

NEW APPROACHES TO PUBLIC DISCLOSURE

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It's our own fault we are in a jam about public disclosure of information. It's our own fault we are being drubbed from all quarters about our lack of accountability, about our lack of transparency, about our failure to be forthcoming.

Nevertheless, after a decade and more of increasing calls for greater accountability and greater transparency, colleges and universities in the United States are responding with new approaches to public disclosure. There is a long way to travel down this new road. Central to the new approach is a shared, professional commitment to public disclosure, the basic elements of which are only just emerging.

Origins of the Current Predicament (In Brief)

Let me briefly – too briefly – recount the story of how we worked ourselves into this predicament. In my understanding, it's a story of abdication of responsibility.

A few decades ago, colleges and universities began to embrace marketing without adopting any professional norms to restrain or guide such marketing. Colleges and universities began making unrestrained and extravagant claims about themselves in an effort to attract student applicants. Anything goes became the watchword. In the marketing of colleges and universities you will find all kinds of claims and assertions. Each college and each university presents itself as the best choice for all students. If we look at such marketing claims (as we should) through the lens of our professional, academic norms of evidence, careful argument and fidelity to truth seeking, we should blush.

At the same time, colleges and universities have been historically slow to voluntarily disclose relevant, systematic information about themselves. By and large we have voluntarily disclosed what we wanted to disclose, and that was only information that was favorable to us: information that showed us in a good light.

Into this context stepped two very different actors with very different claims on our attention: the U.S. federal government and for-profit publishing ventures. Let us note that neither has the same commitments and values that higher education professes at its professional best.

Beginning at the same time that the federal government began awarding financial aid through the Higher Education Act, The federal government mandated that colleges and universities receiving such aid report some information about their activities to the Department of Education. Originally called HEGIS, this reporting system is now called IPEDS, the Integrated Post-Secondary Education Data System. Though the reporting

required today sprawls beyond this, the central legitimate purpose of IPEDS is to ensure that colleges and universities receiving federal financial aid are handling such funds in a fair, honest manner that is consistent with lawful purposes. IPEDS was *not* designed, that is, to help students make wise choices about colleges. (For more on IPEDS, including a good overview on the kinds of data reported, see <http://nces.ed.gov/IPEDS/about/>.)

An array of for-profit publishing houses saw a market opportunity to help students paw their way through the competing claims of colleges. They began publishing guidebooks presenting parallel information about hundreds, even thousands of colleges. *Peterson's* began publishing guide in 1966 – just about a year after the first Higher Education Act. It was joined by a host of other college guides: *Barron's*, *The Fiske Guide*, and many, many more.

In 1987, *U.S. News and World Report* entered this already crowded field with a decisive innovation: the idea of ranking colleges. It has now been joined by a host of other for-profit publishers who produce rankings: *Princeton Review*, *Washington Monthly*, and many others. A great deal has been written about why ranking colleges is a disservice to students trying to choose a college, but that's not my topic today. I am interested in where we go from here.

What is the information source on which these various published guides rely, both those that rank and those that do not? Broadly speaking, they rely on two sources. On the one hand, they rely on the data that colleges and universities report to IPEDS, which is, of course, public data. And on the other, they rely on whatever other data they can get colleges to report or which they can otherwise compile. (Think, for example, of *U.S. News and World Report's* reputational survey administered to college presidents, and academic and admissions deans.) While IPEDS data is collected in accord with explicit, common standards, a great deal of this other information on which the for-profit guides and rankings rely is not collected in a way that passes any test of professional adequacy for collecting and reporting data.

Colleges and university presidents (like me) howl about the dangers and damages done by rankings, but honestly we have to acknowledge we have done this to ourselves by abdicating the responsibility, several decades ago, to adopt and follow professional norms in disclosing information about ourselves.

Over the past several years there has been two more turns of the wheel.

One is the coming of the web. Now all of this information, good and bad, can be provided electronically and in a variety of alternative formats or templates. You can access a wealth of information about colleges and universities on the web, through a number of sophisticated templates. *U.S. News and World Report* has one as does *Princeton Review*. These require a payment for access. The College Board has a good one, called College Search. Even the United States Department of Education has one. Originally called COOL (College Opportunities On Line) it is now called College Navigator, and provides direct access to IPEDS data (see <http://nces.ed.gov/collegenavigator/>)

Two other web templates worth mentioning provide a more analytic focus on colleges and universities. [Economicdiversity.org](http://www.economicdiversity.org) provides a look at colleges and universities through the lens of the economic and ethnic or racial diversity of their students (<http://www.economicdiversity.org/>). You can use it to see which higher education institutions are genuinely serving low income students or minority students. College Results Online, a template provided by the Education Trust, focuses on the graduation rates of

colleges and universities (<http://www.collegeresults.org/>). The data source for both is IPEDS, but they perform some simple analysis to focus on these key issues of diversity and retention.

The second turn of the wheel has been a heightened chorus of criticism of colleges and universities for failing to disclose data. These criticisms have been much in evidence in the Congress over the past few years as it has struggled to reauthorize the Higher Education Act, and they were in evidence again during the work of the Spellings Commission (<http://www.ed.gov/about/bdscomm/list/hiedfuture/index.html>).

Colleges and universities have felt aggrieved by these criticisms, and rightfully so from one perspective. Colleges and universities disclose a wealth of information, now easily available, through IPEDS and in response to requests from publishers of guides and rankings. In addition to IPEDS, many colleges and universities cooperate with the Common Data Set. Begun in 1995, it is described as “a collaborative effort between publishers and the education community,” and is an effort to have the publishers ask common questions to the higher education institutions. Its sponsoring publisher participants today are *Peterson’s*, *U.S. News and World Report*, and the College Board. Printed out, the Common Data Set is 27 pages of questions with a nine page appendix of definitions (<http://www.commondataset.org/>).

But wait, there’s more! Our Director of Institutional Research keeps a spreadsheet of questions publishers of guides and rankings ask us to answer beyond the Common Data Set. It currently totals 687 additional questions we are asked to answer, many asked even by the sponsors of the Common Data Set. *U.S. News* alone asks us to answer an additional 176 questions (and 38 more for a separate disclosure on financial aid). *Peterson’s* asks a modest six additional questions, and the College Board asks 66 more. “Not providing data?” Colleges and universities ask. “Heavens we are disclosing a mountain of data.” Yet still we hear the criticisms.

And deservedly so, because a great deal that should be available – especially to help students making wise decisions about college choice – is still not available. But here’s a good sign: colleges and universities are beginning to rethink their decades old abdication of responsibility to disclose useful information in a professional manner.

Now I have cleared the ground for my main topics: first, to show you some new templates for public disclosure of information, templates that are the collaborative work of colleges and universities themselves; and second, to sketch some issues that I think the colleges and universities need to confront to make good on the promise of this new approach to public disclosure.

Main Elements of a New Professional Approach to Public Disclosure

Just in the past few months, we have seen the launch of two new templates. Both are the work of higher education associations. That is, they are collaborative efforts of colleges and universities themselves.

The first to launch was the National Association of Colleges and Universities (NAICU) College and University Accountability Network, or U-CAN (<http://www.ucan->

[network.org/](http://www.voluntarysystem.org/)). It is graphically lively, easy to navigate, and displays a wealth of publicly disclosed information about the several hundred colleges and universities that are so far participating.

The second is the College Portrait, a joint endeavor of the National Association of State Universities and Land Grant Colleges (NASULGC) and the American Association of State Colleges and Universities (AASCU) called the Voluntary System of Accountability, or VSA (<http://www.voluntarysystem.org/>). It, too, is graphically lively, easy to navigate, and displays a wealth of publicly disclosed information. At this point we can see College Portrait templates for not quite 20 universities that agreed to pilot test a ‘beta’ version of the template.

What are we seeing when we look at these templates? What information is disclosed?

They both contain a wealth of information about an array of topics, including characteristics of students, retention rates, degree programs, campus life, student services, campus safety and the like.

One main source of the information provided is our old friend IPEDS. Some information also comes from other federally mandated reporting such as information about campus safety mandated by the Clery Act. Yet more information comes from the Common Data Set or from the Carnegie Classification Data.

Both templates also allow institutions to provide information of their own design and specification about their programs and opportunities. These allow institutions to provide information tailored to their mission and described in their own words. Because of the common format, a prospective student could see what several different colleges say about community service opportunities, about study abroad, or about disability services. There is no standardization of this information, but there is a common location on each template so students with a particular interest in the topic know where to look.

Third, both templates provide interesting new information about college costs. Both provide ‘sticker price’ information about costs, but both try to go beyond that. The NAICU U-CAN template has colleges provide the “average net tuition for aided undergraduates.” The College Portrait provides a place for a prospective student to compute “a cost estimate for students like you.”

Fourth, the NAICU U-CAN provides a place for institutions to report on their accreditation. A college could use that to report simply on the fact of their accreditation and who provides it; but a college could (and Earlham does) provide the full text of its accreditation report and its self-study. I don’t think I see a similar feature on the College Portrait.

Fifth, and this is the most interesting innovation of all, the NASULGC/AASCU College Portrait provides a place for universities to publicly disclose systematic data about both student experiences and perceptions and about student learning outcomes. You won’t find these in IPEDS or in the publishers’ guidebooks or rankings. Universities are given some latitude about how to report these, but it’s not a free-form opportunity. Universities can report on student experiences and perceptions using one of four professionally designed and administered instruments: the National Survey of Student Engagement (NSSE), the

College Student Experiences Questionnaire (CSEQ), the College Senior Survey (CSS), or the University of California Undergraduate Survey. For student learning outcomes, universities can choose among the Collegiate Learning Assessment (CLA), the College Assessment of Academic Proficiency (CAAP), or the Measure of Academic Proficiency and Progress (MAPP).

The NAICU U-CAN does not specify that such systematic information about student experiences and perceptions and about student learning outcomes will be provided, but there is enough flexibility that a college could provide such information via the template if it wanted.

I see in these two templates (about both of which I am an enthusiast) the glimmerings of a new, professional approach to public disclosure. I want to underscore what an important development I think they are.

At the same time I see a host of issues that deserve our fullest and best attention: an agenda that will take us a number of years to work through. To lay out that agenda, I first need to articulate what I see as the *underlying norms* of this new professional approach.

Shared Professional Responsibility for Public Disclosure: Candidate Norms

In these two templates, I think we can discern some professional norms guiding their design and implementation by colleges and universities. Both NAICU and (especially) NASULGC/AASCU have articulated some of their thinking behind the design of their templates that is worth reading. Here I want to offer five simple-to-state but difficult-to-carry-through candidate professional norms that I believe we should embrace in further work on these templates.

You may well disagree with these norms, but my main goal today is to draw us all into a robust discussion about the professional norms that should guide our public disclosure of information. These are norms that particularly inform disclosure to help students make decisions about college choice. In observing these norms, we would also still have the legal obligation to submit data to governments for purposes of accountability (e.g. IPEDS).

Here are the five candidate professional norms for public disclosure:

1. Colleges and universities have a professional obligation to disclose information that is relevant to students making decisions about college choice. Such disclosure should be a shared, relatively common obligation among institutions, but should also be relative to the mission of individual institutions.

Disclosure should be done in common formats so prospective students can easily find similar information about a range of institutions, but in recognition of the plurality of missions, we should give colleges and universities some latitude in the information they provide, and considerable latitude in disclosing distinctive or unusual features.

2. Information should be disclosed according to published professional standards, and should observe norms of validity, reliability and auditability.

Especially when data is provided, students should be able to know what the data do and do not mean; they should be assured that data with the same label is counted the same way among the variety of colleges that interest them; and they should be able to

trust the accuracy of the data. (To accomplish this last one, we may need to design a way to externally audit such data.)

3. An institution's disclosure should include information about student learning.

Because institutions have different missions, we certainly should not mandate any instruments that all colleges and universities should use. But all institutions should adopt some way to disclose systematic information about student learning, especially learning that is central to their mission.

4. An institution's disclosure should include information about genuinely representative student experiences.

Again, there should be a plurality of ways of reporting this because of the variety of missions.

5. An institution's disclosure should include information about the actual prices students (or their families) will pay, and should include information about the likely debt burdens actual students will bear at graduation.

This fifth obligation speaks to the single most rancorous and poorly understood issue in American higher education today.

I don't know about you, but these five norms seem fairly straightforward to me. They are norms we are working to embrace at Earlham. (In an addendum, I have included an overview of Earlham's current approach to information disclosure.) At the same time, these norms seem like a fairly tall order. Actually fulfilling these norms will take a great deal of hard work by all of us. So, finally, let me turn to some challenges in fully living in to these norms.

Some Challenges Regarding the Shared Professional Responsibility to Disclose

Challenge one: we – and I mean we professional educators – need to design and implement additional measures that address a range of student learning outcomes. The NASULGC/AASCU College Portrait can provide a place for reporting data on student learning only because of significant research and development of student learning outcome measures over the past decade.

For too long, higher education abdicated its responsibility to demonstrate that students are actually learning. In the available instruments we have some promising approaches, but especially because of the *range* and *complexity* of what we expect students, and because of the *plurality of missions* in U.S. higher education, we need many more sophisticated instruments for assessing learning. Each such instrument will take a decade or so and considerable investment to develop.

Challenge two: we – and again I mean we professional educators – need to find better ways of disclosing information about student learning and characteristic student experiences. The problem is not just that we need better instruments; we also need better ways to disclose results that are meaningful.

Let me just focus for a moment on results from the National Survey of Student Engagement (or for that matter the CSEQ, the CSS or the UCUS). We tend to report data from such instruments as arithmetic means. But we know that variation of experience *within*

an institution is considerably greater than variation *across* institutions. Reporting arithmetic means for an institution may not be a good guide for a student in the midst of college choice. Two institutions with the same mean on a particular aspect of student experience may mask a huge difference: at one, all students may have a roughly similar experience; at the other, half the students may have a terrific experience and half a rotten experience.

Or take data reported about class size. One problem is that we have no well articulated, well observed professional standards for reporting class size. (Do we count discussion sections? Independent study courses? Etc.) Beyond that, we tend to report data where the course is the unit of analysis: what percentage of classes are above a certain size. But don't we really want to report this with the student at the center: what's the modal class size of the modal student? To this point, we've let the publishers set the standards for reporting and they are simply inadequate.

Challenge three: we need to find ways to disclose information about the actual prices students or their families will pay, not just sticker prices. Sticker prices are a very inadequate guide to what students will actually pay because of financial aid. It's an amazing feature of our higher education system that people of different means pay different amounts of money to attend the same institution, but we simply have not found good ways to disclose what a particular student might pay simply and straightforwardly. The best we can do is "Ask us and we will figure it out for you." And sometimes, "If you ask again, you may get a better answer."

I have already noted innovations in the NAICU and NASULGC/AASCU templates on this third challenge. I have not had a chance to look carefully at the NASULGC/AASCU cost estimator, but we all know the independent institutions will have a harder time with this challenge. Asking institutions to calculate an "average net tuition" (that is, net of financial aid) may be an improvement over sticker prices, but it's hardly adequate. No family may pay the "average;" some will certainly pay more and some less. We need to find a way to do better.

Challenge four: we not only need to reject participation with the rankings exercises of for-profit publishers, we also need to do better than mere comparisons. If our templates disclose information that students compare side by side, they may well think that every difference is meaningful. They will want to enroll at the highest scoring institution on every dimension. And since no one institution will do best on every single comparison, students will be at sea about which differences matter more. And they may not even realize that some differences are essentially meaningless. This leads straightforwardly to

Challenge five: we need to find ways to embed the public disclosure of information in approaches to providing guidance to students to help them use information to find an institution in which they can thrive educationally. It is not responsible to leave students at sea in a morass of information and data when we, as professional educators, know some things about what should matter in college choice. We don't have to force our views of what should matter on students, but neither should we abdicate that responsibility.

Some templates for disclosure and college choice have an implicit guidance system. The College Board's College Search website has a Matchmaker function (<http://collegesearch.collegeboard.com/search/index.jsp>) that first asks students to pick a category to start their college search: type of school, or location, or campus life, or activities and sports. Suppose a student picks "type of school." She will be given further choices: two

year or four year? public or private? religious affiliation? Do we really think students know what these choices mean? Do we really think they know what lies underneath these differences in terms of their educational future? I don't. It's a consumerist, superficial approach to guidance. I think we can and should do better.

Addressing each of these challenges will require sustained work among faculty and administrative leaders in higher education. The starting premise has to be that we should voluntarily regulate our marketing behavior by shared professional norms. We can still compete for students, but the competition has to be restrained by shared professional norms. Let's be clear, there are only two basic alternatives to such shared professional norms. Option one is unrestrained competition, with the likely intrusion, unwelcome, of additional for-profit actors. And option two is further government regulation, and such regulation is likely to become more onerous and less sensitive to mission differences.

If we accept the premise that we need to develop shared professional norms around public disclosure, we have to recognize one additional challenge.

Challenge six is quite different from the others: what organizations will we choose to oversee our development of and faithfulness to these emergent professional norms on public disclosure and the resultant challenges that arise from embracing these norms? Who is going to oversee the hard work of developing new instruments for assessing student learning? Who is going to oversee the effort to find better ways of reporting characteristic or modal student experience? Who is going to help us find ways to audit what we report?

I salute NAICU and NASULGC and AASCU for developing their new templates. I hope they have ushered in a new era. But I doubt they are the right organizations for the work going forward on some of these challenges. We need to find or found organizations to care for and oversee the professional norms about public disclosure.

And I will close with one final question, to which I do not know the answer: do some of these challenges provide tasks for accreditors, like NEASC?

ADDENDUM: EARLHAM COLLEGE'S COMMITMENT TO PUBLIC DISCLOSURE

At Earlham, we have been discussing what our commitments are to public disclosure. Below are five framing considerations for a new approach we adopted this past summer, and following that are the web pages for some of our most important kinds of information we disclose.

Framing Considerations for Earlham's Approach to Public Disclosure

All of the following such be framing considerations in developing a new Earlham approach to information disclosure.

- (1) *We want to be transparent.* Earlham's understanding of itself as an independent, public-serving educational institution inclines us to make publicly available a great deal of

information about ourselves. We do recognize some limits on transparency: confidentiality of information about individuals, considerations of competitive strategy, and considerations of undue burden in disclosing too much. Our default presumption is to publicly disclose as much as possible of the information that we regularly assemble for our own internal purposes. In addition, requirements of compliance with federal or state law (or requirements of accreditation) may lead us to disclose additional information we otherwise would not choose to disclose.

- (2) *We want to stay focused on our mission.* We want to be sure that the information we disclose provides a rounded picture of the college that we actually are. That is, we do not just want to disclose the same kinds of information that other colleges and universities will because this may make us appear to be a generic institution. Rather, we want to provide information that gives substance to our mission. We need to think actively about what kinds of information disclose who we really are.
- (3) *We want to disclose data only in accord with the professionally responsible standards for collecting and sharing data.* Data that we disclose is likely to be used in comparison with data disclosed by other institutions. Because of this, we want to follow commonly accepted professional standards for the collection and reporting of information, and we want to make sure that there is readily available information about these professional standards.
- (4) *We want to be sure to include data on student learning.* Among the data we provide should be data about student learning. In NSSE and CLA data we have such data to disclose.
- (5) *We want to make data easy to understand by non-professionals.* We already have a great deal of data available on the Earlham website, but most of this would be difficult to find and difficult to understand for someone not experienced in the use of data. We may want to provide simple, summary data at a first level together with an opportunity to see more extensive, more complex data for those who want to go further. We probably want to provide some prose guidance to how to use the information we provide.

IPEDS	http://nces.ed.gov/collegenavigator/?q=Earlham&s=all&id=150455
Common Data Set	http://www.earlham.edu/~ir/cds/index.html
Accreditation	
Self study	http://www.earlham.edu/selfstudy/
NCA Report	http://www.earlham.edu/publicaffairs/content/excellent/nca_report.php
Student Characteristics (CIRP)	http://www.earlham.edu/~ir/cirp_trends/cirp_trends.htm
Student Learning	
NSSE Results	http://www.earlham.edu/~ir/surveys/nsse/nsse_cover.html
CLA Results	http://www.earlham.edu/~ir/cla_index.html
Alumni outcomes	
Baccalaureate origins	http://www.earlham.edu/~ir/bac_org_06.htm
College Results Instrument	participating this year
Earlham in NAICU U-CAN	http://members.uacan-network.org/earlham

