

National Headquarters  
8415 Datapoint Drive, Suite 400  
San Antonio, Texas 78229  
210-692-3805 (voice) 210-692-0823 (fax)  
www.hacu.net



**HACU**  
H I S P A N I C  
A S S O C I A T I O N  
O F C O L L E G E S &  
U N I V E R S I T I E S

April 23, 2015

The Honorable Lamar Alexander  
Chairman  
Committee on Health, Education,  
Labor and Pensions  
428 Dirksen  
United States Senate

Dear Chairman Alexander:

On behalf of the Hispanic Association of Colleges and Universities (HACU), the only national education association that represents the nation's 409 Hispanic-Serving Institutions (HSIs), please accept our response to the white paper on Federal Postsecondary Data Transparency and Consumer Information: Concepts and Proposals.

Today, HACU's membership includes more than 450 colleges and universities committed to Hispanic higher education success in the U.S., Puerto Rico, Latin America and Spain. Our member institutions in the U.S. are home to more than two-thirds of all Hispanic college students, the nation's youngest and fastest-growing population. In terms of socio-economic status, 48 percent of students at HSIs received Pell Grants, indicating a high degree of financial need. As the first in their families to attend college, many of these students have few if any supports to guide them in their college-selection process, much less their "acculturation" as college students. With these realities in mind, HACU urges the Senate Health, Education, Labor and Pensions (HELP) Committee to consider what Data Transparency and Consumer Information look like in the context of the HSI experience.

HACU believes that the federal government can – and should – help students and their families navigate the college selection process. The multiplicity of information tools may actually be a source of confusion, rather than of high-utility information, and may act as a disincentive to utilization. In this context, consolidation may be a reasonable alternative. However, we should not assume that under-utilization of a given federal consumer tool indicates faulty data or lack of consumer interest. For many, including first generation Latino students and their often Spanish-dominant families, underutilization may reflect lack of knowledge about the existence of the information or low utility levels of the data.

Some new approaches to address this barrier may include: more consistent and conspicuous placements of net-price calculators on institutional websites; simplifying and consolidating the 13 separate federally maintained data portals into three friendly, easy to use and accessible tools that link to high traffic Latino-focused non-profits websites; adding a bilingual feature in Spanish to the tools; and making sure that the data presented is relevant and usable for Latino students. For example, interpreted data relevant to the geography and cost of the institutions would be highly useful to Latino students, who often face limited college choices that accommodate their needs. Throughout this process, efforts must be made to involve and capture the voices of consumers themselves, ensuring that the pool of engaged consumers reflects the diversity of the U.S. student population.

What should the data look like? HACU believes that, in addition to assisting policy makers and informing consumers, federal postsecondary data is also important for policy analysis and research at the institutional level. Increasing positive student outcomes is a priority of every HSI. Data analysis that yields usable information on how to strengthen programs, policies and practices at HSIs is essential for the continued growth of Hispanic higher education success.

From HACU's perspective, any new approach to data collection and transparency needs to start with an assessment of the validity, reliability, and usability of current data collection systems. An acknowledgement of the data-handling deficiencies within the U.S. Department of Education must be part of the process. At the same time, the valuable data services already provided by the Department of Education should be supported and enhanced. For example, the Department of Education does a valuable service in collecting IPEDS data. With additional and targeted resources, data interpretation and data vetting services could be enhanced in order to make the information more helpful to the higher education research community and for subsequent policy formulation. In general, institutions are not averse to providing data to the government as long as those data have demonstrated utility for the public.

In addition, a reauthorized Higher Education Act (HEA) should require the Department of Education to be transparent about all data requirements in the law. HSIs were first recognized at the federal level in the Higher Education Act in 1992 and are defined as accredited and degree-granting public or private nonprofit institutions of higher education with 25 percent or more total undergraduate Hispanic full-time equivalent (FTE) student enrollment. Currently, the federal government does not publish a complete annual list of HEA, Title V eligible institutions. Instead, this task falls on HACU and Excelencia in Education to develop a common list of HSIs in the absence of one issued by the Department of Education.

As a result of our combined efforts, the Hispanic higher education sector now has an annual non-official list that follows a methodology aligned as closely as possible to the definition of HSIs in the HEA. Nevertheless, the ensuing analysis produced by these non-profit organizations is important to Latino student success and to our continued understanding of HSIs. HACU calls on the HELP Committee to include a data requirement on the Department of Education to publish an annual list of HEA, Title V eligible institutions. This list of HSIs would be of great use to other federal departments and agencies that work closely or have developed programs to better serve the academic and institutional needs of HSIs and its many low-income and first-generation students they serve. HACU supports an enhanced data reporting system designed to improve informed consumer decision-making and is accessible to multiple communities.

HACU is not advocating for a one-size-fits-all approach to student consumer information and data transparency. Given the diversity among institutions that participate in the student aid program, this approach would not be advisable. As a matter of fact, the great diversity within the HSI community itself would call for a variety of approaches to the use of data and consumer information. HSIs include two-year and four-year institutions, public and private not-for-profits, large urban centers and small rural schools, and range from 25 percent to 99 percent Hispanic enrollment.

The Honorable Lamar Alexander

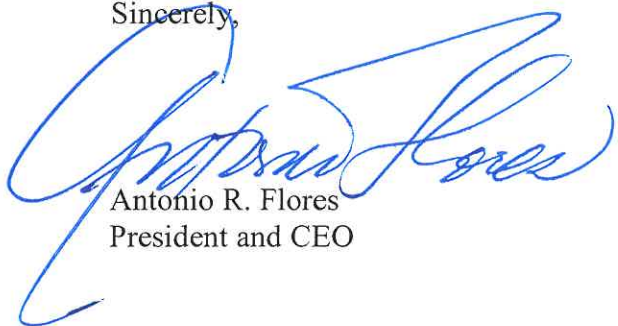
April 23, 2015

Page 3

Chairman Alexander, HACU urges you and your colleagues in the HELP Committee to take this intra-group variability among HSIs into account when debating policy options on data transparency and consumer needs. Researchers must be supported in their efforts to conduct examinations and put forth analysis that enable HSIs to continually assess the academic outcomes of Latino students.

Thank you for your leadership on HEA and for considering HACU's response to your paper on Data Transparency and Consumer Information. We look forward to working with you during the HEA reauthorization process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Antonio R. Flores". The signature is fluid and cursive, with a large initial "A" and "F".

Antonio R. Flores  
President and CEO