

AASCU's Position on the Obama Administration's Proposed Postsecondary Institutions Ratings System (PIRS)

A little over a year ago, President Obama charged the Department of Education with a major new initiative to “rate” postsecondary institutions on the basis of their performance by the 2015 academic year, and indicated that the administration would seek legislative authority to tie access to federal student aid to the proposed Postsecondary Institution Ratings System in subsequent years.

While skeptical that a ratings system is the best federal approach to assessing institutional performance, AASCU supports federal efforts aimed at better gatekeeping, accountability and transparency for colleges and universities participating in federal student financial aid programs. As public institutions, our members respect and understand the public's right to demand positive educational and economic outcomes for students after they leave their institutions. Indeed, public institutions have voluntarily launched a number of accountability and transparency efforts, including the Student Achievement Measure (SAM), Voluntary System of Accountability (VSA), and Voluntary Framework for Accountability (VFA). AASCU believes that effective accountability metrics can be devised in a manner that provides meaningful information to the public and that respects the heterogeneity of institutional missions.

The administration's proposed Postsecondary Institution Rating System can be a component of a broader effort to promote accountability and transparency. It will, however, not be a substitute for strong front-end monitoring and enforcement to weed out waste, fraud and abuse. Better eligibility criteria and more effective risk-based oversight and enforcement could eliminate predatory operations without further imposing burdens on legitimate colleges and universities.

Devising a ratings system that can equitably and effectively capture the relevant attributes of a large and varied universe of legitimate postsecondary institutions serving a diverse population of students will be a daunting task. By its very nature, a ratings system must simplify inherently complex qualities and measures it factors into account, and is thus susceptible to distortions that may prove prejudicial or problematic. Many public institutions are concerned that disproportionate focus on one set of generally desirable attributes (high graduate salaries, for example) may work at cross purposes to their mission of preparing their students for such critically important professions as teaching, social work or public service. To its credit, the department has repeatedly acknowledged the tension between the many diverse—and, at times, competing—goals associated with higher education, and it has assured the community that it intends to strike a reasonable balance.

Data issues, in terms of their availability, quality, reliability, and privacy consequences, represent a significant additional challenge in setting up any ratings system, and deserve very careful consideration. Institutions currently submit enormous amounts of data to the department, and the ratings system should, to the maximum extent practicable, avoid additional data collections. But, given how consequential the ratings will be to institutional reputations and ultimately to their financial viability, vastly expanded data may well be needed to devise a credible system. Institutions are rightly alarmed about the likely costs, compliance burdens, and privacy implications of such a potential expansion of reporting requirements.

The inherent difficulties of constructing a meaningful ratings system need not, however, be fatal. It would be possible to capture a subset of the most essential attributes of institutions and combine them into a rating that involves minimal normative judgments.

The administration's thinking on the configuration of the rating system has not yet been revealed. In the meantime, AASCU will remain actively engaged with the administration and other stakeholders, and will attempt to be helpful to the effort as appropriate.