

Challenging Issues Benefit from Collegial Collaboration

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Thank you for the opportunity to participate in this important discussion and to share some thoughts on the proposed Postsecondary Institution Ratings System. I'm speaking today as a representative of the State Higher Education Executive Officers Association (SHEEO) but I'm also speaking based on my experience as an institutional data collector and user as well as someone connected to the state higher education agencies. I'd like to begin with a few general thoughts and then provide some input from several of those state agencies that have been involved in similar projects designed to provide information for both consumers and policymakers.

To begin and to be clear, SHEEO shares the Department's desire for high quality, cost effective, efficient and productive higher education that leads to meaningful learning and appropriate credentials for millions of Americans. We applaud the Department's efforts to use existing data resources to provide useful information for students, families and policymakers. We also recognize this is going to be a real challenge and the proposal raises some fundamental questions:

Why are we doing this?

Who's the audience?

What do we hope to accomplish?

The response to each of these questions requires clear and transparent answers and all three questions come into play when we ask "Is it possible to realistically provide accountability and consumer information through the same instrument?" Accountability (or as The National Commission on Accountability in Higher Education named it "shared responsibility") requires much nuanced analysis to be done correctly and the second goal, consumer information, requires something simpler. The challenge will be to provide simple information without being simplistic. I would encourage you to be mindful of the adage that data should be used like a flashlight and not a hammer – it should illuminate and inform rather than punish institutions that will, for a wide variety of valid reasons, have different ratings from other institutions.

All of this means that context is critical; it's difficult to measure and report on quality while also acknowledging context and it's even harder to convey that to parents and students. Any rating system certainly has to include basic demographic information (headcount, number of programs, tuition, etc.). But it's also necessary that any comparisons of institutions incorporate institutional clustering based on similar types of students (most especially, similar proportions of Pell students). Recognizing different student populations along with institutions' role, mission, level and control, as well as their service area is important; similar types of institutions should be "rated" with others like them. Otherwise the rating system runs the risk of being seen as meaningless.

Let's strive for improvement rather than simply measuring institutions against others.

As UCLA basketball Coach John Wooden once said "We are all equal in that we can all strive to become the best that we are capable of becoming. We can always improve but we shouldn't compare ourselves to others. We get in trouble when we start trying to measure up to someone else."

In addition to these concerns, we recognize the pressure to move quickly but I think we all realize that, if at all possible, it will be better in the long run to develop this carefully rather than move too quickly as the reaction to other recent federal system rollouts has demonstrated. It can be done quickly or it can be done accurately; with something potentially this complex, it's hard to do both.

I know that you've heard all of this before; I'm not the only one raising these concerns but formulating your answers to these questions is likely to be just as important as the product itself. This community-wide conversation matters; involving and collaborating with others will go a long way towards the ultimate success of this endeavor. This brings me to my second point – while we are not in the classroom per se, education is at the root of all that we do and I encourage you to take the opportunity to learn from those who have lessons to offer. Input will come from a variety of sources but must include data and metrics professionals beyond those who are here today. Participation from the institutional research community and a number of national associations that are doing work around metrics, like Complete College America and the Institute for Higher Education Policy among others, is likely to be particularly helpful.

States also have been providing information of this sort for a while and I'd like to share a few examples and some reactions and lessons from some of those involved. As state-level coordinating, governing and services agencies, many SHEEO members have considerable experience making consumer-type information available to prospective students and the public. A cursory examination of SHEEO-member websites indicates that nearly one-third of SHEEO's 57 member organizations provide or link to resources intended to guide students in selecting and applying to the states' colleges and universities—primarily public but in several cases private institutions as well. Some of these states and others provide institutional performance or accountability reports that include costs, student characteristics, graduation rates, student progression and other information of interest to students and parents as well as state policy makers concerned with accountability. I'd like to share a couple of those examples:

- The Arizona Board of Regents provides “enterprise dashboards” for each of its three universities, containing 32 key indicators of institutional performance. While these dashboards cover much more than typical consumer information, several of the indicators provide data of interest to prospective students and others, including costs, enrollment profiles and graduation rates.
- The Minnesota State Colleges and Universities (MnSCU) system has made substantial investments in developing web-based resources to provide both consumer information and performance indicators across its 31 public colleges and universities at 54 campuses. The consumer resources provide search and selection options across such criteria as program offerings, type and size of campus, setting, and array of student activities and intercollegiate athletics. The performance information is presented for each institution using a dashboard of consistent indicators in six areas (financing, enrollments, facilities, licensure pass rates, student completion, and tuition and fees) with tools for exploring the data behind each of the indicators. While the dashboards are intended primarily for system management and policy makers, together the two separate resources provide public access to an array of information.
- The Texas Higher Education Coordinating Board provides an online “institutional resume” for each of the state’s public institutions, with different versions for prospective students, parents and elected officials, each with a rich array of data on institutional characteristics and performance. A separate, linked website, College for all Texans, provides entry and filtering for three categories of users

(students, military and adult learners) and numerous functional options to access and compare college data, including side-by-side college comparisons across a number of characteristics.

- The Oklahoma State Regents for Higher Education also has conducted a significant amount of productive work in this area which provides highly useful and customizable solutions for campus comparisons. Current Regent's policy requires all of their colleges and universities to feature a link to www.collegeresults.org on each institution's web site. Created by EdTrust in cooperation with a number of foundations, the site is national in scale and contains a broad array of data. It allows consumers to directly compare campuses based on the criteria they select. Most often, those criteria include cost, geographic area, admissions data, financial aid, and graduation outcomes.

I don't think we can say any of these systems is "perfect" but there is much to be learned from these states' experience in providing consumer information that may apply to other efforts, including those intended to be national in scope like the PIRS. Some of those lessons include:

1. Developing useful, comprehensive information to inform consumers about higher education options is challenging and costly. Despite the availability of public data on colleges and universities from both the U.S. Department of Education and state data bases, not all of the desired data elements are available, much of the data available from these sources is of limited value to consumers, and even when potentially valuable, the data need to be modified and analyzed in ways useful for consumers.
2. Unavoidably, comparisons make some institutions look better and more desirable than others, whether comparing the size and features of a campus or the performance relative to students across different measures of success. Comparisons may be perceived as negative for the lower half of any distribution, and seem to undercut the attractiveness and self-interests of the lower performing institutions, whether fairly or unfairly.
3. While usage and traffic on many consumer information sites is probably high (given the universe of potential users), there is little research or evidence to indicate what portion of the website use is essentially adding convenience for consumers, and what portion leads to either better consumer decisions or institutional improvements. Existing research makes clear that preparing for and making good higher education consumer decisions is sufficiently complex that good, technological access to

information and comparisons is helpful, and also that some populations are disadvantaged by the lack of such information. What is less clear in the research is the actual influence and effectiveness of web-based consumer resources in addressing these information needs, and in stimulating better consumer decisions and effective responses by institutions. Unfortunately, this is one of those situations where less information, rather than more, may be helpful. Starting with a lean PIRS is advisable.

I encourage you to learn from the efforts of others. Continuing with this theme, I'd like to use the rest of my time to share a couple of statements from state agencies on ratings in general and the PIRS proposal in particular.

“We want all students to feel that their area institution is a good one and that the education they received there would be of a quality that would benefit them. This is, of course, after we ensure that the basics of governance, finance and course content are met. We understand the government’s interest in ratings but don't want it done in such a way as to imply that the institutions nearer the bottom, assuming they are accredited and meet state requirements, are not capable of providing value to students. We need as many skilled people as we can produce and we would hate to see institutions cut off from providing services due to extremely small differences in ranking element values.”

Another notes “Weighting and scoring should take into consideration the size of an institution in terms of student enrollment, revenue sources (non-tuition), and geography. If you adjust for every difference in mission and student characteristics, you potentially create a different set of metrics for every institution.”

And a third states “One key component of our system is that we distinguish between primarily associate and primarily baccalaureate institutions based on enrollment numbers versus degree numbers as IPEDS does. Since we have our own enrollment survey, we can determine when a school has larger enrollment at the baccalaureate level and classify them so that they are compared against other primarily baccalaureate institutions instead of primarily associate’s institutions even if they award both degree types. In addition to the distinction between associate’s and baccalaureate we also make a distinction between open admission and not-open, or selective, admission. That means an institution is in one of four basic comparison groups.

Another responded “The source of all data should be collected from the institutions. This will ensure that there is no question as to the veracity of the information. The rating system should be as simple as possible. Only provide information such as enrollment, drop-out rate, graduation rate and number of degrees/certificates issued each year by major course of study. Any more information and people begin to become overwhelmed and do not look at anything. Keep it very simple and easy to understand.”

Finally, “Many of our universities are also involved in the Voluntary System of Accountability, which provides another avenue for consumers to compare key aspects of various institutions without reducing those institutions to a single rating or metric. The AACC Voluntary Framework of Accountability is another option for community colleges. In addition, the CollegeNavigator website produced by the US Department of Education already provides students and parents with useful information without inserting a rating metric that may not suit their needs.”

None of these statements are intended to suggest you shouldn't move forward on the proposal but only to remind us all that it is complex and there is a wide range of both experience and opinions that have the potential to impact the PIRS development. Others are working on the challenges of providing precisely this kind of information, even if they are not developing a rating system. Use the resources available to you to build something that truly will be useful to students, families, institutions, and policy makers.

The bottom line is, that to be truly useful, you need to focus on outcomes. That means complete graduation rates (ideally including the value added by each institution as a student progresses through multiple institutions), return on investment which is heavily cost-influenced, student learning, and employment and wages. Things just got a whole lot more complicated with my last statement. To do this accurately and completely, it requires a P20W unit record system to get at outcomes – what consumers really care about. You are between a rock and a hard place. To do this correctly, you don't need just institutional-based metrics but unit record data across the country and across a student's academic and work careers. There are organizations working on precisely this kind of analysis including the Western Interstate Commission for Higher Education (WICHE).

The real purpose of the proposed rating system should be to encourage enrollment, completion, and outcomes and not to compare resource-strapped access institutions with those of substantial means or

to compare regional campuses with national universities. The rating system must take into account the characteristics that are available to students at different institutions in different parts of the country, that quality and learning be considered in whatever system is established, and that the experiences of others, including the states, should be considered as a national system is designed.

Thank you again for the opportunity to participate in this dialogue and we at SHEEO, along with many of our colleagues are available to help develop a lean, well-defined and collaboratively built system designed to encourage improved student learning and productive life-long outcomes.