

May 28, 2024

Dr. Jennifer Engle
Senior Advisor, Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave., SW, Room 5C136
Washington, D.C. 20202

Re: Postsecondary Student Success Recognition Program (PSSRP)
Docket ID: ED-2024-OUS-0014

Dear Dr. Engle,

Thank you for the opportunity to comment on the U.S. Department of Education's (ED) request for information regarding the development of the Postsecondary Student Success Recognition Program (PSSRP), a recognition program for institutions of higher education that support students in completing affordable credentials of value and prepare them for workforce success and civic engagement. The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit research, policy, and advocacy organization committed to driving systemic change in higher education to advance equitable outcomes and generational impact for communities historically marginalized on the basis of race, ethnicity, or income. We lead the [Postsecondary Data Collaborative](#) and provide timely, evidence-based, and student-centered research to inform policy decisions with a particular focus on improving racial and socioeconomic equity, postsecondary value, and postsecondary data quality.

We support the Department's efforts to develop a recognition program that not only recognizes institutions doing exceptional work to ensure successful outcomes for all students, but also recognizes institutions that ensure diverse student representation, including underserved populations. Our higher education system has long valued exclusivity over inclusivity, defining prestige based on how many students are kept out rather than how many are welcomed in and served well. Now is the time for institutions serving large numbers of students from low-income backgrounds, first-generation students, and students historically underrepresented in postsecondary settings, as well as those delivering strong student outcomes and promoting economic mobility, to receive the recognition they deserve.

IHEP's expertise is rooted in our research about measuring institutional outcomes. Our Postsecondary Metrics Framework, developed in 2016, is a guide for institutional improvement efforts to better serve all students and helps policymakers support the development of student-focused, evidence-driven policies. More recently, as part of the [Postsecondary Value Commission](#), IHEP developed the [Postsecondary Value Framework](#), a tool that measures the

economic value institutions deliver to students using a series of thresholds. Leveraging the framework, the Commission created the [Equitable Value Explorer](#). This interactive tool allows users to compare post-college earnings across institutions and student populations, thereby measuring the economic value that institutions deliver to students.

As this recognition program is developed, we encourage ED to prioritize equity, student outcomes, equitable admissions policies, student experience and belonging, and appropriate standards of evidence. Our comments provide input on the following:

1. Metrics that ED should use to determine institutional eligibility;
2. Information that ED should consider as part of the institutional application; and
3. The role research and evidence-based solutions and interventions should play in fostering student achievement.

1. Determining Institutional Eligibility

For the first iteration of the PSSRP, ED should, wherever possible, use publicly available data. Examples include information in the Integrated Postsecondary Education Data System (IPEDS) or displayed in the College Scorecard which is easily available, standardized, and has gone through review and revision processes. This will expedite the application and review process and will minimize burden for institutions. However, IHEP recognizes that existing data sources have limitations. Institutions that do not meet eligibility requirements based on the data below should be allowed to apply after providing alternative documentation that shows the institution meets requirements based on institutional or state-level data.

Enrollment, Net Price, and Completion Metrics

Where possible, ED should leverage through the Postsecondary Student Success Grant Program (PSSG) application process. These measures mirror performance metrics detailed in IHEP's Postsecondary Metrics Framework (see Table 1-1 below). Increasingly, higher education practitioners are recognizing the importance of collecting, publishing, and using performance metrics like these to improve the student experience and reward institutions that have adopted best practices for supporting students in accessing and completing affordable credentials of value. Many of these measures are accepted broadly and informed by [experts](#) across the higher education landscape.

Table 1-1: A Field-Driven Metrics Framework

	ACCESS	PROGRESSION	COMPLETION	COST	POST-COLLEGE OUTCOMES
PERFORMANCE	Enrollment	Credit Accumulation Credit Completion Ratio Gateway Course Completion Program of Study Selection Retention Rate Persistence Rate	Transfer Rate Graduation Rate Success Rate Completers	Net Price Unmet Need Cumulative Debt	Employment Rate Median Earnings Loan Repayment and Default Rates Graduate Education Rate Learning Outcomes
EFFICIENCY	Expenditures per Student	Cost for Credits Not Completed Cost for Completing Gateway Courses Change in Revenue from Change in Retention	Time/Credits to Credential Cost of Excess Credits to Credential Completions per Student	Student Share of Cost Expenditures per Completion	Earnings Threshold
EQUITY	Enrollment by (at least) Preparation, Economic Status, Age, Race/Ethnicity	Progression Performance by (at least) Preparation, Economic Status, Age, Race/Ethnicity	Completion Performance by (at least) Preparation, Economic Status, Age, Race/Ethnicity	Net Price and Unmet Need by (at least) Economic Status, Preparation, Age, Race/Ethnicity Debt by (at least) Economic Status, Age, Race/Ethnicity, Completion Status	Outcomes Performance and Efficiency by (at least) Preparation, Economic Status, Age, Race/Ethnicity, Completion Status

When defining eligibility standards, ED should use publicly available IPEDS and College Scorecard data to assess the below data points for each institution.

1. Percentage of students who are Pell Grant recipients
2. Undergraduate composition disaggregated by race/ethnicity
3. Overall graduation rate, including IPEDS Outcome Measures for institutions where a majority of students are not first-time, full-time.
4. Graduation rates for each subgroup, including by race/ethnicity, Pell Grant receipt, and gender
5. Transfer-out rate (for institutions with a transfer mission)
6. Net price, especially for students from families with an annual income less than \$30,000
7. Cohort default rates and loan repayment rates. Please note, although these datapoints are presently skewed following the COVID-19 payment pause, this information should be incorporated in future versions of the PSSRP.

Student’s Post-College Economic Outcomes

We recommend that ED leverage College Scorecard data on students’ post-college earnings to ensure institutions receiving ED’s recognition provide a positive return on investment for their students. Institutions can improve the value to students by prioritizing affordable educational opportunities, ensuring students receive credentials of value, and supporting students and graduates in navigating career transitions.

Currently, the College Scorecard publishes data on the share of an institution’s students that earn more than the typical high school graduate. This type of earnings benchmark emphasizes the need for institutions to provide a minimum economic return for their students, while

avoiding a focus on median earnings outcomes alone, which tend to be highest among the most exclusive institutions.

We also recommend incorporating measures of students' investments in college, in addition to their returns, because both elements contribute to the value that students receive from their postsecondary education. For example, the Postsecondary Value Commission's [Threshold 0](#) measures whether students earn at least as much as a high school graduate, plus enough to recoup their cumulative net price over a ten-year period. Threshold 0 incorporates students' costs and grant aid over the duration of their enrollment, as well as the cost of student loan interest.

Publicly available data sources are limited in their ability to [reliably construct these cost estimates for Threshold 0](#). Given this limitation, the first iteration of the PSSRP, ED could incorporate existing information from the College Scorecard on annual average net price for first-time, full-time undergraduates receiving Title IV aid, annual average net price for students from low-income families, median cumulative debt amounts for all students, and cumulative debt amounts for students who complete their credentials. In future iterations of the PSSRP, ED should use granular National Student Loan Data System data to refine estimates of student investment with federal aid recipients' actual time enrolled and amounts borrowed, which could allow for a more precise estimate of Threshold 0.

Equity in Post-College Outcomes

The PSSRP should prioritize institutions that provide access to affordable, high-quality educational experiences among diverse groups of students, including providing students with credentials of value. To assess the extent to which institutions are providing access to diverse student groups and serving those students well, ED should consider measures of both access and success across race and ethnicity, gender, and family income, including the percent of student who receive federal Pell Grants, the race and ethnicity of enrolled students, and whether there are gaps in student graduation rates across income and/or race and ethnicity.

ED should also explore whether other metrics are useful. For example, the Postsecondary Value Commission's Economic Value Index (EVI), based on [Opportunity Insight's Mobility Report Cards](#), incorporates measures of both access and success for students with low incomes and students from historically marginalized backgrounds. The EVI is designed to capture the fraction of a school's completers that attain at least a minimum economic return. It combines two components: the fraction of a subgroup's completers whose earnings are greater than Threshold 0 (described above), and the fraction of a school's completers represented by that subgroup.

In future iterations of the PSSRP, ED should include estimates of the EVI for different student subgroups. But data improvements are needed to make these calculations possible. Using currently available data in the College Scorecard, ED could calculate a similar metric by

multiplying the share of all students earning at least as much as a high school graduate by the share of degree completers at the institution that come from each race or ethnicity, gender, and income subgroup. Alternatively, ED could consider these as separate metrics rather than combining them. For example, ED might set eligibility or award criteria in which the percentage of an institution's graduates who are either Pell Grant recipients or students of color must be above the sector average alongside the consideration of post-college economic outcomes. These measurements will help provide a rough estimate of value and of how well the institution supports different student groups.

A more precise estimate of the EVI would require data on the share of women, students from low-income backgrounds, and students who identify with each race or ethnicity subgroup that have earnings that meet or exceed those of the typical high school graduate. ED could calculate those measures through College Scorecard data matches in future iterations of the PSSRP. Currently, earnings cannot be disaggregated by race and ethnicity, but those data should become available in the future because of changes to the Free Application for Federal Student Aid (FAFSA) that collect students' race and ethnicity starting with the 2024-25 year. ED should include those disaggregations by race and ethnicity in future iterations of the PSSRP.

2. Information to Consider in Institutional Applications

Among institutions deemed eligible to apply based on their performance against the metrics described above, ED should consider application factors including: a commitment to shared success for all students reflected in recruitment, admissions, and enrollment policies and practices; demonstrated attention to fostering a positive student experience and sense of belonging; and strategic use of data to support the success and economic mobility for all students.

Equitable Recruitment, Admissions, and Enrollment Policies

The PSSRP should recognize colleges and universities that promote diversity and inclusion rather than the exclusion of Black, Latinx, Asian American Native Hawaiian and Pacific Islander, and Indigenous students, students from low-income backgrounds, and first-generation students. A 2021 IHEP [analysis](#) found that legacy admission policies, binding early decision deadlines, and financial aid policies that prioritize merit rather than need perpetuate inequities and limit college access for underrepresented groups. The students who are most likely to know about and benefit from such policies are typically White, wealthy, and non-first-generation students who already have a leg up in the admissions process in the form of financial resources, high school or private college counselors, access to expensive test preparation, and family members with experience navigating the college admissions process.

To demonstrate a commitment to success for all students is reflected in recruitment, admissions, and enrollment policies, applicants should be required to certify the following:

a. Institutions do not provide an admissions preference based on legacy status. Legacy admissions policies are designed to give special treatment like a boost in admissions chances or access to financial aid or other resources to applicants based on their relationship to alumni, typically benefitting White and wealthy students.ⁱ

b. Institutions do not offer a binding early decision deadline for admission. Binding early decision deadlines require students to commit to attend an institution before knowing out-of-pocket cost and without the ability to compare financial aid packages across institutions, making it an unrealistic option for many students from low-income backgrounds. For example, [research](#) has found that students with SAT or ACT scores at the 90 percentile or above and a family income of more than \$250,000 apply early decision 29 percent of the time, whereas similarly qualified students with a family income of less than \$50,000 apply early decision only 16 percent of the time. While a seemingly innocuous strategy for predicting yield or meeting enrollment goals early in the admissions cycle, early decision deadlines can jeopardize an institution's ability to build a diverse student body.

c. Institutions prioritize using financial aid funds to meet the need of students from low-income backgrounds. Affordability is a key factor in students' college decisions and an important lever for providing economic mobility. A recent [IHEP analysis](#) of data from the U.S. Department of Education's 2019-20 National Postsecondary Student Aid Study reveals that most students face a gap between what their families can afford and what they must pay to attend college, with students of color experiencing larger levels of unmet need than their White peers. For example, Black students have an average gap of approximately \$9,000 between college costs and what they can cover through grant aid and estimated family resources. ED should require PSSRP applicant institutions to share the percentage of enrolled students who receive Pell Grants, the percent of Pell Grant recipients with unmet financial need, the average amount of that unmet need, and the percentage of institutional grant aid awarded to Pell Grant recipients compared with the percentage awarded to non-Pell Grant recipients. ED should recognize colleges and universities that keep unmet need low for students who receive Pell Grants.

Fostering Positive Student Experiences and Attending to Student Belonging

Student experience is a primary driver of postsecondary learning, persistence, and completion. There is a robust evidence-base that identifies proven strategies for attending to student experience and sense of belonging inside and outside of the classroom to drive academic success and support completion for all students, and particularly students from historically marginalized backgrounds. For example, institutions can [reduce bureaucratic hassles](#) like confusing course requirements or complicated financial aid forms, encourage faculty to implement [teaching strategies](#) that employ a growth mindset and other evidence-based approaches for improving student success. Institutions can also [revise communications](#) like

academic probation letters to cultivate a sense of belonging rather than making students feel isolated, ashamed, or scared. Taking such steps is a strong way for institutions to demonstrate their efforts to support student success through tangible actions.

While there is no widely agreed upon single measure for assessing student experience and belonging, the [Student Experience Project](#) developed the Student Experience Index (SEI), which focuses on five core components of student experience. Decades of rigorous research indicate that these five components play a role in students' academic achievement: institutional growth mindset, social belonging, identity safety, trust and fairness, and self-efficacy. Applicants that report SEI data or other scientific measures in their application should be prioritized when awarding postsecondary student success recognitions because the use of such data demonstrates an institution is attending to student experience and sense of belonging.

Strategic Data Use to Support Student Success and Economic Mobility

To provide economic value for students, institutions must invest in and leverage the data sources and tools available to them; use disaggregated data to identify barriers to student success, bright spots of progress, and creative solutions for improvement; strengthen linkages with workforce data systems to assess return on investment; and develop a culture of data-use. A recent IHEP [case study](#) concluded that institutional leaders can and must build evidence into daily decisions, consistently evaluate impact to inform continuous improvement efforts, and empower all campus decision-makers to do the same—providing them with the tools and resources they need to do so efficiently and effectively. While these tools and resources may come in the form of sophisticated data infrastructure, more basic tools, such as spreadsheets, can be highly effective as well. More important than the specific tools employed is evidence that institutions are regularly discussing their data, interrogating it, and using it to inform decisions.

For example, by using a student-centered approach and leveraging disaggregated data, institutions can identify opportunities to smooth student pathways—clearing the way toward academic and workforce success. IHEP [research](#) has found that depending on what an institution's data show, its context, and the needs of its student population, smoothing pathways can include establishing connections between nondegree and academic programs, developing articulation agreements with two or four-year institutions, and ensuring that students have targeted supports before, during, and after transition points. Institutions can demonstrate that they strategically leverage data through their use of early indicators of student success, such as credit accumulation, credit completion ratio, and gateway course completion as described in [Toward Convergence: A Technical Guide for the Postsecondary Metrics Framework](#).

3. Role of Evidence

We recommend the PSSRP application reflect an openness to employing various methodologies for demonstrating and evaluating the effectiveness of student success strategies in promoting economic mobility. Research questions about the postsecondary outcomes of students should inform institutions' decisions about research and evaluation design and methodology.

Randomized controlled trials (RCTs) and other experimental methodologies eligible for the highest rating by the What Works Clearinghouseⁱⁱ offer crucial information about programs and program interventions. When well designed and well executed, such evaluations provide decision makers with high levels of confidence that the intervention studied caused the observed effect. However, not all program interventions lend themselves to such evaluations because of practical and ethical challenges, including the time and cost required to conduct an RCT or the lack of a control group option. Implementation, replication, and descriptive studies, which include qualitative research, can offer insight into fundamental questions about program design, delivery, and scalability. The studies can show, for example, how current funding is being used, students' experiences, inequities in access and outcomes for certain student groups, and the generalizability of findings.

Valuing evaluations with methodologies most appropriate for supporting the applicant's continuous improvement can help ensure the PSSRP application does not unintentionally discourage under resourced institutions from applying simply because their efforts do not meet the most resource-intensive research standards.



We commend ED for developing a recognition program that recognizes institutions doing exceptional work to ensure successful outcomes for all their students. We encourage the Department to prioritize equity, student outcomes, admissions policies, student experience and belonging, and evidence-based practices as it develops the Postsecondary Student Success Recognition Program for Institutions of Higher Education.

For questions about this letter, please contact Diane Cheng (dcheng@ihep.org), Vice President of Research and Policy at the Institute for Higher Education Policy.

Sincerely,

The Institute for Higher Education Policy

ⁱ Coe, D. L. & Davidson, J. D. (2011, March). The origins of legacy admissions: A sociological explanation. *Review of Religious Research* 52(3), 233–247.

ⁱⁱ Randomized control trials (RCTs), regression discontinuity designs (RDDs), and single-case designs (SCDs) are the designs eligible for the research rating, “Meets WWC Standards Without Reservations” because researchers and administrators exercise strong control over participant assignment. All three of these designs are considered to be “experimental,” according to the U.S. Department of Education’s evidence definitions (34 CFR, Part 77).