

# Accountability

Public colleges and universities have an obligation to be responsible guardians of the public's resources and trust and to communicate clearly and effectively about their stewardship of the public's investment in them. AASCU is committed to greater public accountability and has been a leader in promoting improved data systems, greater transparency and increased focus on student learning outcomes. AASCU calls on its members to participate in the AASCU/NASULGC Voluntary System of Accountability (VSA), designed to improve transparency of institutional and student data, core educational outcomes and student engagement. Nearly two-thirds of AASCU members signed on to this initiative in its first year.

With the most recent reauthorization of the Higher Education Act, Congress has called upon colleges and universities to be more accountable, particularly in relation to transparency in college costs. AASCU worked with Congress to ensure these new provisions take into account the unique nature of costs in public higher education and tuition-setting authority of public colleges. AASCU helped to secure several provisions, including recognition of the measure of tuition in dollars and not just percentages; the role of state appropriations in tuition levels; and the role of tuition-setting authority in the price of tuition. AASCU is proud to have supported in the reauthorization bill the state maintenance of funding effort that strengthens the federal government's commitment to ensuring state commitment to public higher education—an important piece in the college cost equation.

AASCU strongly supported and succeeded in its advocacy for a new requirement contained in the HEA reauthorization that adds an economic status component to the existing graduation rate by using receipt of federal financial aid as a proxy for income.

AASCU is pleased that the HEA continues to protect academic autonomy by retaining current transfer of credit law, provides a

boundary between the federal government and the peer-review nature of accreditation, and clarifies the definition of an institution of higher education. The reauthorization falls short, however, by weakening regulation of federal student financial aid programs as it pertains to the “90/10 rule.” Amendments made to the HEA weaken the original intent of the provision by allowing for-profit institutions to include private institutional loans and the extra unsubsidized Stafford Loan eligibility authorized by the Ensuring Continued Access to Student Loans Act (ECASLA) in calculating the minimum required 10 percent of revenue that is to be derived from sources other than federal student financial aid. AASCU will support efforts to strengthen government oversight and institutional accountability to eliminate fraud and abuse in federal student aid programs.

## **Accountability Priorities**

- ★ Support the development of an integrated network of state data systems, based on common data elements, to serve as a privacy-protected national system of student-level longitudinal data.
- ★ Require the reporting in the Integrated Postsecondary Education Data System (IPEDS) and display on the federal College Navigator website of graduation rates for the following three groups of students identified in the HEOA: Pell Grant recipients; subsidized Stafford Loan recipients who are not Pell Grant recipients; and students who do not receive any federal aid or who receive only unsubsidized loans.
- ★ Oppose the direct involvement of the federal government in regulating inter-institutional academic practices such as the transfer of credit.
- ★ Support the strengthening of current laws requiring for-profit institutions of higher education to have a diverse revenue stream that includes 10 percent or more of their revenue from sources other than federal student financial aid to ensure the integrity of taxpayer dollars.

## Federal Role in Accountability— AASCU Policy Statements

### Consumer Information and College Costs

#### Postsecondary Student Data Systems

- Support the development of an integrated network of state data systems, based on common data elements, to serve as a privacy-protected national system of student level longitudinal data.

Public institutions of higher education in only 15 states have authority to set their own tuition rates.

Increases in tuition at public colleges are directly correlated to declines in state appropriations; that is, when state appropriations decrease, tuition and fees must be increased—sometimes significantly—to make up the shortfall. For example, in 1999–2000, state appropriations increased by 7.0 percent and tuition and fees increased at a modest 3.3 percent. On the other hand, in 2003–2004, state appropriations decreased by 2.3 percent (continuing a decrease from the previous year), and tuition and fees increased by 13.9 percent.

To work toward accomplishment of this goal, urge funding of the State Higher Education Information System Pilot Program as authorized in the Higher Education Opportunity Act (HEOA) of 2008. The program will provide competitive grants for development of state-level postsecondary student data systems in up to five states to improve comparable data, to minimize the reporting burden placed upon institutions, and to improve the quality of data reported.

#### Graduation Rates

- Require that graduation rates using federal financial aid as a proxy for income be reported in IPEDS and displayed on the Department of Education's College

The recent amendment of the Higher Education Act (HEA) by the Higher Education Opportunity Act (HEOA) included requirements for institutions to provide more graduation rate data to the federal government for dissemination and, in some cases, display on the federal College Navigator site. For four-year institutions, this includes 200 percent graduation rates (e.g., students who complete their program of study in 200 percent of normal time, or eight years) and graduation rates disaggregated by gender, race/ethnicity, Pell Grant recipients, certain student loan recipients, and those who received neither Pell Grant nor a student loan.

Navigator website. These new graduation rates were identified in the HEOA for the following groups:

- Pell Grant recipients
- Subsidized Stafford Loan recipients who are not Pell Grant recipients
- Students who do not receive any federal aid or who receive only unsubsidized loans

## **Accreditation**

- Support mandatory public disclosure and dissemination of findings from final accreditation reports.
- Encourage the six regional accrediting associations to clearly define and broadly communicate their expectations for assessing and reporting student learning in a manner that is aligned with the AACSB/NASULGC Voluntary System of Accountability (VSA).

## **Transfer of Credit**

- Oppose the direct involvement of the federal government in regulating inter-institutional academic practices such as the transfer of credit. Academic matters are most appropriately handled through the collaborative efforts of accreditors and statewide, system and institutional boards.

## **Fraud and Abuse in Federal Student Financial Aid Programs**

### **90/10 Rule**

- Support integrity in federal student financial aid programs by encouraging changes to the recent amendment to the Higher Education Act that weakened federal regulation of these programs regarding the “90/10 Rule.” The amendment weakens the original intent of the provision by allowing for-

profit institutions to include private institutional loans and the extra unsubsidized Stafford Loan eligibility authorized by the Ensuring Continued Access to Student Loans Act (ECASLA) in calculating the minimum required 10 percent of revenue that is to be derived from sources other than federal student financial aid.

- Oppose any efforts to weaken regulation of an institution of higher education’s financial viability for participation in the Title IV student financial aid programs.

### **Loan Program Integrity**

- Encourage the replacement of Cohort Default Rates with improved indicators to track fraud and abuse in the federal student financial aid system.

Cohort Default Rates (CDRs) on student loans have declined in recent years. However, the decline has been fueled by the misuse of the current CDR formula, which is used to determine eligibility for participation in Title IV programs.

### **Campus Safety, Security and Emergency Preparedness**

- Oppose onerous and expensive mandates from the federal government.
- Encourage and fund federal, state and institutional partnerships that enhance campus safety and security.

## State Role in Accountability— AASCU Policy Statements

### Improved Student and Institutional Data

- Support state efforts to work with the higher education community and the federal government to improve and expand student data systems to inform educators and policymakers on strategies for improving student attendance, retention and college completion. The implementation of statewide or multistate consortia student data systems will provide for the enhanced ability to identify both challenges associated with and solutions for improving student success.  
Just eight states have P-20 data systems that track students from kindergarten through college, but 39 states are developing such systems, according to Achieve, Inc.
- Encourage states to align data system efforts with institutional and system contributions being made via the VSA, a joint initiative between AASCU and the National Association of State Universities and Land-Grant Colleges (NASULGC) that provides greater transparency of student demographic information, core student educational outcomes and student engagement.

### Upholding Ethical Standards

- Promote collaborative efforts with states to ensure that appropriate policies are in place that promote ethical behavior, that ensure appropriate transparency and accountability for institutional transactions, and that seek to prevent conflicts of interest that may arise between institutions and third-party vendors.

### Public Safety, Emergency Preparedness and Disaster Response

- Support state-coordinated efforts to help higher education institutions plan for, respond to and recover from natural disasters and other public safety emergencies.

- Support existing state law and proposed legislation that: 1) bans concealed weapons from public college campuses or 2) provides for institutional and system autonomy with regard to concealed weapons policy. Discourage new legislation that would overturn or weaken concealed weapons bans on campus.

### **Governing Board Selection, Preparation and Institutional Relations**

- Continue to endorse the selection/appointment criteria put forward by the Center for Higher Education Policy Analysis: commitment to public education; record of public or community service; knowledge of complex organizations and academic institutions; demonstrated collaborative leadership; willingness and availability for constructive engagement; commitment to open-minded, nonpartisan decision-making; and a record of integrity and civic virtue.
- Encourage the formation and maintenance of appropriate and constructive relationships between institutions, their governing and coordinating entities and states' elected leaders. The terms of these relationships must be absolutely clear. AASCU opposes changes in these relationships that muddle or politicize the decision-making process or compromise the autonomy or integrity of institutions.
- Continue to endorse the Association of Governing Boards of Colleges and Universities' statement *Governing in the Public Trust: External Influences on Colleges and Universities* as a constructive articulation of the roles and responsibilities of those charged with governing the nation's higher education institutions.

### **Academic Bill of Rights**

- Encourage opposition to state legislation mandating intellectual diversity or faculty quotas on campus.