Chairwoman Foxx, Ranking Member Hinojosa, and members of the subcommittee. Good morning and thank you for the opportunity to testify.

My name is Christine Keller and I am the Vice President of Research and Policy Analysis at the Association of Public and Land-grant Universities (APLU). I am also the Executive Director of two voluntary national accountability and transparency initiatives: the Voluntary System of Accountability (VSA) College Portrait and the Student Achievement Measure (SAM).

Over the past decade, federal investment in higher education has grown, public demand for a postsecondary degree has risen, and tuition costs to attend a college or university have increased. For public institutions state appropriations are at historic lows. The combination of these factors has led to demands for more evidence on the value and meaning of a college degree from a variety of constituent groups.

Access to clear, meaningful data has become increasingly important to answer questions and provide essential information for higher education stakeholders – for student and families to make more informed decisions about where to attend college; for policymakers to determine allocations of public resources and evaluate institutional effectiveness; and for college leaders to facilitate innovation and successful student outcomes.

Efforts by the federal government and states along with voluntary collective efforts by institutions and associations provide crucial lessons on data collection and reporting that can help shape future policy and practice for the benefit of all parties. I am pleased to be able to share with you this morning examples of some of the key lessons we have learned while leading the VSA and SAM projects.
VOLUNTARY SYSTEM OF ACCOUNTABILITY (VSA) COLLEGE PORTRAIT

The Voluntary System of Accountability is an initiative by public four-year universities to supply basic comparable information on the undergraduate educational experience through a common web report, the College Portrait. (The “VSA” is the overall initiative while the “College Portrait” is the common website where the information gathered for the VSA are reported – www.collegeportraits.org.)

Developed in 2007 with the direct involvement of over 70 public university leaders, the VSA is jointly sponsored by APLU and the Association of State Colleges and Universities (AASCU). We currently have 270 participating institutions.

The VSA was a collective response to calls from external stakeholders for understandable and comparable data on student outcomes. These calls were epitomized by the Commission on the Future of Higher Education, known more commonly as the Spellings Commission, which was especially focused on a standard way to measure/report learning outcomes across all types of institutions.

Of the accountability initiatives that were created in response, the VSA is the only national initiative that publicly reports direct evidence of student learning. As I will discuss in more detail later, this requirement led to some of our greatest challenges and continues to provide lessons as we work with our institutions to evolve and refine our reporting requirements.

Successful student outcomes depend on the effectiveness of the overall learning environment for students and on the availability of quality faculty and programs. That’s why the College Portrait provides key information for students, families, and policymakers on the full undergraduate experience. Data on the cost of students to attend, the availability and amount of financial aid awarded, the array of degree programs offered, and campus experiences available to students such as opportunities to participate in undergraduate research, internships, or to study abroad, are included. To promote consistency, the data reported on the College Portrait use common definitions and reporting guidelines from nationally recognized data sources such as Integrated Postsecondary Data System (IPEDS), National Survey of Student Engagement (NSSE), and National Student Clearinghouse (NSC). Data are reported using a standard format and presentation, making it easy for stakeholders to compare information from one campus to another.

While we have learned many lessons since the VSA began in 2007, two lessons in particular illustrate the ability of a voluntary initiative to experiment, innovate, and adapt to participant feedback and changes in the broader higher education landscape: 1) the reporting of student learning outcomes and 2) the creation of a new student progress and completion measure.

Reporting of Student Learning Outcomes
The reporting of student learning outcomes within the VSA began with a four-year pilot project that measured outcomes in a specific way - the learning gains in written communication and critical thinking between first year and senior year students as determined by three standardized tests. At the time, this value-added methodology was relatively new in higher education, but represented an opportunity for all institutions to demonstrate the learning of their students in a comparable way, regardless of the composition of their student body.

A comprehensive external evaluation near the end of the pilot demonstrated that this first attempt at measuring and reporting student learning outcomes, while a good start, presented challenges in terms of the usefulness of the results for campuses and in communicating the results to stakeholders in a meaningful way. Several changes were recommended by the evaluators, which the VSA Oversight Board subsequently approved. Most significantly, the options for assessment instruments and administration requirements were expanded to give colleges and universities more flexibility in selecting an instrument that fit best with their full campus assessment program. The diversity of campus needs in combination with their existing assessment plans meant that there was not a single approach that would provide information for all external audiences or would deliver actionable data to support internal campus improvement efforts across all institutions. Under revised reporting requirements, institutions can now choose from one of four different assessment instruments and two options for administration – the original value-added methodology or a benchmarked approach that allows for comparison to national norms.

One of the reporting options added was the VALUE (Valid Assessment of Learning in Undergraduate Education) Rubrics that the American Association of Colleges and Universities developed in partnership with teams of faculty and other higher education professionals from more than 100 institutions between 2007 and 2009. The VALUE Rubrics offer a common framework for faculty to evaluate the quality of student learning for 16 essential learning outcomes, including critical thinking, written communication, and analytical reasoning. The evaluations are based on samples of student work produced within the context of their courses, making it easier for campuses to use the results to evaluate and guide program improvements.

These adjustments were made in collaboration with institutional leaders and assessment experts within one year – a timeline that would have not been possible if the requirements had been mandated by legislation.

A New Student Progress and Completion Measure

For the second lesson learned, the original teams developing the VSA recognized the need for a more comprehensive metric for student attainment to report more outcomes for more students than the federal graduation rate. The Success and Progress Rate was originally created in partnership with the National Student Clearinghouse specifically for use within the VSA. The Success and Progress Rate is a
more complete measure of outcomes for bachelor’s degree seeking students. The measure tracks the continued enrollment and completion of not only first time students who start and finish at the same institution, but students who attend multiple institutions before they graduate. The federal graduation rate misses this huge and growing percentage of students.

While the Success and Progress Rate has clear advantages for providing a more complete picture of student outcomes and attainment, it was a new idea in 2008 and many campuses were initially uncertain about whether to embrace it. The Success and Progress rate was the first time that enrollment and degree data from the National Student Clearinghouse (NSC) was reported in aggregate for public accountability purposes - previously the NSC data was primarily used to aid in enrollment verification for students with loans and to verify degrees conferred for employers. During the first few years of the VSA, many institutions worked closely with the National Student Clearinghouse to ensure the data they were reporting for enrollment and degree verification was consistent with and appropriate for this new application.

The development and testing of the Success and Progress Rate by the higher education community within the VSA helped build trust in both the methodology and data sources. The Success and Progress Rate is now an established and trusted metric within four-year public universities and is increasingly used by participating institutions to provide more complete evidence to stakeholders. This pioneering work led directly to the creation of the Student Achievement Measure (SAM), which goes beyond the public higher education sector.

In sum, the VSA champions the importance of providing information in a comparable and understandable way to external audiences. It provides a space for institutions to experiment with new metrics for progress and completion and for applying learning outcomes assessments across a large group of institutions. The VSA continues to demonstrate the benefits of a system that is flexible, agile, and can adapt to changing information needs and evolving data availability.

**STUDENT ACHIEVEMENT MEASURE (SAM)**

The Student Achievement Measure was created with one goal in mind - to provide a more complete national picture of student progress and completion for all institutions than the current federal graduation rate, which is increasingly outdated and shows only a subset of the outcomes for today’s mobile and diverse students. SAM brings together two models for reporting more outcomes for more students – the Success & Progress Rate from the VSA and a complimentary measure developed as part of the American Association of Community Colleges’ Voluntary Framework of Accountability, the six year Progress and Outcomes Measure.
More specifically, the federal graduation rate tracks only first-time, full-time students who start and finish their educational career at their first institution. We know that only one-third of postsecondary students currently fit the “traditional student” profile and over half of bachelor’s degree recipients attend more than one institution before earning their degree.

Currently, SAM has 559 colleges and universities participating and is able to show the outcomes of a half million more students than the federal graduation rate. SAM is a cross-sector initiative and is open to all institutions - public, private, two-year and four-year. We continue to conduct outreach efforts to recruit more participants and to publicly demonstrate the value of a more comprehensive, realistic measure of student outcomes. In fact, if all eligible institutions were to use SAM, we would be able to track the outcomes of 1.9 million more students than the federal graduation rate.

I invite you to visit the [SAM website](http://www.studentachievementmeasure.org), and look at the data institutions have already posted to see the value of this initiative. As an example, at Appalachian State University, 69 percent of first-time freshmen who started in Fall 2008 graduated within six years. The federal graduation rate reports only that outcome, leaving the outcomes of nearly 30 percent of first-time, full-time students unknown and potentially considered “drop-outs.” Utilizing data from the [National Student Clearinghouse](https://nces.ed.gov), the SAM metric shows that an additional 10 percent of students graduated from another institution and another 9 percent are still enrolled at Appalachian State or another institution – leaving the status of only 12 percent of students unknown. In short, SAM includes the outcomes of nearly 20 percent more first-time, full-time students at Appalachian State than the current federal graduation rate. This is a much more realistic picture of student progress. Equally important, the federal rate does not include any of the transfer students Appalachian State receives while SAM is able to track the progress and success of the nearly 900 transfer-in students who began in 2008.

**SAM Six-year Outcomes for Appalachian State University**

SAM includes full-time and part-time students, those entering postsecondary education for the first time and those who have transferred from other institutions. It includes two models – one for bachelor’s seeking students and one for associate/certificate seeking students. Within each model, outcomes for each group of students are tracked over the same period of time. There are five possible outcomes for
bachelor’s seeking students: 1) graduated from the original institution; 2) transferred/graduated from another institution; 3) still enrolled at the original institution; 4) transferred/still enrolled at another institution; and 5) status unknown. There are four possible outcomes for associate/certificate seeking students: 1) graduated from the original institution; 2) still enrolled at the original institution; 3) transferred to another institution; and 4) status unknown.

SAM is sponsored by all six of the presidential higher education associations – APLU and AASCU as well as the American Association of Community Colleges (AACC), the Association of American Universities (AAU), the American Council on Education (ACE), and the National Association of Independent Colleges and Universities (NAICU).

SAM is endorsed by nine other education organizations: the Association of Governing Boards of Universities and Colleges (AGB), the College Board, the Education Delivery Institute (EDI), the National Association of System Heads (NASH), the National Center for Higher Education Management Systems (NCHEMS), the National Institute for the Study of Transfer Students (NISTS), the State Higher Education Executive Officers Association (SHEEO), the Coalition of Urban Serving Universities (USU), and the Western Interstate Commission for Higher Education (WICHE).

LESSONS LEARNED FROM THE VSA & SAM

Overall, the VSA and SAM have reinforced the importance of publicly reporting meaningful and accurate data for students and families to make better decisions, for policymakers to fairly evaluate performance and target resources, and for institutions to support evaluation and innovation. The lessons learned from these projects offer guidance to others considering how to address the diverse data needs of higher education stakeholders within a complex system. I will highlight four of these lessons particularly pertinent for discussions during HEA reauthorization.

Lesson 1: Build a Foundation of Trustworthy Data

Reliable data is the foundation for any reporting system regardless if the system is created by an association, state, or the federal government. The underlying data have to be of reasonable quality and sufficient coverage. It is true that the perfect metric or data source rarely, if ever, exists. However, it is equally true that the data needs to be reliable enough to represent a realistic set of outcomes for today’s students and reliable enough for users to make good decisions. When a data source or metric no longer meets this standard it should be replaced. As an example, the federal graduation rate has become outdated and is no longer sufficient to meet the information needs of users as it is limited to providing outcomes for shrinking subset of students.

Lesson 2: Leverage the Data Already Collected and Reported
The VSA taught us that too much data can be overwhelming to external audiences and a burden for institutions. The data collected should be as parsimonious as possible. This is particularly true of information required as part of federal reporting systems. Consider the vast array of data already collected through IPEDS and displayed on College Navigator, the College Scorecard, and the College Affordability and Transparency Center to name a few. Add to the mix data collected and displayed as part of state and national accountability initiatives and it is no wonder that users are overwhelmed or confused.

It is important for those of us who collect and disseminate postsecondary data to work together to better align data definitions, enhance data comparability, and minimize the reporting burden. Before adding other data elements at the federal level, the question of what data elements to remove should be considered as well as what information is already reported through other avenues such as state or national systems. Federal data policy should leverage the work and recommendations of collaborative efforts already underway.

**Lesson 3: Report Meaningful, Limited Information at the Federal Level**

To insure the most relevant information is readily available to all students, APLU recommends minimizing the federal data collection to focus on a few, key data elements related to access, affordability, progress and completion, and post-collegiate outcomes.

The specific metrics endorsed by APLU include: student progress and completion rates similar to SAM, median net price by income level, post-college employment and enrollment in graduate school, and repayment rates. Links to additional contextual information on institutions’ websites, state dashboards, or national data initiatives would supplement and enrich the federal collection of the core elements (e.g., the [Voluntary System of Accountability](https://www.voluntarysystemofaccountability.org/), the [Voluntary Framework of Accountability](https://www.vfaf.org/), and the [University and College Accountability Network](https://www.ucanetwork.org/)).

**Lesson 4: Educate Users on Key Metrics**

Traffic patterns within the College Portrait website showed that some of the data we believe are most critical for making informed judgments about colleges and universities were rarely viewed. In other words, the lesson is that it is not enough to simply display data or metrics on a webpage. Users need guidance on what types of metrics and data are important and why.

Therefore, data-related policies should support the effective and targeted dissemination of data to users so they can effectively use the information in their decision-making. Considerable and sustained efforts must be invested to ensure such information reaches the targeted audiences, in particular students and families from underrepresented and disadvantaged backgrounds. Possibilities for increasing awareness of such data could include partnering with high schools or college access organizations and conducting social media campaigns.
CLOSING

Thank you for the opportunity to offer some of the lessons we have learned through the VSA and SAM in our efforts to meet the data needs of external stakeholders. I look forward to your questions.