

**Statement from Dr. Michelle Asha Cooper, President, Institute for Higher Education Policy, on the  
Postsecondary Institution Ratings System (PIRS / College Ratings System)**

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In order to respond to the economic and societal needs of the 21<sup>st</sup> century, the U.S. postsecondary education system must consistently demonstrate “value,” that is, providing access to a high quality education at an affordable price for *all* students. A well-designed college rating system can promote value in three important ways: 1) to offer college information in a more student-relevant way, (2) to inform policy development and institutional accountability, and 3) to support institutional improvement efforts.

We at the Institute for Higher Education Policy support the idea of a college ratings system, in theory, but recognize that the technical details and application of this framework are essential. We believe that the college ratings system must centralize access, equity, and value. While it is important to include measures that are deemed important by professionals in the field, the ratings system must ensure that the selected measures are relevant to the needs and circumstances of today’s students, especially those from underrepresented groups.

Providing students with more useful information and in a user-friendly way could act as a form of soft accountability, allowing students to “vote with their feet.” In addition, given the immense student and public investment in postsecondary education, policymakers also need information on equity, costs, and outcomes to protect and leverage that investment. We recognize that it may be difficult to achieve the consumer information and accountability goals in one ratings system and encourage the development of a separate ratings system for each goal. Both systems should inform institutional improvement efforts. While the outcomes evaluated should include measures such as transfer, graduation, employment and earnings, a comprehensive evaluation of college quality also would consider indicators that assess learning and contributions to the social good. However, we recognize that it may not be feasible to incorporate those difficult-to-quantify measures into a ratings system.

We appreciate the opportunity to provide feedback on the U.S. Department of Education’s (ED) framework. In the coming weeks, we hope to work closely with them and others across the postsecondary community who desire for this ratings system (or, as we recommend systems) to be developed and applied in such a way to optimize its impact. For our part, we hope to offer technical assistance on the measures included in the framework and will push for the inclusion of other measures, including important, yet omitted indicators of equity – such as access and completion indicators for underrepresented minority students, specifically African-Americans, American Indians, Asian Americans and Pacific Islanders, and Hispanics/Latinos.

We believe that the ratings system can be a positive catalyst for change and action if developed and disseminated effectively. Another tool on a website will not be sufficient to inform student choice or institutional improvement effort. To guide this type of change, ED must engage directly with the right people – those who are on the front lines working with students, both recent high school graduates and adults. It is unrealistic to expect students alone to understand the complex statistical tables and formulas that will make up the ratings system. ED also must work with institutional practitioners, especially those at under-resourced institutions who barely have the staff capacity to report on these data, let alone the capacity to analyze and act upon it. As ED moves forward, it will be absolutely essential to coordinate efforts with these individuals and others to ensure that data use and application are optimized. After all, better data alone cannot change behavior or outcomes; that’s what people can do.