



Docket ID ED-2024-OUS-0014

May 28, 2024

Jennifer Engle
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave. SW, Room 5C136
Washington, DC 20202

Dear Ms. Engle,

On behalf of America Forward and the America Forward Coalition, we thank you for the opportunity to share our comments in response to the Request for Information (RFI) “Regarding Developing a Postsecondary Student Success Award Program for Institutions of Higher Education.”

[America Forward](#) is the nonpartisan policy initiative of New Profit, a pioneering national venture philanthropy organization that invests in breakthrough social entrepreneurs and systems-change initiatives, catalyzes and builds their impact, and transforms how government and philanthropy pursue social change to ensure that all people can thrive. The America Forward Coalition is made up of more than 100 innovative, high-impact [organizations](#) that lead creative solutions to our country’s most pressing social problems ranging from education to economic mobility to democracy.

The America Forward Coalition includes numerous leading high-impact non-governmental organizations that work closely with institutions of higher education (IHE) to promote student success. The organizations we partner with provide a wide array of critical, evidence-based services, including financial aid advising, program selection, retention and completion coaching, support for basic needs, and career navigation ranging from in-school internships to post-college career pathways. We deeply appreciate the Department’s intent to recognize IHEs that support success across all of their students by conferring affordable credentials of value while enrolling student bodies reflective of their communities— and including students from underserved populations.

Our insights reflect our deep experience working with these innovative organizations. America Forward has co-authored this comment with One Million Degrees (OMD), a leading student success organization that supports community college students on career pathways to economic mobility. OMD provides financial, academic, personal and professional support to scholars enrolled at the City Colleges of Chicago, and partners with community colleges across the nation to design and implement holistic student support models. Per a randomized controlled trial evaluation of OMD conducted by the University of Chicago, OMD scholars earn degrees at a 73% higher rate than their peers.

Question 1: Metrics

We offer a few suggestions regarding metrics in order to support a sustainable program that can ultimately drive stronger practice:

- **Focus on elevating paragons of practice backed by data.** We deeply appreciate the Department’s long efforts to build stronger data on postsecondary outcomes and agree with the value of a data-driven approach, including a focus on outcomes such as completion rates, average earnings, and debt-to-income ratios. That said, recognizing the limitations of existing national data on postsecondary economic outcomes today—particularly those gaps that the College Transparency Act would fill— we encourage the Department to consider metrics as illustrative, not fully determinative, when making awards. That is, we urge the Department to avoid a rankings-driven approach and invest more deeply in the practices-focused considerations we discuss below. That said, we also encourage the Department to prompt institutions to leverage economic outcomes data many already have available through sources such as the National Association of Colleges and Employers (NACE) First-Destination Survey.
- **Consider longer-term metrics that directly address contextual factors.** As the Department considers particular measures, we urge you to prioritize consideration of contextual factors as the RFI previews. One particularly strong model was the Bipartisan Policy Center’s 2022 report with cutting-edge methodology on higher education return on investment that considers cost-benefit analysis of lifelong student financial gains (or losses), while also accounting for disparate labor market outcomes across gender, race, and ethnicity.¹ Similarly, an earlier 2020 project by the Urban Institute in Connecticut and Virginia demonstrated that adjusting for student demographics and academic preparation produced major changes in colleges’ relative performance in college completion— and also showed that individual-level data is critical to compare outcomes as institution-level data conflates quality with characteristics of entering students.²
- **Consider not only earnings growth, but public service.** We also comment that purely focusing on earnings growth— while critical— as a metric will leave out important social outcomes. Earlier this year, the Urban Institute’s Molly Scott published research showing that even the highest-ROI institutions will struggle to ensure earnings premia for training and education required for socially-critical positions in fields like education, health care, and social services because these careers are so often underpaid.³ We encourage the Department to ask institutions to report on the percentage of graduates serving in these fields as key context. We also encourage the Department to consider debt-to-income ratios to ensure IHEs are setting up graduates for sustainable careers.
- **Consider leading indicators.** Alongside longer-term metrics, we suggest considering leading indicators of success such as persistence rates; credits attempted and

¹ Bipartisan Policy Center (2022), *Which Colleges Are Worth the Cost?*, <https://bipartisanpolicy.org/press-release/is-your-degree-really-worth-it-bpc-breaks-down-the-roi-of-higher-ed/>.

² Blom, Rainer, and Chingos (2020), *Comparing Colleges’ Graduation Rates*, Urban Institute, <https://www.urban.org/research/publication/comparing-colleges-graduation-rates>.

³ Scott (2024), *Addressing College ROI, Labor Shortages, and Job Quality*, https://www.urban.org/sites/default/files/2024-03/Addressing_College_ROI_Labor_Shortages_and_Job_Quality.pdf.

accumulated; and administrative data on academic performance and programmatic engagement.

Question 2: Demonstrating Data-Driven Success and Serving Students Reflective of the Communities Served

We very much appreciate the Department's emphasis on data-driven practices to drive student success, as well as the priority on serving a student body reflective of institutions that communities serve, including underserved populations. Our recommendations include:

- **Consider growth in capacity.** We encourage the Department to celebrate IHEs that have intentionally built capacity to drive strong student success efforts. As we have seen over and over, a critical step for many institutions is developing strong administrative data infrastructure— often in partnership with external student success organizations and research practice partnerships. Recognizing differences in funding across institutions, we encourage the Department to celebrate not just the most-resourced institutions but also those that are actively prioritizing improvement (including in their budgeting, as we discuss below).
- **Ask for narratives and artifacts.** In our experience, high-capacity institutions— even those that may be lower-resourced— can demonstrate their data and continuous improvement capacity by drawing on internal narratives and artifacts, such as outlining their monthly performance review process and how they have changed strategies after considering program retention data. We encourage the Department to prompt institutions to share these kinds of narratives and artifacts.
- **Consider program mix.** In addition to our point above regarding socially-valuable but lower-compensated credentials, we encourage the Department to consider how institutions have used data to inform their program mix. For example, at too many institutions, slots for high-return, socially-valuable programs like nursing are capped because the incentive structure for expenses and revenue doesn't support expansion.⁴ Rigorous evidence demonstrates that IHEs' choices about what programs, and how many slots to make available, has a tremendous impact on students' outcomes.⁵ We encourage you to elevate this key point.
- **Emphasize student perspectives.** We encourage you to prompt IHEs to describe how they have engaged diverse student perspectives, such as through surveys or interviews— including in partnership with non-governmental organizations— to assess students' needs, consider the effectiveness of student success strategies, and solicit ideas for new approaches.

Question 3: Demonstrating Commitment of Senior Leadership to Support Economic Mobility

We make several suggestions regarding question 3:

- **Emphasize partnerships.** We very much appreciate the Department's consideration of effective external partnerships. While we believe it is important for institutions to develop internal capacity, the incredible impact of organizations in the America Forward

⁴ See Grosz 2020 <https://www.aeaweb.org/articles?id=10.1257/pol.20170506>.

⁵ <https://www.brookings.edu/articles/student-outcomes-at-community-colleges-what-factors-explain-variation-in-loan-repayment-and-earnings/>

Coalition demonstrates that non-governmental organizations provide the ability to partner and scale practices that individual institutions and systems are not able to do on their own. (Some of these organizations are free-standing, and others are housed within institutions of higher education but work with a broader array of schools.) We encourage the Department to recognize partnerships across a range of dimensions, from college completion to career navigation, as an essential component to institutions' success strategies.

- **Consider integration of partnerships.** We also note that partnership can vary in intensity and quality. We encourage the Department to consider how well-integrated these partnerships are in practice. For example, how are partner career coaches connected to institutions' internal staff, including faculty? How are institutions leveraging innovative partnerships in their curricula, such as offering student success courses with external partners?
- **Strategic plans and budgets.** Budgets demonstrate priorities. We encourage the Department to consider how IHEs are prioritizing student success in their strategic plans—and then how they are actually applying a significant proportion of funds to drive those programs. We particularly encourage the Department to celebrate IHEs that have changed their approach and shifted funds to strategies, and partnerships, that have proven most effective and sustainable. In addition, we encourage the Department to elevate the importance of sustainability analyses: IHEs should recognize that investing funds in these programs can not just improve student outcomes, but also IHEs' own balance sheets as greater retention results in greater revenue.
- **Board membership.** IHEs' boards can provide critical insight into the diverse experiences, needs, and opportunities of their students. We encourage the Department to elevate the importance of board members including not only wealthy individuals but also those with proximate, lived expertise in the local communities served as well as those working in public service careers.

Question 4: Demonstrating the Effectiveness of Strategies to Ensure Economic Mobility

We deeply appreciate the Department's emphasis on evidence-based approaches as illustrated by this question. Our suggestions include:

- **Investment in high-quality third-party evaluation.** We encourage you to elevate the importance of high-quality, independent evaluations of IHEs'— and their partners— student success strategies, including longer-term economic outcomes beyond completion. That includes both active participation in ongoing evaluations as well as committing to longer-term research-practice partnerships.
- **Focus on scaling.** The Department should elevate institutions, and partner organizations, that are figuring out how to scale evidence-based strategies. Over the past decade, the menu of evidence-based options has dramatically grown. Institutions should demonstrate how they have successfully scaled up proven practices— and what evidence they have relied on in choosing practices, and partners.
- **Encourage innovation.** Moreover, while we emphasize the importance of high-quality causal research, we also encourage the Department to emphasize the importance of *formative* research to develop innovative approaches to serve a range of diverse student populations – including innovation that adapts existing evidence-based approaches to

new settings and populations. These key approaches include rapid-cycle evaluation, complementary implementation research, pilots, and feasibility studies.

Conclusion

In sum, America Forward supports the Department's plans to move ahead with the Postsecondary Student Success Award Program and appreciates the opportunity to provide input.

Thank you for your attention to and consideration of America Forward's recommendations, and we welcome the opportunity for further dialogue and collaboration. Please contact us if we can be of any assistance at chase_sackett@newprofit.org.

Sincerely,

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Josh Hoen
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