Office of the Under Secretary, U.S. Department of Education

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

February 10, 2023

The National College Attainment Network (NCAN) represents 600 organizations across the country committed to helping first generation students and those from low-income families to attain a postsecondary degree. Fifty percent of NCAN’s members are community-based organizations that provide college and career counseling services to approximately two million students annually. As a result, our members deeply understand the challenges and concerns of students from underserved communities as they consider their options for life beyond high school.

Counselors in NCAN member organizations work to help students make data-driven decisions about college and career. They consistently see that the students they serve consider many factors when deciding where to apply to college, including their values and career aspirations, as well as the cost, convenience, focus, and likely payoff of potential programs of study. At the same time, lack of information about postsecondary options, debt aversion, and logistical hurdles too often hold students back from pursuing postsecondary education. As a result, we see great value in creating a list of low-financial-value institutions and programs to help students make more data-informed choices, and we applaud the Department for taking this step. We are also cognizant of the need to leverage trusting relationships with students to disseminate the list if it is going to drive behavior.

Measures and Metrics

On the question of measures and metrics, we recommend that the Department use outcome measures that are clear, comparable, and intuitive for students and their families. Metrics that are familiar to students and directly connected to their values and goals for the future are more likely to resonate with them than more complex measures that may be difficult for counselors to understand and explain to students and families. While we do not have a specific recommendation for how to determine which schools and programs are placed on the list, here are some categories with suggestions of measures that are used by NCAN college access programs during the college advising process:

1. **Affordability**: Net price, disaggregated by race and ethnicity, income, and first-generation student status
2. **Career prospects**: Average employment rate of graduates, mean and median earnings of graduates ten years after graduation
3. **Graduation rate**: Graduation rate disaggregated by race and ethnicity, income and first-generation status
4. **Student Debt**: Average and median student debt and default levels, disaggregated by race and ethnicity, income and first-generation status
5. **Return on investment (ROI)**: The expected earnings after graduation relative to the cost of attendance and any loan debt.

The more complex and unfamiliar the measure, the more time college counselors – who are in increasingly short supply – will have to spend explaining the concept and the less likely the list is to influence student decisions.

**List Structure**

When developing the structure of the list, NCAN recommends that the Department consider how the list might be integrated into college search and match tools widely used by college counselors, students and families. These tools provide timely and helpful information about postsecondary options to influence enrollment decisions. The most advanced tools enable counselors to quickly evaluate college lists and determine which students need immediate intervention. Some college application management systems include “progress monitoring” features that can flag colleges that are poor fits or matches for counselors, students, and/or families before students submit applications. Unfortunately, many of these tools do not include any outcomes measures or assessments of the likely return on investment that students will receive. In addition, these tools typically show results on an institution-wide - not program-specific - basis.

We recommend the Department:

- Convene the organizations that run these tools to understand how they might integrate the list into their platforms.
- Consider offering incentives to organizations that agree to flag institutions that appear on the list.
- Include schools that have a substantial number of programs that are flagged on the institution-level list.

Here is a non-exhaustive list of search and application management tools used by NCAN members: Achieve Atlanta Match & Fit List Builder, Common App, College Board/Big Future, College Scorecard, College Greenlight, Detroit College Match, KIPP Match Tool, MaiaLearning, Naviance (SuperMatch), Noble Match “Bot,” Overgrad, SchoolLinks, and Scoir.

**Public Dissemination**

Publishing and disseminating the list of low-financial-value institutions is a necessary but insufficient step in helping students make data-informed decisions about their postsecondary education. We recommend that the Department leverage organizations that build and maintain trusting relationships with students to disseminate the list and integrate it into students’ decision-making processes. Specifically, we recommend that the Department:

- Work through intermediaries to introduce the list to college access counselors, explain why the list was developed, how the metrics were calculated and how it can help students. Develop clear guidance and question and answer documents, and host live forums to help counselors understand the list and prepare to use it effectively with students.
- Use National Student Clearinghouse data to identify high schools where significant numbers of students are enrolling in low-financial value institutions. Provide targeted and more intensive support to college access counselors in those areas to increase awareness of the list and
encourage counselors to flag these institutions for students when they become aware that they are under consideration.

• Share the list with scholarship programs. Some NCAN member scholarship providers currently prohibit students from using their awards at programs with poor outcomes and would be well-positioned to build the Department of Education’s list of low-financial-value institutions into their approach.

• Share the list with virtual advising programs that employ chat technology to reach students at specific points during the application process. Provide sample messages that programs might consider incorporating into their schedules.

• Create materials for families who often engage in honest dialogue about postsecondary options with students. Publish the list in multiple languages so that it is accessible to English language learners.

• Leverage a variety of outreach, social media and other communication strategies to reach students where they are, especially those who are not served by college access counselors.

We appreciate the opportunity to provide feedback on the Department’s approach and look forward to partnering with you to help more students make data-driven decisions about their college path.