November 29, 2011

American Association of Community Colleges
Statement on the Report of Committee on Measures of Student Success

On behalf of more than 1,100 institutional members, the American Association of Community Colleges (AACC) commends the approval of the final report of the Department of Education’s (ED) Committee on Measures of Student Success (CMSS). The committee has executed a thorough and balanced analysis of the measurements that ED uses to evaluate community colleges. Among other things, it has found that ED’s metrics substantially misrepresent the performance and many of the achievements of community colleges. The committee’s report goes on to advance recommendations for both public and private actions to better capture the activity and impact of community colleges.

The committee’s most important recommendation is to urge ED to calculate and publicize a single completion rate that includes both those students who receive degrees and certificates and those who subsequently enroll in another institution of higher education for which the prior institution provides substantial preparation. This is required by the Student Right-to-Know statute but has not been implemented. The CMSS report states that a “combined, unduplicated graduation and transfer rate would present a more complete picture of successful outcomes for two-year institutions.” AACC has long maintained that the exclusion of transfer from the federal graduation rate has created a grossly distorted, and overly negative, picture of community college performance, given the centrality of transfer preparation to the community college mission. In fact, the community college completion rate would immediately increase to 40% from the current 22% if this single recommendation were adopted.

The report also reinforces the common understanding that today’s community college students often take longer than 150% of the “normal time” to complete, which is the Student Right-to-Know standard. This does not reflect the family and work commitments facing many students—32% of community college students have dependents and 84% work. A longer timeframe is needed.

Many of the CMSS’s suggested measurements and methodological recommendations are consistent with the Voluntary Framework of Accountability (VFA), a private accountability effort that has been under development by AACC for more than 2 years. Both the CMSS and VFA support incorporating part-time students into the graduation rate measures (although as a discrete population), extending the time that students are given to count as completers as described above, and disaggregating data into critical subpopulations.

The CMSS report also emphasizes the necessity for institutions and states to have access to state wage records and related databases that would enable them to better track students into the world of work. The inability to do so blunts the benefits of many accountability systems. The report notes that, ideally, these employment data systems would be shared across state lines. The report also makes constructive suggestions using earnings data generated through the gainful employment regulations. The report underscores that tracking systems are needed that will allow community colleges to know at which institutions their former students have subsequently enrolled. The lack of comprehensive data in this regard hobbles accountability efforts.

The committee shows sensitivity to the high costs of data collection and reporting and the inefficiencies involved in the current patchwork of accountability frameworks. Community college officials across the country remain troubled by the diversion of resources from students to unproductive, similar-but-different reporting requirements. The report also
recommends that the federal government provide greater technical assistance to institutions in complying with some of these federal reporting requirements.

Some of the report’s recommendations require reexamination. AACC opposes the creation of a separate cohort of students needing remediation. While there is no doubt that developmental students face significant obstacles in completing their programs, and thus substantially lower graduation rates, insuperable methodological obstacles exist in defining a discrete, broadly comparable category of such students.

In addition, successful transfers should not be limited only to those community college students who subsequently enroll in a 4-year institution; lateral transfer to a 2-year college is frequently a pathway to achieving educational success. Furthermore, transfer to a 4-year institution can often be into a 2-year program, thus eliminating the significance of the distinction.

Overall, however, the committee has ably discharged its duties and has done community colleges across the country a great service. AACC urges the secretary of education to act with dispatch to implement many of these key findings. AACC expects to play an active role in this process.

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