July 8, 2024

The Honorable Nasser Paydar
Assistant Secretary, Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, D.C. 20202

Re: Priorities, Requirements, and Definitions for the Postsecondary Student Success Grant Program
Docket ID: ED-2024-OPE-0069

Dear Assistant Secretary Paydar:

Thank you for the opportunity to comment on the U.S. Department of Education's (ED) proposed priorities, requirements, and definitions for use in the Postsecondary Student Success Grant (PSSG) program.

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 believe completion is a fundamental lever in increasing postsecondary value for students, and that students are significantly more likely to capture the benefits of their college experience when they earn a degree or credential.

IHEP's recommendations are informed by our ongoing work to promote evidence-based pathways to degree completion for today's students by identifying attainment barriers. We examine innovative and effective approaches at the institutional, state, and federal levels to promote degree completion. Between 2018 and 2021, IHEP led Degrees When Due, a nationwide completion initiative to reengage students and build institutional capacity by sharing data-driven strategies and tactics, like degree auditing, adult reengagement, and reverse transfer. Nearly 200 Degrees When Due institutions of higher education in 23 states awarded over 10,000 credentials to students.

The PSSG program is currently helping 15 institutions scale evidence-based activities, like those honed through the Degrees When Due initiative and aimed at improving postsecondary outcomes. IHEP's recommendations aim to strengthen the impact of the program and advance solutions that support student success. As such, our recommendations address the following proposed priorities, requirements and definitions.

- Proposed Priority 1 (Early Phase), 2 (Mid-Phase), and 3 (Expansion)
- Proposed Priority 4: Using Data for Continuous Improvement
- Proposed Priority 5: Projects That Support College-to-Career Pathways and Supports

- Proposed Requirement 6: Independent Evaluation
- Proposed Definition for *completions of value*
- Proposed Definition for *underserved student*

Proposed Priorities 1 (Early Phase), 2 (Mid-Phase), and 3 (Expansion)

We applaud ED's proposal to establish a multitier structure for the PSSG program to fulfill Congressional intent to execute the grant as a tiered evidence competition. And we support ED's proposal to link the amount of funding an applicant may receive to the quality of evidence and the scale at which the proposed project is implemented. This structure will allow ED to select and fund appropriately projects that are supported by various levels of evidence and at various scales. This approach will also ensure the required evaluations contribute to a strong and well-rounded evidence base on effective interventions for supporting student success, including emerging practices and what works at scale—driving continuous improvement and equitable outcomes for students from all backgrounds.

To strengthen Proposed Priorities 1, 2, and 3:

- IHEP encourages ED to invite applications for Early Phase, Mid-Phase, and Expansion Phase grants within each funding cycle and fund grants within each tier, as appropriations allow. Grants within each tier offer unique and valuable insights about evidence-based strategies for supporting student success. For example, Mid-Phase and Expansion Phase grants with higher evidence standards and scaling requirements will help scale proven interventions to greater numbers of students across campuses and institutions. And the evaluations of these grants will help the field understand what works and for whom in these contexts. Early Phase grants, supported by evidence that meets the definition of Demonstrates a Rationale or Promising Evidence offer critical opportunities for further testing promising ideas for supporting underserved student success and building the evidence base on such programs through the required evaluations. Supporting grants within each phase will propel and sustain an evidence-based and effective student success movement.

- IHEP recommends ED reconsider the scale requirements for Proposed Priority 2 (projects must be "implemented at multiple institutions of higher education or multiple campuses of the same institution and propose to serve at least 2,000 students") and Proposed Priority 3 (projects must be "implemented at multiple institutions of higher education and propose to serve at least 10,000 students"). Requirements tied to the rigor of evaluations that can be conducted by Mid-Phase or Expansion Phase grants, for example, could better serve the goal of building a robust evidence base of rigorous evaluations without unnecessarily limiting applicants' ability to implement at scale effective interventions, such as the City University of New York's Accelerated Studies in Associate Programs (ASAP) that have high per-participant costs.

Proposed Priority 4: Using Data for Continuous Improvement

Data, and especially disaggregated data, are a powerful tool for driving continuous improvement. Data alone, however, will not shape institutional policies and practices. Institutions must invest in and leverage the data sources and tools available to them; use disaggregated data to identify barriers to student success, creative solutions for improvement, and areas of progress; and create a culture in which all

decision-makers on campus are empowered to make student-centered changes based on the insights generated by the data.

Given the essential role that using data for continuous improvement plays in implementing and scaling programs that can offer students completions of value, IHEP recommends that an applicants' data use be considered as a selection criterion rather than a priority. When evaluating this selection criteria, IHEP proposes ED consider the following:

- (a) The performance and outcome measures applicants will use to monitor and evaluate the implementation of the interventions could include 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*. Additionally, as noted in the proposed priority, disaggregated data are essential for driving equitable improvement. In their applications, institutions should detail their plans for disaggregating performance and outcome measures by demographic information such as race and ethnicity, gender, and socioeconomic, parental, or first-generation status to reveal inequities and opportunities to make policy and practice changes that ensure all students succeed.

- (b) Leveraging data to make informed, student-centered, and equity-focused decisions requires data systems, tools, and capacity. While these resources may come in the form of sophisticated data infrastructure, more basic tools, like spreadsheets, can also be highly effective. More important than the specific tools employed is evidence that applicants can demonstrate that they will have processes in place to regularly discuss their data, analyze it, and use it to inform decisions on an ongoing basis and through the formative and summative intervention evaluations. This distinction should be made clear during the application process so as not to discourage institutions with a strong track record of leveraging data but without the resources to support a sophisticated data software platform, for example, from applying for PSSG funding.

  Additionally, ED should consider awarding funds sufficient to fill the gaps in current data systems, tools, and capacity that institutions detail in their applications. This is aligned with Proposed Requirement 1, which states that program funds may be used for "developing and using data systems, tools, and training to implement data-driven processes and interventions as part of a comprehensive continuous improvement effort." Ensuring grants are sufficient to use funds in this way and support intervention implementation would extend the impact of PSSG funding by enhancing data systems and capacity, especially at under resourced institutions, which will ultimately support data-driven decision-making to improve student outcomes well past the end of the PSSG grant.

- (c) We appreciate ED's recognition of and emphasis on the important role that institutional leadership plays in developing and maintaining a culture of data use. During the selection process, IHEP encourages ED to consider the ways in which institutional leadership supports a strong culture of data use and prioritizes data use within the institution's student success efforts and improvement processes. A recent IHEP case study underscores the need for institutional leaders to 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. Additionally, connecting efforts funded through the PSSG program to the institution's broader student success priorities and improvement processes can ensure these funds have longstanding positive impacts on student outcomes and underserved students' success well beyond the life of the grant.

Proposed Priority 5: Projects That Support College-to-Career Pathways and Supports
Strengthening pathways from college to career and providing students with the necessary supports to transition successfully into the workforce are among the key strategies institutions can employ to deliver completions of value. However, given the PSSG program's goal to implement and scale evidence-based strategies for supporting student success, which include—but are not limited to—college-to-career pathways and supports, IHEP recommends this priority only be used as an invitational priority rather than a competitive preference or absolute priority in future competitions. This would prevent unnecessarily limiting projects—and the evidence-base of rigorous program evaluations that the PSSG program seeks to build—to only those focused on college-to-career pathways and supports.

Proposed Requirement 6: Independent Evaluation
A clear, data-informed understanding of what works in higher education for whom and under what circumstances is essential for driving success for underserved students; requiring independent evaluations through the PSSG program is a key strategy for building the evidence base and informing continuous improvement in higher education.

To strengthen Proposed Priority 6, IHEP recommends the following:

- Evaluations funded through the PSSG program should have methodologies appropriate to the research question being studied. A well-rounded and timely evidence base of what works in higher education consists of evaluations with varied designs and methodologies. Randomized controlled trials (RCTs) and other experimental methodologies eligible for the highest rating by the What Works Clearinghouse provide decision makers with crucial information about the effects of programs and program interventions and are therefore valuable for improving program, policy, and practice design. 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, as well as culturally appropriate evaluations—for example, employing Indigenous evaluation models and systems at Tribal Colleges and Universities—can offer insight into fundamental questions about program design, delivery, and scalability.

- In addition to requiring grantees to submit evaluations to ERIC in a timely manner, ED should take a proactive approach to disseminating evaluations to the public. For example, ED could suggest or require recipients to submit a dissemination plan as part of their applications. Strong dissemination plans could include developing a plain language brief that clearly explains findings and actionable takeaways to facilitate engagement with the research by a variety of stakeholders and ensuring all data, as data privacy limits allow, are accessible through data.gov and other publicly available means.

ED should also leverage existing channels to widely disseminate findings. For example, ED could coordinate with the White House to share research and evaluation findings via White House initiatives on HBCUs; AANHPI individuals; AIAN Education; Advancing Educational Equity, Excellence, and Economic Opportunity for Black Americans; and Advancing Educational Equity, Excellence, and Economic Opportunity for Hispanics. Further, ED could work with associations that represent institutions and grantees to share findings with those stakeholders.

Proposed Definitions: Completions of Value
IHEP applauds ED's focus on funding projects through the PSSG program that lead to completions of value, defined as "credentials that lead to further education through upward transfer or graduate education and/or that lead to economic mobility through earning enough to experience a premium over high school graduates and earning enough to recoup investment in postsecondary education."

IHEP's commitment to promoting equitable postsecondary value is grounded in the recognition that for too many students—particularly students from historically marginalized backgrounds—higher education is not fulfilling its promise as an engine of economic mobility. As managing partner of the Postsecondary Value Commission, IHEP helped develop the Postsecondary Value Framework, which conceptualizes the value-add that postsecondary education can provide to students, their families and society, in both economic and non-economic terms. That framework includes a series of thresholds to measure the economic value institutions deliver to students.

ED's proposed definition of completions of value is aligned with Threshold 0, which 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. IHEP proposes that Threshold 0 be one method institutions can use to evaluate whether programs lead to completions of value. While publicly available data sources are limited in their ability to reliably construct cost estimates for Threshold 0, institutions can use more granular data on costs, grant aid, student loan borrowing, and time enrolled to calculate more precise estimates of Threshold 0.

Proposed Definitions: Underserved Student
The words we use matter, in how we define and describe the populations we seek to serve, the systemic problems we seek to address, and the solutions we propose for doing so. Language influences everyone who is involved and impacted by policy and sets the tone for policy-related conversations. In *"Opening the Promise:" The Five Principles of Equitable Policymaking*, IHEP alongside more than two dozen experts across the field of higher education set forth five principles for infusing equity into every aspect of the policymaking process. The fifth principle states that "committing to racial and socioeconomic equity means using clear, specific, and respectful language." In practice, this means naming the racial or ethnic identities of those students who will be impacted by policy and the policymaking process.

Therefore, IHEP recommends that the definition of "underserved student" include a more detailed description of the subgroup "(b) a student of color." This definition should be in line with and include the race or ethnicity reporting categories that would fall within that definition and eventually align with ED's

implementation of the [Office of Management and Budget's Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity](). For example, ED could update the definition to read as follows:

> *"(b) a student of color, including a student who identifies as Black or African American, American Indian or Alaska Native, Asian, Hispanic or Latinx, Middle Eastern or North African, or Native Hawaiian or Pacific Islander."*

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We are grateful for the opportunity to inform implementation of the PSSG program and look forward to ED's continued support of evidence-based activities that improve outcomes for more students. For questions about this letter, please contact Eleanor Eckerson Peters (epeters@ihep.org), Director of Research and Policy at the Institute for Higher Education Policy.

Sincerely,

The Institute for Higher Education Policy