



## **Cover to Open Letter to President and U.S. Congress**

**January 29, 2014**

Today, the chancellors and presidents of the University of Wisconsin System, the Technical College System, and the Wisconsin Association of Independent Colleges and Universities—the public and private, nonprofit colleges and universities of Wisconsin—released an open letter to the President of the United States and the U.S. Congress indicating their united support of President Obama’s vision to once again make the United States the world leader in the percentage of its population with a postsecondary degree.

“We are in complete agreement that student achievement, access, and affordability should drive the future of American postsecondary education and that students and families deserve to have the information they need to make an informed decision as to which higher education institution will best fit their unique interests and needs.”

The chancellors and presidents also expressed deep concern that proposals in the administration and Congress to create a Postsecondary Institution Ratings System (PIRS) could undermine the achievement of that vision by: limiting the choices students have when determining which institution to attend; reducing financial aid for low income, adult, and place-bound students; and causing redundancy and inefficiency in the data that Wisconsin’s public and private nonprofit universities and colleges already make readily available to potential students and their families.

The presidents and chancellors noted that the current federal higher education data system could benefit from more robust information. They also expressed concern that the proposed rating and ranking system will thwart innovation because of pressure to “game the system.” “We are early supporters and adopters of innovations such as competency-based education, prior learning assessments, career pathways, concurrent enrollment, apprenticeships, career and technical education, MOOCs, and other online innovations. We support regulatory waivers for experimental approaches that aim to promote high-quality, low-cost innovations in higher education.”

Finally, we are concerned that proposals to use Pell Grants, or other student aid, to reward or punish institutions based on their U.S. Department of Education (USDE) ranking undermines student choice and affordability.



**AN OPEN LETTER TO THE PRESIDENT OF THE UNITED STATES  
AND THE U.S. CONGRESS**

**POSTSECONDARY INSTITUTION RATINGS SYSTEM (PIRS)**

On behalf of the chancellors and presidents of the University of Wisconsin System, the Wisconsin Technical College System, and the Wisconsin Association of Independent Colleges and Universities – the public and private, nonprofit colleges and universities of Wisconsin – we write in support of once again making the United States the world leader in the percentage of its population with a postsecondary degree. We pledge to work with you to ensure that student achievement, access and affordability drive the future of American postsecondary education.

We write at a time when we acknowledge that higher education is facing significant challenges. Throughout time, we, as Americans, have believed that anyone who makes the effort should be able to rise into the great middle class, and that higher education is the ticket to getting there. Higher education has always been viewed as the great equalizer, and today that role is in jeopardy. We believe we can all agree that both access and affordability of higher education must be a national priority – and that it is imperative to think about how we do that. We question, however, whether the proposed Postsecondary Institution Ratings System (PIRS), will have any positive impact on access and affordability of higher education. It is against this background that we offer the following comments.

First, we believe that the proposal to tie federal financial aid allocations to college ranking would radically undermine the principal focus of the Pell Grant program. Institutions serving underrepresented, low-income and/or non-traditional populations, who receive the greatest financial and academic benefit from federal financial aid, could be disadvantaged through the potential loss of access to financial aid. More students at these institutions pursue their degree on a part-time basis, for example, typically resulting in a longer than average time-to-degree. A worst-case scenario could result in these students being unable to receive the full Pell Grant amount, which could keep them from enrolling or persisting in college. Indeed, this proposal would punish students rather than institutions by channeling students to institutions, regardless of whether the institution has the programs that meet their college or career aspirations.

Second, we agree that innovation in higher education is critical and efforts to create new funding mechanisms, new delivery models, and more innovation should be encouraged. In Wisconsin, like elsewhere, we are committed to delivering quality online, residential, and hybrid courses, certificates, and degree programs. We are early supporters and adopters of innovations such as competency-based education, prior learning assessments, career pathways, concurrent enrollment, apprenticeships, career and technical education, MOOCs, and other online innovations. We support regulatory waivers for experimental approaches that aim to promote high-quality, low-cost innovations in higher education. Rating and ranking systems by definition drive to standardization as the basis for comparison, thus, reinforcing the status quo.



Third, we affirm the importance of transparency and of disclosure of information to students and parents. Moreover, rather than creating a new, and potentially redundant, one-size-fits-all data system, we need to make better use of the data that we already have and are available. Every public and private nonprofit college and university in Wisconsin currently provides comparable, readily accessible information on admission criteria, the financial aid application process, and cost of attendance. The federally mandated net price calculator is prominently displayed on our websites. Each institution provides information on admissions and enrollments, and data on student populations, faculty qualifications, graduation and retention rates, as well as student life, career and internship opportunities, class sizes, and many other academic, financial, and campus life features. All of this information is publicly available and easily accessible to allow for data-driven student choice among the abundance of postsecondary opportunities available in Wisconsin and across the country.

We submit that the U.S. Department of Education should improve the Integrated Postsecondary Education Data System (IPEDS), which is the core postsecondary education data collection mechanism through the U.S. Department of Education. Currently, there are limitations to the IPEDS data. IPEDS, for example, includes data for first-time and full-time students, but not data from part-time students or students who enroll in more than one institution, both increasingly common practices.

Ensuring that more Americans have access to the opportunities and benefits of higher education is important to all of us. We welcome the opportunity to work with you to ensure that a pathway is available for all students to succeed and for the United States to once again lead the world in the percentage of its citizens with a postsecondary degree.

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