Arnold Ventures

May 15, 2024

U.S. Department of Education
400 Maryland Ave., SW
Washington, D.C. 20202

Docket ID ED-2024-OUS-0014

Re: Request for Information Regarding Developing a Postsecondary Student Success Award
Program for Institutions of Higher Education

To Whom It May Concern:

Thank you for the opportunity to comment in response to the request for information
regarding opportunities for the Department of Education to develop a postsecondary student
success award program for institutions of higher education. Arnold Ventures is a
philanthropy dedicated to tackling some of the most pressing problems in the United States.
For the past seven years, we have invested in research, policy development, litigation, and
advocacy to end predatory behavior in higher education and increase the return on
investment of higher education for both students — especially students who have been
historically marginalized — and taxpayers. Should you have further questions regarding these
comments, we welcome the opportunity to discuss them further.

We strongly support the Department's concept of recognizing the colleges that produce true
economic mobility for their students, supporting communities that have long been left
behind. These high-access, affordable institutions leading their students to graduation and
well-paying jobs are the workhorses of the U.S. postsecondary system, supporting a strong
economy and an educated workforce. The highest rates of socioeconomic mobility are offered
by "typically mid-tier public institutions," according to research that measured increases in
earnings for the lowest-income students.[1] The value of these effective, accessible colleges
cannot be understated – yet for too long, their contributions have gone largely unappreciated.

But even as higher education has immense potential to help reshape our country to be more
equitable, further improvement is needed.

Too many high school graduates lack access to quality postsecondary education options
altogether; in particular, low-income students and students of color who graduate from high

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[1] Chetty, Raj, John N. Friedman, Emmanuel Saez, Nicholas Turner, and Danny Yagan, "Mobility Report
Cards: The Role of Colleges in Intergenerational Mobility," July 2017, http://www.equality-of-
opportunity.org/papers/coll_mrc_paper.pdf.

school are less likely than higher-income and white students to enroll in college.[2] Unfortunately, many of the nation's most selective colleges, in particular, are largely out of reach for low-income students; for instance, legacy students from the wealthiest 1 percent are five times as likely to be admitted to Ivy League or Ivy-adjacent institutions as the average, similarly qualified student.[3] Unfortunately, far from being encouraged to admit more low-income students and advance economic mobility, these institutions are instead typically rewarded with top slots on the *U.S. News and World Report* rankings.[4]

Even for those who do enroll in college, retention and graduation rates nationally show far too many students left behind. Among predominantly four-year institutions, only about half of students who receive federal financial aid graduate within six years; among predominantly associate degree-granting institutions, only about one in four.[5] For those who stop out of college with debt but no degree, borrowers are particularly vulnerable to struggles with repayment, including defaulting on their loans at much higher rates.[6]

To address these systemic challenges of higher education – ensuring that more low-income students and students of color have access to a high-quality, affordable higher education, and that more students (especially at the most affordable institutions) are able to stay in school and graduate on a clear path to well-paying jobs – will require a true national commitment to changing the status quo. To that end, we support the Department's efforts to recognize the value that under-appreciated colleges are already providing to their students and communities, and to drive change from the rest.

Below are more specific comments to help guide the Department's thinking on the development of this award system. We welcome the opportunity to discuss these comments further.

Measure True Indicators of College Success

The Department's request for information indicates that it is interested in recognizing the institutions that "[support] success across all of their students," with a focus of credentials of

[2] "Advancing Diversity and Inclusion in Higher Education: Key Data Highlights Focusing on Race and Ethnicity and Promising Practices," Office of Planning, Evaluation, and Policy Development, U.S. Department of Education, November 2016, https://www2.ed.gov/rschstat/research/pubs/advancing-diversity-inclusion.pdf; and "Percentage of Recent High School Completers Enrolled in College, by Race/Ethnicity and Level of Institution," Table 302.20, Digest of Education Statistics, National Center for Education Statistics, August 2023,
https://nces.ed.gov/programs/digest/d23/tables/dt23_302.20.asp?current=yes.
[3] Chetty, Raj, David J. Deming, and John N. Friedman, "Diversifying Society's Leaders? The Determinants and Causal Effects of Admission to Highly Selective Private Colleges," October 2023, https://opportunityinsights.org/wp-content/uploads/2023/07/CollegeAdmissions_Paper.pdf.
[4] "Best National University Rankings," U.S. News and World Report, available at: https://www.usnews.com/best-colleges/rankings/national-universities.
[5] Analysis of College Scorecard data.
[6] Dynarski, Susan, "Why Students with Smallest Debts Have the Larger Problem," The New York Times, August 2015, https://www.nytimes.com/2015/09/01/upshot/why-students-with-smallest-debts-need-the-greatest-help.html.

value that lead to economic success. We strongly agree, and urge the Department to consider measures of outcomes – including postsecondary retention and completion rates, as well as post-college earnings – alongside its consideration of measures of access (such as enrollment of low-income students, e.g., Pell Grant recipients, and enrollment of students of color) and affordability (such as the tuition and fees charged by the institution and the net price paid by low-income federal financial aid recipients).

Importantly, the Department should be sure to balance all three of these factors: access, affordability, and outcomes. While access and affordability are important to establishing pathways for economic mobility, without ensuring those students are able to succeed at the institution, such "access" could be problematic, or even predatory in nature. Students who take on debt to attend an institution and who do not graduate are three times as likely to default on their student loans.[7]

As the Department considers appropriate sources for these data, we encourage the inclusion of measures from the Integrated Postsecondary Education Data System (IPEDS) and the College Scorecard, or other federal sources, wherever possible. These data are the most accurate, complete, and comprehensive data publicly available, even where they require additional improvement,[8] and should form the basis of any federal recognition program for institutions. By relying on the best available data, which across the higher education system are those held by the federal government, the Department can avoid the inconsistencies in definitions and reporting, or even gaming, that may exist with data that institutions may cherry-pick for submission in an application.

Assess Institutions' Commitment to Evidence-Based Practices

The Department's request for information suggests it will likely require eligible institutions to submit an application demonstrating "the effectiveness of [institutions'] strategies to ensure economic mobility through student success efforts." We thank the Department for its inclusion of this important question in the RFI, and we agree this commitment to engaging with the evidence is a critical component of ensuring that institutions have earned federal recognition.

Evidence-based student success strategies live up to their promise on campuses across the country, helping thousands more students graduate from college and reach well-paying jobs. For instance, high-quality research has found that the Accelerated Study in Associate Programs (ASAP) intervention founded at the City University of New York (CUNY) doubled graduation rates, both at that institution and in subsequent institutions that have replicated the effort.[9] A recent evaluation found that ASAP's implementation in Ohio community

[7] "Toward a New Focus on Outcomes in Higher Education," Press Release, U.S. Department of Education, July 2015.

[8] Friedrich, Michael, "A Third Act for College Transparency," Arnold Ventures, March 2021, https://www.arnoldventures.org/stories/a-third-act-act-for-college-transparency.

[9] Dai, Stanley, Colleen Sommo, an Rebekah O'Donoghue, "Improving Academic Outcomes at Westchester Community College During the Pandemic," MDRC, November 2022,

colleges led to an 11 percent increase in wages for graduates, compared with their non-ASAP peers.[10] A newer iteration of the ASAP program for four-year colleges, Accelerate, Complete, and Engage (ACE), has also proven effective, with an on-time graduation rate more than 12 percentage points higher for ACE students than for their peers.[11] Other interventions have also proven effective, like the Bottom Line advising program that has shown graduation rates for impacted students 23 percent higher than their counterparts without the benefit of Bottom Line's services.[12]

Given the substantial impact seen across these interventions – and the growing body of evidence that they can work on different types of campuses to support students from all kinds of backgrounds – the Department should explicitly require institutions to demonstrate this same commitment to evidence-based practices in order to qualify for recognition. For example, the Department can require eligible institutions to indicate the types of evidence-based practices, as identified in the What Works Clearinghouse or via other evidence registries and systematic reviews, that they are instituting on their campuses and prioritize institutions that are implementing the most effective interventions (such as ASAP and Bottom Line). With this approach, the Department can also automatically consider institutions that receive federal funding to implement evidence-based practices – such as mid-phase or expansion grantees of the Postsecondary Student Success Grants program – as having demonstrated this criterion, qualifying them for recognition.

Similarly, the Department should consider institutions' contributions to the growing body of evidence about what works in higher education. Rigorous evaluation is an important commitment that institutions make to the improvement of higher education, not only on their own campuses but also to inform other institutions. That is one reason that Arnold Ventures, for instance, has two open requests for proposals seeking opportunities to fund rigorous research into what works in higher education and other social programs.[13] Institutions that can produce documentation verifying they are actively engaged in rigorous causal research

https://www.mdrc.org/work/publications/improving-academic-outcomes-westchester-community-college-during-pandemic; and McManus, Kelly and Shrutika Sabarwal, "There's a Proven Fix for an Urgent Education Problem – Congress Should Embrace It," The Hill, June 2023, https://thehill.com/opinion/congress-blog/4033355-theres-a-proven-fix-for-an-urgent-education-problem-congress-should-embrace-it/.

[10] Miller, Cynthia, Camielle Headlam, Michelle Manno, and Dan Cullinan, "Increasing Community College Graduation Rates with a Proven Model: Three-Year Results from the Accelerated Study in Associate Programs (ASAP) Ohio Demonstration," MDRC, January 2020, https://www.mdrc.org/sites/default/files/ASAP_OH_3yr_Impact_Report_1.pdf.

[11] Zhu, Jing, Michael Scuello, and Diana Strumbos, "Evaluation of Accelerate, Complete, Engage (ACE) at CUNY John Jay College of Criminal Justice: Year 4 Interim Study Report," Metis Associates and City University of New York, April 2023, https://www.cuny.edu/wp-content/uploads/sites/4/2023/06/CUNY-ACE-Study-Four-Year-Graduation-Results-Full-Report-April-2023.pdf.

[12] Sullivan, Bob, "'Blockbuster' Results in College Completion Program," Arnold Ventures, October 2021, https://www.arnoldventures.org/stories/blockbuster-results-in-college-completion-program.

[13] "Strengthening Evidence: Support for RCTs to Evaluate Social Programs and Policies," Request for Proposals, Arnold Ventures, February 2024, https://craftmediabucket.s3.amazonaws.com/uploads/PDFs/AVEE_StrengtheningEvidenceRFP_Final.pdf; and "Building Evidence: Support for Causal Studies to Evaluate Social Programs and Policies," Request for Proposals, Arnold Ventures, February 2024, https://craftmediabucket.s3.amazonaws.com/uploads/PDFs/AVEE_BuildingEvidenceRFP_Final.pdf.

on their campuses should similarly be considered to have met the criterion of demonstrating a commitment to evidence-based practices. The Department should prioritize institutions engaging in evaluations of interventions designed to improve retention and graduation rates, particularly for underserved students rigorous, using well-designed causal research methods, such randomized controlled trials or quasi-experimental studies.

Ensure Institutions Are Dedicated to Continuous Improvement

While engaging with the evidence is critical, it is also essential that institutions engage in continuous improvement to monitor progress and – importantly – adjust course as needed. To effectively monitor improvement, it is important that institutions set measurable goals for improvement on metrics like college completion rates, with interim benchmarks (like persistence or retention rates, credit accumulation, and passage rates in gateway or developmental education courses) along the way. To the extent practicable, these metrics and benchmarks should be disaggregated across student subgroups, enabling the institution to identify and address students with additional needs. And institutions should be expected to periodically compare their data against the original interim and overall benchmarks to determine progress, assess additional needs, identify what is and is not working, and adjust course as appropriate.

To ensure institutions are engaged in this work, the Department should request both an explanation of the institution's processes for engaging in data-driven, continuous improvement work, and a dashboard (which may be in whatever format the institution uses, minimizing the burden to the school for its application) that contains the institution's interim and overall benchmarks alongside its current progress. This will provide the necessary assurances that the institution has an adequate and even exemplary process in place for improvement.

Sincerely,

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