

## College Transparency Act

### ACE Position on the Legislation

As of May 2022, ACE has [publicly endorsed](#) the College Transparency Act (CTA). It would allow researchers and policymakers to use comprehensive data to inform policy and give colleges and universities new tools to assess their programs. The enactment of the CTA would positively impact students, institutions, policymakers, and taxpayers.

### Introduction

In April 2023, Sen. Bill Cassidy (R-LA), ranking member of the Senate Health, Education, Labor and Pensions (HELP) Committee, reintroduced the College Transparency Act ([S. 1349](#)). An identical bill was introduced in the U.S. House of Representatives by Rep. Raja Krishnamoorthi (D-IL-8) as [H.R. 2957](#). This bill has also been included in a bill package known as the Lowering Education Costs and Debt Act ([S.1972](#)), which Sen. Bill Cassidy introduced two months later. The CTA is a bipartisan, bicameral bill establishing a postsecondary student-level data system.

### Key Provisions

#### Postsecondary Student Data System

The bill would authorize the Commissioner of the National Center for Education Statistics to establish a postsecondary student data system within four years after the date of enactment and overturns the current ban on student-level data collection in the Higher Education Act. This data system would include:

- Student enrollment patterns, progression, completion, and post-collegiate outcomes, and higher education costs and financial aids;
- Analysis of Federal aid programs.
- Customizable information for students and families in making decisions about postsecondary education; and
- Minimize duplication reports to ensure consistency in data privacy and security with federal law.

#### Postsecondary Student Data System Advisory Committee

Within two years of enactment, the Commission would establish a Postsecondary Student Data System Advisory Committee. Members of this committee must include:

- The Chief Privacy Officer of the Department or an official of the Department delegated the duties of overseeing data privacy at the Department;
- The Chief Security Officer of the Department or an official of the Department delegated the duties of overseeing data security at the Department;
- Equal number of representatives from 2-year and 4-year institutions of higher education, and from public, nonprofit, and proprietary institutions of higher education, including minority-serving institutions;
- Representatives from State higher education agencies, entities, bodies, or boards;
- Representatives of postsecondary students;
- Representatives from relevant Federal agencies;

- Individuals with expertise in data privacy and security; and
- Other stakeholders (including individuals with consumer protection and postsecondary education research).

### Required Data Elements

The Commissioner, in consultation with the Advisory Committee, would implement 'student-related surveys' in the Integrated Postsecondary Education Data System (IPEDS) and report student enrollment, persistence, retention, transfer, and completion measures for all credential levels. Collected data elements would be reevaluated every three years after establishing the postsecondary student data system.

The Commissioner must not include data regarding individual physical or mental health, student discipline records, elementary or secondary education data. It also must not include an exact address, citizenship status, migrant status or national origin status of the students' families, course grades, postsecondary entry exam results, political affiliation, or religious beliefs in the data system.

### Periodic Matching with Other Federal Data Systems

The Commissioner must enter into a data-sharing agreement with other relevant Federal Agencies to maintain consistent reporting and streamline data matches to minimize duplicative reporting. Periodic matching or sharing of data in the system would comply with security and privacy protections. Additionally, in consultation with the Advisory Committee, the Commission is responsible for establishing a process for students to request data access or correction to their personal information.

### Publicly Available Information

The Commissioner is responsible for developing and implementing a secure and privacy-protected process student-level, non-personally identifiable information, with direct identifiers removed from the postsecondary student data system, available for vetted research and evaluation purposes.

Publicly available information should be accessible and user-friendly. It would also include analytical tools for users to customize and filter information by institutional and student characteristics to make comparisons across multiple institutions and programs.