Act closely reflects the metrics in AACC's [Voluntary Framework of Accountability \(VFA\)](#), currently used by hundreds of community colleges to drive institutional improvement and promote student success. AACC strongly supports the legislation.

As the Committee works to reauthorize ESRA and improve the quality and utility of federal education data, Congress should ensure that the standard measure of postsecondary success used by students and families, institutions, employers, researchers, and policymakers accurately reflects the educational paths of community college students. The Committee can do this by setting a clear priority of deemphasizing the original GR within IPEDS data collections and resources. It also should continue to refine existing outcomes measures to capture the experiences of community college students more accurately. Finally, it should move towards a comprehensive postsecondary data system along the lines of that proposed in the College Transparency Act.

For more information, please contact AACC Senior Vice President of Government Relations, David Baime ([dbaime@aacc.nche.edu](mailto:dbaime@aacc.nche.edu)) or Government Relations Manager, Kathryn Gimborys ([kgimborys@aacc.nche.edu](mailto:kgimborys@aacc.nche.edu)).