

“Assessing College Data:
Helping Provide Valuable Information to Students, Institutions and Taxpayers”

Testimony of Tracy Fitzsimmons, PhD
President, Shenandoah University
Winchester, Virginia

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Chairwoman Foxx, Ranking Member Hinojosa, and members of the subcommittee, I appreciate having the opportunity to appear today to discuss higher education data issues. I am Tracy Fitzsimmons and I am president of Shenandoah University, located 70 miles to the west of Washington D.C., in Winchester, Virginia—the top of the beautiful Shenandoah Valley.

Shenandoah University educates 4,000 students in its undergraduate, master’s and professional doctoral programs. Shenandoah is not a liberal arts institution, nor is it a pure professional school. Rather, Shenandoah offers its students the broad education necessary to be active and informed citizens, while also training those students for a specific career. The 68 degree programs at Shenandoah are housed across six schools: Business, Conservatory, Education & Human Development, Arts & Sciences, Pharmacy, and Health Professions.

In real-life terms, Shenandoah educates the students who will be the police officers and teachers and accountants of our communities; the nurses and physical therapists who will care for us as we age; the environmentalists and entrepreneurs who will compel our country to do more and better; and the performers of Broadway or the Kennedy Center who will touch our souls with their artistic performances.

Today, I represent not only Shenandoah University, but also the National Association of Independent Colleges and Universities (NAICU), a public policy association for non-profit higher education that represents more than 960 private, non-profit colleges and universities and more than 70 specialized independent college associations. NAICU has long been involved with issues related to the collection and use of data.

My thanks to you for holding this hearing. Having a PhD in political science, I think good data helps inform good decisions — both in the classroom and in Congress. And I think that government has contributed to quality data across American higher education. However, the question of data — what the government should collect, and how it should collect and use it — is central to education policy. As you consider this question, I urge you to keep in mind several questions about additional levels and means of federal data collection:

1. Will the benefits of new data requirements outweigh the costs?

There are already reams of data easily available to the public to help them make decisions about how to assess colleges in the higher education sector.

For example, many data discussions involve longitudinal data systems. These systems are being built in the belief that tracking individuals throughout their schooling and on through the workforce can assist in developing more successful educational and employment strategies. At the same time, they raise serious concerns about student privacy — a longstanding concern of NAICU. In addition, we believe that some current information is collected without a clear policy purpose, retained long after its purpose has expired, and used for unintended purposes. Too much data, or out-of-date data, only serves to confuse or mislead those who were the intended beneficiaries.

Frequently, data issues center on the large and growing list of disclosures that institutions are required to provide. Like regulatory kudzu, it seems that every new problem gets a new proposed disclosure, but none of the old ones ever go away. We are concerned that such excessive requirements place a great administrative burden on institutions — a burden that I and other presidents are certainly willing to bear if it serves a productive purpose. I will address this issue later in my testimony.

For now, however, you have asked me to consider whether it is possible and cost-effective to identify a limited set of data upon which everyone can rely in evaluating institutions? Can policy gains be made while also saving costs in red-tape and money to our universities, to our taxpayers and to our students?

2. In the effort to provide students, parents and taxpayers more data, will you implement measures that make it more difficult for colleges to give at-risk students a chance?

Using retention rates and graduation rates as a be-all, end-all measure of institutional worth could lead to this result. The best way for any college or university to increase its graduation rate is to enroll traditional, high-achieving students — you know to whom I refer: the 18 year-olds who have stable families, attended the best high schools, flew through high school with an A average, and have significant financial means. I, and other presidents, certainly want those students to succeed in college — and the odds are in their favor. But many of us also want students from the broad spectrum that makes up America to be able to have a chance at college....the 25 year-old single mother, the veteran suffering from PTSD, the C+ student who is bright and motivated but struggled to make good grades in high school because he was working two jobs to help pay the rent. Shenandoah, and many other schools, believe those students also deserve the opportunity to go to college. But *if Congress takes measures to position graduation rates as the key indicator of institutional value, then you will force my colleagues and I to narrow the range of applicants we accept.* Just this fall at Shenandoah, we drove two hours away to pick up one of our incoming freshmen students from a homeless shelter — his family had lost their home earlier this summer — and Shenandoah has committed to providing significant levels of financial support to him. But Federal rankings based on graduation rates might have led us to think twice. We also welcomed into our freshman class a student who is the youngest of six children, the first

in his family to go to college, from a household where Spanish is the primary language. Both of these young men had at least a B average in high school – and I believe in them – but I also know that both will face significant challenges in moving through college to graduation. But they deserve a chance at higher education. If you force colleges to play the graduation numbers game, we will think twice about admitting students who are not the absolutely best-bet to graduate.

Furthermore, are you assured of choosing the right measurements? Right now, for example, there is much attention paid to retention and graduation rates. Yet in fields such as nursing or physician assistant studies, completion of the degree program is not the key measure – the crucial measurement is how many of the students completing the program pass their board exams, because without passing they cannot practice in their chosen field.

3. Will your use of data push higher education away from independent thought and creative problem-solving toward equating value only with financial return?

A sound college education prepares our graduates not only to enter the workforce, but it also provides them with a deeper understanding of the world around them. *Focusing on employment earnings as the primary measure of value diminishes the deeper benefits of education, reduces the flexibility to address new educational needs, and ignores the very real contributions to society by those who choose to pursue lower paid service occupations.* Right now, in Virginia, the State Council of Higher Education is preparing to release to the public a website that lists Virginia’s public and private colleges according to how much money their graduates earn 18 months and five years after graduation. While I am pleased that my institution comes out high on the chart, there are many institutions of high educational quality that end up at the bottom of this list. I am vehemently opposed to creating and pushing such data sets to students and parents. What is the message? That those colleges who educate future hedge fund managers and physicians are somehow more valuable than those who educate our future ministers, middle managers, teachers and part-time-worker-stay-at-home-mothers?

4. Will your use of data shift the historical focus of need-based aid to students to a focus on institutional aid instead?

If institution-based metrics such as graduation rates or alumni earnings are used to assign federal “rewards and punishments,” will that mean a shift in federal aid to higher education away from individual students to the institutions they attend? Is that really the direction that we want to go in a country that traditionally has put high value on the individual? As the parent of young children, I know well that rewards and punishments induce – whether intended or not – certain behaviors. Is Congress certain that it wants to send higher education the message that if you don’t graduate all of your students, or if your graduates don’t end up in high paying jobs, then you will reduce the financial aid we can make available to students? If so, then the behavior you will induce will be a narrowing of the field of students that colleges see as “admissible”. In essence, colleges will be unable to “gamble” on high-need but high-risk students because their potential failure could jeopardize the government aid available to all other students.

5. Will your use of data fundamentally alter the role of the federal government in higher education — essentially federalizing what has been a pluralistic, local, and entrepreneurial network?

We have an internationally-respected system of education because it is diverse and dynamic; students from across the globe flock to study in the United States – even non-Ivy League institutions and those colleges tucked away in rural communities have international student populations in the 2 percent to 10 percent range. They come because America’s higher education system is rich in quality and diversity. If you create a system of rigid and well-defined data points, that diversity will begin to disappear as many institutions will feel forced to assimilate their programs and admissions policies to score well on the common data set. I caution you against creating a set of data that unintentionally will become the governmental version of the U.S. News & World Report rankings! *If institutions must adhere to a set of narrowly-defined priorities and measures the federal government establishes, they’ll do that, but lost in that approach will be the diverse models and creativity that have defined American higher education since before the nation’s founding.*

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While I do not agree with many of these new directions, I encourage you to have a purposeful conversation about where Congress wants our educational system to go. Similarly, I encourage you to actively reach out not only to researchers, but also to practitioners on college campuses to get their feedback on what really matters. As Albert Einstein famously said, “Just because something can be counted, doesn’t mean it counts.” I fear that many of the millions of us who work on college campuses are not actively engaged in, or even aware of, the profound policy conversation taking place in Washington.

The challenge here is in recognizing that the chosen information will drive policy outcomes in ways both intended and unintended. There is the potential to find ourselves in the dilemma best outlined by the age-old fable, *The Blind Men and the Elephant*. In short, it is the story of six blind men who each feel a different part of an elephant. Each comes to a different conclusion as to what they have touched (a rope for the tail, a spear for the tusks, etc.). Looking at narrow indicators of institutional performance could have the same misleading effect—especially when we apply those indicators to the diverse array of institutions in the United States.

Similarly, I fear some of the well-intentioned analysts advocating innovation in post-secondary education are unaware of the remarkable changes taking place on most college campuses. Technology is rapidly reinventing how, who, and where we teach. Colleges are offering new career programs and serving new student populations. And, more and more campus resources are being allocated to match the federal efforts in student aid, and helping to make college possible for our increasingly needy and diverse college population.

All of this innovation is happening in higher education because of the marketplace. The market has provided higher education with volumes of useful products and opportunities that drive our direction –

and in turn, many institutions and faculty have contributed to the development of those new innovations. We academics sometimes like to think that we are somehow outside of the market, or exempted from it. But in reality, the market is the most important driver of educational creativity and quality. Inside the academy, we know which faculty members are the most engaging professors, and students “vote” with their feet by registering, or not, for their classes. Similarly, if an institution is of poor quality, students and parents will figure that out – whether through social media or through the thousands of data points currently available to the public – and they will migrate to other educational options, eventually causing the weakest institutions to close. In addition to the market, the extensive process of peer-review accreditation in this country provides an important level of additional quality oversight.

In order to be effective, markets need transparency in information. Today, I am presenting to you—literally – reams of paper documenting the information that is readily and openly available to the public on just one institution – Shenandoah University. Will more disclosure requirements or an over-arching data set really add more to what is already there? Or, will it simply add another layer or a narrowing of the information available to students and parents as they attempt to navigate the higher education sector?

As the president of a not-for-profit institution of 4,000 students, I am proud of working in a field that I believe is essential not only to our nation’s future, but central to who we are as Americans. The way we approach education at Shenandoah reflects not only our national traditions, but the history and challenges of our region, and most importantly, the unique needs of our students. Shenandoah would be different if we were in California or Maine. Shenandoah would be different if we were a public or community college, or a purely liberal arts institution, or a research university, or an Ivy League university. Yet, I am proud of our place as one shining tile in our national mosaic of higher education, and I am equally proud of my colleagues in higher education who serve different populations in different ways. Together we reflect a high quality and diverse system that is unlike that of any other nation.

As a college president, I can also tell you that every decision you make here affects us profoundly on campus, in more ways than you can realize. If you tell me to improve my graduation rates in a certain way, or that you will judge Shenandoah by the earnings of our graduates, I am going to respond to that. But if this is done under a rigid national formula, bringing the broad swath of American postsecondary education under one rubric, I worry that you will unintentionally federalize a system that is strong because of its diverse and non-governmental foundation. And, ironically, not only will choice suffer, but quality will suffer as well.

I recognize the difficulty here. You see a broad taxpayer investment in student aid. You need to ensure it is well spent and well used. I have the fun part. I see the human face of that investment. I see the low-income, first-generation-to-college student who makes it because of our student aid partnership with the federal government. I *know* it is working, but you don’t have that on-the-ground view. So you need proof. But I worry that your proof could become codified in a way that makes it less likely that low-income student is given a chance.

This, I believe, is the real policy conundrum for this reauthorization. We all have the same goal, but our needs for evidence are different from the top than from the ground. The resulting requirements can also come at considerably higher costs to those of us on the ground.

In this regard, I have also been asked to address today two other aspects of the data question: burden and transparency. Specifically, if we could agree upon a narrow set of data points on which to establish institutional validity, could we then reduce some of the heavy regulatory burden and compliance costs for colleges that flow from federal, state and accreditor mandates? It is a question worth exploring, but one that I am not sure I can fully answer because it involves so many layers of independent decision makers, and so many entrenched rules.

Let me give you the campus view of just the federal role in this issue. I hear a lot of criticism from Washington that colleges are not transparent enough. For example, I was asked to address whether colleges should provide more *fiscal* transparency. From where I sit as a college president, we are drowning in fiscal transparency – and at today’s hearing I am leaving with you a stack of sheets representing just some of the data available right now to the general public about any public or non-profit private, two or four year, institution in our country.

In 2008, the IRS decided they, too, wanted more fiscal transparency and so revised Form 990, the mandated annual filing for all non-profits. The new form, which took several years to revise, includes an 11-page, 11-part core form, and 16 schedules. The many reporting changes affecting colleges include governance, compensation of officers, fundraising, public support, political activity, and related organizations. The changes necessitated a major additional workload on every private, non-profit college, and added considerable auditing costs.

I have with me today, Shenandoah’s Form 990. I will leave it behind, so you can look at it and tell me what you don’t know from reading this that you need to know....and recall that all of these financial data are available to anyone, since the 990s are public documents available on-line. Now that our auditors and CFOs are all trained on this, now that our compliance software is re-purchased and upgraded, are we to expect another new layer of fiscal transparency from the Department of Education?

The year 2008, when the new Form 990 went into effect, was a big year for new college regulations because it was also the year that the last reauthorization of the Higher Education Act became law. Attached is an executive-level introduction, *President’s Quick Guide to the New Law*, produced by NAICU for independent college presidents, to help us meet the massive campus-wide compliance requirements this legislation generated. The guidebook is just a bird’s eye view; for example, it includes virtually none of the changes made to the student aid programs, because our financial aid offices generally know how to handle those matters. Simply skim the book to see the kind of changes affecting areas beyond student aid, including campus police, technology officers, CFO’s, institutional researchers, and academic affairs -- and this in legislation that called for two studies of deregulation – one of which has not even been started.

So, this is the dilemma. Even when Congress tries to deregulate, we end up with the new requirements, but no relief on current requirements. And, if those new requirements were to measure us by narrow standards, and make our system of higher education less diverse, we would lose more than we gain.

I don't want to close without offering some thoughts on emerging ideas I see as having good potential. I think the federal government can play a positive role in consumer information. There is much conversation right now, at the national level, about how to ensure that students and families have some basic information on all colleges to help them find a "best fit" school. I love this idea because, like so many of my small-college colleagues, I believe my institution is a hidden gem. Shenandoah is just a little more than an hour away from Washington, and easily accessible, but I'm sure many of you never heard of my university before today. We have capacity to serve more students who might find our university a good fit, but I don't have a big advertising budget. I love the idea that the federal government might help prospective students find us.

However, let's look at how the current federal consumer transparency efforts are playing out. Just last week, a Senate committee began consideration of a bill that would require institutions to collect a whole new set of detailed data for veterans. I wholeheartedly support our providing information that helps veterans to make smart choices, but I fear that many of the current proposals will not have their intended effect. For example, we estimate that the new Senate requirements include almost 30 new items, several of which would have to be further broken down by program level. Nearly all of this differs from the information that is already being collected by the Department of Education.

Also last week the House approved its own legislation dealing with information for students who are veterans. The approach in this measure avoids many of the excesses of the Senate proposal, but is not without its problems as well. For example, it would require disclosure of median Title IV debt levels for all students at an institution, while another federal initiative is already calling for disclosure of median debt levels "for completers." Having two numbers for the same institution that will appear to most consumers to describe the same thing confuses more than it enlightens.

And both of these bills come on top of several other current efforts to provide more consumer information by the Administration. Colleges have been asked to sign on to the "Principles of Excellence" included in an executive order (EO 13607) dealing with veteran- and military-related education programs. Among other requirements, institutions agreeing to the principles must provide all military-related students with a new **Financial Aid Shopping Sheet** for the 2013-14 award year. Although a final version of the Shopping Sheet has yet to be developed, the Department of Education is already pressing colleges to provide it to all incoming students. The Shopping Sheet is not to be confused with the **College Scorecard** or the **Aid Offer Comparison Tool**, also under development. And, all of these are in addition to the **College Navigator**, the Department of Education's website intended to help consumers choose a college that best fits their needs.

My students have a term for this: TMI!

Not only is it too much information, but nearly all of these proposals are based on the various factors policy analysts *want* students to use when making a decision on where to go to college – rather than the ones they actually use.

Let me tell you how the college selection process goes from my vantage point: high school students, often with their parents, decide how far away from home they are willing to go for college. They get advice – solicited or not – about which college would be best for them from relatives, high school teachers and counselors, from peers, from Facebook “friends.” They narrow their search in so many ways! Some already believe they know what they want to study, so they look for a school that has their intended major or career path; while others feel more comfortable with a broad, liberal arts environment. Some settle on a place like Liberty University because it is strongly Christian and others lean toward Swarthmore because it is deeply academic. University of California at Berkeley attracts those interested in research – or often those with a particular political preference. Northern Virginia Community College is the obvious pathway for many in the region who want or need to live at home and save money while also presenting them with lots of opportunities. At Shenandoah, we find that students initially look at us and apply to SU because of our location, and also because of the variety and quality of academic programs. But in the end, those who choose to attend Shenandoah often say they do so because of the warmth and personal touch and faculty support they experienced while visiting campus. In effect, our 9:1 student-to-faculty ratio meant nothing to them until they experienced it. There is no data set that you can establish that will capture the personalized-approach or research-intensiveness or student-life or religious-commitment that in the end compels students to attend and strive to graduate from a particular institution.

My point here is not to disagree with the view that there are some important data points we might place in front of perspective students for an informed college selection. Rather, my point is that the selection process includes some very important factors that cannot be measured. And just as importantly, if we don’t keep it simple, we have accomplished nothing but more costs for colleges and more confusion for the student.

There are some better examples out there. In 2007, NAICU took all the ideas on consumer information swirling in Congress during reauthorization, and put them before focus groups of perspective parents and students. Attached is the simple, two-page profile on Shenandoah University that resulted from that process. It combines both elements of interest to policymakers and the information families told us they wanted. We are one of 827 NAICU schools that are signed up to participate in U-CAN. I’m citing this example not to promote U-CAN but to make two points: first, that less can be more, and second, that the needs and interests of real-world students must inform the development process or the end result can be the type of all-but-the-kitchen-sink approach we see emerging from the veterans committees.

I’m afraid I may have raised more questions than provided answers today. If so, it is because of where we are in the process. The data question is really the tip of the iceberg of the more profound underlying questions I have suggested. *I want you to know that college officials care deeply about our nation’s educational future, and we are deeply appreciative of how much Congress has done to support our low-*

income students' dreams to go to college. We welcome this conversation and are appreciative that you have asked us to be part of it.

I understand how tight the federal budget is. I am even more aware of how tight the budgets are for so many of our students' families. The funding to make their dreams possible does not come easily, nor without painful tradeoffs, but it does make a profound difference in so many lives. We need to ensure that we are accountable to the taxpayers who provide our students with this critically important support. However, we also must ensure that any accountability measures are appropriate and helpful, and don't have unintended consequences.

Let me thank you again for all you do for the students at Shenandoah University and for students across the country.