

knowledge alliance

Roberto Rodriguez, Assistant Secretary for Planning, Evaluation, and Policy Development
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Assistant Secretary Rodriguez,

I am writing on behalf of [Knowledge Alliance](#) (KA) with recommendations in response to the U.S. Department of Education’s (ED’s) [request for information](#) (RFI) soliciting comments from the field on the use of the pooled Higher Education Act (HEA) funding for evaluation, data collection and analysis activities. Knowledge Alliance, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members promote the use of rigorous research to figure out “what works” and why and to improve student outcomes and then share those findings with policymakers, practitioners, and the general public.

KA supports ED’s use of funds for data collection and evaluation of HEA programs, as we know the importance of having accurate data to inform our education systems on how to best meet the needs of all students. While higher education can provide students and their families opportunities for postsecondary success, barriers to equitable access, enrollment, retention, and completion of higher education plague many students—particularly students from historically marginalized populations. The funds set aside for evaluation and analysis could advance long-term equity-focused, student-centered, and evidence-based policy by building additional evidence about what interventions work for which students and institutions, and under which circumstances. This letter includes KA’s recommendations to help inform ED’s decision-making regarding the process of data collection, types of data to collect, and dissemination practices.

1. Employ Gold-Standard and Equity-Focused Evaluation and Analysis Practices:

ED should employ a wide range of methodologies to ensure data capture an accurate understanding of HEA programs for all student groups. For funded evaluations to yield the most accurate data, ED must employ multiple experimental methodologies, such as randomized control trials and others, that are eligible for the highest rating by the What Works Clearinghouse. Studies employing a diverse range of well-designed evaluation methodologies meriting that rating will provide policymakers high levels of confidence that the intervention studied caused the observed effect, making the results of these studies valuable for understanding how to improve HEA programs for all students.

ED should disaggregate data by race/ethnicity and income as well as other demographics. With these funds, ED should prioritize collecting data that would expand our understanding of the impact of HEA programs on specific subgroups of students, while maintaining privacy and security. Limitations with current data—for example, the paucity of finer-grained data on outcomes for Asian American, Native Hawaiian, and Pacific Islander students, as well as small sample sizes that often lead to suppressed data for American Indian/Alaska Native students—hinder ED’s ability to make informed decisions about how

specific HEA programs impact these historically marginalized groups. This authority represents an opportunity to build an equity-focused evidence base that is more inclusive of students' postsecondary experiences.

2. Prioritize Evaluations of HEA Programs' Efficacy for Historically Marginalized Groups

ED should evaluate HEA interventions for their efficacy in helping all students achieve desirable outcomes. Currently, there is a lack of understanding of how HEA programs and interventions affect college enrollment, persistence, retention and completion for students facing different racial and socioeconomic inequalities. ED should utilize these funds to conduct program evaluations that would help us gain a clearer picture of the challenges that students from diverse backgrounds face. Specifically, ED should carry out cross-cutting, equity-focused evaluations of HEA program design and implementation. These evaluations should contribute to a more accurate understanding of which programs and interventions:

- Enable equitable access to higher education for students, particularly students from historically marginalized populations;
- Enable completion for enrolled students or students who dropped out but are close to earning a credential;
- Improve retention and completion for young adult learners;
- Facilitate transfer students' credit accumulation and transition between institutions of higher education; and
- Support students' transition between postsecondary education and high-quality jobs.

In addition, KA is very concerned about the recent, pandemic-related decline in postsecondary enrollment, particularly among historically underrepresented student populations, and asks that ED carefully track and monitor enrollment trends for all student groups and seek to identify practices that could reverse that trend.

3. Ensure Widespread Access and Efficient Dissemination of Findings

ED should ensure that data can be merged with current databases and other existing data sources. It will be important for contractors receiving this funding to be able to access readily available, high-quality, student-level data on programs authorized by the HEA. Moreover, the merging of databases between HEA-authorized programs and other restricted-use datasets from ED would allow researchers to identify additional data elements that will add to the rigor, generalizability, and usefulness of the evaluations. The merging of databases would also increase the precision and rigor of research and allow for additional outcome measures to be evaluated (e.g., financial aid measures with the National Postsecondary Student Aid Survey dataset, employment outcomes with the Baccalaureate and Beyond dataset).

ED should make data and findings from evaluations readily accessible and widely disseminate them.

We know and support that ED continues to prioritize research across the entire spectrum of education systems. However, if the findings are not made widely accessible, then they cannot be effectively

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leveraged by policymakers, program administrators and students. ED should ensure that research funded through this authority adheres to IES’s Standards for Excellence in Education Research’s (SEER), which encourage making findings, methods, and data open by ensuring that final manuscripts are publicly available and providing access to final research data, while maintaining privacy and confidentiality. Making these findings accessible will allow stakeholders in the field to utilize them in making informed decisions and changes to HEA programs so as to better meet the needs of all students.

4. The Secretary should maximize the authority granted by Congress by setting aside the full 0.5 percent of funds and pooling these funds to be distributed across research studies according to opportunity and need.

We recognize that the full 0.5 percent of funds will not be available to pool in FY2022, since many program expenditures were already obligated before the set-aside authority was granted. Given these circumstances, we commend ED for setting aside all available funds in FY 2022 (\$6,904,996). To fully maximize this authority and increase the likelihood that interventions equitably benefit underserved students, in FY 2023—and in the future should this authority continue to be maintained—the Secretary should set aside the maximum allowable percentage. Pooling the funds in this way would support effective research and evaluations that can lead to continuous improvement without arbitrarily limiting the availability of vital resources.

Conclusion

KA would like to thank ED for the opportunity to provide comments on how to best evaluate the efficacy and impact of HEA programs and interventions. The evaluations, data-collection activities, and analyses funded through this authority will help build the evidence base on which to make policy decisions about how the Federal government should support students across the country, particularly those from groups that have been historically excluded. The comments provided above are informed by KA’s extensive experience in the field, and we believe that these they illustrate ways in which ED can ensure that these funds are utilized to produce rigorous, equity-centered evaluations that will best assist policymakers in making changes that to reduce barriers to success in higher education for all students.

Please reach out to Rachel Dinkes at rdinkes@knowledgeall.net with any questions.

Sincerely,



Rachel Dinkes