



DATE: August 1, 2013

TO: U.S. House of Representatives, Education and Workforce Committee

FROM: National Association of Colleges and Employers

In response to the request for comments about the reauthorization of the Higher Education Act, the National Association of Colleges and Employers (NACE) would like to offer the following observations and perspective. As a professional association whose mission involves promoting the employment of the college educated, we are very much in favor of providing students/consumers with the most accurate information possible regarding outcomes associated with their pursuit of a degree. As the NACE position statement (August, 2012) on first destination surveys states: "NACE expects that all higher education institutions will assess the career and employment outcomes for their graduates through a first-destination/post-graduation survey."

Nevertheless, NACE prefers that any legislation dealing with the collection and reporting of outcomes data be structured in the broadest possible fashion. The major components of such legislation should be: (1) schools will collect data on the initial destinations of their graduates at all degree levels; (2) the collected destination information be reported in an aggregated fashion that ensures the confidentiality of any individual graduate; and (3) the reported data are made available to the public. The preference is that schools should be responsible for the assembly of the data, not government.

NACE recognizes that such broad directives leave a host of operational issues open to ensure the reliability and comparability of the data being collected by individual schools. In order to ensure the confidence of the individual consumer and the public at-large that the outcomes reported by individual schools are "valid" and directly comparable, NACE has constructed a task force of professionals with experience in collecting and reporting such information which will develop standards for data collection and reporting of first destination outcomes. The aim is to have these standards completed and implementation begun by NACE member schools by the end of the 2014 academic year. (There are approximately 1,600 institutions of higher education that are current members of NACE.) We would be happy to share these standards and/or to work with regulators to ensure that quality outcomes data will be produced.

Although our own concentration is on employment outcomes, we want to make it very clear that any outcomes assessment that will be part of a revised Higher Education Act should be comprehensive in

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nature. We strongly believe that outcome information should include not only employment data but also other outcomes: data on the pursuit of additional education; participation in “year of service” programs; entrance into military service; etc. If the student/consumer is to choose educational options based on a return on investment calculation, the calculation of ROI needs to be complete allowing the consumer to make an individual determination of value based on his/her unique set of preferences.

Once again, NACE supports the idea that student/consumers should be provided adequate data on outcomes associated with a potential investment in higher education. Our preference is that schools be given the opportunity to collect and disseminate this information themselves before an extensive government program be initiated to obtain the data. NACE will be open to working with the committee to ensure the development of reliable procedures that will produce a comprehensive, fair basis for assessing graduate outcomes.

Sincerely,

A handwritten signature in black ink, reading "Marilyn T. Mackes". The signature is written in a cursive style with a long, sweeping underline.

Marilyn Mackes
Executive Director