

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

October 24, 2025

Dear Chairman Cassidy and Ranking Member Sanders,

This letter responds to your request for information about increasing college cost and value transparency for students and families. The National College Attainment Network (NCAN) represents more than 550 college access and success programs that help students consider their postsecondary educational options, understand financial aid offers, and decide where to go to college. Most of our members are student-serving non-profit organizations. As such, they witness the complexities in financial aid offers and the challenges students face in understanding the cost and value of college. Without clear information about how much college will cost and the likely return on investment, students can end up with debt they cannot afford to repay. We appreciate your longstanding commitment to addressing this critical issue in a bi-partisan fashion.

We write to respond to questions 1 and 3 about price transparency, 4 and 6 about value, 8 about financial aid offers, and 12 about informed borrowers.

Price Transparency

1. What are the pros and cons of the federal government developing a universal net price calculator vs. students relying on individual colleges' calculators?

Net price calculators (NPCs) provide valuable information about the cost of college. But because institutions of higher education (IHEs) use <u>different approaches</u> to determining the cost, update the data that feeds into their calculators at different times, and place the NPCs in different locations on their websites, these tools <u>vary in how useful they are</u> to students.

A universal NPC would enable students, families and counselors to make apples-to-apples comparisons of the net price of different schools. The terms, definitions, data sources, fields, and questions would be the same.

If a universal NPC replaced individual ones, some of the calculations might be less accurate. A private college with a high tuition, high aid model that currently collects detailed financial information to generate a more accurate – and often lower – net price for low-income students might appear less affordable. Conversely, a community college that asks fewer questions to generate a faster result, would lose that flexibility.

Regardless of which approach Congress takes, NPCs might be <u>most useful as a tool for counselors</u> to help younger students understand the colleges that are within reach for them. NPCs help students look beyond sticker price and understand that they may be eligible for substantial student aid. We recommend that the federal government develop training tools to help counselors make the most of NPCs, ensure that colleges place their NPCs in a prominent and easy to find place on their financial aid landing page,

We also recommend that the federal government requires IHEs to use the most recent data available in their NPCs and create a standardized methodology for determining the cost of non-tuition expenses. Since NPCs rely on cost of attendance measures, they may not always accurately reflect all the costs students face, especially non-tuition expenses such as childcare, transportation, and a laptop. Linking NPCs to Federal Student Aid Estimator could improve the tools' accuracy and make it possible for them to include Pell grant estimate as a line item.

Given the <u>substantial reductions in force</u> over the past nine months at the U.S. Department of Education (ED), it seems unlikely that ED will have the capacity to meet its statutory obligations and create a universal NPC for the more than 5,000 IHEs across the country. If Congress does pass a law that includes this requirement, we recommend an extended phase-in period to give ED time to carefully and thoughtfully engage with IHEs and determine all the definitions, parameters, data sources, communication and implementation plans so that NPCs can be as accurate and useful for students as possible.

3. What actions should the federal government consider to ensure that students and families can compare non-tuition costs, such as housing and food, across colleges?

Research has shown that <u>schools use different methodologies</u> to determine these costs, which undermines comparison shopping and defeats the purpose of having NPCs. Estimating the cost of off-campus housing is a particular challenge. Some IHEs use the U.S. Department of Housing and Urban Development's Fair Market Rent figures or other regional cost of living indices, others survey current students living off campus, others use Zillow or other rental listings, and still others take a hybrid approach.

Colleges and universities may inadvertently understate the cost of living, which can make students think a college is more affordable than it is. Lower-income students, who are less able to absorb unexpected costs, may be particularly impacted by these methodological issues.

We recommend that the federal government strongly suggest or require an approach and data source/s for calculating off campus living expenses that accurately captures the cost of attendance for different types of students and takes into account the geographic and institutional variations that exist. We also recommend that IHE's share their assumptions with students so they can verify the accuracy of the model. The <u>College Cost Transparency Initiative</u> may provide practicable recommendations that could be universally adopted. It already has 732 partner IHEs participating.

Value Transparency

4. What are the strengths and weaknesses of the College Scorecard?

The College Scorecard is an invaluable source of information because it has comparable, relevant data by postsecondary program that can help students make informed decisions about their postsecondary education. Specifically, the strengths of the College Scorecard are that it draws from federal databases, such as the Integrated Postsecondary Data System (IPEDS) and the Internal Revenue System (IRS), which makes it:

- Reliable and hard to manipulate
- Standardized across IHEs with metrics calculated using the same definitions and methodologies
- Useful, with program-specific data on earnings, cost, debt at graduation, graduation rates for Pell students, and more, which allows students to evaluate outcomes by major, not just by institution.

It's also free and easy to use, with an appealing and clear format, large font and intuitive interface, and is integrated into the FAFSA Submission Summary (FSS), providing key outcomes data for every school a student sends their FAFSA data too.

Some of its limitations are that it:

- Uses data that can be several years old because of reporting requirements about when IHEs submit their data to IPEDs and when that data is published
- Doesn't include data on students who did not take out federal student loans
- Doesn't acknowledge that variations in earnings may be because programs prepare students for jobs in the social sector that pay less but are meaningful to society
- Doesn't control for characteristics of the incoming student body or provide a value-added measure of average graduate earnings
- Doesn't provide any context about why certain schools may have lower graduation rates (open access mission vs. selectivity).

Finally, the amount of data and technical terms used can overwhelm families unfamiliar with higher education metrics. The College Scorecard works best as a tool that counselors can use to talk with prospective students and their families about postsecondary options. Counselors can explain the data and explore with students how they might consider it in their decision-making. While it is helpful to include data from the College Scorecard on the FSS, it's a little late in a student's decision-making process.

We recommend passing the bi-partisan <u>College Transparency Act</u>, which modernizes the postsecondary data reporting to include more students and more detailed information about outcomes by program.

6. How can the federal government partner with private and non-profit entities to ensure that information on college value reaches prospective students and their families?

College access programs can be instrumental in helping students make evidence-based decisions about their postsecondary pathways. Research shows that when information about college is shared by trusted sources, students are more likely to select a program that is strongly fits with their interests, and to complete a degree. Yet, non-profit college access programs receive almost no federal funding and are often prohibited from being the lead entity in federal grant competitions. We recommend changes to the following programs:

- TRIO Student Support Services. The TRIO statutory authorization provides that non-profit organizations should be eligible for TRIO grants across the five TRIO programs. However, ED has restricted eligibility for Student Support Services funding to IHEs and does not allow non-profit organizations to serve as formal partners in contrast to other TRIO programs.
- **GEAR UP**. The Higher Education Act limits lead applicant eligibility for partnership grants to school districts and IHEs. While community-based organizations can partner on applications, they cannot lead.
- Postsecondary Student Success Grants. ED has hamstrung this program's potential by excluding non-profit providers from applying as lead or standalone applicants in contrast to Congress's explicit directive to do so in the appropriations process. Congress should build on the strong model of the Education Innovation and Research (EIR) program, which permits non-profit providers with a proven record of results to be core participants. While IHEs can and should play key roles in increasing college access and degree attainment, given the longstanding gaps in completion rates, non-profit organizations have a critical role to play and should be tapped as full partners for their reach and expertise.

The federal government could also provide more targeted materials, resources, and support to college access programs that want to use College Scorecard when advising students. ED could look to FAFSA for ideas. The FAFSA team at Federal Student Aid provides adaptable training decks, training sessions, explainers, one pagers, communications toolkits, and student-facing, interactive tools. FSA staff regularly participate in conferences of counseling and college access organizations and communicate directly with student-facing staff and advisors to understand and resolve sticky technical problems. This type of proactive engagement with entities that use their product could improve the College Scorecard's functionality and usability while increasing the field's awareness of it and trust in it. A direct to student marketing campaign aimed at raising the profile of the Scorecard might also be valuable.

Financial Aid Offers

8. What barriers exist to more colleges adopting best practices with their offer letters?

NCAN supports creating standard terms and definitions to be used by IHEs in their offer, or award, letters. Research has shown that colleges and universities use 136 different terms to describe federal, unsubsidized loans alone. Students should be told clearly which of the items on their award letters are grants, which are loans, and which require them to work throughout the semester. Standardized terms and definitions would go a long way towards helping students compare their options and make smart educational and financial decisions. This approach would also afford colleges and universities the ability to customize their award letters to their student populations, educational missions, and financial aid management systems while continuing to innovate, test, and improve the way college costs are communicated to students.

Informed Borrowers

12. Are there special considerations that colleges should take when communicating information to students attending the short-term, workforce-oriented programs that will become eligible for Workforce Pell Grants in the coming years?

Students considering workforce Pell programs, especially those who are graduating from high school and have many years to complete an associate or bachelor's degree, deserve transparent information about the trade-offs. Before enrolling, they should know exactly how much of their lifetime Pell eligibility the program will use, how much they'll have left afterward, and whether that remaining amount can cover the additional semesters needed for a degree. Equally important, students need to understand their options for continuing their education, including whether the workforce Pell program they are considering enrolling in stacks toward a degree program. They should also be informed about the job the workforce Pell program they are considering enrolling in will prepare them for, including median earnings and career prospects over time.

We appreciate the opportunity to provide feedback on this important issue. For more information, please contact Catherine Brown at brownc@ncan.org.