



April 24, 2015

The Honorable Lamar Alexander  
U.S. Senate Committee on Health,  
Education, Labor, and Pensions  
Washington, DC 20510

Dear Chairman Alexander:

The National Association of State Directors of Career Technical Education Consortium (NASDCTEC) and the Association for Career and Technical Education (ACTE) would like to submit the following comments on the Committee's recently released staff white paper titled *Consumer Information: Concepts and Proposals*. Our organizations represent the broadest spectrum of the Career Technical Education (CTE) community with regards to secondary, postsecondary, and adult CTE throughout the country.

The below comments focus on just a few issues, specific to CTE and the intersection of postsecondary data and consumer information with the Carl D. Perkins Career and Technical Education Act (Perkins). We would also like to draw your attention to the Postsecondary Data Collaborative's comments which both of our organizations have endorsed and fully support.

We applaud your ongoing work to ensure that the public has access to reliable information on their postsecondary education options and to make certain that data is used to make informed decisions with regards to public policy making and consumer choice. In addition to the comments provided by the aforementioned Postsecondary Data Collaborative, we would like to highlight three issues that are of significance to the CTE community.

First, our organizations support the paper's focus on streamlining and leveraging existing data systems. Federal reporting requirements have become increasingly difficult for many institutions to implement, particularly smaller institutions in the CTE community that may not have sufficient resources or personnel to meet those requirements. In the past, our members have expressed concern regarding the expansion of reporting requirements for the Integrated Postsecondary Education Data System (IPEDS) and the many redundant data elements that CTE institutions must report. We therefore recommend a greater emphasis in future legislation on the use of common data elements across all federal programs, where appropriate and feasible, to create greater efficiencies in this area.

Conversely, there are many instances where CTE institutions are excluded entirely from IPEDS data collection efforts despite these reporting requirements. This makes much of the federal

government's postsecondary data collection effort inconsistent and leaves the resulting dataset incomplete. For instance, area career technical centers are required to submit data to the National Center for Education Statistics (NCES) at either the secondary level (captured in the Common Core of Data) or at the postsecondary level (located in IPEDS). An institution's participation in one system is not captured in the other despite the fact that the center is serving both secondary and postsecondary students. To address this we suggest a greater degree of coordination between the two data systems to ensure that institutions are not forced to duplicate effort when reporting this information, while also making certain that this vitally important information is incorporated in the appropriate data systems.

Second, we would like to reiterate the importance of linking postsecondary data elements to employment information and outcomes. The Higher Education Act is the federal government's largest investment in the nation's workforce and linking employment information to existing postsecondary data is extremely important when attempting to determine the efficacy of this expenditure.

At present, linking this information is exceptionally difficult because of the current ban on a student unit record system. We strongly encourage you and your colleagues on the HELP Committee to repeal this ban in future legislation to help ensure that these sorts of linkages can be established. Doing so would give the public and policymakers much needed information on the employment and earnings of students and can actually be done using many existing data systems such as the National Student Loan Data System, Unemployment Insurance (UI) wage records and other systems, all while ensuring student privacy and data integrity. Regardless of whether the federal ban is lifted, more must be done to ensure existing data can be linked appropriately at the state and local level so that high-quality employment outcome information is available both for accountability and program improvement purposes.

Finally, we encourage the committee to support the safe and secure use of student data by researchers studying postsecondary education. Hand in hand with Perkins accountability indicators and other federally mandated outcomes measures, this research provides much needed evidence of program effectiveness. We also support safely and securely linking data from third-party sources, such as information on individuals taking industry certification exams and earning industry certifications, with education and workforce data to enhance knowledge of student outcomes. Information shared with non-governmental entities should be kept secure, safe, and private and should be aggregate or de-identified data, whenever possible.

We look forward to working with you and the rest of the HELP Committee in the coming weeks and months as you consider the reauthorization of the Higher Education Act. Should you have any questions about our comments or positions, please feel free to contact Steve Voytek ([svoytek@careertech.org](mailto:svoytek@careertech.org)), NASDCTEC's Government Relations Manager, or Mitch Coppes ([mcoppes@acteonline.org](mailto:mcoppes@acteonline.org)), ACTE's Legislative and Regulatory Affairs Manager.

Sincerely,

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