



February 10, 2023

Mr. Jean-Didier Gaina
U.S. Department of Education
400 Maryland Ave. SW
Room 2C172
Washington, DC 20202

Re: Request for Information Regarding Public Transparency for Low Financial-Value Postsecondary Programs [Docket ID ED-2022-OUS-0140]

Dear Mr. Gaina,

Thank you for the opportunity to provide comments in response to the Department of Education's (ED) Request for Information (RFI) on its plans to publish list/s of "low financial-value postsecondary programs." As president of the Association of Public and Land-grant Universities (APLU), I am pleased to offer feedback to inform ED as it receives constructive responses from the field on its proposal.

As you may know, APLU is a research, policy, and advocacy organization dedicated to strengthening and advancing the work of public universities. With a membership of more than 250 public research universities, land-grant institutions, state university systems, and affiliated organizations, APLU's agenda is built on the three pillars of increasing degree completion and academic success, advancing scientific research, and expanding engagement. Annually, our U.S. member campuses enroll 4.2 million undergraduates and 1.2 million graduate students, award 1.2 million degrees, employ 1.1 million faculty and staff, and conduct \$48.7 billion in university-based research.

APLU shares ED's interest in empowering students and families to make informed decisions about academic programs and respects the appropriate role of the federal government to protect the interests of students and taxpayers as it relates to the investments made in higher education. For public universities, the federal government's efforts are in addition to the significant role of states in oversight of state entities.

While APLU respects the intentions of the Department's efforts, we urge ED to proceed with great care and caution given the limits of available federal data and gravity of its determinations. Further, while individual economic advancement is a critical component of the mission of public universities and undoubtedly the primary driving force that motivates students to pursue a degree, the benefits of higher education are vast. APLU is concerned that creating lists just based on "financial value" will leave untold and underappreciated the full benefits and mission of higher education. That said, APLU would fully agree with several key basic premises relevant to the RFI and values ED's mission in furtherance of these objectives:

- 1) Students should be able to repay that which they borrow from the federal government to pursue higher education
- 2) The Department of Education has a direct and appropriate interest in making sure it is extending federal aid to institutions and programs of academic quality
- 3) The Department of Education has a direct and appropriate interest in utilizing student outcomes data to support students and families making informed decisions

The Financial and Social Value of Public Higher Education is Vast

Public universities provide the most affordable path to a higher education with extraordinary returns for graduates. Data are clear that bachelor's degree holders enjoy lower levels of unemployment, higher earnings, and significant additional benefits such as greater levels of health insurance and paid leave. Median annual earnings for recent bachelor's degree recipients are \$22,000 higher than similarly aged workers whose highest degree is a high school diploma. Over a lifetime, graduates see \$1.2 million in additional earnings. Graduate students also see substantial further returns on their education.

Still, the value of a degree cannot be reduced to a financial return alone. Students enroll in institutions of higher education not just for higher earnings, but also for increased knowledge, skills, broadened horizons, and in some cases the opportunity to assume a career in public service such as teaching and social work. These professions play a critical role in creating a well-functioning society, but they are not highly compensated. Likewise, evidence suggests that while students earning liberal arts degrees experience lower earnings right out of college, they see more significant earnings returns later in their careers. Still other students, such as those aspiring to become medical doctors, frequently enroll in academic programs that are aimed at providing foundational knowledge for professional degrees rather than an immediate economic return.

Workers with advanced degrees in particular play an instrumental role in ensuring the United States has the world's most advanced and competitive workforce. Nearly half of elementary and secondary school teachers hold master's degrees. Between 2019 and 2029, the number of entry-level jobs requiring master's degrees is expected to grow 15 percent. Many of the most innovation-heavy sectors of the economy require a broad base of highly educated workers to drive new discoveries, spark new innovations, and create new businesses.

All of society benefits from more college-educated individuals. College graduates are twice as likely to volunteer and contribute more than three times as much to philanthropic organizations. Thanks to higher earnings, college graduates pay \$273,000 more in taxes over a lifetime. Compared with high school graduates, bachelor's degree holders are also less reliant on government services support such as Medicaid, housing subsidies, nutrition assistance, unemployment insurance, and more. They are also nearly five times less likely to be imprisoned. In total, government spending is \$82,000 lower over a lifetime for college graduates. The combined fiscal impact is \$355,000 over a lifetime.

Limits of Federal Data Create Challenges

As the Department considers “value,” it seems likely a measure of earnings will be used, possibly in balance with the cost of an academic program or debt incurred by a student. Income data are an important measure. APLU supported the launch and continued work of the College Scorecard spanning multiple administrations to publish and improve upon the Department of Education’s income data at the institution and program levels. Unfortunately, through no fault of the Department, the data has severe limitations. Relying on such data for purposes of determining which programs are of “low financial value” significantly raises the stakes as to the importance and utility of the Scorecard’s income data.

Exclusion of Non Title IV Students is a Big Hole

First, as the Department recognizes, the data presently only include those who receive Title IV federal student aid. Thus, 39 percent of all students in postsecondary education are excluded from ED’s income data. With potentially significant differences in outcomes between Title IV aided and non-aided students, such data gaps are profound. Additionally, there are significant differences between program enrollment of aided and non-aided students, leaving accurate comparisons across programs very challenging.

These gaps are one of the reasons APLU champions the College Transparency Act, legislation Congress should pass to ensure the outcomes of all students, Title IV aided and non-aided, are represented in higher education outcomes data.

Short-Term Earnings Data are Not Appropriate for Programs Meant to Deliver Long-Term Outcomes

APLU recognizes ED is limited by the data it presently possesses and collecting and reporting long-term earnings data is not achievable in the short-term. However, we are very concerned about the use of short-term earnings data as a methodology of determining “value” of academic programs not designed or intended just for short-term earnings outcomes. As you are aware, the earnings data on the College Scorecard are limited to one and three years after completion. If the Baseball Hall of Fame only judged players by their first several seasons, the makeup of Cooperstown would look quite different. Nor could a film critic fairly write a movie review based on only the opening scene.

Short-term earnings data are appropriate to judge programs intended to deliver immediate occupational and short-term earnings outcomes. For example, a certificate program in plumbing is intended as a workforce training program for the student to become a plumber following completion of the program. However, a bachelor’s degree in History is not just designed to train students to become professional historians right out of college. The degree teaches students skills, such as critical thinking, that will blossom over a lifetime and are adaptable to many professions as well as lead to a higher academic credential. Such a program should not be judged based on a short-term outcome it is not designed to achieve.

What the Data Do and Do Not Measure

In addition to the existing challenges with the data, it is also important to keep in mind what the data do and do not measure. Earnings data, especially as it relates to programs not tailored to achieve short-term occupational outcomes, are not just a measure of an academic program, but also the economic conditions locally, regionally, and nationally, as well as the makeup of a student body. For example, it is likely of no surprise that highly selective institutions that disproportionately educate students from higher income families will likely graduate students who earn more. Earnings data for graduates of an academic program tell a story that is much deeper than just the academic quality of a program.

Continue to Improve Data Collections but ED Should Not Require a New Data Collection

As noted, the collection of long-term earnings data will be critical to measurements of degree programs, baccalaureate and post baccalaureate. APLU strongly supports ED's efforts to improve on the data it presently has in this regard. Additionally, APLU strongly supports legislative efforts, such as the College Transparency Act, to plug the holes in much of the data ED has and to provide important disaggregated outcomes to better understand various student populations.

Given the most important improvements to data will either take many years (long-term earnings data) or a legislative fix, APLU urges caution with requiring new data collections of institutions that will not fully address the gaps that exist and the information most needed by students and families, policymakers, and institutions themselves.

Moving Forward

APLU appreciates the Department's intention but has serious concerns as to whether it can fairly and accurately accomplish the objective. Thank you for soliciting feedback from the field and for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Becker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Becker
President
Association of Public and Land-grant Universities