

February 10, 2023

Secretary Miguel Cardona
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

RE: Docket ID ED-2022-OUS-0140

Dear Secretary Cardona:

On behalf of the [Council of Graduate Schools \(CGS\)](#), I would like to thank the Department of Education (Department) for the opportunity to submit comments in response to the [Request for Information Regarding Public Transparency for Low-Financial Value Postsecondary Programs](#).

For over 60 years, CGS has served as the national organization dedicated to advancing graduate education and research. Our membership includes 500 institutions of higher education in the United States, Canada, and abroad representing over 1.8 million graduate students. Collectively, our members grant 87 percent of all U.S. doctorates and majority of U.S. master's degrees. As an association, we are proud to represent a diverse and dynamic group of higher education institutions ranging from public and private research-intensive institutions to regional comprehensive institutions, Minority-Serving Institutions, Hispanic-Serving Institutions, and Historically Black Colleges and Universities.

U.S. graduate education is the crown jewel of the American system of higher education, attracting top domestic and international students by creating dynamic programs that foster scholarship, research, and scientific discovery. Current and future leaders in a variety of academic disciplines are educated at the nation's graduate schools. Indeed, a graduate degree -- whether it be a master's, professional, or doctoral degree -- is a private benefit for the individual and a public good for the community. As we all know, people with graduate degrees are critical to the success of the U.S. workforce, economy, innovation ecosystem, and the health and wellbeing of our local communities. The CGS member-institutions are proud of the high-quality graduate education programs we provide to our students.

As the Department embarks upon this effort, CGS would like to note the challenges in determining the metrics and methodology to use to identify low-financial-value programs. After reading the questions under the Measures and Metrics section of the RFI, it is questionable if there is a set of metrics that captures the relevant information the Department is seeking to use to identify low-financial-value programs. For example, the data the Department is seeking to collect may need to be aggregated since some graduate level programs have small cohorts. As a result, data on small program cohorts may need to be collected over time and there is a real possibility that personal identifiable information may be compromised due to the size of the cohort. Another challenge to consider is the comparability of the data. As you know, not all graduate program level data is comparable across the graduate school, let alone across academic institutions. Given the diversity of graduate programs, it would be extremely difficult to establish a metric or set of metrics that equally, accurately, and fairly evaluates programs.

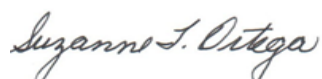
Despite CGS' concerns about the challenges the Department may experience in trying to determine metrics and methodology for identifying low-financial-value programs, we want to assure you that the graduate community takes transparency concerning our programs seriously. In our view, graduate school programs should be

transparent and provide a wealth of information about their programs to prospective and current students. In addition, graduate programs should track career outcomes and conduct periodic reviews of their graduate programs.

- ***Transparency and Easily Accessible Information about Graduate Programs:*** Before prospective graduate students start a degree program, they should have access to important information on the cost of the degree program, time to degree completion, degree completion rates, potential career pathways, and career outcomes. This information should be easily accessible, understandable, and available on graduate program websites. Please know that America's graduate schools place a high priority on providing relevant information to prospective and current students, so they can make the best decision about pursuing a graduate degree.
- ***Track Career Outcomes and Job Placement Information for Graduate Students:*** Good reliable data on career outcomes and job placement are critical to understanding and improving the education of and, career transparency for graduate students. In CGS' view, "university leaders, including graduate deans, need to work together to establish processes for collecting and using student outcome data by program. The timeframe for collecting data should cover a period of time that is long enough to capture information beyond the first or second job and to convey meaningful information about career trajectories."¹ Fortunately, many graduate schools have already invested in methods to track the career outcomes and career pathways of their alumni and have accessible websites with this information.
- ***Periodic Review of Graduate Programs:*** While most graduate programs are carefully evaluated when they are created, periodic program review is also important and necessary. After all, graduate degree programs are dynamic and may change as academic disciplines evolve, as workforce and market demand shift, and the educational and training needs of students change. While program reviews are not public-facing exercises, they do take place regularly, to ensure the continuity of high-quality graduate programs. Again, the graduate education community believes in providing the best education to our students.

Again, thank you for the opportunity to submit comments on the RFI on low-financial-value programs. If you have any questions about our comments, please contact Ms. Amy Scott at amscott@cgs.nche.edu or Mr. Nick Cox at ncox@cgs.nche.edu.

Sincerely,



Suzanne T. Ortega
President

¹ Wendler et al, Pathways Through Graduate Schools and into Careers, 2012, p.32.