



Paperwork Reduction Act Coordinator  
Strategic Collections and Clearance Governance and Strategy Division  
U.S. Department of Education  
400 Maryland Ave. SW,  
LBJ, Room 6W208D  
Washington, DC 20202–8240

## **RE: Comments on Revised Information Collection ED-2020-SCC-0177, Experimental Sites Initiative Reporting Tool**

To Whom It May Concern:

Thank you for the opportunity to provide comment on the Education Department’s recently proposed revisions to the Experimental Sites Initiative reporting tool. As you know, the Experimental Sites Initiative (ESI) is a critical tool for the Department of Education to help policymakers test reforms to higher education and program improvements at a small scale to identify what works.

However, that mission has not been fully realized due to a lack of credible evaluation of those experiments.<sup>1</sup> For over a decade, the Department has spun up and wound down experiments with very little public reporting about the outcomes of those experiments; what little information has been made public has been descriptive in nature and of limited utility. Even for two experiments launched in 2011, specifically designed to rigorously evaluate the use of federal financial aid for job-training programs through a randomized controlled trial, the Department failed to consider the core outcomes important to the experiment: employment and earnings.<sup>2</sup>

We are encouraged that the Department is taking steps today to improve, at least, data collection that will improve the comprehensiveness of descriptive data reporting; and we provide comments on the specific items included in those information collection requests. We would be remiss not to offer our larger-picture hopes for this program, though: that future experiments will be created by first developing key policy questions, and then designing an experiment and evaluation plan that can answer those questions reliably. This may seem straightforward, but too often, the ESI approach has been to establish an experiment first and develop questions later. A haphazard approach has made it difficult for the Department to get answers to the questions in which it is most interested, and has also contributed

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<sup>1</sup> Clare McCann, Amy Laitinen, and Andrew Feldman, “Putting the Experiment Back in the Experimental Sites Initiative,” New America, January 2018, <https://www.newamerica.org/education-policy/policy-papers/putting-experiment-back-experimental-sites-initiative/>

<sup>2</sup> “The Effects of Expanding Pell Grant Eligibility for Short Occupational Training Programs: Results from the Experimental Sites Initiative,” U.S. Department of Education, Institute of Education Sciences, December 2020, <https://ies.ed.gov/ncee/pubs/2021001/index.asp>

to excessive burden on institutions, which have only been told after the fact (sometimes several years into the experiment) what information they are expected to collect.

We are happy to provide additional input at any time regarding the construction or redesign of the Department's experiments. Below, we provide specific feedback on the items included in the recent information collection request.

Please do not hesitate to reach out if you wish to discuss this comment further. We can be reached as follows: Amy Laitinen, [laitinen@newamerica.org](mailto:laitinen@newamerica.org); Clare McCann, [mccann@newamerica.org](mailto:mccann@newamerica.org); Rachel Fishman, [fishmanr@newamerica.org](mailto:fishmanr@newamerica.org); Monique Ositelu, [ositelu@newamerica.org](mailto:ositelu@newamerica.org); and Taylor White, [whitet@newamerica.org](mailto:whitet@newamerica.org).

Sincerely,

Amy Laitinen  
Director, Higher Education Program  
New America

Clare McCann  
Deputy Director of Federal Higher Education Policy  
New America

Rachel Fishman  
Deputy Director for Higher Education Research  
New America

Monique Ositelu, Ph.D.  
Senior Policy Analyst for Higher Education  
New America

Taylor White  
National Director, Partnership to Advance Youth Apprenticeship and  
Senior Policy Advisor for K-12 Education and Workforce  
New America

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## Overall Comments

In general, we urge the Department to consider the most rigorous possible methodology for evaluating each of these experiments. It is not possible to glean from these lists of data elements how, exactly, the Department anticipates using each of them in combination with other data elements already within the Department's possession. However, we are confident that the Department could evaluate at least some of the experiments for impact, rather than simply publishing high-level data points. This would provide more useful and actionable information for lawmakers, and is more in keeping with the purpose and mission of the ESI.

Additionally, we appreciate the inclusion of numerous questions across the surveys about the impact of COVID-19 on the operations of each experiment. Through our work to evaluate the impact of the pandemic on higher education,<sup>3</sup> we have learned important insights about how institutional leaders and state officials are approaching challenges differently and are identifying best practices that have worked well, particularly for vulnerable populations of students. We encourage the Department to maintain the questions it incorporated from *Inside Higher Ed's* "Responding to the COVID-19 Crisis: A New Survey of College and University Presidents." We have also noted in several places throughout where we believe additional information would contribute to a fuller picture of the challenges the pandemic has presented to students and institutions, and the research itself, alike.

The pandemic dramatically accelerated a shift to fully online or hybrid distance education programs. Given the uncertain future and the trends prior to the pandemic, we also urge the Department to add a new element related to distance education for all students included in any of these experiments in either the treatment or control groups. Incorporating a new reporting requirement to NSLDS, asking about the distance-education status of each enrolled federal financial aid recipient, will help to support the Department's research efforts and ensure the data it is collecting are adaptable for an uncertain future. We believe this could be incorporated by reporting whether each Title IV student is enrolled exclusively online; exclusively as a brick-and-mortar student; or as a hybrid student in both online and brick-and-mortar instruction. These data points should be collected as of the student's status prior to the pandemic, during the pandemic, and at subsequent changes in modality. This will help the Department better understand if and how enrollment modalities affect the interventions being studied.

## Loan Counseling

Importantly, the loan counseling experiment is one of the few experiments from the Department designed to be rigorously evaluated. In its original Federal Register notice, the Department said that "students will be randomly selected...to participate in the experiment, either in the treatment group or in the control group."<sup>4</sup> Thus, the Department must be particularly careful to ensure it has all of the appropriate data elements for a rigorous RCT of the loan counseling experiment.

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<sup>3</sup> New America and State Higher Education Executive Officers, "Higher Education's Shift Online During the Pandemic," New America, published August 2020, <https://www.newamerica.org/education-policy/collections/higher-educations-shift-online-during-pandemic/>

<sup>4</sup> 81 FR 54053

## School Survey

Currently, the school survey asks about the challenges that institutions have encountered while administering the Additional Loan Counseling experiment. However, students may face substantial challenges, as well; those challenges are not currently captured in the survey. For instance, students who face barriers to accessing their federal financial aid may fail to complete all the necessary steps and lose access to that funding — producing a credit crunch that has downstream effects for the student.<sup>5</sup> The Department should add a new question after current survey item #12 that asks about the biggest challenges that the institution’s students have encountered in participating in the experiment (as treatment-group participants). Possible responses could include:

- A. The amount of time required to complete the additional counseling
- B. Accessing the counseling (e.g., technical challenges and/or difficulties with the institution’s hours, etc.)
- C. Lack of understanding that the additional counseling is required, and/or that the student will be unable to access other federal aid if the additional counseling is not completed
- D. Timing of the counseling interferes with the student’s ability to access federal aid and/or register for classes
- E. Challenges with the content of the financial literacy program
- F. Other: Please specify.

The institutions may be able to rely on student complaints in initially responding to this item, but may wish to implement the question as part of a student survey in subsequent years.

The Department’s school survey currently asks questions about both the additional loan counseling required as part of the experiment, and about voluntary loan counseling the experiment offers to students. We recommend the Department include a comparable question about the amount of time required to complete voluntary counseling, as a question to pair with current survey item #26. This will provide a helpful baseline about the added counseling students in the treatment group receive, relative to students not in the treatment group, but who complete the voluntary counseling. The new question would read:

How much time on average do you estimate individual students took to complete the voluntary loan counseling that your institution offers to students? Please check one category.

- Less than 15 minutes
- 15 - 30 minutes
- 31 - 45 minutes
- 46 - 60 minutes
- 60 - 90 minutes

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<sup>5</sup> Susan Dynarski, “Taking Out a Student Loan Is Better Than Dropping Out,” *The New York Times*, September 6, 2019, <https://www.nytimes.com/2019/09/06/business/student-loans-needed-community-colleges.html>

- 91 -120 minutes
- More than two hours

## Student Survey

One of the key questions that the Department intended to answer with the loan counseling experiment is whether the additional loan counseling “has an impact on students’ academic performance (*e.g.*, grades and time-to-completion).”<sup>6</sup> While we are pleased to see that students’ grade point averages will be collected through this ICR, we note that students’ expected date of completion is not included (month/year). If the Department believes it can approximate this figure on its own, using attendance intensity and students’ program of study/credential level, we recommend it do so. If not, however, the Department should incorporate a new item collecting each participating student’s estimated time to completion, and use that element to assess the academic impact of the experiment.

Similarly, we recommend that the Department rely on data already in its possession about student loan repayment outcomes to answer key questions about whether the loan counseling impacts repayment behavior, such as reducing delinquencies and defaults, increasing uptake of income-driven repayment plans that allow borrowers to repay their loans based on their incomes, and/or increasing use of loan management tools like the Department of Education’s repayment simulator or mobile app and auto-debited payments.

To answer the third research question established by the Education Department in its original notice, whether additional counseling “positively influences students’ decision-making about borrowing,”<sup>7</sup> more nuance will be required. Positive impact on decision-making is more difficult to measure. For some students, that may mean borrowing more to allow them to finish their programs more quickly and enter the labor market able to reap the benefits of their credential; for others, it may mean borrowing less to avoid unaffordable loan payments after leaving school. To allow for a holistic understanding of students’ financial circumstances, we recommend incorporating additional student survey questions that relate to the food and housing security of the students, and that measure credit card and other types of debt.

Already, the U.S. Department of Agriculture has a battery of survey questions about food insecurity appropriate to ask college students. New America surveyed current college students using these questions, and learned that more than 40 percent, during the prior year, had food that didn’t last long enough and not enough money to buy more.<sup>8</sup> Those questions are available from the USDA Adult Food Security Survey Module;<sup>9</sup> and inclusion of several of them will provide more extensive background on the trade-offs students participating in the loan counseling have made. The Department could also

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<sup>6</sup> 81 FR 54053

<sup>7</sup> 81 FR 54053

<sup>8</sup> Rachel Fishman, Sophie Nguyen, Alejandra Acosta, and Ashley Clark, “Varying Degrees 2019,” New America, September 10, 2019, <https://www.newamerica.org/education-policy/reports/varying-degrees-2019/#authors>

<sup>9</sup> <https://www.ers.usda.gov/media/8279/ad2012.pdf>

consider a question like the one below, adapted from a recent survey New America conducted into reasons that Americans did or did not enroll in community colleges.<sup>10</sup>

Now you are going to see a list of problems that some families have faced making ends meet. For each one, please indicate if you have experienced it in the past year:

- Fallen behind on a credit card, utility, loan, or other bill
- Applied for public benefits
- Received free food or meals from a food pantry or meal program
- Received free food or meals from family or friends because you did not have enough money to buy food
- Skipped meals because you did not have enough money to buy food
- Fallen behind on your rent or mortgage
- Not gotten or postponed getting medical care or surgery because of a lack of money or insurance
- Went hungry because you did not have enough money to buy food
- Had either the gas, electricity, or telephone turned off because the bill was not paid
- Been without health insurance coverage
- Needed to fill a prescription for yourself but could not afford to
- Moved in with other people even for a little while because of financial problems
- Needed to fill a prescription for a family member but could not afford to
- Been threatened with foreclosure or with eviction

Additionally, the Department should consider the possibility of conducting focus groups with students following the experiment. Given the challenges of collecting data on household finances, focus groups could provide greater detail and context about students' holistic financial circumstances.

## Second Chance Pell

Among the Department's largest experiments is the Second Chance Pell one — an exceptionally complex one that has also been a recent policy debate in Congress. In December 2020, Congress passed a law, both repealing the prohibition on Pell eligibility for incarcerated students (effective July 1, 2023, unless implemented early by the Department) and directing the Department to further study the policy as it is implemented. It is also one of the few experiments for which the Department has published even descriptive data in recent years (though it has not been rigorously evaluated in any way).

Given the importance of the experiment in the policy debate and to the students it serves, we strongly urge the Department to adapt its ICR to improve the quality of the data collected while it continues to

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<sup>10</sup> Rachel Fishman and Sophie Nguyen, "Where Did All the Students Go?: Understanding the Enrollment Decline at Community Colleges During the Pandemic," *New America, EdCentral*, January 14, 2021, <https://www.newamerica.org/education-policy/edcentral/community-college-enrollment-survey/>

operate the experiment. These data will also provide an important foundation for the studies the Department is directed to conduct following the implementation of the policy.

### Consideration of the Restoration of Pell Grants to Incarcerated Students in the December 2020 Law

The Department should also particularly seek to incorporate the kinds of data collection required by the law into the experiment now. Given that clear direction from lawmakers, it is incumbent upon the Department to ensure it knows how to access the data points that will be required in the statute and to build expertise in assessing and analyzing those metrics. Specifically, the Department is required to assess:

- Data about prison education programs themselves, such as:
  - The names and types of institutions of higher education offering prison education programs
  - The number of incarcerated students receiving Pell Grants through prison education programs
  - The amount of Pell Grant expenditures for prison education programs, and the average Pell expenditure per FTE student (compared with the average Pell expenditure per FTE student in non-prison-education programs)
  - The demographics of students enrolled in prison education programs using Pell Grants (which we propose should include at least race/ethnicity, age, and gender)
  - The most common programs and courses offered in prison education programs
  - The size of waiting lists for prison education programs
  
- Data about incarcerated students' experiences, such as:
  - Incarcerated students' ability to complete the FAFSA
  - The cost of attendance for students in prison education programs
  - The mode of instruction (such as distance-education, in-person education, or a combination of both) for the program)
  - Safety in penal institutions with prison education programs\*
  - Any information available on student satisfaction surveys (which we recommend should include at least students' satisfaction with the program, the curriculum, the instructors, the rigor of the course, the support services provided, and the outcomes of the program)\*
  - Information on student transfers between prison education programs\*
  - Rates of instructor turnover and/or departure from prison education programs\*
  
- Data about incarcerated students' outcomes in prison and upon release, including:
  - Academic outcomes (such as credits attempted and credits earned)\*
  - Postsecondary attainment of a degree or credential
  - At 1, 3, and 5 years after release:
    - Continued enrollment in higher education post-release

- Credits transferred post-release\*
- Employment and job placement rates of incarcerated students post-release
- Earnings of incarcerated students post-release (which we recommend should be collected via a Department of Education data match with another federal agency, such as the IRS, the Social Security Administration, and/or the Census Bureau)
- Rates of recidivism\*

While many of these data points are already available to the Department through its surveys of institutions and/or via its student-level data collection, we believe it is critical that the Department lay the necessary groundwork now on any remaining elements it does not currently collect. The elements marked with an asterisk above merit particular consideration. (Some elements may warrant further information even if not marked with an asterisk, but we believe the Department has expertise on most of those elements already.)

If the Department does not currently collect such data and does not believe it could do so readily, it should add questions to the school survey this year requesting information from the participating institutions about whether those data are currently collected or maintained by the school or another entity; how those data are maintained; and invite suggestions from the institutions about the collection of those data in subsequent Education Department surveys.

### School Survey

Among the significant problems that institutions have previously identified, including in the Department's Second Chance Pell report, are difficulties in helping students complete the FAFSA, a required task of institutions participating in the experiment. The reasons for that appeared to be varied, but it would be helpful to learn more systematically what the biggest issues were. To that end, the Department should incorporate a new question asking about the main reasons that prospective students struggled to or did not complete the FAFSA, including the following options:

- A. Students had trouble obtaining tax documentation for themselves
- B. Students had trouble obtaining tax documentation for their spouse or parents
- C. Students had trouble obtaining identification documentation (for all students, but disaggregated particularly for students who were juveniles sentenced as adults)
- D. Students had trouble obtaining documentation for failure to register for the Selective Service
- E. Students had trouble obtaining documentation who are asylees
- F. Students had defaulted student loans
- G. Students lacked Internet access to complete the FAFSA and/or obtain needed paperwork
- H. Students declined to complete the FAFSA
- I. Other (please specify)

A similar question, with many of the same options for responses, should be included about challenges students faced with verification. The Department should also ask, or calculate based on its own available

data, an estimate (by percentage bracket: 0-10%, 11-20%, 21-30%, etc.) of the percentage of students completing the FAFSA who were selected for verification in each program and nationally.

For question #3, the Department asks about challenges encountered while administering the experiment. We recommend adding the following challenges we gathered in our research of interviews, observations, and focus groups of over 200 individuals directly impacted by college in-prison programs (including currently incarcerated students).<sup>11</sup>

- A. Finding adequate classroom space
- B. Incarcerated students leaving the program for other reasons (such as schedule-conflicts with prison jobs, other mandatory programming, etc.)
- C. Limitations because the correctional facility is located in a remote area
- D. Implementation of “education holds,” which permit students to avoid transfer to another facility while they are enrolled in the program
- E. Cultural conflicts or lack of buy-in from correctional staff (e.g. correctional officers)
- F. Need to modify course offerings for incarcerated students in certain degree programs due to security or other constraints

On current question #22, the Department asks about ways in which the correctional facility limits incarcerated students from participating in the experiment. We recommend several changes to this item. First, the experiment already requires the participating institutions of higher education to provide a priority to students who are eligible for release within five years of participation; thus, we expect that most facilities are already incorporating that restriction. A more interesting response might include gradations within that category. For instance, the Department could break that response into two or three suggested responses. Those might include:

- Based on time until scheduled release (within two years); and
- Based on time until scheduled release (within two to five years).

We also suggest incorporating another response that does not relate to students’ past crimes or sentences, such as employing a waiting list, which we believe is a common practice among participating facilities and which was identified by at least one official in the Department’s Second Chance Pell report.

We also recommend adding a new question to the school survey that includes detailed information about the communications that schools have had with prospective students. In our own research, speaking directly with students in Second Chance Pell, we heard a concerning lack of knowledge about

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<sup>11</sup> Monique Ositelu, “Equipping Individuals for Life Beyond Bars: The Promise of Higher Education and Job Training in Closing the Gap in Skills for Incarcerated Adults,” *New America*, November 4, 2019, <https://www.newamerica.org/education-policy/reports/equipping-individuals-life-beyond-bars/>

the terms of the experiment.<sup>12</sup> Students should be full participants in their education, with knowledge of the experiment and the terms of participating with federal aid. Specifically, we recommend asking institutions for a brief description of the information they provided to prospective students on each of the following issues:

- A. Second Chance Pell and the nature of the experiment
- B. How the institution intends to transition programs to the full authorization of prison education programs when the new law takes effect, including communicating with students and obtaining necessary approvals
- C. FAFSA and associated requirements
- D. Verification and associated requirements
- E. Post-release work opportunities (including potential licensure challenges)
- F. Credit transfer opportunities (including into new programs and post-release)
- G. The impact of transferring prison facilities
- H. Lifetime eligibility restrictions of the Pell Grant

### Student Survey

We suggest adding several additional items to the student survey. First, we recommend including sufficient detail to calculate students' trajectory of credential programs. That includes measuring how many students pursued multiple credentials and at what levels. The data held by the Department may be sufficiently detailed to answer this question; or it may simply make sense to collect the number, order, and credential level of credentials earned and/or programs pursued for each student. During our prison-site visits, we met some students participating in the Second Chance Pell program who were accumulating multiple associate degrees, in part because those were the programs available to them and sometimes because they did not realize that doing so could exhaust their Pell Grant eligibility in the long-run.<sup>13</sup> At the same time, the Department is seeking to measure which institutions offer "stackable certificates that can lead to a 2-year or 4 year degree" (School Survey Question #10); these data would provide critical information about not just whether the school offers stackable credentials, but whether students are stacking their credentials in reality.

Finally, we recommend tightening the wording around student survey question #21, which asks the student's incarceration status at the end of the most recently completed award year. Given that one important metric of the effectiveness of prison education programs (and a metric identified by Congress as something the Department should study) is the rate of recidivism, the Department should request data sufficient to answer whether the participant was ever released and, if so, whether the person has remained out of prison. The Department does ask about release from the facility due to COVID-19 (student survey question #28), but does not ask about release for other reasons.

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<sup>12</sup> Monique Ositelu, "Equipping Individuals for Life Beyond Bars: The Promise of Higher Education and Job Training in Closing the Gap in Skills for Incarcerated Adults," *New America*, November 4, 2019, <https://www.newamerica.org/education-policy/reports/equipping-individuals-life-beyond-bars/>

<sup>13</sup> Ibid

## Dual Enrollment

The dual/concurrent enrollment experiment is not designed for rigorous evaluation. However, that means more detailed data collection is even more important for ensuring policymakers understand the value of the policy and can see any possible trade-offs. Dual enrollment has the potential to give students a leg up as they enter college; but the experiment requires students to spend down their Pell eligibility — making a high-value dual enrollment experiment even more important for students. The Department should research that question; suggested changes to the survey are below.

## School Survey

Already, the survey asks institutions whether they have any articulation agreements with other institutions of higher education that cover the dual enrollment program in the experiment (survey question #12). However, this question should be extended to provide more and better information on credit transfer. Specifically, the Department should ask about *actual* credit transfer, rather than credit transfer agreements in place. Institutions participating in the experiment are required to accept the dual enrollment credit as regular postsecondary credit at their own institutions;<sup>14</sup> so the Department should ask about the number of students who, after completing high school, enrolled at the institution; and how many (and what percentage of) dual enrollment credits were accepted for students.

Additionally, the Department should ask that institutions report, to the extent they know, the number of students who enrolled at another institution following high school graduation, and the number and share of credits they were able to transfer. We understand that, given our nation's broken system of credit transfer, this will be difficult to confirm for many students; and especially that initial reporting in the first year of this question being asked will likely be unreliable. However, this is among the most central questions about the value of dual enrollment programs, and the Department must seek to answer it. Institutions can employ surveys of students in the future to improve their coverage on this metric. The Department could also help to facilitate responses to this question by identifying students' subsequent enrollment as Title IV students in other institutions, potentially even conducting a survey of those students itself.

The experiment also “prohibit[s] the use of Federal Pell Grant funds for remedial coursework taken by students who are enrolled in a public secondary school.”<sup>15</sup> The survey asks whether the institution arranges for remedial education using another funding source (survey question #14). The phrasing of this question is vague and should be clarified to more specifically define the students in question; it is not clear if the question is requesting info about *any* prospective student, only prospective dual enrollment students, or only those prospective dual enrollment students seeking to use Pell dollars to fund dual enrollment coursework. Though comparing the availability and effects of remediation services made available to these groups would be a valuable research question, at minimum the survey should collect data on experiment-eligible students.

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<sup>14</sup> Dual enrollment arrangements through the experiment must “provide that students will receive Federal Pell Grants only for coursework that applies towards completion of a postsecondary credential at the participating institution.” 80 FR 67736

<sup>15</sup> 80 FR 67736

In addition, the survey should be expanded to collect information to better understand the scale of this particular challenge and what strategies, if any, institutions had adopted to respond. We recommend two additional questions: one that requests the number of students rejected from the experiment due to a need for remediation (i.e., prevented from accessing a Pell Grant, even if students were enrolled using an alternative funding source), and one that solicits additional information about any remedial supports offered to these students with the goal of supporting their future participation in dual enrollment, the institution providing the remediation (i.e. secondary or postsecondary institution), and the source of funding for such supports, where available.

Institutions and/or secondary schools participating in the experiment are required to provide numerous other support services. Either the college or the high school is required to support students in completing the FAFSA. The Department should add a survey question asking which entity provides that assistance to students.

Institutions or high schools in the experiment, or a third-party entity, must “provide appropriate student support services, such as academic tutoring, high school to college transition support, guidance counseling, or other comparable services designed to increase student preparation for and success in postsecondary education.” These kinds of support services have proven to be critical to ensuring student success in higher education.<sup>16</sup> The Department should prioritize learning what different institutions are doing; who is providing the services; and whether (and how) it differs from the services available to postsecondary students at the institution more broadly, through the addition of new questions. Even though this information cannot be used to measure impact on students’ postsecondary success without a redesign of the evaluation for this experiment, it will provide helpful contextual information.

The final question regarding STEM and/or workforce alignment (question 20) has the potential to solicit useful information about the extent to which dual enrollment programs are serving as pathways to valuable career opportunities in STEM and other in-demand fields. However, it is phrased in a vague manner and may inadvertently collect information about auxiliary or supplemental programs, rather than information about the coursework provided through the experiment. The question should be rephrased to request more specific information about the dual enrollment coursework funded through the experiment and its alignment to specific programs or student/career pathways, work-based learning opportunities, or other workforce training and credentialing programs.

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<sup>16</sup> Rachel Fulcher Dawson, Melissa S. Kearney, and James X. Sullivan, “Comprehensive Approaches to Increasing Student Completion in Higher Education: A Survey of the Landscape,” University of Notre Dame and Wilson Sheehan Lab for Economic Opportunities, August 2020, [https://leo.nd.edu/assets/411401/comprehensive\\_approaches\\_to\\_increasing\\_student\\_completion\\_in\\_higher\\_education\\_fulcher\\_dawson\\_sullivan.pdf](https://leo.nd.edu/assets/411401/comprehensive_approaches_to_increasing_student_completion_in_higher_education_fulcher_dawson_sullivan.pdf); and Clare McCann, “Closing the Evidence Gap: Doing More of What Works in Higher Education,” *New America*, May 2, 2019, <https://www.newamerica.org/education-policy/reports/closing-evidence-gap/>.

## Student Survey

Currently, the student survey asks for each student's cumulative GPA for their postsecondary education. However, it is also critical to understand and ensure that students' academic success in high school is not suffering from the added workload, or even whether their postsecondary classes have improved their high school performance. To that end, the Department should also request a data point on students' high school GPAs.

The survey wisely requests information on the number of postsecondary credits attempted and earned. By definition, these credits also earn students secondary credit. However, dual enrollment credit does not always count toward high school graduation requirements; in these cases, students earn elective credit for dual enrollment coursework. Such policies can make it difficult for students who have not completed graduation requirements ahead of schedule to reap the benefits of dual enrollment. To understand the extent of this issue, a question should be added to ascertain the portion of dual enrollment credits earned that counted toward students' secondary graduation requirements. Such information may also provide valuable insight into how alignment between secondary and postsecondary partners can be strengthened.

Finally, as noted above, one risk of this experiment is that the students involved are spending down their Pell Grant lifetime eligibility in the dual enrollment program. The Department should ensure it measures how much Pell Grant eligibility has been expended in the dual enrollment programs, and should ultimately track this information into the students' postsecondary education to assess whether students' time-to-degree is faster and whether (and when) students hit their Pell lifetime eligibility limit. This information is already available to the Department in its existing records, but could be reported by institutions on the student survey if doing so facilitates simpler data production.

## Limiting Unsubsidized Loans

As one of the oldest still-running experiments, the loan limits pilot project has had longer than most to collect data on its impact. However, as detailed in a New America report, *Off Limits: More to Learn Before Congress Allows Colleges to Restrict Student Borrowing*, the existing data on the experiment leave major gaps and unanswered questions.<sup>17</sup> The Department has already sought to cancel this experiment before restoring it following complaints from participating colleges. The Administration must finally take this evaluation seriously and construct and answer credible research questions. Specifically, we recommend—as we did in *Off Limits*—that the Department begin anew and implement the experiment as a randomized controlled trial, with strict circumstances around which institutions are permitted to limit loans. Absent a serious evaluation plan and research design, the Department should again end the experiment.

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<sup>17</sup> Ben Barrett and Amy Laitinen, "Off Limits: More to Learn Before Congress Allows Colleges to Restrict Student Borrowing," New America, May 2017, <https://d1y8sb8igg2f8e.cloudfront.net/documents/Off-Limits.pdf>

## School Survey

Many institutions that wish to limit loans also have a high default rate, and believe excessive borrowing is the source of the problem. (At many community colleges, students borrow primarily for living expenses because Pell Grants and other scholarship aid may cover the low tuition.) To better understand the alternatives institutions have pursued, the Department should request a brief description of default management activities in which the institution has engaged, including use of default management contractors.<sup>18</sup>

## Student Survey

Among the most significant concerns with this experiment is whether limiting loans so severely limits students' credit that they are forced to forego necessities; turn to other, less-safe forms of debt; or drop out of postsecondary education altogether. For instance, Western Governors University asked students who chose not to enroll their reasons for not enrolling, and 100 explicitly stated that they did not attend because of the restrictions on borrowing.<sup>19</sup>

Better data are needed to answer these questions and identify any concerning problems. Specifically, the Department should add questions about changes to students' credit card debt (private loan debt is already recorded as non-Title IV loans, in survey question #19); budget constraints, including instances of food insecurity and difficulty paying rent; and reasons for failing to enroll in or return to higher education.

These data points, no doubt, will be difficult to understand. Institutions or the Department itself should survey participating students about this issue to glean new insights about the potential trade-offs of the experiment. As we noted earlier in our suggestions on the loan-counseling experiment survey, already, the U.S. Department of Agriculture has a battery of survey questions about food insecurity appropriate to ask college students, through the USDA Adult Food Security Survey Module.<sup>20</sup> The Department could also consider a question like the one below, adapted from a recent survey New America conducted into reasons that Americans did or did not enroll in community colleges.<sup>21</sup>

Now you are going to see a list of problems that some families have faced making ends meet. For each one, please indicate if you have experienced it in the past year:

- Fallen behind on a credit card, utility, loan, or other bill

<sup>18</sup> "Actions Needed to Improve Oversight of Schools' Default Rates," U.S. Government Accountability Office, April 26, 2018, <https://www.gao.gov/products/GAO-18-163>

<sup>19</sup> Ben Barrett and Amy Laitinen, "Off Limits: More to Learn Before Congress Allows Colleges to Restrict Student Borrowing," New America, May 2017, <https://d1y8sb8igg2f8e.cloudfront.net/documents/Off-Limits.pdf>

<sup>20</sup> <https://www.ers.usda.gov/media/8279/ad2012.pdf>

<sup>21</sup> Rachel Fishman and Sophie Nguyen, "Where Did All the Students Go?: Understanding the Enrollment Decline at Community Colleges During the Pandemic," New America, *EdCentral*, January 14, 2021, <https://www.newamerica.org/education-policy/edcentral/community-college-enrollment-survey/>

- Applied for public benefits
- Received free food or meals from a food pantry or meal program
- Received free food or meals from family or friends because you did not have enough money to buy food
- Skipped meals because you did not have enough money to buy food
- Fallen behind on your rent or mortgage
- Not gotten or postponed getting medical care or surgery because of a lack of money or insurance
- Went hungry because you did not have enough money to buy food
- Had either the gas, electricity, or telephone turned off because the bill was not paid
- Been without health insurance coverage
- Needed to fill a prescription for yourself but could not afford to
- Moved in with other people even for a little while because of financial problems
- Needed to fill a prescription for a family member but could not afford to
- Been threatened with foreclosure or with eviction

Additionally, the Department should consider the possibility of conducting focus groups with students following the experiment. Given the challenges of collecting data on household finances, focus groups could provide greater detail and context about students' holistic financial circumstances. As we noted in *Off Limits*, "with additional information about the impact on students, lawmakers would not have to guess whether more institutional authority to limit borrowing may cause harm."

### Federal Work-Study

As the newest experiment, the Department has a chance to ensure the Federal Work-Study (FWS) experiment begins on the right foot, with usable, valuable data. However, it is not clear from this survey that the Department will have adequate information to answer the research questions it identified, which include the extent to which flexibilities improve wages and work hours; increase students' satisfaction with the program; and improve eventual labor market outcomes.<sup>22</sup> We urge the Department to reevaluate its intent behind this experiment, and ensure any evaluation answers key research questions.

### School Survey

Among the most significant questions about this experiment is whether it will inappropriately subsidize for-profit employers and whether it increases student employment with for-profit companies related to their field of study. Survey question #10 asks about how many employers previously participated in the program; but none of the questions addresses whether private-sector employers changed their investments in or numbers of student employees. The Department should ask a question, to be answered by institutions through a survey of their employer partners, about the dollar amounts employers spent on student employees prior to the experiment and then in each subsequent award

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<sup>22</sup> "Federal Work Study Experiment — Fact Sheet," U.S. Department of Education, May 2019, <https://experimentalsites.ed.gov/exp/pdf/FWSFactSheet.pdf>

year during the experiment. They should also ask for baseline data on the number of students employed at these employers prior to the experiment and then in each subsequent award year during the experiment. This information will be particularly important in light of the pandemic, when many businesses faced additional financial challenges.

Relatedly, the Department's experiment allows institutions to lift or remove the 25 percent cap on using FWS dollars to pay for student-employees wages if those students are employed by for-profit, private-sector employers. The Department should request baseline data regarding the percentage spent by each institution prior to the experiment on wages for private-sector employers, as well as the percentage for each year in which the institution participates in the experiment.

### Student Survey

One of the Department-identified research questions relates to the satisfaction of students participating in the experiment. However, none of the data elements to be collected answers that question. Institutions or the Department itself should conduct a survey of participating students to understand more about their experiences, including the extent to which they believe that:

- The content of their work relates to their career goals and educational program;
- The employer with whom they work relates to their career goals and educational program;
- The connections they make in their work will improve their career opportunities;
- The skills they learn in their work will improve their career opportunities;
- The experience they can include on their resumes will improve their career opportunities;

The survey should also ask whether, for students who engaged in off-campus work, the FWS opportunity presented any additional challenges for them, including related to transportation costs; whether they believed they earned a fair wage for participating in the program; and whether they believed the number of hours they worked conflicted with their studies.