NATIONAL SKILLS COALITION
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Comments of the National Skills Coalition
Docket ID: ED-2022-OUS-0140
Request for Information Regarding Public Transparency Low-Financial-Value Postsecondary Programs

The National Skills Coalition (NSC) is a national organization fighting for inclusive, high-quality skills training so that people have access to a better life, and local businesses see sustained growth. NSC supports policies that lead to an inclusive economy where workers and businesses who are most impacted by economic shifts, as well as workers who face structural barriers of discrimination or lack of opportunity, are empowered to equitably participate in –and benefit from –a growing economy. NSC welcomes the opportunity to comment on the Department of Education's (the department's) proposal to identify metrics that may be used to assess the value of postsecondary programs and classify certain programs as low-financial-value programs. NSC has a strong interest in ensuring equitable access and strong outcomes for students enrolled in subbaccalaureate programs, as well as those enrolled in longer-term career pathway programs.

Through its Quality Postsecondary Credential Policy Academies, NSC has worked with 11 states to adopt a set of quality criteria to guide state policy and investments that are oriented toward increased attainment of and access to quality non-degree credentials for students.[i] Tailored technical assistance, peer learning, and resource development has helped these states make progress towards defining the key criteria for understanding the value offered to learners, workers, and employers of non-degree credentials and integrating racial equity considerations into states' quality assurance criteria and frameworks. NSC also worked with states to develop data policies for measuring and evaluating the quality and equity outcomes of non-degree credentials and to identify and implement policies that are guided by quality assurance frameworks to increase equitable access to and attainment of quality non-degree credentials.

NSC commends the department's efforts to enhance consumer information available to students and families, including its work on developing and expanding the College Scorecard. In particular, the expansion of the Scorecard to include programmatic level data is important for students considering postsecondary pathways. We recognize that there are limitations to data available for the Scorecard and other federal consumer tools, and hope there may be near-term and longer-term opportunities to provide additional information to consumers on the value of postsecondary education and training programs.

The majority of individuals who pursue a postsecondary credential do so in order to enhance their career and earning prospects.[ii] Yet the array of postsecondary options can be daunting for consumers. It is estimated that there are over one million unique credentials offered in the United States.[iii] Given the vast array of options, students and families need systems to evaluate the quality of credentials to help identify the education and training programs that align with their goals.

Historically, the department and Congress have been particularly focused on institutional-based accountability. The system of governance for that accountability being the triad – gatekeepers consisting of the state (which provides consumer protections), national and regional accreditors (who assess academic quality and institutional mission), and the Department of Education (which certifies institutional eligibility for Title IV funds). While there is some consideration for programmatic quality – including from specialized accreditors and through Gainful Employment regulations – the system by and large tends to look at the institution as a whole.

However, considering the quality of the institution alone does not provide a full picture for most students and families when it comes to evaluating postsecondary opportunities. In considering what institution to attend students will consider a number of factors, including cost, location, selectivity, support services, availability of aid, flexibility, graduation rate, and prestige. Perhaps equally important is the program or field of study a student chooses to pursue. For example, potential earnings can vary greatly for students pursuing subbaccalaureate certificate programs, and do not necessarily correlate to the length of a program.[iv] In fact, in high premium fields, such as IT, certificate holders can out earn degree holders in many instances. Conversely, there are certain fields of study with very low return on investment, and many of these disproportionally enroll women and minority students.[v] Understanding this potential return on investment is important for students when considering their postsecondary options. It is also important from an equity perspective to understand both access and outcomes for historically marginalized groups. It can help facilitate policies to break down barriers for individuals and groups, including women and persons of color, to lead to stronger outcomes.

In an effort to help state policymakers, students, and employers feel confident in their investments in credentials—specifically, non-degree credentials—NSC consulted with 12 states and national organizations to develop a consensus definition of and associated criteria for assessing "quality" for non-degree credentials. NSC defines a quality non-degree credential as one that "provides individuals with the means to equitably achieve their informed employment and educational goals" and which has "valid, reliable, and transparent evidence that the credential satisfies the criteria that constitute quality."[vi] NSC outlines four criteria for a credential to be identified as "quality," including: 1) substantial job opportunities; 2) transparent evidence of competencies mastered by credential holders; 3) evidence of the employment and earnings outcomes of individuals after earning the credential; and 4) stackability to additional education and training.[vii] These criteria are intended to guide sensible budget and policy decisions, advance equity, and put students on a path to success.

Defining and enhancing metrics around postsecondary programmatic value will also be acutely important if Congress were to pass legislation expanding Pell Grant eligibility to short-term education and training programs. NSC strongly supports this expansion, as well as providing strong accountability standards in defining quality for these programs. Additionally, it will be important to provide appropriate consumer information to students and families.

While NSC supports the department's efforts to identify programs that offer low-financial-value, we also believe that it is essential that students and families have the information and tools to identify programs that represent a good return on investment and lead to strong educational and career opportunities. This includes evidence of strong labor market gains, such as employment, earnings, and prospects for advancement. Additionally, assessing the value of programs may go beyond just the financial component and should include whether a program has: strong completion and placement rates (that are disaggregated across groups); a system of academic and non-academic supports; credits that can articulate or stack to additional credentials; significant labor market demand and meets the needs of employers; and an adequate pass rate for students taking licensure or certification exams.

We recognize there are challenges in achieving some of these metrics based on the availability of data but encourage the department to look at ways within its authority to expand consumer information related to quality. Additionally, NSC has addressed several of the department's questions for this request for information below.

Question 1: What program-level data and metrics would be most helpful to students to understand the financial (and other) consequences of attending a program?

The department could consider a few options when attempting to highlight programmatic financial outcomes. The availability of data, of course, is a limitation in some areas. However, we will try to focus on options that may be feasible given the department's authority.

- Programmatic cost – The department could look at programmatic cost in a couple of different ways. In addition to simply listing the costs of tuition and fees, as well as cost of attendance, the department could consider comparing the cost of the program with similar programs in the state, region, or local area.

  The department could also consider a cost-to-earnings metric to demonstrate return on investment to students and families. This may be particularly useful for programs that have little-to-no Direct Loan borrowers. There would be some limitation on the availability of earnings data assuming that the department would only be able to capture students who are Title IV participants. If the department pursues this strategy, we would encourage a metric that looks at programmatic completers. From a consumer information standpoint, students are more likely to want to know what their earnings prospects are if they complete a program. Combining completers and non-completers, while useful from a research standpoint, can be potentially confusing for consumers.

- Completion rate – The department often provides completion rate metrics for consumer tools, including in the College Scorecard. We encourage the department to explore ways to disaggregate these data if possible, in order to better determine whether outcomes are uniform across groups. Categories of disaggregation could include age; gender; race and ethnicity; disability status; income quintile; military or veteran status; first generation college student; and parenting student. We recognize that some of these data may be difficult to obtain based on availability and identity concerns related to cohort size. However, we'd encourage the department to disaggregate to the extent possible and to also cross tabulate data in order to look at multiple categories. In addition to the availability of disaggregated data, the department could also consider a metric on average time to completion.

- Placement or Employment Rates – The department should include metrics related to employment for assessing programmatic value. Ideally, this metric would be able to identify whether an individual is employed in an occupation related to the programmatic field of study. This is particularly important for individuals who enroll in non-degree credential programs. However, there are significant data limitations in achieving this goal. Records of employment are generally provided through state unemployment insurance (UI) wage data. Not only do these data not capture everyone employed in the state (leaving out self-employed, federal employees, and individuals who work in different states), but few states collect data on Standard Occupation Classification or SOC codes. As states enhance their UI wage data, we encourage the department to work with the Department of Labor (DOL) to integrate metrics, such as placement related to field of study, into its consumer facing tools.

- Borrowing and Student Debt – In addition to information on median student debt and repayment, the department should consider instituting a metric looking at debt-to-earnings when evaluating programmatic value. This could be similar to efforts the department has undertaken with its Gainful Employment regulations.

- Earnings – The department should disclose earnings of completers for any consumer information tool and consider earnings of completers and non-completers for policy and research purposes. A metric looking at earnings progression – comparing earnings of an individual prior to enrollment to earnings following at least six months after completion – could also be an indicator that the department considers relative to financial value. In 2019, NSC published a report entitled *Expanding Opportunities, Defining Quality Non-Degree Credentials for States*. Within this report, NSC explored options for states that considering instituting an earning metric for assessing the value of non-degree credentials. Options and considerations for wage metrics included, return on investment relative to cost and time; appropriate earnings for the field of study; comparison of prior earnings; consideration of regional wage differences; and stackability with higher paying credentials.[viii]

- Licensure Pass Rate – The department should consider requiring reporting and disclosure of passage rates for programs of study that culminate in a licensure or certification examination in order for an individual to attain the license or certification necessary for related employment. Many accreditors already require such disclosures, and providing these data was a requirement under the 2014 Gainful Employment rule.

Question 3: In addition to the measures or metrics used to determine whether a program is placed on the low-financial-value program list, what other measures and metrics should be disclosed to improve the information provided by the list?

In addition to the metrics discussed under question number one, the department could consider the following recommendations in assessing the value of an education or training program.

- Labor Market Demand – An additional factor the department could consider in assessing programmatic value is labor market demand for the career or occupation associated with the programmatic field of study. There should be evidence of substantial job opportunities associated with the credential, and quantitative data demonstrating demand beyond just a singular locality. Several states that have already instituted a metric on labor market demand when assessing whether a non-degree credential is a quality credential. These states have considered a combination of different data sources, including current demand; projected growth; and statewide averages for job growth. In question six, we address some potential options for federal data sources in helping identify labor market demand.

- Stackability – While NSC supports assessing stackability as a measurement of value, we also recognize the complexity of doing so at the federal level. Stackable credentials are sequential postsecondary awards that allow an individual to build upon their education and training to progress along a career path. It is preferable that all credentials articulate with or otherwise provide credit towards another postsecondary credential. Examples of such stackability include, but are not limited to articulation agreements, direct transfer agreements, credit for prior learning, career pathways, and data demonstrating that a credential leads to continued education.

- Student Supports – The department could also look at ways to incorporate data from IPEDS survey on institutional characteristics and potentially expand those survey questions. For example, IPEDS already asks questions regarding the availability of credit for prior learning, academic counseling, and employment services. The availability of these services represents some value for students at both the institutional and programmatic level. The IPEDS survey could also be expanded to ask institutional level questions around the availability of emergency aid or whether the institution has a system in place to connect students with need-based assistance such as SNAP or TANF. This would not only be important information for students considering an education or training program, but asking the question via IPEDS may also encourage institutions to offer these services.

Question 6: What additional data could the Department collect that would substantially improve our ability to provide accurate data for the public to help understand the value being created by the program? Please comment on the value of the new metrics relative to the burden institutions would face in reporting information to the Department.

In addition to the sources mentioned in the previous questions, the following are data sources that the department may wish to consider when determining programmatic value.

- As mentioned in the previous question, NSC is supportive of using labor market demand as a metric to evaluate programmatic value. This is a metric that many states currently use in defining a quality non-degree credential.[ix] If the department were interested in using federal data sources to support evaluating occupational demand O*Net and the Bureau of Labor Statistics (BLS) would be potential sources of data. However, given the changing nature of occupational demand the department would probably want to provide institutions with the opportunity to dispute an O*Net or BLS-based evaluation if they could demonstrate demand based on state or local data. This could include state Labor Market Information data or evidence of emerging job opportunities.

- The department may also want to consider cross collaboration with DOL to share data on programs authorized under the Workforce Innovation and Opportunity Act (WIOA). While IPEDS data is generally limited to individuals participating in Title IV, WIOA's six core accountability indicators look at every individual enrolled in a program (not just those receiving assistance, such as an Individual Training Account). While this will not fill in gaps to look at every student enrolled in every program, it would at least provide earnings and other outcomes data for programs under the WIOA Eligible Training Provider List.
- In addition to pulling data from IPEDS on institutional characteristics, the department could consider integrating information on institutional grantees of the Child Care Access Means Parents in School (CCAMPIS) grant program. Access to affordable, high-quality child care is an essential support for many students with children. Providing information to students on the potential availability of subsidized child care at an institution could serve as an important factor for program choice.

NSC appreciates the opportunity to provide input on this topic. Please contact Jennifer Stiddard (jennifers@nationalskillscoalition.org) if you have any questions.

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[i] https://nationalskillscoalition.org/networks/state-initiatives-and-academies/quality-postsecondary-credential-policy-academy/
[ii] https://news.gallup.com/reports/226457/why-higher-ed.aspx
[iii] https://credentialengine.org/all-resources/counting-credentials/
[iv] https://cewgeorgetown.wpenginepowered.com/wp-content/uploads/2014/11/Certificates.FullReport.061812.pdf
[v] Ibid.
[vi] https://nationalskillscoalition.org/wp-content/uploads/2020/12/9.18-NSC_QNDC-paper_web.pdf
[vii] Ibid.
[viii] Ibid.
[ix] Ibid.