Evidence-Based Institutional Effectiveness: Empirical Data to Supplant Proxies

The Case for Student Unit Records

Introduction

Americans voluntarily disclose individual information to take out loans, purchase discount groceries, receive movie suggestions, seek travel aids, access healthcare, and subscribe to newspapers and newsletters. In a digital society, personal information—from social security numbers to email addresses--is coin of the realm, opening the door to a wide array of personalized transactions that make life more convenient, productive and satisfying. In a digital world, consumers decide with whom and to what extent they are willing to share information. Interactions they control occur at local, regional, national and international levels with great frequency and appropriate security.

At a national level, one door to data-driven accountability remains obstinately closed: the use of student unit records (SUR) in higher education. The tool has strong potential to bolster consumer choice, improve pedagogy, close workforce skill gaps and establish more reliable and meaningful measures of institutional effectiveness. Student unit records are a combination of data elements, including demographics, academic background, enrollment status, academic activity, and academic attainment.[1]   Combining SUR records with other public databases on employment and workforce dynamics would tie academic preparation more closely to workplace and career opportunity.

But there is a rub: While commercial enterprises pour over billions upon billions of records to better understand customer demographics, preferences, behaviors and shopping practices, current law prohibits the U.S. Department of Education from collecting individual information from college students. This prohibition exists notwithstanding the fact that a database of student unit records could:

- better inform prospective students about their college options;
- help institutions and instructors deliver more effective instruction;
- provide regulators, higher education commissions, and accrediting agencies with objective, evidence-based tools for assessing institutional quality and performance;
- provide policy makers and funding sources with new insights into institutional accountability, taxpayer return on investment, and workforce readiness;
- increase alignment between the expectations of employers with individuals seeking employment.

Some might argue it is beyond ironic that Americans can give up reams of personal information when buying discounted muffins or cheese at the local warehouse megastore, but a provision of the Higher Education Act bars institutions from sharing individual student information that would raise the nation's postsecondary education IQ. Largely defended in the name of privacy and security, the SUR ban forces

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[1] National Center for Higher Education Management Systems, C2SP Student Unit Record Survey Report, http://www.nchems.org/c2sp/sur/

college and university stakeholders to make choices based on intuition and anecdote rather than data, to analyze with vague proxies instead of real metrics, and to perpetuate a system where consumers have better access to objective information about buying a house, car or computer than about the college education of themselves or their children.

On the occasion of the reauthorization of the Higher Education Act, the Accrediting Council of Independent Colleges and Schools (ACICS), as a major quality assurance agency for proprietary post-secondary education, joins others who recommend that the door be opened to fair and effective assessment of postsecondary education based on SUR data. The White House, for example, has called for a federal rating system of colleges and universities. Student unit records provide the directly relevant data needed to fuel real educational reform, and to establish more transparent and objective means to compare institutions with each other. ACICS recognizes that access to SUR data at a federal level must take place within a framework that is appropriately designed, developed, maintained and protected. Equally ambitious systems, including Medicare and Social Security, have been built. It can be done. It should be done.

Meanwhile, progress abhors a vacuum. Many states have begun to build their own SUR systems, and, failing an overarching federal approach, efforts have been made to link these systems. Imperfectly. Like taxation, healthcare, environmental protection and other issues at the state level, rules and regulations differ, as do the data and systems used to support those rules and regulations.

An important disclaimer should also be noted. Today, the quality and effectiveness of postsecondary education is often assessed using data aggregated at the institutional level. The approach protects student privacy but foments widespread mixing of "apples and oranges" when it comes to institutional assessments. This mixing perpetuates fundamental misunderstandings of higher education as a result.

Evaluating institutional effectiveness based on the analysis of aggregated student unit records would help clarify the linkages between primary, secondary and postsecondary education; between the classroom and the workplace; and between skills and careers. Creating a federal SUR system will help higher education stakeholders see brighter patterns and more predictable trajectories for economic advancement.

But life is also about choice, free will, motivation and a host of other intangibles that cause even the most precise experiments to fail. Student unit records will add decision-making clarity and coherence, but they will not impose cause and effect surety. In higher education, as in life generally, there are no success guarantees. Build a federal SUR data repository and, while the future can never be known, the course is set for significant and beneficial changes to U.S. higher education thinking and practice. More importantly, the collection and analysis of protected, anonymous SUR demonstrates a policy commitment to science over art and data-driven analysis over anecdote, intuition and speculation.

New Metrics, Better Context for Assessing Postsecondary Quality

Academic Preparation

It is widely acknowledged that too many students enter college not really prepared for college level work, for a variety of reasons: high schools may lack a strong college preparatory curriculum; students may have learning disabilities or other debilitations that make learning difficult; individuals may have strong skills in some academic areas but require remedial help in others.

The National Center for Public Policy and Higher Education points to the gap between college eligibility and college readiness. It notes that nearly 60 percent of first-year college students are not ready to perform college level work.[2] Worse, recent reports show that just 26 percent of students taking the ACT college entrance examination demonstrated college readiness in all four academic test areas.[3] Given the increasing numbers of non-traditional students entering the postsecondary realm from the workforce rather than high school, with GED credentials, or with long absences from the classroom, the task of assessing academic preparation becomes increasingly complicated. Collection of SUR longitudinal data could help educators spot deficiencies across a range of indicators, including socio-demographics, schools and school districts, emotional and behavioral factors, prior remedial interventions and the like and to devise better learning strategies and accommodations.

Admissions

Logic suggests that the factors for assessing the academic quality of a highly selective college or university should be very different from those used to assess a less selective or an open admissions institution. While elite colleges and universities may be able to fulfill their academic missions by admitting only the highest achieving students, other institutions may strive to serve a more diverse student population, students interested in a particular field of study like music or art, the residents of a particular region or locality, students coming from a particular religious faith, older adults seeking career skills, or other groups. SUR data can help institutions make more informed admissions decisions by isolating success characteristics beyond academic merit, identifying students with emotional or disciplinary problems, striving for greater fairness by decoupling student academic performance from zip code, flagging patterns of grade inflation by teachers or schools, or by better understanding the academic rigor required in high school courses.

Persistence

Without student persistence, students do not complete or graduate. Improving graduation rates is a common goal of postsecondary education reform proposals, yet a basic underpinning of graduation—persistence—is as a practical matter often under-funded and under-staffed. The College Board performed a study of four-year institutions in five states and found resources expended on student retention to be minimal and inadequate. Improvements, the College Board determined, must be empirically grounded and based on context specific benchmarks across institutions. "For institutions to have informed ways of improving persistence, they need a deeper understanding of the student-

[2] Beyond the Rhetoric, Improving College Readiness through Coherent State Policy, IHEP, http://www.highereducation.org/reports/college_readiness/gap.shtml
[3] Emma Brown and Lynh Bui, "Just 26 Percent of ACT Test-takers Are Prepared for College," The Washington Post, August 21, 2013 http://www.washingtonpost.com/local/education/just-26-percent-of-act-test-takers-are-prepared-for-college/2013/08/21/a99fba0e-0a81-11e3-8974-f97ab3b3c677_story.html

institution interaction from which student persistence arises," the College Board notes.[4] SUR data could be used to provide such benchmarks, shedding new light on effective orientation programs, early warning systems, and the delivery of courses with high failure rates, the structuring of class sizes, and the quality and quantity of staff interaction.

Learning Accommodations

Accommodations intended to help students persist and graduate from college cover a broad waterfront, from specialized programs for those with learning and physical disabilities to tutoring, mentoring, and study centers.   The challenge is particularly acute for first-generation college students, who as a group face the most difficulty in making a successful transition to college. These students tend to have a weaker academic foundation, may lack study skills, and may have less confidence in their ability to succeed than their more affluent and academically-prepared counterparts.[5] While various approaches intended to assist in the learning process may intuitively seem like good ideas, only quantitative data allow researchers to look across student populations and see broad patterns of effectiveness.

"Analyzing student unit record data provides valuable feedback to both educators and policy makers as they work to improve educational outcomes," said Hans Peter L 'Orange of the State Higher Education Executive Officers Association. "Unit record data have value even if they are not used to report individual student level data but are used in the aggregate to analyze the experience of groups of students with similar characteristics. These analyses, often predictive, frequently support adjustments in educational practices and ultimately impact student experiences."[6]

Affirmatively knowing what works (as opposed to making informed guesses) would be particularly useful in the case of non-traditional students, individuals who may change postsecondary institutions multiple times in the pursuit of career skills.

Graduation

The White House has reiterated what many labor economists have pronounced for years: jobs of the future will require more than a high school degree. Broad consensus seems to suggest that college graduation is a competitive necessity for job seekers, and that the employer's willingness to accept applicants with just a high school diploma or "some college" has significantly decreased. Ironically, graduation rates have failed to respond. Between 1996 and 2009, these rates edged up marginally, from 62.7 percent to 63.2 percent.[7] Policymakers and academicians simply need to know more about which, how and why students are graduating, and what steps can help eliminate barriers and foster success.

[4] "How Colleges Organize Themselves to Increase Student Persistence: Four-Year Institutions", April 2009 http://professionals.collegeboard.com/profdownload/college-retention.pdf

[5] Jennifer Engle, "Postsecondary Access and Success for First-Generation College Students, American Academic, American Federation of Teachers, http://www.aft.org/pdfs/highered/academic/january07/Engle.pdf

[6] Hans Peter L'Orange, "Student Unit Records are Critical to Evaluating Our Effectiveness," NASFAA Perspectives, August 19, 2013

[7] Kevin Carey, The Quick & the Ed, http://www.quickanded.com/2010/12/u-s-college-graduation-rate-stays-pretty-much-exactly-the-same.html

Of course one obvious approach to immediately improving graduation rates would be to lower standards and to make graduation itself less difficult. However, the appetite for "dumbing down" graduation is minimal. On the contrary, as social expectations surrounding graduation have intensified, so have pressures seeking to equate graduation with learning outcomes, skills attainment and marketplace value. As the American Association of Community Colleges rightly notes, "The use of data to make decisions is at the core of an accountability culture."[8] While educational quality and accountability is not one and the same thing, SUR data would provide new insights into the ability of institutions to support and graduate different types of students, the popularity and attrition rates of certain types of programs and the effectiveness of faculty in motivating and engaging students.

Learning Outcomes and Placement

Postsecondary education has many purposes, including basic research, personal growth and enrichment, and the pursuit of knowledge for its own sake. Quality is critical to each. Yet as tuition prices increase, so does pressure on all stakeholders to link college education to subsequent, suitable employment. While a knowledgeable and informed citizenry is a social and cultural ideal, a well skilled and appropriately employed population is an economic imperative.

The road from college to workplace is not always a straight line. On the contrary, workforce development specialists, labor economists, local economic developers, educators, and students struggle with what can be a vexing series of detours between the near- and mid-term conditions of labor supply and actual demand. SUR data linked to local employment and compensation data could help answer questions now left only to the marketplace to address—questions such as market demand and the tradeoff between employment risks and rewards.

SUR data are important evidence regarding "what works," but not the only evidence. As AACC points out, even if SUR data were linked to existing federal government databases pertaining to employment, large swaths of the workforce would still be difficult to cover, including those who are self-employed.

Yet many learning outcomes are immediate, obvious, and translate quickly to employment. Such outcomes include pass rates on certification and licensing examinations. SUR data could help students, academicians, curriculum developers and other stakeholders understand not only what institutions and programs produce more readily employable graduates, but even what courses may prove most influential.[9]

Institutional Best Practices

Benchmarks help institutions to take corrective action and to engage in continuous improvement. The accreditation process provides much of this peer level input, in part because that is what the accreditation process is intended to do; in part, because the ability of institutions to benchmark

[8] Christopher M. Mullin and Anna Lebesch, "Moving Success From the Shadows: Data Systems That Link Education and Workforce Outcomes," AACC, March 2010
[9] Peter Ewell and Hans L'Orange, "The Ideal State Postsecondary Data System: 15 Essential Characteristics and Required Functionality," NCHEMS and SHEEO, September 14, 2009

themselves using U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) is limited in scope and utility.

IPEDS limitations include the fact that the system's graduation data are based only on first-time, full-time, degree-seeking students who enroll in summer or fall, a throwback to the days when the preponderance of college-goers entered four-year institutions directly from high school. Times have changed:

- More than 50 percent of students entering career colleges in 2007, for instance, enrolled in certificate, not degree programs; only 13.3 percent sought four-year degrees.[10]
- Career college students attend school year round, increasing the possibility that they enrolled in winter or spring and thereby miss the IPEDS count. Many career college students have previously attended community college. As a result, they are also excluded from graduation counts.
- Many career college students earn a certificate in one school and a certificate or associate's degree at a second school. The subsequent awards are not included in the IPEDS count.

These types of skewed measures tend to accentuate positive outcomes for traditional, four-year colleges and universities and misrepresent the negative outcomes of institutions serving large percentages of non-traditional students. This mixing of "apples and oranges" also subverts the ability of postsecondary institutions to make meaningful inferences about themselves or others based on the available public data. As IPEDS exists today, America's most selective colleges and universities are lumped with open admissions colleges and universities; super-achievers co-exist with the academically under-prepared; the affluent with the at-risk. SUR data would help eliminate the types of systemic discrepancies and distortions described above, helping all institutions use fact-based benchmarking to better pursue their respective missions.

Discerning or Discriminating?

New metrics, based on SUR data and applied across the postsecondary landscape to institutions of every type, could yield a cornucopia of insights, ideas and innovations. Such metrics could help students and parents better weigh college choices, institutions compare and contrast their operations and performance, accrediting agencies to extend and advance their assessment processes and methods, and taxpayers assess the effectiveness of their investment in financial aid programs like guaranteed student loans and Pell grants.

Lacking a comprehensive system to collect and analyze student unit record data and to link these data to workforce records, the federal government has opted to make policy based on partial information and proxy measures. In current law, cases in point are cohort default rates (CDR) and 90/10 funding source compliance, codified in the Higher Education Act.   Both the CDR and 90/10 assess institutional quality based on inference and supposition rather than fact-based inquiry into school and student performance.

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[10] Association of Private Sector Colleges and Universities

The 90/10 rule, which disqualifies from Title IV participation those institutions receiving more than 90 percent of their revenue from guaranteed student loans and Pell grants, applies only to for-profit institutions. The rule assumes that schools of reasonable academic quality should be able to generate 10 percent or more of revenue from students tapping private resources, not the federal student aid program.

Proprietary colleges and universities serve a largely at-risk population. Three of four career college students are financially independent of their families, meaning that, unlike traditional college students, they are not enjoying the financial support of parents while attending school. Of dependent students, those who do depend on their families, almost half come from the lowest economic quartile. A majority of career college students are the first within their families to enroll in postsecondary education: they enter college without the context, expectations, and preparation of traditional college-goers.

It's reasonable to suppose that students lacking a strong academic foundation and financial resources would struggle more than their more affluent peers, both to pay for college and in loan repayment after college. This struggle is manifest in the use of federal student financial assistance programs and the rate of default on student loans, regardless of the type of postsecondary institution disadvantaged students attend. Are students at or near the poverty line more likely to pay for college from personal sources if they attend a traditional college or university? Do borrowers default on their loans because the college they attend lacks quality or because their risk factors make them far more likely to do so?

A federal, across the board SUR database would decouple institution type from student demographics. Student record data would answer the question and allow public policy to be based on fact, not intuition or bias.

The Department of Education has proposed a third proxy measure of institutional quality, the gainful employment rule. The proposal calls for limited use of individual student records to determine the quality of programs at career colleges and other institutions with vocational programs. If the rule were implemented, student records would be linked to social security records to determine whether graduates' earning met or exceeded a pre-specified debt to income ratio. Other gainful employment program tests included use of SUR data to determine student loan repayment rates and the ratio of a borrower's student loan debt to discretionary income (the loan repayment ratio has since been dropped).

Promulgation of the original rule stalled when a federal judge blocked its imposition, finding that the government had failed to justify the provision requiring that institutions be able to demonstrate a certain level of student loan repayment. The Department of Education issued revised draft of the regulation in September 2013.[11]

While noteworthy that the proposed Gainful Employment Rule seeks to use individual student data to assess institutional quality, the effort is handicapped by the fact that it would apply largely (although not exclusively) to for-profit career colleges, and that it is not built upon a comprehensive, evidence-based

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[11] Paul Fain, "Now What?", Inside Higher Ed, March 21, 2013

model of data acquisition that would ensure objective analysis, rather than a narrow analysis based only on the relationship between student investment in college and their subsequent economic success. As proposed, the Gainful Employment Rule turns a blind eye to the ability of most postsecondary institutions to educate and prepare traditional and non-traditional students alike for careers and upward mobility. Although it uses individual student data, it limits school access to employment information, thereby compromising the transparency that a federal student record database should provide.

Addressing Student Privacy and Security Issues

Should a federal student unit record database be transparent? Concerns about student privacy and record security constitute primary arguments against a federal SUR database. While at first blush academia opposing more data and better research seems counter-intuitive, it should be acknowledged that privacy rights are as important to protect as they are easy to damage. Does college enrollment become one more excuse for an over-reaching government to monitor the interests, activities and movements of its citizens? These are legitimate questions and concerns that merit further scrutiny.

"Big Brother" fears are difficult to dismiss, particularly in an increasingly digital society where interest can quickly turn to intrusion. At the same time, it is difficult for educational institutions dedicated to intellectual inquiry and the pursuit of knowledge to argue that some doors must remain permanently locked. Taboos are the antithesis of the arts and sciences. Warning of over-reach by government agencies, privacy adherents claim that data at the institutional level – the status quo -- is good enough for research purposes, and that student level data is not necessary to make informed, evidence-based analysis of institutional effectiveness. It is a bit like arguing that a magnifying glass is a satisfactory substitute for a microscope.

  "The use of aggregate data has some limitations in comparison to [unit record] data, such as the inability to track the academic progress and experiences of individual students, and therefore to study the longitudinal enrollment of different types of students," says one National Center for Education Statistics study. NCES notes that the IPEDS system is incapable of measuring many of the trends in postsecondary education necessary for sound policy decisions.[12]

The upside social and economic benefits of a federal SUR database would seem to outweigh the downside harms to privacy rights, particularly in an era energized by social media—an era in which personal information is more freely exchanged than ever before. Privacy concerns regarding student records can be ameliorated if not eliminated, especially if:

- Federal law prohibiting the wrongful disclosure of personally identifiable, confidential information, including Family Educational Rights and Privacy Act (FERPA) and the Privacy Act of 1974, is rigorously enforced;

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[12] Alisa F. Cunningham, John Milam and Cathy Statham, "Feasibility of a Student Unit Record System Within the Integrated Postsecondary Education Data System," NCES, March 2005

- SUR data is released only to organizations able to demonstrate that they have adequate physical and logical security processes and methods in place;
- Students receive prior notification about how and when their data may be used;
- Students have the ability to opt out of SUR database inclusion and opt out provisions should be prominently and clearly stated;
- Students have the ability to review their personally identifiable information, to amend erroneous records and to appeal data in dispute;
- Requests for release of SUR data be accompanied by an acceptable justification from a research, academic or government agency and be subject to a complete and thorough pre-release review process;
- SUR data recipients agree to destroy or return data upon research completion.

As a report from Jobs for the Future notes, many states have been able to strike a workable balance between use of student unit records and privacy protections.[13] ACICS believes that the states' success can be replicated at the federal level. While states have done a good job at managing privacy concerns, the disparate nature of the state data holdings themselves explain the need for a federal SUR database. State level differences include who collects and governs the use of SUR data; the processes by which data are collected; and the number and type of institutions participating.[14]

At present, these state systems do serve as input to specific federal workforce programs. They do not, however, readily support broad inquiry or exploration beyond their program boundaries. In an economy in which college students are likely to transfer from school to school and workers are apt to change jobs several times in the course of a career, the ability of even the most ambitious legacy systems to capture macro patterns and trends is limited. Thus, while some limited SUR data sharing partnerships between state and federal agencies exist (the tracking of student loan defaulters is one notable example), the SUR data sharing relationship, including all types of postsecondary institutions, needs to be a major program goal, not a derivative benefit or secondary application.

Leveraging Technology

New technology innovations bolster the case for a federal approach to student unit records. Big data and data analytics are giving other sectors of the economy the ability to replace hidebound thinking with evidence-based, data-driven innovation that addresses markets in creative ways. Most of all, big data and analytics are helping organizations manage with facts and data, not intuition and inference. In the higher education realm, a quantitative approach to policy formulation, quality assessment, performance benchmarks, career development and placement, pedagogical effectiveness and much more would be nothing short of revelatory.

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[13] Jack Mills, "State Data Systems and Privacy Concerns: Strategies for Balancing Public Interests," Jobs for the Future, February 2005

[14] Molly Ott, "Protection and Accessibility of State Student Unit Record Data Systems at the Postsecondary Level," State Higher Education Executive Officers

The size and scope of data holdings was once limited by the capabilities of data base management systems. Data were narrowly defined and their use fit into tightly controlled applications. Systems could do nothing more than answer questions that analysts and programmers knew enough to ask.

Big data allows the organization to form, utilize and maintain vast holdings of disparate data. These data include structured records in existing systems, records acquired from third parties, and data gleaned from the Internet and social media sources like Facebook and Twitter. Big data allows businesses and organizations to collapse divisional silos and boundaries that block more holistic views. Data can be used to answer specific questions or illuminate avenues of inquiry. But big data and data analytics, operating on petabytes or exabytes of data, can also help researchers in visualization, prediction and discovery.

A college or university is a data rich environment—an environment in which analytical certainty about the combination of factors producing the best learning outcomes and most prepared students would trump supposition and guesswork.

A single process, academic advising, provides a clear example. For many traditional college students, the first two years of the postsecondary experience are spent either searching for a major or pursuing a pre-defined course of study for entry to a particular major. Are classes relevant to a particular major? Will a student be prepared to declare a major in the third year? Is the student's academic performance sufficient to enter a program? Is the academic advising of a particular student sufficient to improve the odds of his or her ultimate success? One university executive terms this transition from lower to upper division status "hand-crafted."

Elizabeth D. Phillips says that eAdvisor, a new, automated academic advising system at Arizona State University, allows the institution to offer a roadmap to curricular alternatives based on the student's experience and preparation. "The analytical framework not only allows advisors to chart a path for each student, but it enables the university to offer courses (with the necessary seats) that students must have in order to complete a major on time…Recent developments in computer technology and data-mining techniques permit a systematic analysis of student success patterns over substantial populations of diverse students. This allows for the development of criteria predictive of student success in each major. With these criteria available, the computer can match the performance of any individual student to the anticipated success patterns."[15]

The growing likelihood of students "mixing and matching" their postsecondary experience from instruction received in college classrooms, in traditional online courses, via MOOCs (Massive Open On-line Classes), through experiential-based training and other sources adds to complexity and makes the rationale for big data approaches that much stronger.   Extrapolations of data based on larger aggregates of student unit records (or a single, common federal SUR database) could help not only individual colleges and universities but university systems, accreditors, states, the federal government,

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[15] Elizabeth Peters, "Improving Advising Using Technology and Data Analytics," Change, the Magazine of Higher Learning, January-February 2013

college goers, and other stakeholders make more informed decisions about institutional quality and accountability.

Achieving Real Accountability

Imagine a world in which students can learn from the course, program and career choices of other students like themselves; in which colleges and universities can improve their administrative, operational and academic performance by comparing and contrasting themselves to similar institutions and to the institutions they most aspire to be like; in which professors can craft pedagogy and develop course content based on what learning styles work best with specific types of students; and in which higher education officials and policymakers can set rules and provide oversight based on real world experience rather than conjecture and subjective criteria. In moving to a postsecondary regime characterized by outcomes rather than inputs, SUR data is the necessary substrate for enlightenment.

For individual students, a federal SUR database would mean:

- The information necessary to perform "apples and apples" comparisons of schools' success in educating students most like themselves;
- New insights into roadmaps for career success and matching courses and programs to in-demand jobs and real employment opportunities;
- The ability to gain proven educational and learning supports during an academic career to improve the chances for success.

For institutions, a federal SUR database would mean:

- Views across the postsecondary landscape, unobstructed by state borders, institution types, disparate data definitions or record gathering, or data holder restrictions;
- Practices and methods based on empirical research, producing replicable results and improving the odds of successful outcomes;
- Tools for performing fine-grained, institution to institution comparisons and building meaningful performance benchmarks;
- A real opportunity to answer questions surrounding college tuition and return on investment to students and taxpayers;
- A system of metrics that would align student achievement and outcomes with institutional mission, helping to eliminate overly broad, "apples and oranges" comparisons.

For those involved in making laws and writing regulations that oversee postsecondary education, a federal SUR database would mean:

- A postsecondary education information system that truly reflects the conditions of education, filling the gaping holes now present in existing systems;
- A resource for understanding the depth and breadth of major trends and directions, such as the rise of non-traditional students in higher education, the embrace of new technology delivery

systems, such as MOOCs, and the acceptance of new credentialing alternatives, such as the Council for Adult and Experiential Learning;

- A mechanism for understanding that colleges and universities have different missions, building risk adjusted policies recognizing that fact, but imposing real sanctions on truly under-performing institutions;
- An ability to perform crosswalks between the volumes of graduations in particular program areas and the economic and workforce demand in those areas.

For the American taxpayer, a SUR database would mean:

- The quantitative data necessary to hold policymakers responsible for ineffective policy decisions and to seek policy adjustments based on real facts;
- A more vibrant, more competitive system of postsecondary education, more attuned to market demand;
- A more rational workforce better prepared to meet the current and future challenges of a global marketplace.

Accreditation Impacts and Implications

"Accreditation" is a formal, systematic process of institutional performance appraisal. Voluntary self-regulation, regular peer review, and an on-going commitment to educational excellence are critical to the process and goals shared by accrediting agencies. For more than 100 years, accreditation has been extremely successful in safeguarding the quality of American higher education. Past performance is no guarantee of future success, however, and accrediting agencies must be willing to grow and change with the times.

Reauthorization of the Higher Education Act represents an important inflection point and an opportunity for change.

A federal SUR database would provide powerful new metrics for voluntary self-regulation. Self-assessment is the foundation of robust accreditation. While an internal review is important and necessary, it is with the comparison with others that evaluation takes on its most significant meaning. SUR data would provide the benchmarks needed for schools to make these comparisons.

In addition to self-assessment, peer review provides an outside check on the educational quality and integrity of school programs. As with other industries and professions, peer review in higher education brings the weight of practitioners and subject matter experts to the assessment process. A SUR database would help peer review take place on an even more probing, analytical basis. Finer grained analysis would produce a clearer picture of school operations and outcomes, issues that need remediation, and the results of corrective actions. Such a database would also aid accreditors in determining the validity of current standards, in

exploring new avenues for quality and integrity assessment, and in predicting the impacts of proposed standards.

From the ACICS perspective, a federal SUR database would be a major step in a broader mandate shared by all accrediting agencies to assure the continued excellence of U.S. higher education.

Conclusions

Does U.S. higher education stand at the precipice of decline or the threshold of improvement and growth? Much will depend on the ability of stakeholders to answer fundamental questions about cost, benefits, relevance, effectiveness, access, quality and affordability. These questions cannot be completely answered with partial information or surrogate metrics. Unfortunately, too much of the conventional wisdom about higher education today is based on surrogates and proxies, leading to false comparisons and unwarranted controversy.

The education community may view student data as a figurative ark of the covenant, a collection too powerful or potentially dangerous to create or use. While privacy concerns present important care considerations, the direction of postsecondary inquiry must always be forward. Academia must never resist the opportunity to study itself and better understand the value of higher education.

The National Student Clearinghouse, a non-profit organization, tracks student enrollments and related information. NSC contains student records from more than 3,500 postsecondary institutions and nearly 99 percent of the student population. Participating colleges and universities submit data on student enrollment and awards. The information is used to verify enrollment and deferment status for financial aid, transcript ordering, and academic research into postsecondary enrollment and outcomes.[16] The NSC resource demonstrates that collection of student unit records is possible in a safe and secure manner, enjoying broad participation by colleges and universities. The success of the clearinghouse, created by the student loan industry in 1993, shows that a publicly funded and available SUR clearinghouse with broader range and larger national purpose could be built with privacy, security and broad participation in 2013.

Trusting in the ability of objective information to define a clear path and a better way, ACICS supports creation of a federal database of student unit records. The empirical data would help to strengthen and lend greater credibility to the enterprise of quality assurance in higher education.

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[16] http://www.studentclearinghouse.org/about/clearinghouse_facts.php