

March 24, 2017

Dear Secretary DeVos:

We urge you to help students make more informed decisions about where to attend college by supporting greater transparency in higher education.

The U.S. Department of Education, under the leadership of both Republican and Democratic administrations, has worked for decades to increase the availability and utility of postsecondary education data. The Integrated Postsecondary Education Data System (IPEDS), College Navigator, the Federal Student Aid (FSA) Data Center, and other resources provide students, families, and policymakers with important insights into thousands of colleges and universities. For its College Scorecard, the Department generates data on federal student loan debt, repayment rates, and post-college earnings. This information, *which can only be reliably calculated using federal data sources*, is provided through a public-facing tool and through an API and spreadsheet format so that private companies can develop their own resources for students.

College Scorecard data is essential to aid in student choice and make the higher education market function effectively. The evidence is clear: College is worth the cost for most students, but some schools (and programs) are better than others. The right college can provide students with tremendous opportunities to reach their full potential, while a wrong choice can saddle students with crippling debt and limited job prospects. Students need good information to help them choose, and it's especially important for first-generation and low-income students, who often lack knowledgeable family, friends, or counselors to guide them on college decisions.

Surveys show that students planning to attend college overwhelmingly identify better post-college earnings and employment as the most important reasons to seek postsecondary education. However, accurate information on average post-college earnings and debt repayment has not typically been available for specific colleges. College Scorecard data fills this gap. The Department has a unique ability to calculate comparable post-college earnings, by cooperating with the Treasury Department to utilize tax data. This collaboration allows prospective students, guidance counselors, and educators to view average post-college earnings, while keeping sensitive individual data private and secure.

Here are just a few ways that College Scorecard data is making a difference. (More information is available in the attached documents.)

- High school counselors in Minnesota report that data about post-college earnings are sparking discussions with students and families about college occupational programs. Employers in fields like healthcare and manufacturing too often can't find skilled workers, and these postsecondary programs can lead to good jobs.

- Students say that information like the College Scorecard would have helped them make better choices about colleges and debt. In just one example, Bridget Little, a college graduate who is still struggling to get a stable full-time job, said, “Transparency and accountability provided through higher education data would arm students with information to help them make the informed decision that I could not.”
- Through a partnership with Google, the College Scorecard data now appears in the search results for any Title IV-eligible college. Students and parents looking online for information about colleges have easy access to information about acceptance rates and tuition fees. By collaborating with the private sector, the Department of Education is increasing transparency and making the college choice process easier for families.
- The College Scorecard is changing the way that states and higher education leaders are thinking about using data to improve student outcomes. At Miami Dade College, the nation’s largest community college, leaders regularly monitor key performance indicators similar to those in College Scorecard data, including graduation rates and median post-college earnings.

Without question, there is room for improvement. Last year, the Education Department announced it had discovered and corrected an error in the repayment rate metric that inflated rates for most institutions. But students still have a right to know whether the colleges they are considering offer them an affordable education that will help launch their careers. Taxpayers deserve information about whether the institutions they support through grants and loans deliver a quality education.

The Department should continue to provide and improve key information like the data offered through the College Scorecard. The most significant improvement would be publishing more information by program of study, rather than only by institution. Even at the same school, outcomes can vary considerably for different programs. Many students (including low-income students and working adults) are choosing from among programs at their local college rather than comparing schools around the country. Viewing employment outcomes by program can help institutions and area employers understand whether curricula are aligned with labor market demand. Other improvements that would make the College Scorecard more useful for students and families include incorporating the tool into the FAFSA process, and developing side-by-side comparison features.

We hope you will lead the Department in working with institutions to improve data quality and ensure information continues to be available to students and families in a timely, clear, and understandable format. Your dedication to providing more and better information would make a tremendous difference in the lives of millions of college students as they make choices that will help them to pursue their dreams and careers.

Sincerely,

YOUR ORGANIZATION HERE

Building Institutional Capacity to Use Data for Student Success

INSTITUTIONAL CONTEXT

Increased calls for accountability and transparency at the state and federal levels, in addition to professional best practices, are informing the way Miami Dade College (MDC), the nation's largest community college, is evolving its data culture. Specifically, the Florida legislature recently passed a law that funds the state's community colleges based on their performance on four metrics: 1) completion rates, 2) retention rates, 3) job placement or continuing education rates, and 4) the wages of graduates in their first job post-graduation. Similarly, the U.S. Department of Education recently released more data on student success and institutional performance through its College Scorecard. Finally, the Association for Institutional Research recently published a *Statement of Aspirational Practice for Institutional Research*, which provides support for an intentional focus on increasing the ability to produce and use data.

Guided by a new strategic plan for 2015–2020, and in response to these growing demands for more sophisticated, timely, and actionable data, MDC launched a strategic set of activities designed to increase its ability to produce and use data to improve student success and institutional effectiveness:

- Focus on key performance indicators such as enrollment and completion;
- Track groups of students who start at the college at the same time over the course of their studies;
- Create data models based on past student performance to predict success for current and future students;

- Build internal capacity to evaluate the impacts of implemented interventions; and
- Increase the comfort and ability of faculty and staff to work with data.

USING DATA TO IMPROVE STUDENT OUTCOMES

MDC leadership closely monitors select key performance indicators (KPIs) that provide a snapshot of its institutional performance. Informed by accountability and transparency initiatives such as Florida's performance funding model and the U.S. Department of Education's College Scorecard, the KPIs include but are not limited to metrics such as the number of students enrolled and the number of credits in which they enroll; the rate at which students re-enroll from one semester to the next; the rate at which students complete their studies; the rate at which students continue their education at another institution whether or not they complete their studies; the rate at which students who complete their studies are employed; and the entry-level wages of students who complete their studies. KPIs allow MDC to gauge progress on high-risk and high-profile metrics, on a semester-by-semester and annual basis. Since data for some of these metrics are available for other colleges and universities through state and federal sources, they are also able to benchmark their performance against other institutions.

While KPIs provide an appropriately high-level view of institutional performance, MDC sees value in producing more granular data and analyses that can be used to improve specific policies, programs, and practices. One way to

do that is to track the progress of groups of students over time. First, MDC establishes cohorts of students who begin studies in the same semester. If necessary, they establish subgroups within each cohort, such as students who attend full time or enroll directly after finishing high school. At the end of every semester, they determine the status of each student in the cohort—if they enrolled, graduated, or did not enroll. MDC tracks the status of each student in the cohort, every semester, for eight years. This approach allows them to identify when a student discontinues enrollment. By using different variables within a cohort, like program of study, GPA, or high school, MDC can develop and apply more targeted interventions to help students succeed. For example, they can use the insights gained from the data to identify the highest-risk courses in a program of study and offer extra supports, like tutoring or group projects for students enrolled in those courses. This approach also aligns with cohort-tracking models used by federal, state, and voluntary accountability efforts.

MDC is also creating data models using the performance of past students to help mitigate risk—and predict success—for current and future students. By tracking the progress of students over time, they can identify those who did not persist from one semester to the next, construct a profile of those students, and determine whether there are common characteristics or behaviors among them. They can then determine the likelihood that other students who share the same characteristics or behaviors will not persist and complete. This student-level data helps faculty, academic advisors, and academic program managers work with students sooner by prioritizing interventions and focusing on the highest-risk students.

RESULTS

Steps MDC has taken to build institutional capacity to use data for student success have led to promising improvements in practice, including:

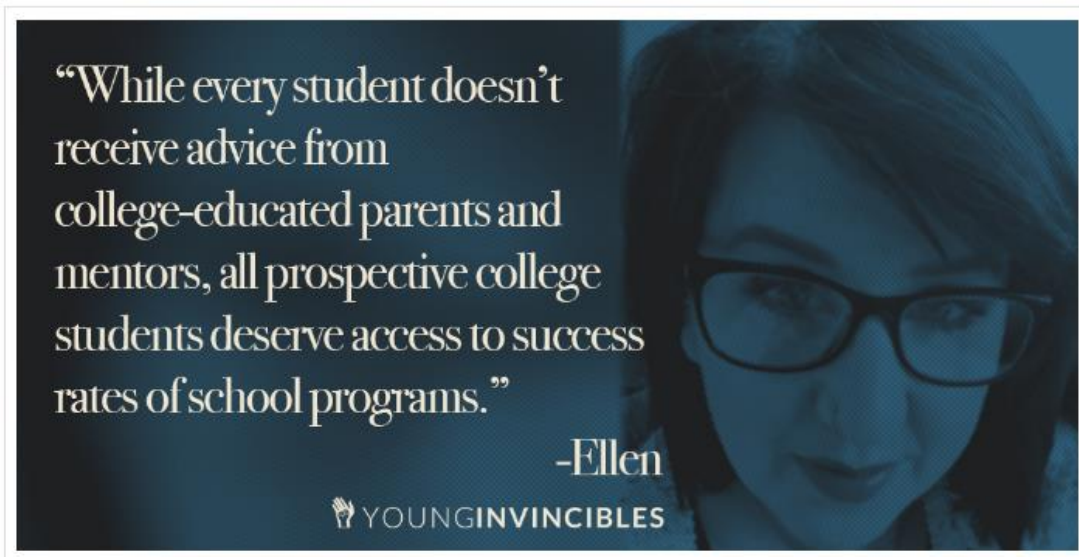
- Increased use of KPIs and student-level data by faculty, department chairs, and academic advisors in strategic enrollment management activities, including course scheduling;

- Increased use of external accountability metrics in academic program reviews; and
- Knowledge sharing to strengthen data literacy among faculty and staff through the MDC Data Academy, a 30-hour noncredit professional development course,

LESSON LEARNED

MDC captured three key lessons from their experience of using data to improve student success.

- ▶ **Build a stronger data culture.** The ability to respond to internal and external demands for more and better data is dependent on an institution's data culture. While an institution must have the technical capacity to produce more and better data, it is more important that faculty and staff possess a willingness and ability to use such data to inform changes in policy, practice, and programs. Otherwise, tools will remain underutilized, and insights will remain unexploited.
- ▶ **Learn from existing activities.** Few institutions must start from scratch to increase their ability to produce and use more and better data to improve student success. There are benefits to building on initiatives that have been previously launched and advantages to aligning the change effort with external public policy developments that must be addressed anyway. For example, MDC has aligned its institutional KPIs with metrics used in state and federal accountability and transparency initiatives.
- ▶ **Dig deeper into student-level data.** Institutions should dig more deeply into the data than they may have done historically. Especially for open access institutions like community colleges, ensuring that all entering students in the cohort persist all the way to completion takes extraordinary effort. But without a deeper look at who these students are, developing appropriate supports and interventions will be that much more difficult.



Empower Students to Better Assess School Quality 

To say my educational journey has been a rocky road is an understatement. That journey—which included four institutions and a subsequent trail of debt—could have been much easier if I had more information about my schools and their programs. I didn't have the best guidance growing up—I lived on my own since I was 15 and didn't graduate from high school. When I turned 18, I knew I didn't want a career in customer service, so at the recommendation of a family member I started classes at (the now notoriously defunct) Lamson Jr. College towards a certificate in word processing. Had I known how many Lamson students in the word processing program found relevant work after graduation, I may have changed my very expensive decision to attend. While every student doesn't receive advice from college-educated parents and mentors, all prospective college students deserve access to success rates of school programs.

There were several red flags that I only discovered once I was enrolled. Lamson, a for-profit school which was located in my local shopping mall, accepted me without a GED. Of course, I was promised I would earn my GED, but was never offered classes to help me achieve this goal. I was also assured that a word processing certificate would put me on the path to a well-paying administrative career, but the school never offered career preparedness services. Three quarters of the way through my program, I was involved in a car accident, which caused me to spend nearly a year recovering from my injuries. Although I had to drop out of school, I was determined to complete my education.

I took another risk 20 years later and attended a community college where, given the quality of my last school, none of my credits transferred. I brought my prior loans out of default, paid my first semester out of pocket, and finally earned my GED. I went to school part-time to make up for the damage from Lamson, and I worked full-time.

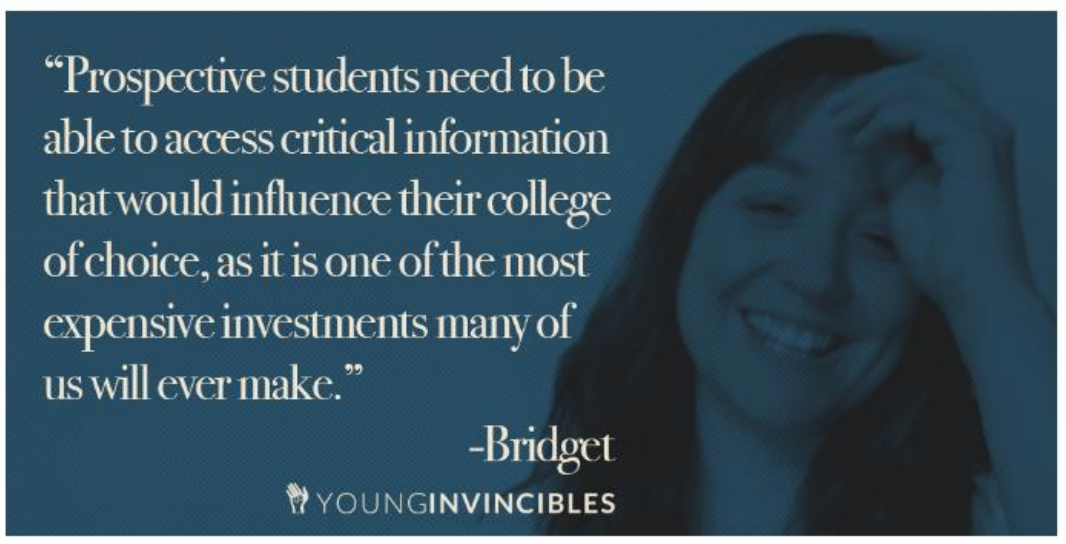
When I was ready to transfer to a university, I was offered two different scholarships. One was to a state university and one was to a small private university. With the limited knowledge I had on graduation rates and career success from each institution, I chose the private university's scholarship for the school's prestige. While it did not cover my full tuition, I felt more comfortable at a smaller campus with advisors and administrators who would help me through the transition. It had an impressive graduation rate overall, but I had no access to how my particular program performed or if graduates were able to obtain jobs in their field, but this information is not available for any college or university. Fortunately, that institution was not the same predatory school that Lamson was. Nevertheless, I was cautious about my chances of finding work after graduation. I was an English major—a significant step upwards from word processing—and received overwhelming support from my professors. I was told that I would find plenty of job opportunities, but never saw stats released on the program's success.

Financially, I struggled. I borrowed additional money that wasn't covered by scholarships and Pell Grants. Things went from bad to worse in my second semester, when I was diagnosed with thyroid cancer and and withdrew from all of my classes. When I finally returned to school, I was still sick, had to drop classes again, and lost my job. Despite my good grades previously, I was in danger of not graduating.

I finally transferred a third time to Park University, where I am currently enrolled. I'm paying less for many of the same services I received at previous schools. I'm happy here, and I don't feel manipulated. In hindsight, I wish I could have gone here immediately after completing my GED. Instead, unfortunately, I have debt passing through four different schools. My loans are near the limit. I will have to take fewer classes, and if I am able to graduate it will take me longer.

The odds are against me, but I'll overcome it. Not everybody has the same perseverance as I have, and this is the part where a lot of people just stop, and those are the people I want to be an advocate for. Taxpayers do not contribute to Pell grants for students like me to be mislead and buried in debt, all driven by a severe lack of information. It's time for our government to help provide us access to information so that those of us who seek to gain skills and be educated do not fall prey to colleges that can operate and turn a profit with no accountability.

Ellen Griffin is a full time college student studying Social Psychology at Park University. She hopes to use her education to improve the way people communicate with one another in business. She has a 15-year-old daughter who she hopes will be inspired by her educational journey.



“Prospective students need to be able to access critical information that would influence their college of choice, as it is one of the most expensive investments many of us will ever make.”

-Bridget

 YOUNGINVINCIBLES

What You Don't Know Will Hurt You: A Lack of College Program Data Can Land Students in Deep Debt

A certain image of the struggling Millennial shows up often in the media – underemployed, underpaid, and swimming in debt. I am that Millennial. I am buried in more than \$113,000 of student loan debt, and can barely stay afloat financially. And there are thousands of people grappling with similar stories. These numbers – these people – can't be linked to the common misrepresentation of Millennials – that we're lazy, entitled, and misguided. There's a much larger network of institutional barriers at work here. One of these barriers is accountability of our higher educational institutions. Prospective students should be able to access critical information that would influence their college of choice, as it is one of the most expensive investments many of us will ever make.

I graduated from the University of Pittsburgh in 2007 with bachelor's degrees in Anthropology and Sociology, and a certificate in Women's Studies, just as the economy was beginning to stagnate. I loved my time at Pitt. I honed my analytical skills, expanded my understanding of worldviews, and learned the value of a liberal arts education. It was just the college experience I had been promised, and it was so personally enriching. But that experience doesn't seem to translate that easily for hiring managers.

I thought having three degrees would have made me more well-rounded and appealing to potential employers, as it demonstrated my analytical skills and work ethic. At least that's what I was led to believe when I was provided with a list of careers paths for sociologists and anthropologists and the variety of ways in which we could leverage our degrees. These lists made the job market out to be brimming with opportunities, all without releasing a single statistic from my school on how many students in my program actually found work in their field. I spent the summer after graduating looking for a job, and when I couldn't find anything in my field, I eventually settled for a minimum wage job at my local Starbucks.

My mistake, I thought, was my lack of specialization, so I signed the papers, pursued the shiny program brochures and enrolled myself in a masters in interior design program at Chatham University, believing that it would lead to a good job.

Interior design has always been a hobby and secondary interest of mine, and those around me echoed the idea that pursuing a more focused degree would lead to a more stable job and a good living. Perhaps unsurprisingly, when I graduated in the fall of 2009, I was still without a job. We were in the throes of the worst recession since the Great Depression, the housing market had collapsed, and finding a job was that much harder as a young person. I've spent the years since initially working three part-time jobs, and moving into a full-time position stagnating at around \$30,000 a year. Finally, after going a year and a half without a raise and working 40 hours a week, I got a second part-time job.

Looking back at my education, I can't help but feel misled and cheated. While I'll never regret my undergraduate liberal arts degrees, I pursued my graduate education without realizing how important your choice of school and program is when planning for and pursuing a career. It isn't as if I never did my homework, there just isn't enough information available for research. I may have been able to know how many students graduated from my school in my programs, and how many of them found work in their field, or found work at all a year after graduation. But right now, our government nor our schools make any of that information available. These details would have heavily influenced which school I attended, what programs I selected, and how much debt I'd be willing to accumulate for my education. But the blame instead has to fall on my shoulders, and schools continue to share none of the accountability.

Since graduation, I've been continuously solicited for donations with these requests following me through moves and relocation, but have not found equal efforts to give students resources on finding work in their field.

Transparency and accountability provided through higher education data would arm students with information to help them make the informed decision that I could not. Further, colleges should be, in part, accountable for the placement of their students post-graduation and accountable at holding their degrees to the esteem in which they cost. Simply put: if the students are paying a premium for the degree, the institutions should be accountable for delivering a return on investment.

For me, getting a return on investment will be a lifelong battle. I continue to hold onto the hope that those so quick to point fingers and call Millennials names will eventually recognize the need for action. Until then, I'll continue to work more than 40 hours a week.

Bridget is a more-than-full-time working girl who spends her nights easing her furiously fervent mind by daydreaming about writing op-eds and taking her activism to the next level. In her free time she enjoys volunteering in her community, spending time outdoors and pretending she has a green thumb. She is perilously passionate about Millennials and their fight to reclaim any semblance of the American Dream.

“We need more information on which schools best serve first generation and minority students, to feel comfortable and assured we’ll find a college committed to our success.”

-Thien

 YOUNGINVINCIBLES



Why First Generation Students Need Data

Students today have a vast amount of options for where to obtain an education, which allows us a lot of flexibility in finding schools of different sizes, cost, and locations. It's a great advantage for some, but can create quite a lot of stress if you aren't exactly sure how to assess which school will set you up best for post-graduation success. Students, especially those from underserved or underrepresented backgrounds, need data that clearly explains graduation and career success rates for people like them. In order to create a generation of leaders and innovators, today's students need to make more informed decisions on which paths will lead them there.

I aspired to become a lawyer since I was 14, so I was lucky to already have an idea of which programs would help me reach my goals. This didn't necessarily make shopping for colleges easier, though. High school advisers and parents can be great resources to students struggling with higher education decisions, but I'm a first generation college student from a non-English speaking family, and there was not a lot of advice to go around. Most of my decisions were made through my own independent research. While my high school adviser was helpful in directing me to scholarship opportunities, I was essentially on my own to pick the right college.

As a 17-year-old, I did not have nearly enough knowledge of federal loan programs, extra college fees, trends in increasing tuition costs, or credit transferability to make the best possible decision when considering the investment I was making in paying for school. Institutions of higher education sometimes provide a cost calculator on their websites and some even provide financial aid estimators. These tools can be helpful in estimating front-end costs, but they do little to educate on what life after graduation, or dropping out, would bring. It only takes a few clicks for a student to receive thousands of dollars in loans, but some can end up repaying them for decades afterward. Once on campus, students have a lot to manage — jobs, internships, community involvement, all on top of classes — so often times learning about our interest rates, repayment options and potential loan forgiveness programs come as a harsh reality after graduation. Colleges need to be more transparent when advertising their costs by also informing prospective students on the costs that go along with repayment.

It can be an even higher stakes situation for students with backgrounds similar to my own, who may not have family or community resources, may need extra support, and may not be native English speakers. We need more information on which schools best serve first generation and minority students to feel comfortable and assured we'll find a college committed to our success. A college campus can be a very unfamiliar environment when you don't have family members to help navigate the strange new setting. Students from similar backgrounds already on campus can be a huge resource to prospective students, as they understand the struggles and can help provide guidance. But that alone isn't enough. Sharing simply the number of minority students at a given school doesn't tell us about the community we may be joining. Our institutions of higher education need to paint a more accurate picture of their minority communities, and the rate of success of those communities experience after graduation, including how prepared they are for the workforce. It's a great resource for some of us, who are not used to asking for help and may let ourselves fail out of college before mentioning anything to anyone, but it's frankly not enough.

I can't speak for every low-income, first generation, minority college student in America, but I know these words resonate with a lot of my peers. While we know we need to take the reigns of our own success, we need to be empowered to do so, and it is clear that there is a lot of information that needs to be made available before students can make a decision that will impact the rest of their lives and those close to them. What we need right now is better data, more of it, and to have it in a transparent and easily digestible form.

Thien is a graduate of the University of Nebraska – Lincoln with degrees in Political Science and Environmental Studies. He served as UNL student body president and pursued increased state funding for colleges with the student government. He has also worked with the National Campus Leadership Council to advocate for college affordability on a national level.



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NEW COLLEGE RANKINGS CREATED USING COLLEGE SCORECARD DATA

by Jenna Leventoff

November 6, 2015

Traditionally, students, parents, and employers have looked to rankings from just a handful of entities, including *U.S. News & World Report*, to gauge the quality of higher education institutions. However, rankings are subjective, and not everyone agrees about what criteria indicate quality. The release of the Department of Education's (ED's) *College Scorecard* and *College Scorecard Data* websites have allowed other entities, such as *the Economist* and the *Brookings Institution*, to create their own rankings based upon their own criteria. These new rankings provide different measures to help students and parents consider how postsecondary education can impact their future careers.

Both rankings focus on monetary success. Generally speaking, each utilized the College Scorecard's data to compare their own estimates of alumni's expected income to actual outcomes to determine the financial gains attributable to each college. Nevertheless, the rankings reached largely different conclusions.

The *Economist* based its estimate about the expected earnings of alumni of 4-year colleges on a variety of factors, including SAT scores, race, prevailing wages in the school's city, the number of Pell grant recipients at each school, and even whether students had an affinity for marijuana. The *Economist's* top rankings went to schools whose graduates exceeded estimated income. According to this ranking method, the top three schools were Washington and Lee University, Babson College, and Villanova University, while the bottom three schools were Gallaudet University, St. John's College, and Cooper Union for the Advancement of Science and Art.

Rank	%ile	College	State	Expected earnings	Median earnings	Over/Under ▼
1	99	Washington and Lee University	VA	\$55,223	\$77,600	\$22,377
2	99	Babson College	MA	\$65,170	\$85,500	\$20,330
3	99	Villanova University	PA	\$60,455	\$73,700	\$13,245
4	99	Harvard University	MA	\$74,466	\$87,200	\$12,734
5	99	Bentley University	MA	\$62,327	\$74,900	\$12,573
6	99	Otis College of Art and Design	CA	\$29,562	\$42,000	\$12,438
7	99	Lehigh University	PA	\$64,559	\$76,800	\$12,241
8	99	Alderson Broaddus University	WV	\$31,766	\$43,400	\$11,634
9	99	Texas A & M International Univer...	TX	\$33,692	\$45,200	\$11,508
10	99	California State University-Bakers...	CA	\$37,025	\$48,100	\$11,075

The Brookings Institution ranked both two and four year colleges. Somewhat similar to the *Economist*, it based its estimate about expected earnings on factors including family incomes, the regional cost of living near the school, race, and test scores. The top ranking schools were those that had the highest score on a scale of 1 to 100, with higher scores signifying the greatest increase over expected earnings. Fifteen 4-year colleges, including a handful of maritime colleges, Babson College, and Harvard University, as well as thirteen 2-year colleges including North Central Institute, Foothill College, and Highland College of Montana Tech, received the Brookings Institute's top score. The 16 bottom scoring 4-year colleges include a number of prestigious conservatories such as The Julliard School and the Boston Conservancy, while the 14 bottom scoring 2-year colleges include the Golf Academy of America - Myrtle Beach and Honolulu Community College.

Search for a school		<input type="checkbox"/> Two-year	<input checked="" type="checkbox"/> Four-year		Value-added to median student earnings 10 years after enrollment of 2001-02 cohort (100 = top score) ▼
Institution	City	State			
Albany College of Pharmacy and Health Sciences	Albany	N.Y.			100
MCPHS University	Boston	Mass.			100
The University of Texas Health Science Center at San Antonio	San Antonio	Texas			100
Maine Maritime Academy	Castine	Maine			100
Massachusetts Maritime Academy	Buzzards Bay	Mass.			100
LIU Brooklyn	Brooklyn	N.Y.			100
University of the Sciences	Philadelphia	Pa.			100
SUNY Maritime College	Bronx	N.Y.			100
California Maritime Academy	Vallejo	Calif.			100
University of Colorado Denver	Denver	Colo.			100
Babson College	Wellesley	Mass.			100
United States Merchant Marine Academy	Kings Point	N.Y.			100
Palmer College of Chiropractic-Davenport	Davenport	Iowa			100
Rose-Hulman Institute of Technology	Terre Haute	Ind.			100
Harvard University	Cambridge	Mass.			100

The *Economist* compared its results to Brookings' and found that, "the Brookings numbers regard a college's curriculum as a significant part of its "value add", causing the top of its rankings to be dominated by engineering schools, and the bottom by art and religious institutions. In contrast, we treated fields of study as a reflection of student preferences, and tried to identify the colleges that offer the best odds of earning a decent living for people who do want to become artists or study in a Christian environment. Similarly, the Brookings rankings do not appear to weight SAT scores nearly as heavily as ours do, if they count them at all: colleges like Caltech and Yale, whose graduates earn far more money than those of an average university but significantly less than their elite test results would indicate, sit at the very bottom of the *Economist's* list, whereas Brookings puts them close to the top."

The *Economist's* comparison illustrates how different priorities can impact rankings. Nevertheless, WDQC is pleased that the College Scorecard has enabled institutions to conduct research and draw their own conclusions. WDQC applauds all efforts to provide students with the information they need to make informed decisions.

April 13, 2017

Commission on Evidence-Based Policymaking
C/O U.S. Census Bureau
4600 Silver Hill Road
Suitland, MD 20746

Dear Members of the Commission:

To improve information about higher education programs and outcomes, our organizations advocate for lifting the ban on a national postsecondary student level data system, sometimes referred to as a federal student unit record system. Many of us previously expressed our opinions in written submissions and oral testimony in response to the Commission's requests for comment. In sum, a national postsecondary student level system has the potential to:

- Provide a more complete picture of program impacts for educators;
- Enable academic and career counselors to provide better advice to students;
- Fill in information gaps on students who move across state lines to complete their studies;
- Eventually reduce onerous reporting burden for schools;
- Offer tax payers and policymakers a more accurate idea about the performance of postsecondary programs and the return on their investments in higher education; and,
- Enable better research and evaluation.

As documented in the Federal Register, the Commission received many comments that pertained to student record data. Out of 355 submissions to the Commission, about 265 were against data collection and sharing, but less than 20 percent of those comments indicated who submitted them and included detailed arguments for retaining the ban on the U.S. Department of Education's (ED) creation of a national postsecondary student level data system.

We want to address those substantively stated concerns. Many of the comments stated fear of government over-reach and concern for the privacy of minors. In advocating for lifting the ban on a national postsecondary student level data system, we are not recommending changes that would allow violations of privacy or require more government intervention in the personal business of individuals. The system would include appropriate oversight and protections against government over-reach while simultaneously maintaining student data securely, safely, and privately.

The federal government would be prohibited from taking action against any individual student based on data compiled through an appropriately designed student level data system. The type of data collected in this recommended system would be limited, and would not facilitate surveillance on individuals. Current privacy laws regulate how the federal government handles personal information and must be applied in all uses of postsecondary data. The proposed system would necessarily conform to those laws and expectations.

The student level data system as envisioned by our associations and organizations would be limited to postsecondary students, the vast majority of whom are not minors. This system would be about college access, completion, debt, and workforce outcomes for adult postsecondary students. It would

not be a K-12 national database on children and would not have sensitive information on health, religion, or discipline. Moreover, a student level data system would not disclose personally identifiable, individual-level data to the public or corporate actors outside the federal government, except those charged with appropriate oversight of postsecondary education institutions. The lifting of the ban would not negate protections in the Family Educational Rights and Privacy Act (FERPA), which only allows disclosure of individual level data for specific purposes, including audit and evaluation of educational programs.

Additional comments against lifting the ban reflected concerns about reducing the value of higher education to simple economic cost-benefit analyses, or effectively forcing students into particular career pathways. We agree that postsecondary education has benefits beyond increasing earnings potential, and affirm that information should be used to guide student choice, rather than limit options. Students have a right to know, however, what outcomes they can expect from postsecondary programs, and the current national data arrangement is ill-equipped to provide them with useful information. Use of performance information and analysis will always require vigilance on the part of educators, institutional leaders, government and contractor personnel, policymakers, and researchers. These professionals should be responsible for:

- Ensuring the implementation of best practices for protecting privacy and using the most advanced security protocols;
- Monitoring changes in threats to privacy and security, and making changes to counter these threats; and,
- Refraining from reductionist applications of performance reporting and academic analysis that would encourage oversimplified conclusions or policy actions.

The need for this vigilance will exist whether or not the ban is lifted. Overturning the ban would allow the use of existing data to help advance student success in a structured and systematic way. The intent of lifting the ban is to provide better information to improve individual choice and benefit society, and information gained by the provision of a privacy-protected system should add to a holistic approach to postsecondary and career decisions.

In light of these considerations, we would like to conclude by highlighting recommendations put forward previously by the Future of Privacy Forum, a non-profit organization that serves as a catalyst for privacy leadership and scholarship, and advancing principled data practices in support of emerging technologies:

The Commission could recommend that any new federal student-level data system expressly define what data elements may be collected, and propose including a governance process, such as regulatory rulemaking with a public comment period, before new elements are added. In order to assuage fears that this database would include pre-K-12 sensitive data or even that the system would include such data on postsecondary students, the Commission could also recommend that there be a statutory provision that enumerates certain data that should never be shared with the federal student-level data system and/or limits what data can be collected on pre-K-12 students.¹

¹ Future of Privacy Forum, Submission to the Commission on Evidence-Based Policymaking, Docket No. USBC-2016-0003, December 14, 2016, p. 3.

We ask that the Commission consider the abovementioned points and recommend lifting the ban on a national postsecondary student level data system.

Thank you for your time and service.

Sincerely,

Achieving the Dream

Advance CTE

Association for Career and Technical Education

Association of Public Data Users

Association of Public and Land-grant Universities

Complete College America

The Council for Community and Economic Research

Ed Trust

Georgetown University Center on Education and the Workforce

George Washington Institute of Public Policy

The Institute for College Access & Success (TICAS)

Institute for Higher Education Policy

NASPA – Student Affairs Administrators in Higher Education

National Skills Coalition

New America Education Policy Program

Veterans Education Success

Workforce Data Quality Campaign

Young Invincibles

April XX, 2017

President Donald Trump
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

Dear Mr. President,

We write to you as strong supporters of the Bureau of Labor Statistics (BLS) to urge the swift appointment of a BLS commissioner with the necessary credentials. We believe such credentials should include strong management experience, economic and statistical skills, extensive engagement with the federal statistical agencies, familiarity with BLS and an understanding of its products and broader relevance, visibility in the statistical community, an ability to interact effectively with both Congress and senior Department of Labor staff, and a thorough understanding of the National Academies' Principles and Practices for a Federal Statistical Agency.

The BLS is the country's second largest federal statistical agency and a major producer of the nation's primary economic indicators. Countless businesses, communities, students, and government policy makers rely on the accuracy, objectivity, and timeliness of statistical information from the BLS. Among the critically important products that BLS provides are the:

- Jobs outlook, upon which employers, job seekers, and students base their training, participation, and other labor market decisions;
- Consumer Price Index, which tracks inflation and informs monetary policy;
- Employment and unemployment at the national, state and local levels, which serve as the most timely and accurate indicators of economic activity;
- Measures of productivity that gauge our nation's economic performance; and
- Monthly data on changes in the prices of imported and exported goods traded between the U.S. and the rest of the world, which help track trends in international competitiveness.

In addition to swift appointment of a high-quality BLS Commissioner, we urge appropriate funding levels for the Bureau. BLS has been flat funded

since FY2010, resulting in a 12% cut to its purchasing power due to inflation. We urge that you prioritize and work to ensure that BLS funding returns to levels sufficient to cover its varied and vital statistical programs.

Thank you for your consideration.

American Statistical Association
Association of Population Centers
Association of Public Data Users
Center for Data Innovation

Council for Community and
Economic Research
National Association for Business
Economics
Population Association of America

Cc: Secretary of Labor [If confirmed by sending of this letter]
Gary Cohn, Director, National Economic Council
Chair, Council of Economic Advisers [If filled by the time of the sending
of the letter]
Mick Mulvaney, Director, Office of Management and Budget
Reince Priebus, Chief of Staff, The White House

March 14, 2017

The Honorable Mick Mulvaney
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Mulvaney:

The Campaign to Invest in America's Workforce (CIAW) is a diverse coalition of national organizations that offer direct services, advocacy, research, and policy development to help people of all ages and conditions develop their skills, enter gainful employment, and enroll and succeed in postsecondary education. As the Trump Administration develops its Fiscal Year 2018 budget requests for the U.S. Departments of Labor and Education and related agencies, CIAW urges you to include adequate investments in job training and adult education so these programs have the capacity to meet the Administration's job creation goals.

Middle skill jobs—those requiring more than a high school diploma, but not a four-year degree—make up 53 percent of today's labor market, but only 43 percent of U.S. workers are trained at this level. This skills gap leaves rural and urban businesses struggling to find workers with appropriate skills, and it leaves workers without meaningful pathways to better-paying jobs.

Congress has acknowledged the need to address this issue and to reform our nation's workforce development strategy. In 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law after being passed by wide bipartisan majorities in the House and Senate. WIOA contains significant changes that will help better match employers with the skilled employees they need to grow. These include fewer and better-aligned performance metrics (including a measure of effectiveness in serving employers), a simpler structure for workforce development boards, and integration of best practices such as industry partnerships and career pathways.

Final regulations to implement WIOA were completed last year. As a result, states are now finalizing their plans to align their employment and training programs with regional economic development strategies that benefit businesses and workers alike. Maintaining funding for WIOA implementation is needed for states to fully carry out congressional reforms. Doing so will improve our nation's economic competitiveness and ensure comprehensive workforce strategies are in place to support national priorities, such as rebuilding our infrastructure.

WIOA, as well as the upcoming reauthorizations of the Carl D. Perkins Career and Technical Education Act and the Higher Education Act, provide unprecedented potential to develop America's workers through access to effective workforce education and training. For this potential to be realized, sustained funding is required.

However, we are deeply concerned by reports that indicate the Administration will propose cuts of up to \$54 billion in non-defense discretionary spending in FY 2018, in addition to elimination of some programs. These cuts that would come on top of historic disinvestments in critical workforce and education programs and the already low caps on non-defense discretionary spending under the 2011 Budget Control Act. Funding for state workforce grants, which WIOA reformed to be more responsive to industry needs, have been cut by 38 percent since 2001. Despite strong bipartisan support, career and technical education programs that prepare workers for the jobs of tomorrow have been cut by 32 percent since 2001. Investments in adult education have been cut by 21 percent since 2001. AmeriCorps is authorized to provide opportunity for 250,000 youth and veterans to serve their country and gain in-demand skills but is only funded to meet the needs of 80,000 participants.

We simply cannot compete in the global economy if we keep cutting and eliminating effective programs.

CIAW urges you to maintain parity between defense and non-defense spending levels, and recommend adequate funding for critical programs under WIOA, the Perkins Act, the Higher Education Act, Homeless Veterans Reintegration Program, Title V under the Older Americans Act (OAA), the Corporation for National and Community Service's programs like AmeriCorps, and related activities, as part of the Administration's FY 2018 budget request. You can find further details regarding specific funding recommendations in the attached, "Funding Challenges: Adult and Youth Education and Training for FY2018." All related programs should be funded at least at the authorized levels set by Congress.

If you have questions about this letter or its attachments, please contact Paul Seifert, CIAW Convener, at paul.seifert@goodwill.org or 240-333-5478. Thank you for your leadership, your commitment, and your attention to these matters that are so important to unlocking our nation's true job creating potential.

Sincerely,

AdvanceCTE
AFL-CIO
American Association of Community Colleges
American Federation of Teachers, AFL-CIO
Association for Career and Technical Education (ACTE)
Association of Community College Trustees
Association of Farmworker Opportunity Programs
Center for Law and Social Policy (CLASP)
Coalition on Adult Basic Education
Corporation for a Skilled Workforce
Council for Adult and Experiential Learning
Easterseals

Goodwill Industries International
Heartland Alliance
International Association of Jewish Vocational Services
International Economic Development Council
Jobs for the Future
National Association of Development Organizations
National Association of Regional Councils
National Association of Workforce Boards
National Association of Workforce Development Professionals
National College Transition Network at World Education, Inc
National Council for Workforce Education
National Council of La Raza
National Council of State Directors of Adult Education
National Fund for Workforce Solutions
National League of Cities
National Skills Coalition
National Youth Employment Coalition
ProLiteracy
Sargent Shriver National Center on Poverty Law
The Corps Network
Workforce Data Quality Campaign
Young Invincibles
YouthBuild USA

Funding Challenges: Education and Training for FY 2018

Reinvest in the skills of America's workforce, including fully funding the Workforce Innovation and Opportunity Act (WIOA) and the Older Americans Act – Despite declining unemployment over the past few years, 7.6 million people remained unemployed as of January 2017; 1.9 million of those have been jobless for 27 weeks or more. While our economy is headed in the right direction, further investment in job training and education is necessary to ensure workers have the skills employers rely upon to compete in the global economy. To reach this goal, the Administration's request should fund both formula and national grant programs at or above authorized levels. The Administration's budget request should:

- Fund WIOA Title I employment and training programs at least at statutorily authorized levels so states, local areas, and other partners in the public workforce system can fully realize the bipartisan vision outlined by WIOA. This includes state adult, dislocated worker, and youth formula grants under Title I-B, the Job Corps program under Title I-C, and national grants under Title I-D. The nation's workforce system plays a critical role in meeting the skill needs of high demand employers and of regional economies. In PY 2015, the system served over 6.8 million participants, two-thirds of whom (over 4 million people) were placed into employment, many of whom were provided with the skills needed by employers through workforce training programs.
- Fund adult education and literacy programs under Title II of WIOA at least at authorized levels to ensure that Americans with low basic skills are able to strengthen their educational levels in order to take advantage of emerging economic opportunities. OECD research shows 36 million adults in the U.S. have low basic skills, yet current funding only supports serving about 1.7 million eligible participants a year.
- Fund Wagner/Peyser Employment Services (ES) activities under Title III of WIOA at current levels to give states the necessary resources to provide WIOA's intensive reemployment services while implementing the new law.
- Fund the vocational rehabilitation program and other employment services authorized under WIOA Title IV for adults and students with disabilities. Substantial updates to Title IV require important updates to our workforce development system's service delivery to individuals with disabilities. These updates reflect the bipartisan understanding that significant barriers to employment exist for many with disabilities. Investment in these individuals

would boost their access to the training and education necessary to develop skills employers value.

- Fund job training and employment services for older workers and veterans authorized through the Older Americans Act and other laws at no less than level funding. Title V of the Older Americans Act authorizes the Senior Community Service Employment Program (SCSEP), the only federal workforce development program targeted to serve older Americans. Last year, more than 65,000 low-income jobseekers ages 55 years and older updated their skills through on-the-job SCSEP training and provided nearly 35 million hours of support to libraries, senior centers, schools and other community- and faith-based organizations across the country. The Homeless Veterans' Reintegration Program is the only federal nationwide program focused exclusively on the employment of veterans who are homeless or at risk of homelessness. Last year, 17,000 veterans received job training and employment supports through HVRP. Funding at the authorized level of \$50 million would mean an additional 5,000 homeless veterans could be served through HVRP.
- Maintain or increase the \$90 million investment in apprenticeship programs. This investment ensures that apprenticeship programs across the country continue to grow and better serve workers seeking training and employers that need to hire them to support the expansion and growth of their businesses. Attention should also be paid to engaging pre-apprenticeship programs to increase opportunity for new partnerships and new types of apprenticeship programs.

Request necessary funding to support Career and Technical Education (CTE) – The Carl D. Perkins Career and Technical Education Act (Perkins Act), which supports our nation's high schools, technical centers and community colleges in providing the education necessary to develop the highly skilled workforce demanded by employers, has been cut more than 30 percent since 2001. These cuts are incompatible with our nation's increased need for skills obtained in CTE education and training programs. Federal workforce and education investments must be targeted so jobseekers can access high-quality education and training that results in market-ready skills and credentials, and to support employers' engagement in aligning training with their skill requirements. The Administration's request should reflect additional funding necessary to restore and strengthen the investment in the basic state grant and implement the programmatic changes of the impending reauthorization of Perkins, including additional discretionary funds to support the development and implementation of innovative CTE strategies, including partnerships between CTE providers, employers, and other key stakeholders. The Administration should request at least FY 2010 levels, or approximately \$1.3 billion.

Modernize and reinvest in the Pell Grant Program – As Congress prepares to reauthorize the Higher Education Act, the Administration's budget request should include investments in implementation and reflect the necessity to update HEA to reflect realities of today's students. The Administration should retain the current Pell Grant surplus and reinvest in the program. Surplus funds exist in part due to prior cuts to the Pell Grant program. Those cuts resulted in a loss or reduction of financial assistance for thousands of students. Surplus funds generated from reductions in student aid should now be

reinvested back into the program, and not diverted away from postsecondary student aid. The Administration's budget request should include investments to protect and modernize the Pell Grant program, including:

- Reinstatement year-round Pell Grants. Providing Pell Grants beyond the current two semesters or three quarters could increase persistence and graduation rates by forestalling summer learning loss and giving students the opportunity to complete their degrees more rapidly. Students need more flexibility in accessing financial aid. In particular, low-income students should be able to enroll continuously. We urge the reinstatement of the year-round Pell Grant in order to support student persistence and on-time completion.
- Expand access to Pell funds for students enrolled in short term training programs leading to industry-recognized credentials and employment in local in-demand industries. Current restrictions on access to Pell funding limits credential attainment by students who cannot afford to access longer term training programs and stifles job growth as businesses can't access trained workers.
- Fully reinstate Pell Grant eligibility for "ability-to-benefit" (ATB) students. In 2012, Congress eliminated Pell Grant eligibility for all new ATB student in order to close a funding shortfall. ATB students lack a high school diploma or GED, yet have proven their abilities to benefit from college-level coursework either through the successful completion of classes (six credits) or by passing a test. Over the past two fiscal years, Congress has begun to incrementally reinstate Pell Grant eligibility for ATB students. Moving forward, the program should be reinstated back to its original, pre-FY 2012 structure. This would allow more students to access this essential aid.
- Maintain the current Pell Grant discretionary baseline funding of \$22.475 billion in order to preserve fiscal stability for the program.
- Maintain mandatory funding for the Pell Grant program. Cutting or eliminating mandatory funding for the Pell Grant program would potentially result in a multi-billion shortfall in future fiscal years.

Support AmeriCorps and the Corporation for National and Community Service (CNCS) – The CNCS is structured to promote public-private partnerships with local organizations and governors), particularly through the bi-partisan AmeriCorps program, in order to address critical community needs by engaging disconnected youth and veterans in high-quality, locally-driven, work-based service programs. Through those programs, students and veterans gain certifications and credentials and further education; receive education awards that can be used for training or school; and complete priority projects that are important to the community and states where they serve. Projects include disaster response, wildfire remediation, invasive species removal, infrastructure repair and development, education, construction, and community/economic development. We urge your support for funding CNCS and its critical programs like AmeriCorps State and National, AmeriCorps VISTA, AmeriCorps NCCC, and the State Service Commissions.

April 1, 2017

The Honorable Thad Cochran
Chairman
Senate Committee on Appropriations
U.S. Senate
Washington, DC 20510

The Honorable Patrick Leahy
Ranking Member
Senate Committee on Appropriations
U.S. Senate
Washington, DC 20510

The Honorable Rodney Frelinghuysen
Chairman
House Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

The Honorable Nita Lowey
Ranking Member
House Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Cochran, Ranking Member Leahy, Chairman Frelinghuysen, and Ranking Member Lowey:

The Campaign to Invest in America's Workforce (CIAW) is a diverse coalition of national organizations that offer direct services, advocacy, research, and policy development to help people of all ages and conditions develop their skills, enter gainful employment, and enroll and succeed in postsecondary education. CIAW urges you to include adequate investments in job training and adult education as you work to complete the Fiscal Year 2018 appropriations process so these programs have the capacity to meet the Administration's job creation goals.

Funding critical investments in workforce and education strategies is essential to ensure businesses have access to workers with appropriate skills. CIAW urges you to invest in the upskilling of American workers and reject proposed cuts to training and education in President Trump's budget proposal.

Middle skill jobs—those requiring more than a high school diploma, but not a four-year degree—make up 53 percent of today's labor market, but only 43 percent of U.S. workers are trained at this level. This skills gap leaves rural and urban businesses struggling to find workers with appropriate skills, and it leaves workers without meaningful pathways to better-paying jobs.

Congress has acknowledged the need to address this issue and to reform our nation's workforce development strategy. In 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law after being passed by wide bipartisan majorities in the House and Senate. WIOA contains significant changes that will help better match employers with the skilled employees they need to grow. These include fewer and better-aligned performance metrics (including a measure of effectiveness in serving employers), a simpler structure for workforce development boards, and integration of best practices such as industry partnerships and career pathways.

Final regulations to implement WIOA were completed last year. As a result, states are now finalizing their plans to align their employment and training programs with regional economic development strategies that benefit businesses and workers alike. Maintaining funding for WIOA implementation is needed for states to fully carry out congressional reforms. Doing so will improve our nation's economic competitiveness and ensure comprehensive workforce strategies are in place to support national priorities, such as rebuilding our infrastructure.

President Trump's budget contains significant cuts that threaten to undermine this progress. The proposal includes approximately \$9 billion in cuts to the Department of Education, or 13 percent below current funding levels. It also cuts \$2.5 billion from the Department of Labor, or about 21 percent below current funding levels. The proposal does not provide clear guidance on where the bulk of the cuts would be made, but it indicates that there are likely to be major cuts to workforce and Wagner-Peyser Employment Service formula grants under WIOA.

WIOA, as well as the upcoming reauthorizations of the Carl D. Perkins Career and Technical Education Act and the Higher Education Act, provide unprecedented potential to develop America's workers through access to effective workforce education and training. For this potential to be realized, sustained funding is required.

However, we are deeply concerned by Administration proposals that would make draconian cuts to essential programs – even cutting programs that provide businesses with the skilled workers they need. These cuts would come on top of historic disinvestments in critical workforce and education programs and the already low caps on non-defense discretionary spending under the 2011 Budget Control Act. Funding for state workforce grants, which WIOA reformed to be more responsive to industry needs, have been cut by 38 percent since 2001. Despite strong bipartisan support, career and technical education programs that prepare workers for the jobs of tomorrow have been cut by 32 percent since 2001. Investments in adult education have been cut by 21 percent since 2001. AmeriCorps is authorized to provide opportunity for 250,000 youth and veterans to serve their country and gain in-demand skills but is only funded to meet the needs of 80,000 participants.

We simply cannot compete in the global economy if we keep cutting and eliminating effective programs.

CIAW urges you to maintain parity between defense and non-defense spending levels, and recommend adequate funding for critical programs under WIOA, the Perkins Act, the Higher Education Act, Homeless Veterans Reintegration Program, Title V under the Older Americans Act (OAA), the Corporation for National and Community Service's programs like AmeriCorps, and related activities, as part of the Administration's FY 2018 budget request. You can find further details regarding specific funding recommendations in the attached, "Funding Challenges: Adult and Youth Education and Training for FY2018." All related programs should be funded at least at the authorized levels set by Congress.

If you have questions about this letter or its attachments, please contact Paul Seifert, CIAW Convener, at paul.seifert@goodwill.org or 240-333-5478. Thank you for your leadership, your commitment, and your attention to these matters that are so important to unlocking our nation's true job creating potential.

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Funding Challenges: Education and Training for FY 2018

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Program is the only federal nationwide program focused exclusively on the employment of veterans who are homeless or at risk of homelessness. Last year, 17,000 veterans received job training and employment supports through HVRP. Funding at the authorized level of \$50 million would mean an additional 5,000 homeless veterans could be served through HVRP.

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degrees more rapidly. Students need more flexibility in accessing financial aid. In particular, low-income students should be able to enroll continuously. We urge the reinstatement of the year-round Pell Grant in order to support student persistence and on-time completion.

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The CNCS is structured to promote public-private partnerships with local organizations and governors), particularly through the bi-partisan AmeriCorps program, in order to address critical community needs by engaging disconnected youth and veterans in high-quality, locally-driven, work-based service programs. Through those programs, students and veterans gain certifications and credentials and further education; receive education awards that can be used for training or school; and complete priority projects that are important to the community and states where they serve. Projects include disaster response, wildfire remediation, invasive species removal, infrastructure repair and development, education, construction, and community/economic development. We urge your support for funding CNCS and its critical programs like AmeriCorps State and National, AmeriCorps VISTA, AmeriCorps NCCC, and the State Service Commissions.

Thank you for your leadership on these matters.

Sincerely,

Senator	Department	Agency/Account	Program	Funding Request Level	Report Language (if applicable)	Bill Language (if applicable)
	Labor	Training and Employment Services	WIOA Title I - Adult Formula Grants	\$861,060,000		
	Labor	Training and Employment Services	WIOA Title I - Dislocated Worker Formula Grants	\$1,374,019,000		
	Labor	Training and Employment Services	WIOA Title I - Youth Formula Grants	\$922,148,000		
	Labor	Training and Employment Services	Workforce Data Quality Initiative Grants	\$40,000,000		
	Labor	Training and Employment Services	WIOA Title III - Wagner/Peyser Employment Service Grants	\$680,000,000		
	Labor	Training and Employment Services	WIOA Title IV - Vocational Rehabilitation and	\$3,302,053,000		
	Labor	Training and Employment Services	Apprenticeship Funding	\$90,000,000		
	Labor	Training and Employment Services	Migrant and Seasonal Farm Workers	\$92,050,000		
	Labor	Training and Employment Services	Native American Programs	\$51,795,000		
	Labor	Training and Employment Services	Ex-Offender Activities	\$88,078,000		
	Labor	Training and Employment Services	YouthBuild	\$87,147,000		
	Labor	Training and Employment Services	Older Americans Act - Senior Community Service Employment Program	\$454,499,494		
	Education	Career, Technical, and Adult Education	WIOA Title II - Adult Education and Literacy State Formula Grants	\$649,287,000		
	Education	Career, Technical, and Adult Education	Carl D. Perkins Act State Grants	\$1,271,694,000		
	Education	Student Financial Assistance	HEA - Pell Grant Program	\$22,475,000,000		



May XX, 2017

The Honorable Thad Cochran
Chairman, Committee on Appropriations
U.S. Senate
Washington, DC 20510

The Honorable Patrick Leahy
Vice Chair, Committee on Appropriations
U.S. Senate
Washington, DC 20510

The Honorable Rodney Frelinghuysen
Chairman, Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

The Honorable Nita Lowey
Ranking Member, Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

The more than XXX undersigned* organizations—representing the full range of stakeholders supporting the Departments of Labor, Health and Human Services, Education and Related Agencies appropriations bill (Labor-HHS)—urge you to increase the fiscal year (FY) 2018 302(b) subcommittee allocation for these programs and services. The activities administered by the departments and agencies under Labor-HHS’s jurisdiction serve a broad range of constituencies and needs, but they all share a common, fundamental goal of strengthening this nation by improving Americans’ lives. The federal government must invest sufficient funding to meet that goal.

Despite Labor-HHS’s profound impact on health and well-being, child development, educational and skills attainment, and productivity, its programs and services continue to be short-changed in the annual appropriations process. For example, with the much-needed sequestration relief provided through the Bipartisan Budget Act of 2015, the Consolidated Appropriations Act of 2016 provided nondefense discretionary programs with a 6.9 percent increase overall, but programs in the Labor-HHS bill only received a 3.3 percent increase over 2015 levels. As a result, funding for Americans’ health, education, workforce, and social services programs—representing more than half of all nondefense discretionary spending—rose less than half as much as the nondefense average. Today, funding for Labor-HHS programs is almost 12 percent below FY 2010 levels, adjusted for inflation. Under President Trump’s budget request, the Labor-HHS allocation would be roughly 15.5 percent lower than current levels, and more than 25 percent below FY 2010 in inflation adjusted terms.

Continuing to underfund these programs and agencies is irresponsible and unsustainable. The effects of short changing the Labor-HHS allocation are:

- Slowing scientific discovery in basic, biomedical, and health services research that prevents disease, improves health, and curbs medical costs;
- Eroding the public health infrastructure and workforce, limiting our ability to respond to public health crises and monitor health trends for new and emerging threats;
- Hindering efforts to close troubling achievement gaps, raise overall student achievement, and increase high school graduation, college access, and college completion rates;
- Leaving far too many low-income children without access to high quality preschool and other early learning opportunities;
- Hindering efforts of local employers to fill approximately five million job openings in the U.S. because too many workers lack the necessary postsecondary education and credentials required for these positions;

- Preventing millions of workers from accessing the critical workforce and job training services that Congress overwhelmingly authorized in 2014; and
- Ignoring the needs of individuals without a high school credential and who need a pathway back to education and employment.

Without an increase in the Labor-HHS 302(b) allocation, it will be impossible to meaningfully increase investments in important initiatives—such as expanding medical research at the National Institutes of Health, implementing the bipartisan Every Student Succeeds Act, or achieving the goals contained in the bipartisan Workforce Innovation and Opportunities Act —without deep cuts in other equally important initiatives.

We urge you to commit to improving the lives of Americans by increasing the Labor-HHS appropriations allocation for FY 2018. More broadly, we remain eager to work with you to help produce another bipartisan budget agreement to stop sequestration and raise the caps for these and other nondefense discretionary programs.

We appreciate your consideration of this recommendation. If you have questions about this letter, please contact:

Emily Holubowich, Coalition for Health Funding (202-484-1100 or eholubowich@dc-crd.com)
Sheryl Cohen, Committee for Education Funding (202-327-8125 or cohen@cef.org)
Kermit Kaleba, Campaign to Invest in America's Workforce (202-223-8991 or kermitk@nationalskillscoalition.org)

*A full list of signatures may be found at XXXXX.

Cc: Members, House and Senate Subcommittees on Labor, Health and Human Services, Education and Related Agencies, Committees on Appropriations