



Senate Committee on Health, Education, Labor and Pensions  
428 Senate Dirksen Office Building  
Washington, DC 20510

October 24, 2025

Dear Chair Cassidy, Ranking Member Sanders, and members of the Senate HELP Committee,

On behalf of America Forward, I write to share our comments in response to the Senate HELP Committee's request for information regarding "Increasing College Cost and Value Transparency for Students and Families."

America Forward leads [the America Forward Coalition](#), a network of 100+ of the nation's most impactful and innovative non-governmental organizations that develop and advocate for more effective public policies to advance opportunity and move all of America forward in policy areas from early learning to workforce development. The America Forward Coalition includes many leading non-profit college access and success providers that deliver critical, evidence-based postsecondary navigation services, including financial aid advising; program and college 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 Senate HELP Committee's commitment to these issues, which are ripe for bipartisan action. Our comments focus on the following issues:

- 1) In response to question 5: Pass the College Transparency Act and expand value-added measures
- 2) In response to question 6: The federal government should enhance support to private, nonprofit navigation providers and address key eligibility gaps in federal funding
- 3) In response to question 8: Federal action is necessary to shift behavior in the postsecondary market around offer letters
- 4) In response to question 12: Clear, understandable reporting will be critical to support effective decision-making for Workforce Pell

1) Pass the College Transparency Act and Expand Value-Added Measures

First, we appreciate the RFI's recognition of the College Scorecard's lack of data on outcomes for students who do not receive federal grants or loans, which also makes it "difficult or impossible to publish reliable data on programs within college[s]." **America Forward strongly supports the bipartisan, bicameral College Transparency Act as a critical solution** for this issue and appreciates Chair Cassidy's long leadership on this point.

Second, we support **expanding reported data to include measures of not just absolute outcomes, but value-added metrics**, building on similar measures in K-12. That is, measures simply based on outcomes

often act as a proxy for selectivity, but some institutions and programs do much better at boosting students' outcomes relative to what their entering characteristics would predict. A 2020 Urban Institute study of institutional outcomes in Connecticut and Virginia, for example, found that adjusting for student demographics and academic preparation produced tremendous differences in “adjusted” graduation rates once rankings no longer conflated institutional quality with student characteristics.<sup>1</sup> That study also demonstrated the importance of using individual-level data to calculate such measures.

## 2) Federal Support for Private, Non-Profit Postsecondary Navigation (Response to Question 6)

**The federal government should substantially expand its support for high-quality non-profit postsecondary navigation efforts,** addressing major eligibility gaps and lack of prioritization for the most effective approaches under present funding streams.

**Non-profit student success organizations have spearheaded some of the most creative, evidence-based approaches to postsecondary navigation.** Investing in these organizations' efforts to help students identify high-value programs and institutions, to navigate their financial aid options, and then to successfully complete their postsecondary journeys and transition to a strong career option would provide tremendous value to students and to the public. Recently-published experimental research on one of these programs, Bottom Line, illustrates the incredible value of high-quality college navigation. As the researchers write, **investments in high-quality advising that facilitates college (and program) selection could have tremendous returns to students and the public.**<sup>2</sup>

The consistency of our results across sites, cohorts, advisors, and students indicates that intensive advising may provide a scalable solution to improving postsecondary educational attainment and, potentially, economic mobility for low-income students. Providing cities with a combination of financial and technical assistance to replicate the model could be a more efficient approach to increasing bachelor's degree attainment than offering students additional aid. Indeed, providing intensive advising to every eligible high-school student (roughly 34 percent meet the eligibility requirements) would cost \$2.7 billion, roughly 10 percent of the cost of doubling the Pell grant. More generally, strategies that improve the quality of the colleges attended by low-income students, such as intensive advising, likely have the most potential to improve degree attainment.

These non-profit organizations have often stood at the forefront of innovation in college access and success – including recent efforts leveraging AI in a responsible, effective way. A few examples include:

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<sup>1</sup> Blom, Rainer, and Chingos (2020), “Comparing Colleges' Graduation Rates,” Urban Institute, <https://www.urban.org/research/publication/comparing-colleges-graduation-rates>.

<sup>2</sup> Page 30-31 in Barr and Castleman (2025), “Increasing Degree Attainment Among Low-Income Students: The Role of Intensive Advising and College Quality,” NBER Working Paper #33921, available at <https://www.nber.org/papers/w33921>.

- **Beyond 12** is a national, tech-enabled nonprofit that helps institutions provide their students with the support they need to succeed in higher education. Beyond 12 leverages expert, near-peer personalized coaching; a campus-customized, Gen-AI powered student success coach; and an AI-powered analytics engine that predicts which students need help and prescribes the right kind of support. Among students coached by Beyond 12 for four years, 85 percent graduate or remain enrolled by the end of their sixth year compared with the national average of 44 percent. Beyond 12 recently published a toolkit and framework to guide higher education leaders' and practitioners' responsible development of AI student success tools, including such elements as an emphasis on maintaining privacy and security and guidance on testing and gathering feedback on AI tools.<sup>3</sup>
- **College Possible** is one of the nation's largest college access and success organizations, annually serving about 25,000 high school and college students from low-family-income backgrounds in partnership with 180 colleges and high schools. Through a Salesforce Accelerator grant, College Possible has scaled its student services by launching a Coach Possible tool that provides around-the-clock support for students and coaches. The tool has increased coaches' capacity from 60 to as many as 250 students by helping them be more effective with routine functions and more available for personalized coaching.<sup>4</sup>
- **College Advising Corps** (CAC) has helped over 1,000,000 high school seniors enroll in college – and equally more enlist in military service or become career-ready through job certification – by placing hundreds of near-peer advisers in under-resourced high schools across the country. Supported by CAC's AI-supported case management system, GRACE, advisers efficiently monitor student progress, identify barriers, and provide timely, personalized guidance that helps students reach their college and career goals. CAC's interventions have proven particularly effective in increasing FAFSA completion and encouraging students to take actionable steps towards their postsecondary journeys.

In general, **college and program selection remain an underappreciated factor in students' ultimate postsecondary outcomes.** A few key findings include:

- While persistent mismatch between students from families with lower-incomes and higher-selective institutions is significant, there are enormous differences in student completion and career return on investment even comparing colleges of similar selectivity – as leading college access and success organizations help students recognize. In fact, as Hoxby's 2019 research demonstrated, less-selective colleges have the largest variation in students' return on investment.<sup>5</sup> Similarly, a landmark 2019 analysis in the *New York Times* supported by the Urban

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<sup>3</sup> See Beyond 12, <https://responsibleai.beyond12.org/#about>.

<sup>4</sup> Nietzel (October 16, 2025), "Now In Its 25th Year, College Possible Adds A New AI Coaching Solution," *Forbes*, <https://www.forbes.com/sites/michaelnietzel/2025/10/16/now-in-its-25th-year-college-possible-is-adding-a-new-ai-coaching-solution/>.

<sup>5</sup> Hoxby (2019), "The Productivity of US Postsecondary Institutions," in *Productivity in Higher Education*, University of Chicago Press, at page 31-66, available at <https://www.nber.org/system/files/chapters/c13875/c13875.pdf>.

Institute shows that some colleges do far better, and some do far worse, than expected based on their student demographics.<sup>6</sup>

- Program choice makes an enormous difference in long-term outcomes, particularly for students from lower-income families. As a 2024 Brookings Institute piece found, “Pell [Grant] recipients are concentrated in majors that lead to lower earnings after graduation for both Pell recipients and non-Pell Grant recipients.”<sup>7</sup> The authors comment, “Thus, a student’s choice of major while in college is an underappreciated arbiter of social mobility, and universities should be doing more to ensure students do not face undue barriers in these choices.”
- While 80 percent of entering community college students intend to transfer to a four-year institution, only 31 percent actually do so – and only *half* of those who transfer ultimately complete a four-year degree within six years.<sup>8</sup> Students widely struggle to navigate complex transfer processes and often lose many credits once they transfer. Non-profit advising organizations are ideally positioned to serve as a bridge for students transferring between systems and institutions.

The evidence also strongly suggests that, **for many students, effective advising is essentially a necessary precondition to make effective use of enhanced data on costs and value for institutions and programs.** Multiple studies have found that simply expanding data, or providing very light-touch informational tools or nudges, have often failed to meaningfully change students’ behavior.<sup>9</sup> While important new research from the American Enterprise Institute shows that increased data and general awareness of college quality has shifted enrollment from the lowest-quality schools, as the author notes, “It’s important not to overstate the dynamics of student choice. Most students are not poring through spreadsheets of outcomes data to determine the optimal college pathway.”<sup>10</sup>

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<sup>6</sup> Leonhardt and Chinoy (May 23, 2019), “The College Dropout Crisis,” *New York Times*, <https://www.nytimes.com/interactive/2019/05/23/opinion/sunday/college-graduation-rates-ranking.html>.

<sup>7</sup> Startz (2024), “Economic inequalities among college graduates are linked to college major choice,” Brookings Institution, <https://www.brookings.edu/articles/economic-inequalities-among-college-graduates-are-linked-to-college-major-choice/>.

<sup>8</sup> See Community College Research Center (accessed October 20, 2025), “Community College FAQs,” <https://ccrc.tc.columbia.edu/Community-College-FAQs.html>.

<sup>9</sup> See, e.g., Hurwitz and Smith (2018), “Student Responsiveness to Earnings Data in the College Scorecard,” *Economic Inquiry* 56(2): 1220-1243; Blagg et al (2017), “Rethinking Consumer Information in Higher Education,” Urban Institute, [https://www.urban.org/sites/default/files/publication/91666/rethinking\\_consumer\\_information\\_in\\_higher\\_education\\_2.pdf](https://www.urban.org/sites/default/files/publication/91666/rethinking_consumer_information_in_higher_education_2.pdf); Linklow et al. (2021), “Study of College Transition Messaging in GEAR UP: Impacts on Enrolling and Staying in College,” Abt Associates and Mathematica, prepared for Institute of Education Sciences, <https://ies.ed.gov/use-work/resource-library/report/evaluation-report/study-college-transition-messaging-gear-im-pacts-enrolling-and-staying-college?pubid=NCEE2021005>.

<sup>10</sup> Cooper (2025), “Learning with Their Feet: Student Enrollment Trends in Postsecondary Education by College Quality,” American Enterprise Institute, <https://www.aei.org/research-products/report/learning-with-their-feet-student-enrollment-trends-in-postsecondary-education-by-college-quality/>.

However, **there remains a tremendous unmet need for effective advising despite its value.** Nationally, the American School Counselor Association estimates that high schools nationally have a student-advisor ratio somewhere between 178:1 to 326:1.<sup>11</sup> Non-profit college access and success organizations work to fill this gap while leveraging unique expertise and approaches. In fact, many non-profit organizations span high school and college – with many now operating within middle school as well – enabling them to help students select and then complete high-value programs.

**However, the vast majority of non-profit college access and success organizations addressing this issue receive no meaningful federal support for their work, seriously limiting their ability to scale.** Earlier this year, America Forward and the National College Attainment Network co-authored a report, *The Non-Profit Funding Gap: Strengthening the Postsecondary Student Success Ecosystem*, that illustrated this issue.<sup>12</sup> Our report, based on a survey of more than 50 organizations operating across the country, found that **less than quarter of these non-profit college access and success groups receive any public funding** – only about half the national average for nonprofits.

Why is this the case? One major reason is that **non-profit organizations are not in fact eligible to directly receive most federal funds dedicated for college access and success.** The Department of Education has excluded non-profits from serving as lead grantees for the TRIO Student Support Services and Postsecondary Student Success Grants programs – in sharp contrast to K-12 funding streams such as Education Innovation and Research. Moreover, the Higher Education Act limits eligibility for partnership college access grants under GEAR UP to school districts and institutions of higher education, inexplicably excluding non-profit providers. **We strongly support efforts to address these technical issues moving forward, alongside reforms that will emphasize evidence-based strategies in federal access and success programs and make the application process more accessible.**

In addition, among those groups that do receive public funding, AmeriCorps has historically provided a critical source of support for evidence-based college access and success efforts. However, recent stoppages and barriers to accessing AmeriCorps dollars have had a serious negative impact on postsecondary advising efforts nationally. **We strongly support the continued, reliable disbursement of critical AmeriCorps dollars for postsecondary programs and otherwise.**

### 3) Shifting Behavior in the Postsecondary Market for Offer Letters (Response to Question 8)

Federal action is necessary to shift behavior in the postsecondary market for financial aid offer letters. As the RFI notes, while some colleges have improved their practices in this area, they represent “only a

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<sup>11</sup> American School Counselor Association (accessed October 15, 2025), “School Counselor Roles & Ratios,” <https://www.schoolcounselor.org/about-school-counseling/school-counselor-roles-ratios>.

<sup>12</sup> Brown, López, Sackett, and Woodhouse (2025), “The Non-Profit Funding Gap: Strengthening the Postsecondary Student Success Ecosystem,” America Forward and National College Attainment Network, [https://www.americaforward.org/wp-content/uploads/2025/03/NCAN-America-Forward\\_Student\\_Success\\_Report\\_FINAL-1.pdf](https://www.americaforward.org/wp-content/uploads/2025/03/NCAN-America-Forward_Student_Success_Report_FINAL-1.pdf).

portion of a thousands of institutions nationwide.” Rising economic pressures for colleges due to declining enrollment and other factors could exacerbate these challenges.

**Accordingly, we believe that federal action is necessary to level the playing field and support a transparent higher education financing market, and strongly support passing the bipartisan, bicameral Understanding the True Cost of College Act as championed by America Forward Coalition member uAspire.** This legislation will provide critical clarity to the prospective and current postsecondary students served by dozens of America Forward Coalition members.

#### 4) Clarity in Reporting for Workforce Pell (Response to Question 12)

We appreciate the Committee’s interest in data transparency regarding Workforce Pell. In our recent comments to the Department of Education on Workforce Pell implementation, we made the following recommendations on outcome reporting:<sup>13</sup>

**[T]he Department should provide for strong, timely data reporting in the College Scorecard as provided by the Bipartisan Workforce Pell Act, including program costs, earnings (for both completers and non-completers, including as early as 180 days post-exit), and placement (both at 180 days and 1 year).** We also encourage the Department to **disaggregate this data by demographics (e.g., income, age, race/ethnicity),** aligned with the Bipartisan Workforce Pell Act’s approach, and, as granularly as possible, by credential type. Providing this level of granular data – as administrative data will facilitate – is critical to support learners to make strong choices (e.g., for the many young adults entering the labor market for the first time), to facilitate program improvement, strengthen cross-sector partnerships, and ultimately bolster the market for these programs.

We also, for context, provided technical recommendations regarding the use of administrative data to ensure accurate collection and reporting of program outcomes and to reduce burden on institutions and their partners. We recommended, for example, that the Department pursue the use of high-quality quarterly employment and earnings data to enable reporting on 6-month job placement metrics – as required by the One Big Beautiful Bill Act – that would not necessitate burdensome and often low-quality surveys of program participants.

#### Conclusion

We appreciate the Committee’s interest in public input on this critical issue. We would welcome the opportunity to discuss our comments further and would be very happy to arrange a meeting with

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<sup>13</sup> America Forward (2025), “Response to ED-2025-OPE-0151,” <https://www.americaforward.org/wp-content/uploads/2025/09/America-Forward-Workforce-Pell-Comments-8-25-25.pdf>.

members of the America Forward Coalition to provide direct on-the-ground insights from their work with students, families, and educators. Please feel free to contact me at [chase.sackett@americaforward.org](mailto:chase.sackett@americaforward.org).

Thank you,

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