



www.studentprivacymatters.org
info@studentprivacymatters.org
[@parents4privacy](https://twitter.com/parents4privacy)

124 Waverly Place
New York, NY 10011
917-435-9329

March 14, 2022

Dear Senator / Representative:

We write to urge you to oppose the inclusion of the College Transparency Act (CTA) in the America Competes Act (ACA), which would authorize the creation of a federal data system that would track all college students throughout their lives. The CTA was slipped into this bill without any hearings and has no relation to the bill's core purpose of strengthening the ability of the U.S. to compete with China.

As drafted, the CTA would enable the federal government to create a surveillance system that collects the personal information of every student enrolled in college or another higher education institution, and continues to track them after graduation, with no opportunity for students to preserve their privacy by either opting in or out of this overarching data collection or providing them with the ability to have their personal information deleted.

In opposing the inclusion of the CTA, we do not seek to diminish concerns about how certain postsecondary educational institutions in this country charge their students high tuitions in return for degrees that are of little economic value, or about how these institutions often prey upon poorer applicants and applicants of color. Rather, our opposition to the inclusion of the CTA is that, in seeking to address the aforementioned problems, it creates a far more significant threat to the privacy of every college student and graduate in the nation.

The CTA language contained within the ACA would allow the Department of Education not only to collect personal information directly from colleges and universities for each of their full-time and part-time students, including their enrollment status, attendance, age, gender, and race, but also to include highly sensitive information pertaining to their disabilities and/or "status as a confined or incarcerated individual."

This personal data would then be matched to information held by other federal agencies as these students leave college and move through their lives and careers, including data held by the Department of Defense, the Veterans Administration, the Census Bureau, and the Social Security Administration. Over time, nearly any other personal data element could be added to the system if the US Department of

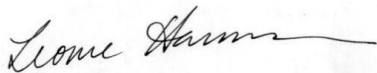
Education thought it “necessary to ensure that the postsecondary data system fulfills [its] purposes,” although those purposes are not clearly defined.

Although the CTA’s supporters maintain that creating this massive federal system holds value for prospective students, history shows clearly how this sort of data collection has been used to target and violate the civil rights of our most vulnerable and marginalized individuals and communities. We have also learned that whatever guardrails exist to protect student privacy and anonymity in the current bill could easily be amended in the aftermath of a national crisis, like 9/11, so the CTA data could be used to target current and former students simply because they are a member of a disfavored racial, ethnic, religious, or other vulnerable group. Whatever the value of such a system in terms of promoting accountability for higher education institutions may be, such benefits must be pursued through far less invasive means that do not threaten core American rights and values.

In short, this effort to create lifelong dossiers on all students and graduates of America’s postsecondary educational institutions is dangerous. As parents, education, and privacy advocates, we implore you to exclude the CTA language from the America Competes Act.

The goal of protecting students’ financial interests, although important, should never be advanced by placing their most fundamental rights at risk.

Yours sincerely,



Co-chair, Parent Coalition for Student Privacy

Submitted on behalf of the following organizations:

American Civil Liberties Union
Children and Screens: Institute of Digital Media and Child Development
Consumer Federation of America
Electronic Privacy Information Center (EPIC)
Fairplay
Me2B Alliance
Network for Public Education
Parent Coalition for Student Privacy
ParentsTogether Action