CLASP Comments on a Proposed Postsecondary Institution Rating System

Submitted to the U.S. Department of Education on January 31, 2014

CLASP—a national organization that develops and advocates for policies that improve the lives of low-income people—welcomes and strongly supports the U.S. Department of Education's efforts to ensure that students have access to the information they need to make better choices about college and career goals and information about the outcomes of postsecondary education and training. While recent initiatives, such as the College Scorecard, have strengthened the information base available to the public, there is more work to be done to provide access to better and more comprehensive information about access, progress, completion and important post-graduation outcomes.

Our comments on the proposed Postsecondary Institution Rating System (PIRS) are guided by two core principles. First, there is a sharp distinction between the functions of increasing transparency of information about postsecondary education and holding institutions or programs accountable for outcomes. Transparency refers to the ability of postsecondary education consumers to have access to the facts that they need in order to be able to make an informed decision about whether to enroll in postsecondary education, what to study, where to enroll, and how to finance their education. Accountability refers to the creation and imposition of minimal standards of performance that are meant to remove unqualified providers, as well as the creation and implementation of financial incentives to spur performance improvements over time. Transparency is about creating a postsecondary market; accountability is about regulating the market. Although transparency and accountability may use similar metrics and require similar data, they are likely to have different audiences, require different standards for data comparability, use different minimal numbers of records to support reporting, and have different requirements for disaggregation of results.

Second, while CLASP supports the overall goals of increasing transparency and accountability for postsecondary results, any proposal for a ratings system should be carefully assessed to determine its potential impact on students from disadvantaged backgrounds, including low-income and under-represented students. Any major reform proposal, including an accountability system, should be modeled to determine the expected effects on low-income students and, ideally, piloted to understand the effects before major changes are scaled up. (see CLASP, Reforming Student Aid: How to Simplify Tax Aid and Use Performance Metrics to Improve College Choices and Completion, February 2013) Our comments include a number of suggestions for avoiding or at least minimizing the potential negative effects on students.

1. Questions Regarding Data Elements, Metrics, and Data Collection

1.1. Using data currently collected by the Department or other Federal agencies, and given the Administration's focus on access, affordability, and outcomes, what metrics are possible for rating the performance of postsecondary institutions? What metrics are appropriate for consumer information purposes? What metrics are appropriate for accountability purposes? What metrics are appropriate for consumer information and accountability purposes? For each metric, include information about data sources, quality, availability, and limitations.

For consumer information purposes, CLASP recommends including a range of measures reflecting the goals of student access, student progress, completion and labor market results, as shown in the following table:

Examples of Measures and Current Data Availability

Categories	Focus	Examples of Measures	Current Data Availability
Access and affordability	College access, college costs and debt burden after graduation	Percent of students receiving Pell or other need-based financial aid	Available in current federal databases for Pell grant recipients
		Net price	Available in IPEDS and National Student Loan Data System (NSLDS)
		Average debt of students with college loan debt	Available for students in the NSLDS
		Loan repayment rates	Can be calculated from NSLDS data
Student Progress	Progress of students toward completion	Percent of students retained in subsequent year	Reported in IPEDS for first-time, full-time students
		Percent of students enrolled in development education or remedial coursework	Not available
		Percent of students enrolled in college-level credit instruction	Not available
Completion	Student completion and attainment of credentials	Graduation/Transfer rate	Reported in IPEDS for first-time, full-time students; Completion can now be collected through the NSLDS
Employment and Earnings	Post-graduation labor market results	Median earnings one to two years and five years following graduation	Can be calculated for students in the NSLDS if matched with national earnings data

Although these metrics can and in some cases are being used for consumer information purposes, there are significant limitations. First, completion rates are difficult to estimate because of limited data coverage of students in community colleges and other institutions that serve students who are not attending for the first time. This is starting to change with the anticipated collection

of additional information on non-first time and part-time students through IPEDS. Second, student outcomes available through IPEDS cannot be disaggregated by age, socioeconomic status or other student characteristics that can provide a complete picture of postsecondary results. New outcome measures in IPEDS, for example, are expected to be reported in the aggregate for all students in an enrollment category.

Information about post-graduation outcomes, particularly earnings and labor market results, is not widely available, but it is important to consumers and must be part of any consumer information system. The Higher Education Research Institute (HERI) survey of freshman at four-year institutions (Pryor, et.al., 2009-2012) reflects the continuing trend for students to place their prospects for employment and improved earnings at the top of their motivations for deciding to go to college (Table 1). Three of the top five reasons freshman cited as reasons for going to college were related to anticipated employment and earnings results, including "to be able to get a better job," "to get training for a specific career," and "to be able to make more money." These motivations also figured prominently in their selection of the particular college or university they were attending, and outcomes related to earnings were mentioned as two of the top four objectives considered "essential" or "very important" for freshman survey respondents, including "being very well off financially," and "raising a family."

These data suggest that, for the vast majority of students and parents, postsecondary education is seen as a way to boost *prospects for stable employment and greater earnings*. The HERI freshman survey results are for first year Baccalaureate degree-seeking students; it is very likely that this orientation toward the labor market is even stronger among Associate degree-seeking students and occupational certificate-seeking students, many of whom are returning to gain skills to increase their wages after being in the labor market. These results support the principle that the development of an accurate and fair method for measuring and comparing labor market results should be a top priority for postsecondary outcome measurement.

A growing number of states have begun to meet the demand for comprehensive and consistent information about labor market results. However, the state consumer information systems tend to report outcomes for those employed within the state given limited availability of Unemployment Insurance (UI) wage records across state lines. For example, the Virginia Longitudinal Data System provides information about average and median wages of graduates 18 months and five years following graduation. Data are available by program and institution for graduates who are employed in-state. (See VLDS at http://research.schev.edu/apps/info/Articles.First-Look-Post-Completion-Wages-of-Graduates.ashx) Similarly, the SeekUT system provides information about earnings and debt levels of graduates one year and five years following graduation. Earnings are shown at different percentiles for graduates who are employed in-state. (see http://www.utsystem.edu/seekut/) The California Community Colleges, one of the nation's largest community college systems, has developed several tools that disseminate information on the median annual earnings of award recipients who are employed in-state two years and five years after completion. (See California Community Colleges http://extranet.cccco.edu/Portals/1/TRIS/Research/wages/Framework%20for%20Tracking%20Wages.pdf) These states have joined a number of early adopters, such as Florida and Washington, which have for years presented labor market outcomes of postsecondary completers.

Because students and graduates of various programs are likely to be highly mobile across state lines, it is important to provide information about labor market outcomes based on cross-state or national data. At the national level, it is possible to report annual earnings for federal financial aid recipients in the National Student Loan Data System (NSLDS) if student data are matched with the Social Security Administration (SSA) earnings file. This data source has the broadest coverage of administrative data sources, including nearly all workers. The table below shows the strengths and weaknesses of this national data source.

Social Security Administration earnings data	
Advantages	**Disadvantages**
• Includes essentially all workers: those covered by UI, and those exempt from UI, including federal civilian, military, and self-employed. • Data are obtained from IRS and maintained centrally by SSA.	• Data are annual only (for Master Earnings File). • Currently does not include industry or occupational codes.

Source: CLASP Workforce Results Data Briefing Memo prepared for the RADD Simplification and Transparency Consortium

A combination of measures of access, progress, completion and earnings are likely to be useful for accountability purposes. While we feel that existing data sources may be adequate to provide consumer information (based on data for students covered by the NSLDS, and supplemented by earnings data from SSA earnings file or other federal databases), substantial improvements are needed, particularly in the collection and dissemination of post-graduation outcome data.

Accordingly, we do not support the use of the PIRS for accountability purposes until more and higher quality data are available and adequate protections are in place. Any major reform proposal, including use of metrics for accountability purposes, should be modeled to determine the expected effects on students from disadvantaged backgrounds and, ideally, piloted to understand the effects before major changes are scaled up. (RADD white paper, February 2013 page 14 http://www.clasp.org/documents/Final-RADD-WhitePaper-Feb-2013.pdf) Our comments in response to 1.2 address a number of the principles to be considered if the PIRS is ultimately used for accountability purposes.

1.2 Using data not currently collected by the Department or other Federal agencies, and given the Administration's focus on access, affordability, and outcomes, what metrics are possible for rating the performance of postsecondary institutions? What metrics are appropriate for consumer information purposes? What metrics are appropriate for accountability purposes? What metrics are appropriate for consumer information and accountability purposes? What is the best way to collect data that will inform those metrics? What are the challenges in collecting such data?

As discussed in the response to 1.1, CLASP recommends a range of measures that reflect the goals of student access, progress, completion, and labor market outcomes. Additional data collection and improved connections between federal databases are needed to calculate most of the proposed metrics. Key data needs include:

1) Increased coverage of students: the expected changes to IPEDS will increase the coverage of non first-time and part-time students and should allow for calculation of an expanded graduation rate. However, earnings measures can be calculated for a limited set of students in the NSLDS.

2) More information on student characteristics to support calculation and disaggregation of outcomes for sub-groups of students: student-level data on outcomes are not available through IPEDS at the needed level of disaggregation.

3) Additional data on student progress, especially in less selective institutions: the measures of enrollment in remedial/developmental instruction and enrollment in college-level instruction cannot be calculated without new data collection.

4) Additional data on labor market outcomes: access to national or cross-state employment data is needed to provide comprehensive information about labor market outcomes, such as median earnings.

With respect to the earnings measures, the Department can explore additional national data sources beyond the SSA earnings file referred to in the response to 1.1. For example, the National Directory of New Hires (NDNH) operated by the Office of Child Support Enforcement contains earnings information for all workers covered by unemployment insurance, plus military and federal civilian employees. The authorization for use of the NDNH could be expanded to provide access to other federal agencies and states and to include consumer reporting or the calculation of postsecondary and workforce results. The table below shows the strengths and weaknesses of this national data source.

National Directory of New Hire data	
Advantages	**Disadvantages**
• Includes all workers covered by UI, plus military and federal civilian employees. • Data are quarterly, which provides more flexibility in creating employment and earnings metrics. • Includes UI claimant information (unemployed).	• Does not include self-employed. • Does not include hours worked, industry or occupation. • Not currently permitted to be used to support calculation of outcomes for postsecondary institutions.

Source: CLASP Workforce Results Data Briefing Memo prepared for the RADD Simplification and Transparency Consortium

Another source of information about employment and earnings is the Longitudinal Employer-Household Dynamics (LEHD) program administered by the Census Bureau in cooperation with the states. The LEHD combines administrative data provided by the states with additional data from surveys conducted by the Census Bureau. As a result of access restrictions, it is not a source of data on results for students; however, it is an important source of information on the local employment and earnings context that can be used to make sense of the labor market results for postsecondary students. For example, LEHD data could be used to show the median earnings of persons with a bachelor's degree within certain industries in a regional labor market.
A combination of measures of access, progress, completion and earnings may be useful for accountability purposes. However, the experience with performance accountability under the

Workforce Investment Act (WIA) reinforces the need for caution in implementing performance systems without adequate protections for low-income individuals. Under WIA, the pressure to meet high performance expectations for labor market outcome measures, together with policy and programmatic factors, have created disincentives to serving less educated, less job ready individuals who generally require more assistance to achieve good outcomes. (See Government Accountability Office, Community Colleges and One-Stop Centers Collaborate to Meet 21st Century Workforce Needs, May 2008 http://www.gao.gov/products/GAO-08-547) In the same way, tying high stakes to increased graduation rates and post-graduation outcomes could lead to undesirable consequences, if proper protections are not in place.

Any major reform proposal, including an accountability system, should be modeled to determine the expected effects on students from disadvantaged backgrounds and, ideally, piloted to understand the effects before major changes are scaled up. (RADD white paper, February 2013 page 14 http://www.clasp.org/documents/Final-RADD-WhitePaper-Feb-2013.pdf) The goals of a performance accountability system also should be clearly determined and agreed upon before any metrics are adopted.

If a PIRS is used for accountability in the future, the Department should seek to minimize the potential disincentives to enrolling students from disadvantaged backgrounds by applying the following principles.

First, the PIRS should incorporate a variety of metrics reflective of the core goals of access, progress, completion and earnings. The incorporation of data on intermediate outcomes such as retention and credit accumulation will provide incentives for institutions to retain students and will encourage less selective institutions to move more students into credit-bearing instruction as soon as possible.

Second, the PIRS should present results for each of the metrics for Pell grant recipients and other low-income students, at a minimum, so that institutional results for these students can be compared to results for all students. A fair assessment of access and completion for low-income students requires information on both enrollment of Pell grant recipients and other recipients of need-based aid and results disaggregated by sub-group. Including results for Pell grant recipients is important for both consumer information and accountability purposes, but it will become of critical importance if PIRS results are to be used for resource allocation or qualification of institutions for Title IV funding. A system that does not include this capability will almost certainly lead to strong incentives for institutions to become less open to the enrollment of low-income students—many of whom are first generation college attendees, and many of whom require developmental instruction and additional services to allow them to remain in college and successfully complete.

Third, the PIRS should not use composite ratings (that is, reducing results about multiple metrics or dimensions to a single score) to disqualify institutions from Title IV eligibility. Disqualification thresholds should be based on clear criteria that are designed to remove those institutions that have shown over time an inability to meet minimal standards of performance. Setting thresholds based on a single criterion can create strong incentives to game results, distort institutional missions, or create other undesired results. No institution should ever be in a

position of not understanding exactly where that minimal threshold is, and what metric or metrics must be improved in order for its eligibility to be protected.

Fourth, if metrics are used for qualification or resource allocation, there should be an initial pilot or phase-in period, so that unanticipated consequences can be detected and adjustments implemented. Any further allocation of resources intended to incent institutional performance improvement should be phased in over several years, with careful attention to the potential for negative impacts on the enrollment of low-income students. Such efforts should also be accompanied by increased support for institutional continuous improvement. If metrics are used to allocate resources through incentives for institutions, it is important that the metrics incorporate incentives for institutions to focus resources on improving results for students from disadvantaged backgrounds.

1.3 What metrics should apply to all types of postsecondary institutions?
See the response to 1.4.

1.4 What metrics should apply to institutions with specific missions? How should those missions be defined?

The metrics for access, completion and post-graduation outcomes would apply to all institutions. In addition, we are recommending two progress metrics that would apply only to less selective institutions, many of which have open access policies and offer developmental education:

- Percent of students enrolled in developmental education or remedial coursework; and
- Percent of students enrolled in college-level credit instruction.

Institutions should be categorized along two dimensions for the purposes of consumer information:

1) the level of selectivity (open access or selective based on the percent of applicants admitted); and
2) types of credentials/awards granted (certificates; associates, bachelors, advanced degrees).

These categories would be used to determine what metrics would be applied and in some cases how the metrics would be defined. For example, access and completion measures for two-year institutions are likely to have different definitions than measures for four-year institutions. The graduation rate for two-year institutions in particular may be adjusted to reflect the number of students transferring to other institutions.

1.5 How should existing limitations in Federal postsecondary data and data collections be addressed?

As a national partner in the Workforce Data Quality Campaign, CLASP supports a broad-based agenda for improving education data quality, so that these data sources "reflect the diversity of *students and workers* and the *range of education and labor market outcomes* that comprise our

nation's human capital strategy." This data quality agenda includes the following proposed improvements at the federal and state levels:

1) Include data for students in programs beyond higher education, including out-of-school youth, adult workers, and other individuals enrolled in job training, adult education and career and technical education programs;
2) Capture individual achievement of the wide range of industry-recognized credentials (including certificates, certifications, licenses, et.al.) and related competencies, as well as degrees;
3) Assess employment outcomes by matching student records to employment and wage records for enrollees across all of our education and workforce programs;
4) Expand the use of labor market information and make it more understandable to students, workers and employers; and
5) Ensure appropriate data access and use, so that aggregated, privacy-protected data on student outcomes can be made available to education and training institutions so they can assess their graduates' outcomes and guide program improvements; to students and workers who want to choose the best programs for their respective career goals; and to policymakers who want to know more about the effectiveness of public education and training policies. (See the Workforce Data Quality Campaign for more information http://www.workforcedqc.org/)

There are three types of limitations of existing federal postsecondary data systems that affect the ability to implement an effective PIRS:

1) missing data for calculating important metrics;
2) students that are not included in data collection and reporting requirements, especially those who attend community colleges and who may not attend full-time and;
3) lack of information on student characteristics that are needed to support calculation and disaggregation of results for key sub-groups.

Ultimately, access to student-level data is necessary to ensure that access and outcome data include the level of disaggregation needed for transparency and especially accountability purposes. As we have discussed in previous responses, access to consistent employment and earnings data across states is also necessary to ensure that labor market outcomes for a variety of programs can be fairly evaluated.

1. The most straightforward approach to developing comparable workforce results data for postsecondary institutions and their programs along the lines discussed above would be a comprehensive national database with student-level graduate data (with SSNs and other required student characteristics) submitted to ED by all postsecondary institutions. The advantages of a national model are substantial, including the ability to implement consistent definitions of metrics, and a greater capacity to ensure high data quality. A national model also lends itself to a national approach for accessing and disseminating the results data, which can promote simplification and may increase utility to consumers. Implementation of this approach would require legislative action to reverse or modify a ban on creation of a national student unit record system.

2. The second approach is to build on the progress of the many states that have been working to link student records with available earnings data to develop workforce results data for postsecondary students. The Statewide Longitudinal Data System (SLDS) grants and the companion Workforce Data Quality Initiative (WDQI) grants represent an effort to support and expand these state-based models. The primary advantage of a state-based model is that states are free to proceed with unit record development, including incorporation of earnings data, without the need for legislative changes.

3. The third option is a federal-state cooperative model for developing and presenting workforce results data combining features of national and state-based models. Under this model, states would create student unit records, building on their longitudinal data system efforts. These records would be linked to the state UI covered earnings data, and connected to earnings data in other states via an expansion of the Wage Record Interchange System (WRIS 2) partnership. They could also be connected to federal civilian and military data through expansion of the Federal Employment Data Exchange System (FEDES) partnership. However, self-employed persons would not be included in these databases unless access could be arranged to the SSA earnings data. (More information on these options will be available in a forthcoming CLASP report on calculating workforce results of postsecondary education and training)

2. Questions Regarding Weighting or Scoring

2.1 What empirical methods for weighting, scoring, or otherwise reducing a large and complex amount of information into a single dimension or a set of dimensions should be used in a PIRS?

CLASP advises against using composite ratings (reducing information about multiple metrics or dimensions to a single dimension) for consumer information or accountability purposes. A composite rating that weights and combines the values across multiple dimensions is likely to be difficult for consumers and other stakeholders to understand and virtually impossible for institutions to respond to as they seek to improve results.

2.2 What empirical methods for weighting or scoring are appropriate for consumer information purposes?

For consumer information purposes, any summary results or ratings could be presented for each of the metrics or at least for each metric area (e.g. access, progress, completion, earnings). In general, overall or composite ratings of institutions are likely to be of limited value to consumers, given all of the factors that could contribute to the calculation of such a composite rating. Not all metrics are of equal importance, and consumers may place a higher priority on net price and a lower priority on graduation rate. If an overall rating of institutions must be part of the PIRS, it should be based on how the institution performs with respect to the metrics that are most important to the consumer, relative to those results for other peer institutions.

2.3 What empirical methods for weighting or scoring are appropriate for accountability purposes?

As we have discussed elsewhere in these comments, the use of the PIRS for accountability purposes may create disincentives for enrollment and completion of low-income students unless data limitations are addressed and adequate protections are in place. If the Department deploys the PIRS for accountability purposes in the future, we advise against using composite ratings that may be difficult to understand and difficult to interpret for program or institutional improvement. Any disqualification thresholds should be based on clear criteria that are designed to remove those institutions that have shown over time an inability to meet minimal standards of performance. Setting thresholds based on a single criterion can create strong incentives to game results, distort institutional missions, or create other undesired results. No institution should ever be in a position of not understanding exactly where that minimal threshold is, and what metric or metrics must be improved in order to maintain its eligibility.

2.4 What empirical methods for weighting or scoring are appropriate for both purposes?

See responses to 2.2 and 2.3.

2.5 How should metrics be adjusted to account for institutional differences, such as mission, and student characteristics? How should those characteristics be defined?

For consumer information purposes, we think that only *unadjusted* information should be provided to students and stakeholders. Consumers should be able to use selection criteria to compare institutions based on location and other factors. They should be able to compare results with the results of peer institutions.

Any accountability system, if it is not designed with care, may have adverse consequences on access and success for students from disadvantaged backgrounds. An accountability system without protections for enrolling low-income students and helping them to succeed will create incentives to focus resources on the most prepared students and those most likely to succeed in postsecondary education.

The advantages and disadvantages of using an adjustment model should be carefully weighed. An index or model can be developed to take into account and adjust for identifiable characteristics of the students that may influence programmatic or institutional outcomes. Regression-based models have been used for years to take into account different economic conditions and differences in those served in the calculation of results for workforce programs. However, an adjustment model is only as good as the underlying data, which are based on past experience. Selection of variables for a model also reflects policy choices and value judgments. Another concern voiced by student advocates is that adjusting for educational outcomes, in particular, may set the stage for lowered expectations for certain groups of students or students at certain institutions. To recap, an adjustment model may be appropriate, and even necessary, for leveling the playing field for programs or institutions if outcomes are tied to funding, but it may not be appropriate if the goal is to increase awareness of disparities in outcomes and advance

equity in outcomes. (see Burt S. Barnow and Carolyn J. Heinrich, One Standard Fits All? The Pros and Cons of Performance Standard Adjustments, 2009)

2.6 How should metrics be adjusted to reflect institutional improvement over time?

Improvement over time should be an important component of any use of PIRS, and especially if it is used for accountability purposes. This is based on the notion that what is primarily being sought through an accountability system is improvement over time, particularly for those institutions whose performance on the metrics is lower than what it is expected to be. Institutions should be rewarded (or at least protected from negative consequences) if they are making substantial progress toward achievement of desired results. It is not the metrics that are adjusted to reflect improvement over time, but rather the use of the metrics for accountability, especially allocation of resources, should be conditioned on the progress of the institution.

3. Questions Regarding the Development of Comparison Groups

3.1 What empirical methods for developing institutional comparison groups are appropriate for consumer information purposes?

In developing comparison (or peer) groups, it is important to distinguish between institutional characteristics that are part of a consumer frame of reference (location, cost, size) and institutional characteristics that are inherently connected to or that influence the results (such as degree of selectivity, types of credentials granted). It may be entirely appropriate to compare results for institutions of differing location, cost and size, but it is probably not appropriate to compare results for selective and less selective institutions. The peer groups for comparison should encourage students to compare institutions that are similar on these fundamental characteristics.

Accordingly, consumers should have access to two types of comparative information: 1) information on location, cost and other characteristics; and 2) information about results based on key institutional differences that influence outcomes. Institutions should be grouped along dimensions that have strong predictive power for the metrics. These dimensions may include:

- Level of selectivity (e.g. percent of applicants admitted);
- Types of credentials granted (awards, certificates; associates, bachelors, advanced);
- Percent receiving Pell grants or other need-based aid; and
- Percent of students attending other than full-time.

3.2 What empirical methods for developing institutional comparison groups are appropriate for accountability purposes?

As we have discussed elsewhere in these comments, the use of the PIRS for accountability purposes may create disincentives for enrollment and completion of low-income students unless data limitations are addressed and adequate protections are in place. In addition to the peer group characteristics listed under question 3.1, there are several additional characteristics of institutions

and students that should be considered if the PIRS is to be used to support accountability. Some examples are listed below:

- Percent of students enrolled in remedial/developmental instruction;
- Percent of students over 22 years of age at first enrollment or age 24 and older;
- Percent of students who are first generation college students.

CLASP believes that any accountability system should be modeled prior to implementation to determine the expected effects on students from disadvantaged backgrounds and, ideally, piloted to understand the effects before major changes are scaled up. (see CLASP's RADD white paper, February 2013 page 14 http://www.clasp.org/documents/Final-RADD-WhitePaper-Feb-2013.pdf)

3.3 What empirical methods for developing institutional comparison groups are appropriate for both purposes?

See responses to 3.1 and 3.2.

3.4 Should students be disaggregated for comparison purposes and if so, by what sub-groups?

Results should be presented for sub-groups of students for comparison purposes. As we have indicated above, it is not sufficient to report information on access for various sub-groups; the results for these sub-groups must also be presented, for two reasons. First, for consumer information purposes, students need to be able to see how each institution performs, not just for all students, but for students like themselves. A prospective student who is a Pell-eligible should be able to observe institutional results for Pell grant recipients. Second, showing results for categories of students from disadvantaged backgrounds is a necessary condition for the use of results for accountability purposes because disaggregating outcomes may help reduce the potential for negative consequences for these students in the face of increased performance pressure. If results are presented for sub-groups of students together with information about access, it becomes possible to measure and ultimately begin to address critical achievement gaps or disparities in educational and labor market outcomes.

Student results should be disaggregated and presented for the following sub-groups:

- Programs of study: This is of particular importance for employment and earnings results, which probably do not make much sense outside of a program of study context.
- Pell Grant recipients: Does the institution obtain good results for its Pell recipients as well as non-Pell recipients?
- Full time/part time/mixed enrollment status: The ability of the student to attend full time or not has a great bearing on the prospects for graduation, and this should be clearly shown.
- Gender: Showing institutional results for students by gender, particularly in settings where they will be underrepresented, is an important part of the context.

- Race/ethnicity: The ability of the institution to minimize achievement gaps for minority students is an important element for comparison of institutions.

4. Questions Regarding the Presentation of Ratings Information

4.1 What models for presenting institutional ratings are appropriate for consumer information purposes?

We recommend that the Department dedicate its resources and energy to making more and better data available to ensure that students have access to the information they need to make better choices about college and career goals. The Department has a critical role in development of data standards, improvement of data quality, collection of new data and data matching among federal datasets to calculate metrics results.

It is important that metrics results be available and presented to students in an easy-to use and appropriate context to support effective use. The College Scorecard represents a major step forward in the presentation of information in an easy-to-use and graphical format. In general, data for each of the metrics reported in the PIRS could be presented in four ways:

- Overall results in each metrics area or for each metric (How did this college perform against a certain metric?);
- Results for subcategories of interest to the consumer, such as programs of study or types of students (How did students like those you have selected do at this college?);
- Comparison of results to the average or median for institutions in the peer group (How does this college compare to other similar colleges?); and
- Comparison of results to those of the other institutions selected by the consumer (How does this college compare to other selections?)

Earnings results must be presented in a labor market context if they are to be meaningful and used appropriately. These data should be presented for graduates of the specific program(s) of study identified by the consumer, for earnings in specific regions based on consumer interest, and in comparison to earnings for specific occupations and industries related to the program(s) of study. While this will certainly require the presentation of data in a more sophisticated manner than what may be envisioned in a simple model, it is essential to provide context for earnings results; otherwise colleges serving economically distressed labor markets, or preparing students for entry into less lucrative fields, will be unfairly compared to other colleges.

An enhanced College Scorecard with additional metrics and data will increase transparency of higher education outcomes. However, it is clear that information alone, even if presented in an easy-to-use and engaging format, is not enough. Information on results should be integrated into college access programs and the career guidance and college choice delivery systems that reach students at different levels. Counselors and advisers should be equipped to interpret this information for prospective and enrolled students. Students should have access to online tutorials or other means to learn how to access and interpret results about the institutions and programs they are considering. The Department should provide guidance and invest resources to support this function.

4.2 What models for presenting institutional ratings are appropriate for accountability purposes?

See response to 4.1.

4.3 What models for presenting institutional ratings are appropriate for motivating consumers to make choices that promote institutional accountability?

Increased transparency of information can improve the functioning of a market for postsecondary education and training. Armed with better data, consumers will have more options and increased chances of making informed choices about college and career goals. Even enrolled students can use information about results at the institution they are attending to advocate for institutional improvement. Employers, policymakers and other stakeholders may also use consumer information to identify achievement gaps and begin to address them.

4.4 How could the PIRS strengthen States' and others' oversight and fiduciary responsibility for postsecondary education?

A PIRS with an appropriate set of metrics for access, progress, completion and earnings, as well as disaggregation of these results for groups, as described in response to question 3.4, could be a helpful tool for states. These data could help states to assess the progress of their postsecondary institutions in closing achievement gaps. For states that have developed or are contemplating the development of results-based funding models for their postsecondary system, these data could be a starting point for considering the appropriate measures in these models. Finally, a PIRS based on national data collection and data standards would provide a solid basis for states to gauge progress in improving completion and other key results relative to other states.

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