O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 12:42 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I am totally opposed to the Department of Education's proposed rating system because it would:
Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support
Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.
Use poor data for high-stakes decisions: The Department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.
Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The Department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 6:54 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Punishing higher education institutions is the wrong way to ensure high-quality education.

The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions. The department's proposal would:

1. Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support.

2. Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

3. Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

4. Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 8:50 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Graduate earnings absolutely does not show the effectiveness of a university program. This will only make schools divest from programs in teaching, social work, and the humanities. With less invested in these programs students will not have the resources to get the education and experience they need for their career, which will create generations of unprepared and low performing graduates.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): revangelista@cps.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 9:34 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: My impression of the new system as a general comment is that it is not necessary. Measures and policies are developed with good intention to inform people but then because of too much information or because data definitions are slightly different, the information loses its usefulness and causes confusion for intended audiences. It can be misconstrued. Metrics geared to highlight community college success metrics are overlooked altogether. For example, the community college specifically could be negatively impacted by the information, as a degree completion is not always the end goal for a community college student – it could be a job skill upgrade or a course. For the intended- and unintended- audiences who could come across "ratings" data, there is no or little context for what the numbers mean and how it specifically reflects on a community college vs. the various education types out there. The word "rating" in a! nd of itself carries assumptions about definition with the user. In addition, institutions already allocate many resources to create data and information per state and federal requirements and this is challenging enough with decreasing resources. As a result, there is less time to do internal success research and more time going to report. Colleges are severely impacted by unfunded mandates to create more data. There is also an inflated assumption about this new data being used to make decisions about college; there are many sources of familiar and useful information available. Overall, the whole concept of creating a ratings system is not needed. More attention and resources should be spent on educating people about the current information collected and shared and helping teaching people to be better consumers. The right decision is to stop creating new reporting- without fixing or deleting things that are not working and bolstering things that are. Resources should be all! ocated to the colleges to produce any new information.

Constituency: Other (specify below)

Other Constituency (*if supplied*): Higher Education Administration

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Jennifer Zienty (b)(6)
Sent: Friday, February 06, 2015 1:24 PM
To: College Feedback
Subject: rating institutions of learning

Dear sirs,

The following entry was composed on your website which then failed to send it. Hopefully this works better!

It is not the responsibility of government to 'rate' our higher education. Our current obsession with accountability by testing, rating, checklisting, etc. does nothing to improve learning and would eventually harm access to higher learning (by reducing our options). Generally speaking, students get out of college (and high school) what they put into it. Institutions and teachers facilitate their learning by developing curriculums, determining the best resources to expose students to this curriculum, and providing assessments so the student can determine how well he or she is learning the skill or gaining the knowledge. But the actual learning is the responsibility of the student. The reason everyone has so much difficulty developing assessments in the education field is because education does not fit a business model. Nor does it fit a scientific model. The natural resource being used here are human beings, not a static piece of ore or wood. Each human being reacts differently to the process applied to it, thus creating no measurable standard product.

As a retired special education teacher, I spent years attempting to perfect the IEP process; crossing every t and dotting every i, changing the way it was written every time new guidelines came along (and there were many). The evaluation of the effectiveness of our school's program consisted of auditing these documents. Yet noone ever came to observe our program, to see what it was doing, or how the written IEPs were being implemented. The same is true of testing. One of my colleagues often compared the constant obsession with testing to weighing the baby every day and lamenting the lack of weight gain without making sure the baby was being fed properly.

To be sure, some data is helpful to anyone making a decision. Too much data, irrelevant data, and ignoring the human factor will not help.

Sincerely,
Jennifer Zienty

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 1:36 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The department has outlined a plan to rate colleges and universities based on several outcome-based metrics, with the goal of tying these outcomes to funding through federal student aid. And while the department has acknowledged that its plan is not fully formed, the details we do know are disturbing.
The department has identified several data points it wants to collect for this system; much of its plan is either faulty or emphasizes the wrong outcome, and there are some glaring omissions. It wants to skip collecting race or ethnicity data, which will make it impossible to track racial and ethnic disparities. One of the metrics the department would like to use is graduate earnings, but as we know from our own lives, those who work in public service make less than they would in the private sector. This could create a perverse incentive that encourages institutions to divest from programs in teaching, social work and the humanities in order to pursue a higher rating. And the department wants to look at graduation rates by using data in the Integrated Postsecondary Education Data System, which only counts students who are first-time, full-time students, even though we know that this definition covers fewer than half of all students, and even though this measure fails to ackn! owledge the diversity of the missions of our higher education institutions. Yet, at the same time, the plan largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and valueless degrees.

And finally, what the department has released—after nearly two years of talking about it—is only an outline. It acknowledges the complexity of the task it is attempting and is asking for input on what factors it should consider as it further develops the ratings system. Yet although so much uncertainty exists, instead of using this time to reconsider the value of creating this plan, the department continues to move ahead in an effort to have the system in effect for the 2015-16 school year, with the goal of tying the ratings to funding decisions for the 2018-19 school year.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 1:43 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Rating colleges is a wholly bad idea! Individual college students are responsible for their own learning, and they alone should be held accountable for their individual actions. No faculty member or institution can possibly ensure variable student factors wholly out of their control. For example, many students who choose to work over 30 hours a week spend less time succeeding in courses and end up graduating more than four years later. Many freshmen are not ready for the rigors of the college and end up dropping out no matter how much faculty and staff try to help them. Many students fail to avail themselves of using campus tutoring, writing centers, counseling services, etc. Many students no longer read required readings in courses (whether online or off), much less buy textbooks anymore. ETC!

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 2:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: "…the Department set out to design a ratings system that is clear, fair, and focused on a few key critical measures of institutional performance…"

Instead, cribbed the plan that has been a demonstrable failure for K-12 graders.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 3:10 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Education is the backbone of our future. We should be supporting measures for improvement not punishment.

Constituency: Member of the Public

Other Constituency (*if supplied*): former student, parent of former students

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 3:08 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: February 5, 2015

Robert Gomez
Director of Higher Education Outreach
Office of Communications and Outreach
US Department of Education

Dear Mr. Gomez,

Ferrum College supports and endorses the forthcoming comments of the National Association of Independent Colleges and Universities (NAICU) on this important college scorecard issue, and we greatly appreciate this opportunity to respond on behalf of our institution in particular.

The true measure of a college's worth is in the enduring strength of its mission rather than in data snapshots. Ferrum was founded in 1913 for literacy outreach and to "serve the underserved" in this Blue Ridge Mountain region. During our 100+ year evolution from training school to 2-year junior college to 4-year baccalaureate degree granting institution, our mission has always been one of opportunity, accessibility and affordability. Today's students of promise come from rural Appalachia as well as throughout Virginia and the entire country. With a large part of Ferrum's student population being first-generation, approximately 60% are Pell Grant eligible, and diversity is nearly 35%. Our institutional commitment to student success comes in many forms, including providing significant institutional financial aid to the majority of our students. Successful Ferrum alumni echo the refrain that "we owe it all to Ferrum for giving us a chance when no other school! would," and "we wouldn't be where we are today without Ferrum." They are inspired by our motto, "Not Self, But Others."

Ferrum, along with similar institutions, including HBCU's (historically black colleges and universities), the "Yes, We Must Coalition" institutions with more than 50% Pell Grant students, and others that serve today's new student majority, is being targeted for our century long mission of serving such "students of promise." The proposed legislation to implement a federal "Scorecard" and rating system is based on cherry-picked data and artificial value judgments for measures of success. Those of us in this sector encourage accountability but we must be evaluated on the good works we accomplish rather than penalized on the disadvantages many individual students often struggle to overcome. Our faculty and staff provide multiple support mechanisms to improve each individual student's persistence and completion. We value those faculty, staff, alumni and friends who are committed to faith-based education of students in "mind, body and spirit," ensuring! that we have an informed, culturally-aware, socially-minded and civically engaged citizenry.

Ferrum is accredited by SACS (Southern Association of Colleges and Schools) and fares well in recognized core requirements and assessment standards such as quality of faculty, student learning outcomes, academic programs, library holdings, institutional integrity and financial viability. Like other NAICU members, we collectively believe that, as President Obama has stated, "In America, our diversity is a strength, not a weakness." In addition, Ferrum College, along with the presidents of forty-nine Virginia public and private colleges and universities, sent a letter in July, 2014 to the Virginia Congressional Delegation, the U.S. Secretary of Education, and the Governor of Virginia stating our "serious reservations about" ratings and scorecards. The

responses we have received to date, from Congressmen Robert Hurt and Bob Goodlatte, are in strong support of our position.

A concern of all fifty Virginia college presidents was that "Institutions serving low income or non-traditional populations would be disadvantaged under the current proposal." Furthermore they stated, "We are also mindful that there is a clear correlation between family income and graduation rates. Institutions enrolling students from lower income backgrounds generally have lower graduation rates and would be penalized by the proposed rating system." Their conclusion was, "A one-size-fits-all rating system fails to acknowledge the unique missions of various higher education institutions in America....We feel the proposed rating system will result in negative unintended consequences and harm many of the students we seek to serve in Virginia." This collective statement underlines the importance of maintaining the focus on this country's democratic mission that all Americans are deserving of the opportunity for a college education. It is sadly ironi! c that the scorecard enthusiasts who want to "advocate" for students of need and promise disparage many of us who have strived to achieve these same goals for over a century.

Mr. Gomez, I invite you to visit our campus to meet our minority and need-based students and see firsthand how implementation of this plan could irreparably harm the very students who, without institutions such as ours, would not be able to achieve the American dream of a college education.

Sincerely,
Jennifer L. Braaten
President, Ferrum College

Constituency: Other (specify below)

Other Constituency (*if supplied*): Ferrum College President

User E-mail (*if supplied*): president@ferrum.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 3:05 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I oppose the "New System of College Ratings" because it has been tried before in grade and high schools where it failed miserably. There is no reason to expect a diifferent outcome by using it as part of a college standard!

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:57 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The following features of the Department's proposed rating scheme have come to my attention:
–The same data types will be collected for all colleges (e.g., a music school will respond to the same prompts as a vocational college),
–The data to be collected is incomplete (e.g., only full-time student graduation rates, no part-time students).
–The data will be assessed using a common rubric with all colleges treated equally regardless of their individual missions.

A rating scheme with these features cannot accomplish what the President has requested. I ask that the Department re-evaluate its plans.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): fteti@ccsf.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:37 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The future of this country is dependent on an educated public. All efforts must be made to make sure this
happens. As a member of the general public I am concerned. Higher education is one aspect of education. There are many who would benefit from other forms of education and training. Please include all, starting from pre-school education.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:36 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Average salary is a poor criteria by which to judge teaching efficacy.

In particular, various fields have radical salary disparities, not to mention the public sector versus private sector distinction, that skews this data beyond utility.

Stepping back, the bigger picture is that we should fund education programs that educate their students and instill in them a love of learning. Perhaps looking at future education enrollment of those students – do they take the GRE and go on to grad school? Do they take further classes on their own time? – is a better way to evaluate the programs.

Constituency: Student

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:27 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The President directed the U.S. Department of Education to develop and publish a new college ratings system by the 2015-16 school year that would expand college opportunity by recognizing institutions that: excel at enrolling students from all backgrounds, focus on maintaining affordability, and succeed at helping all students graduate.

In response, the Department set out to design a ratings system that is clear, fair, and focused on a few key critical measures of institutional performance, while accounting for the diversity and complexity of the nation's rich system of higher education.

Based on extensive consultation with stakeholders and experts, the Department has now released a draft framework for the ratings system for further public comment. We will continue to refine the ratings system over time based on user and institutional experience, input from the field, and the availability of additional data.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:26 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This rating system seems designed to punish educational institutions for societal ills. Using largely meaningless data to justify funding allocation is simply misguided. Draconian policies such as this will have negative ramifications for education and society that we can't even anticipate. We have been using the same data driven process for eight years in secondary education in order to close the achievement gap and it has been a complete failure. It has only forced districts to allocate funds wastefully in ways that don't benefit students and hinder teachers' ability to do their job well. These destructive, corperate driven policies have go away before they do any more damage to our educational system at every level.

Constituency: Other (specify below)

Other Constituency (*if supplied*): High school Teacher and Parent

User E-mail (*if supplied*): kodishd@mpsct.org

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:20 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please make sure you are not focusing on he wrong things. This method of accountability didn't work with K-12 why use it with higher ed? This is not the time to move in this direction. Chose wisely.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:10 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The form available on the Department of Education website for submitting comments on the new ratings system for higher education "failed" to submit my comments. I therefore submit them through the following email. Please make them part of the public comment on the proposed rating system for higher education. Thank you.

As I understand it, the new ratings system for higher education relies on the same sort of "accountability system" developed for K-12 which has resulted, not in better education for underfunded or minority school districts, but rather in a for-profit charter school industry bent on undermining fundamental educational standards and teachers' unions. The new ratings system for higher education is not intelligible, not well-contructed, still in outline form, and has dubious purposes. Like the K-12 system, it encourages by exclusion for-profit schools which exploit student financial aid and blight higher educational opportunities with substandard outcomes. Moreover, using metrics such as graduation rates and salaries upon graduation skew to results with which not everyone would agree, such as devaluing careers in public service or training in the humanities. Education is not an "industry" and these metrics do not belong in the evaluation of any level of educatio! n.

Thank you for your attention to my views.

Professor Wendy A. Fitzgerald, Retired

Constituency: Other (specify below)

Other Constituency (*if supplied*): Law Professor, Retired

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 4:48 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The new system of tracking graduation rates based on first time full time freshmen is racist and discriminates against the poor. Students at urban colleges are typically 80-90 percent transfer students, single mothers, and students who are working while going to school. These students graduate, but not at the same 6 year rate as 18 year old white freshmen because they have children and financial pressures from work. Look at the data. The graduate rates as proposed by the government do not track the success of these students and fly in the face of the students who the community college pipeline is designed to help –the poor and nonwhite students who need the most help. The poor will lose their scholarship and become part of a permanent underclass. African Americans and Latinos will eventually have to rise up in protest against this discriminatory proposal.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 4:58 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The department has identified several data points it wants to collect for this system; much of its plan is either faulty or emphasizes the wrong outcome, and there are some glaring omissions. It wants to skip collecting race or ethnicity data, which will make it impossible to track racial and ethnic disparities. One of the metrics the department would like to use is graduate earnings, but as we know from our own lives, those who work in public service make less than they would in the private sector. This could create a perverse incentive that encourages institutions to divest from programs in teaching, social work and the humanities in order to pursue a higher rating. And the department wants to look at graduation rates by using data in the Integrated Postsecondary Education Data System, which only counts students who are first-time, full-time students, even though we know that this definition covers fewer than half of all students, and even! though this measure fails to acknowledge the diversity of the missions of our higher education institutions. Yet, at the same time, the plan largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and valueless degrees.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 5:09 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please don't Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 6:51 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please, explain how it is that you are recommending programs that have failed at the K to 12 levels for institutions of higher learning. How about a little imagination?

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 7:02 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I oppose the Department of Education's new college rating system for the following reasons:

Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 7:18 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please include rape statistics in College Ratings systems. I was raped on my college campus. I did not consider this an option when choosing schools. Had I had this information, it would have made a huge difference in my college choice and where I chose to spend a hundred twenty thousand dollar investment.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 7:25 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Don't punish schools whose successes don't fit into a bubble sheet. Don't rate universities with the similar faulty metrics that are being used in K-12. Be mindful of the mission of the school and its students (ethnicity, economic strata, gender). Reward innovation that works, even if it can't be measured in a simplistic way. Be sure the for-profit schools aren't just mills turning out students with debt that can't get a job in their field. Calculate graduation rates by suing data in the Integrated Post-secondary Education System. I graduated from Northeastern Illinois University, NEIU, in 1965, with no debt. I was in the first class to graduate under the new curriculum which was innovative. We majored in K-3 or 3-8 education, learning HOW to teach, plus a second major, a subject area so we knew CONTENT to teach. This got me my first job in teaching. Then I got a masters at another public university, Governors S! tate University IL, which got me a job with 50% more salary and responsibility, which I had for 18 years. Within that 18 years I also earned a CAS, which increased my expertise in the job I held. I chose this over a doctorate, because I wanted to be better in my current position in K-12, rather than become a professor in a university. After retirement I taught English in China for 2 years to students who were the first persons in the family to go beyond 6th grade, off the farm where the only equipment was a hoe.

Constituency: Member of the Public

Other Constituency (*if supplied*): retired educator

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 7:44 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I teach at a wonderful community college that serves New York City. Our students are mostly the first in their families to attend college, and they often come from minority groups. They have pressures on them to work and go to school, and take care of their families. Thus it's unfair to penalize us if our graduation rates are low unless all those things are taken into account.

Instead of penalties to the colleges, why not give students who are working hard a tuition break, help with pressures, counseling and free tutoring?

I am concerned that this plan punishes, rather than helping.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 06, 2015 9:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Let teachers teach. Our judgment means nothing today. Try treating us like the resources that we are.

Constituency: Other (specify below)

Other Constituency (*if supplied*): public school teacher

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 2:39 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: why would the fed do that? there are already so many college rankings, from USNWR to Forbes to The Times of London, etc. — each emphasizing different areas with different weights. for any new ranking to be useful, it would need to use markedly different criteria that had been left out of other rankings but were equally significant nonetheless.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): drjeff@drjeffsoftware.com

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 5:05 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This new "rating" system is unfair and meaningless and punitive. It completely sucks. Get rid of it.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: (b)(6)
Sent: Saturday, February 07, 2015 10:23 AM
To: College Feedback
Subject: Fwd: Regents Article July 22,2010

This is an article with a response that I wrote to an editorial in the Albany, NY, Post Star back in 2010. This is just a tip of the iceberg but I feel it needs to be addressed.

There are standards that have to be taught but I believe that teachers, the local boards of education along with parents should make the major decisions in ***how children are taught***. I had some excellent teachers all through school particularly in high school that took interests in kids individually and were able to get us through. With both parents working today teaching unfortunately has also required the extra responsibility of babysitting. This is totally unfair and puts an excessive, burdensome and unwarranted responsibility and task on the teaching profession. I don't believe we should be wasting money and time on full time pre-K education and making sure kids have their breakfasts, toilet and shoe tying skills, etc. These are parental responsibilities and the parents are shirking those responsibilities and blaming the teaching profession as is the government and the people responsible for setting these standards. These are **still kids** and aren't ready for school. They should be home with their parents getting taught basic learning fundamentals, authority, respect and right from wrong. Then when they reach kindergarten level they should be prepared to be taught by professional teachers and individually evaluated as they progress. A teachers main job should be educating their students, not babysitting! If that could be accomplished teaching would be the great profession that it was in the past. Thank you.

From: (b)(6)
Sent: Friday, July 23, 2010 8:55 PM
To: Omar Aquije
Cc: (b)(6)
Subject: Regents Article July 22,2010

Mr. Aquije:

I read your column on raising the bar on the Regents. I would like to give my opinion & hopefully you will follow up on this. For years all students that graduated in NY State were granted a high school diploma, the Regents Diploma was awarded to the graduates who went the extra mile and put in the extra effort and that was their reward. The Regents Diploma was granted in addition to the high school diploma. Most students that received the Regents were also planning to continue their education through college. Many students would not have been able to achieve a Regents Diploma or didn't feel as though they needed one. Many students went to BOCES and learned a blue collar trade. From there many were able to immediately enter the workforce upon graduation. This doesn't mean they weren't as smart as someone with a Regents Diploma, it's just they felt it wasn't in their best interests. Many went into the trades where they received further training and an excellent education through apprenticeship programs sponsored by the trade Unions. Some became accountants, cashiers, etc., where basic & business math helped them more than algebra, geometry, and other regents courses. Approximately four or five years ago, the NY State Board of Regents and the NY State Dept. of Education in their ***"infinite wisdom"*** decided that everyone graduating should be required to have a NYS Regents Diploma. Common sense told me back then that this was a mistake. In order not to have a decrease in graduates with this added requirement how do you think this was going to be successful? Obviously, they had to lower the standards so that everyone had a chance. Now the same people that ***"fixed"*** a system that hadn't been broken for years are saying they now need to raise the bar on tests because they're to easy. I guarantee that they're not to easy for everybody and now watch the percentage of graduates go down and the dropout rate go up. Then they'll have another catastrophe on their hands that will need another fix, where does it stop? Don't any of these people that are supposedly intelligent have any common sense. They should have looked at the big

picture as all the other decision making people in this state and in this country should do before they waste time and money on projects that don't need fixing and we don't need. This also raises havoc on peoples futures and their lives. The old adage still is true, "If it a'int broke, don't fix it!

Another one of their mandates that tees me off is requiring teachers to attain a masters degree. I won't argue that furthering someone's education is beneficial however, these teachers are teaching grade school and high school students, not college students. If a teacher wants to continue their education that's fine, but to mandate is wrong and excessive. It takes time away from their job which is teaching our children. It doesn't make them anymore qualified to teach than they already are. What it does do is raise the teachers salaries because they now have to recoup the time and money they had to spend in order to comply with these mandates. It also increases what the education department has to pay out and in turn raises taxes. I feel I had excellent teachers when I was in school and they weren't required to have a masters degree! So who wins here?

In closing, I could go on and on but there's to much to write and not enough time. I hope you will respond to this email as I only get through the Albany area once a week and therefore only see Wednesdays paper when I layover. Thank you for your time and I enjoy your articles and The Post-Star in general. Thanks again

Sincerely,

Bob Prosser

From: (b)(6)
To: (b)(6)
Sent: 7/26/2010 8:24:03 A.M. Eastern Standard Time
Subj: RE: Regents Article July 22,2010

Mr. Prosser,

Thank you for your e-mail. The Board of Regents has often been criticized for its decisions to raise the standards, and for other decisions. There are many people (parents, teachers, superintendents) who believe that some students are not able to graduate in four years, or cannot obtain a Regents diploma, but are still capable of being successful. These are people who you mentioned in your e-mail, people who move on to get blue collar jobs. Everyone learns differently – that's what school officials often say. They are right. But Regents believes the education system is broken and needs to be fixed. Regents is using various studies as proof about why the tests must be made harder and why teachers and schools need to do a better job of educating students. Those studies showed that some students who met the state standards on the grade 3-8 exams still were unprepared for college. On Friday, I read a New York Times article that said the U.S. was ranked 12th for nations that produced people with college degrees. The story was based on a report by the College Board, which ranked about 38 nations. Canada was ranked No. 1, for having about a 55 percent rating for students who earned college degrees. In the story, education experts blamed the k-12 school system for the low ranking by the U.S. I'm not supporting how the Regents wants to push students to achieve more, but I believe it's good to want students to become more successful. More people with more education are beneficial to the nation. I am going to believe what the studies show—that there are flaws in the nation's education system. I am in no position to offer solutions, but I will hope that the nation's education experts are capable of finding them.

Omar

The Post-Star

(b)(6)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 11:06 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions.

The department's proposal would:

Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support.

The department's proposal would:

Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

The department's proposal would:

Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

The department's proposal would:

Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 11:24 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions. The department's proposal would:

- Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

- Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

- Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

- Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Please Select…

Other Constituency (*if supplied*): Community College

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 11:33 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support
Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.
Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.
Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 1:12 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: It is patently absurd to profess to promote affordability in a climate where administrative costs have risen 300% in the recent past, while teachers salaries have stagnated and tuition has skyrocketed. Right there is your answer to the affordability problem, one of the two most alarming problems in higher Ed today, the other being the appalling lack of response to the problem of campus sexual assault. Colleges and universities that receive federal funds should be required to show transparency in their spending, as well as viable, responsible policies to address sexual assault. Respect and listen to your students and teachers, and curtail the corporatization (using flawed and failed corporate profit models and hiring practices) of higher Ed.
When it comes time to send my daughter to college, I'll advocate for community college if the bloated salaries of administrators are not curbed.

Constituency: Other (specify below)

Other Constituency (*if supplied*): Holder of 3 higher Ed degrees, 2 at the masters level

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 1:39 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: It would be nice if we supported all schools, pre K – 12, and helped the teachers & students reach better levels.
I'd rather not make it political & harass the kids & teachers with this god awful testing BS.
We should be educating ALL our children & our teachers not blaming their schools & our overworked, underpaid teachers when they have problems.
The GOP is killing America & must be stopped! ALEC must be Exposed & stopped! Get your heads out of your ass & be constructive not destructive. Let teachers teach! Provide good schools, good materials & supportive school boards.
And stop all this asinine TESTING! It's killing creativity & spontaneity & killing childrens initiative. Defeating them at the very start. It's absolutely terrible & CA is 45th out of 50 states.
We always used to lead the nation! Used to be top innovators.
WHAT THE HELL HAPPENED? Look to the GOP, they just DONT CARE!

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 2:40 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: One important metric would be the percentage of full-time instructors vs. part-time instructors, as full-time faculty are able to attend to school and student needs in a different way than part-time instructors, who may not be as available on-campus or knowledgeable about the school, and may split their time among different colleges, or different types of job altogether (e.g., bartending, light secretarial work, pizza delivery, or event planning) in an attempt to make ends meet or get health insurance.

Having a full-time instructor can connect students to resources and recommendations, that having equally talented and hardworking part-time instructors cannot. This would be important for students to know and, ultimately, important to study in relation to metrics beyond cost.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 2:40 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: As a long-time professor of English, I bristle at the idea of even more education reform that comes from non-educators. Whenever there are problems, "reform" is the word touted everywhere, but reform needs not be cut from whole cloth: it must come from methods proven to work. My colleagues and department–but mostly my students–have suffered from the mandate to graduate as many of our students as possible. For example, I teach a capstone course in my English dept., and in two different years have had students with TBI, traumatic brain injury so severe that one of them couldn't write a single sentence correctly. Because of the expectation that all students must go to college and earn a degree, this student was still in college after two years of floundering and taking one of the most difficult courses with me; she couldn't understand the material we were reading, let alone write papers about it. So I had t! o work with her every day on her papers, in effect writing them for her. She will never be able to write a paper, I know from having worked with her daily, but she, her parents, and the school WANT HER TO GRADUATE. The other student, a veteran, was so emotionally traumatized as well as unable to process the material from his war experiences that he daily visited me in my office, blaming me for the difficulty of the course. Again the party line I was to tow was, "of course you'll graduate ; let me help you do so!" I am more than happy to help, but when graduating as many students as possible is the goal of a university education, the focus isn't on education but often on giving students a false sense of their capabilities. Is this what we want in the work force? I think not.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 3:53 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions. The department's proposal would:

Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support.

Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 4:47 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: glorianemerowicz@yeswemustcoalition.org
Sent: Saturday, February 07, 2015 4:53 PM
To: College Feedback
Subject: Comments on A New System of College Rankings
Attachments: Comments on Rating System.docx

Attached are comments from the Yes We Must Coalition on the proposed new system of college rankings. Thank you for the opportunity to comment.

Gloria Nemerowicz
President
Yes We Must Coalition

YES WE MUST COALITION
COLLEGE SUCCESS FOR ALL
5 COLTSWAY • WAYLAND, MASSACHUSETTS 01778

February 2015

Thank you for the opportunity to offer comments on "A New System of College Ratings". The Yes We Must Coalition has provided comments in prior forums, and we are pleased that the Department has been responsive to many of the concerns expressed by YWM and others. We are encouraged that members of the Department continue to struggle with several of the metrics that might be part of the rating system and that the Department recognizes "important data limitations." We are, however, concerned that there is an imperative to implement a rating system even while acknowledging that shortcomings in the metrics will negatively impact some institutions and their students. Those likely to be negatively impacted are precisely those institutions that are committed to educating low-income students. We are asking the Department to avoid causing potentially irreversible harm to institutions and to students by proceeding with inadequate data. We urge a delay in implementation until the data for the components of the system are available.

The Yes We Must Coalition represents 36 private, non-profit, 2- and 4-year institutions where undergraduate enrollment is 50% or more Pell eligible. Though our members have come to their missions from different historical roots, the focus on higher education for students from poverty is what unites us. Comments on the Rating System from our members include:

1. The incoming characteristics of our students must be taken into account. Pell students cannot be lumped into one group. They vary greatly in how they come to college. They all qualify financially for Pell grants, but many other factors, including variables associated with success in college, differ greatly. These factors include:

- the poverty level of the community where they live and have attended high school. We are gratified that the Department is taking EFC into account when rating schools. Many of our members have a majority of zero EFC students;

- whether there has been any pre-college program/mentor intervention. In most cases, students at Yes We Must schools have not had benefit of the support,

encouragement and guidance of a pre-college program. Consequently, our schools attempt to provide the benefits of those kinds of programs after the student has enrolled in college. We function as a preparation for college after our students are enrolled and then support them through degree attainment;

- whether they can be in residence on campus or need to commute;
- whether they can attend college full-time or, due to other family and work demands, must attend part-time;
- hours worked at off-campus paid employment each week;
- parental or other daily family obligations;
- educational level of parents.

It is crucial to take these variables into account both when looking at student outcomes and when forming peer groups of institutions. One of our members has suggested applying the equivalent of a "patient acuity index" from the healthcare field, correlating outcomes with incoming characteristics. This in no way suggests that we do not think systems and approaches can be developed to beat the odds. We do that every day, but the odds need to be part of a comparative measure of outcomes.

2. An on-line rating system needs to allow for interactivity so students can enter their own characteristics, in the detail noted above, and see where others with similar characteristics have enrolled and specifically what support is available on particular campuses for students "like me." To be meaningful, many of the metrics proposed have to reflect the characteristics of the prospective student. The net price calculator is an example of an interactive tool that allows the student to enter data about herself to figure out a piece of information (in this case net price to a student like her).

3. Before implementing the system, metrics to measure the movement of students among institutions need to be developed. All institutions involved in the awarding of credits to a student on her way to getting a credential should be acknowledged as contributing to the student's success. If the administration is serious about measuring transfer rates, it must commit to improving federal administrative data systems and

data collection to provide inclusive outcomes. We have members with fewer than 20% of their undergraduates represented in the first-time, full-time category. A majority of our members are educating students who transfer in and are also spending vast resources on counseling/advising students who should transfer out. We need a system that includes a positive value for resources devoted to intensive, intrusive advising, particularly in the first year, to get a student to explore alternatives and have support to find the next best step for her academic development. Transferring, stopping out, and reducing course load to part-time are all strategies that should be supported and not counted as failure for the student or the institution. Oftentimes a student will only enroll in higher education if he is assured that, given the complexity of his life, there is flexibility in how he can complete a course of study.

4. There is serious concern among members regarding the intention to force schools into only two categories of classification based on the majority of degrees awarded, Associates or Baccalaureates. The reality for many of our schools is a mixture of degrees that can change from year to year, with the numbers of degrees awarded hovering right at the 50% mark between Associates and Baccalaureates, so they may qualify in one category one year and in the other category the next. We would urge that a category be created for the blended Baccalaureate/Associate category, as is done in the Carnegie Classifications, to assure more accurate peer grouping.

5. Most Yes We Must members have heeded the administration's urging to establish Dual Enrollment programs with local high schools. Some have raised concern, however, that the DOE may be including dual enrolled students, who would not be receiving Pell grants, in the overall enrollment on which Pell percentages are based. When "total undergraduate headcount" is requested, it would include dual enrollment students. We have members whose dual enrollment programs enroll a full third of their regular enrollment (a campus with 3000 undergraduates may have 1000 students served by the dual enrollment program). This greatly impacts the calculation of percentages of Pell recipients and other percentages as well that are intended to be based on undergraduate populations. We should not be penalized for helping to lower overall college costs for students via the Dual Enrollment program.

6. If the metrics that are used to rate institutions are not disaggregated, we will have another single metric ranking system with no utility for the student. Furthermore, only disaggregated metrics can be used over time to indicate trends. Combining metrics makes sense only if the combined measurement has some intrinsic meaning.

7. Asking each college to post a short mission statement and description of the college would be helpful. Yes We Must members are proud to be known for their understanding of and commitment to those from backgrounds of poverty whose educational journey may have been less than successful by the time they apply to college. Each institution might also offer an interpretation of ratings metrics within the context of the populations it serves.

The members of the Yes We Must Coalition are working together to craft what students from low-income backgrounds need most....new approaches, new collaborations, new financing, and new structures that welcome and support the new student majority. We would welcome partnering with others. Thank you for the opportunity to comment.

Gloria Nemerowicz
President
Yes We Must Coalition
www.yeswemustcoalition.org

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 5:45 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I have Bachelor and Masters degrees in teaching music. I make far less than graduates of business schools especially those connected to large corporations. Salaries of graduates is not a helpful criteria for evaluating the success of colleges.

Far too many college courses are being taught by adjunct professors earning poverty wages. Investment in the faculty needs to be increased at all but the most prestigious schools.

I have taught in impoverished African American and Hispanic Urban schools. How well minority students do is an important indicator of success.

All students are being crushed by debt. We need a new plan for funding colleges and universities. Student loans should not have interest rates much higher than other types of loans as they do now.

No Child Left Behind and Race to the Top punished schools that deal with the poorest of our citizens, despite the fact that poverty is the main reason urban and rural schools are unable to meet standardized tests. Now we are going to force colleges to abandon programs such as social work and teaching in favor of programs whose graduates earn the most money. The top 1% already has most of the resources of this country and are trying to keep the rest of us down.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 7:06 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Stop ridiculous testing, use tests only to help teachers with educational decisions, and use the saved money to fund college. EVERYBODY wins!

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, February 07, 2015 11:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This college rating system will steer teachers away from the lower socio economic students. The students who need them the most!

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 8:29 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Dear Department of Education Personnel,
Please put a halt on the plan to rate colleges and universities on student outcomes. I have attended classes at seven different colleges and universities and each one has helped me become a better teacher. Recently, I obtained my Reading License from the University of Minnesota. It was an excellent program and has a high rate of teachers passing the exit exam. It has prepared me well to teach reading. Am I still learning and taking additional professional development? Yes. Do I think my students' scores reflect my learning at the U of M? No. How can one institution be accountable for all the multiple facets of teaching? The logic just isn't there.
Thank you,
Lisa Lange

Constituency: Other (specify below)

Other Constituency (*if supplied*): Public School Teacher

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 9:22 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 10:38 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: You should be looking to fund and support educational institutions. I have seen first hand the detriment of oversimplified evaluation systems. Focus on students and educators not outcomes. The results will follow.

Constituency: Other (specify below)

Other Constituency (*if supplied*): teacher

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 3:10 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please consider including as a metric the disparity in completion rates between the overall student body and student athletes (maybe any student who has played a full season of any interscholastic sport?) – schools with too high a disparity would automatically be "low performing". The ability of universities to milk young athletes (esp male basketball and football) to generate profits which subsidize the sports of privileged students (softball, lacrosse, etc.) is unconscionable, especially given that many of these athletes are low-income, not graduating, and not going on to professional sports careers. They are essentially used and thrown away. Making their graduation rate relative to others in the school important to a university's "performance" would send a powerful message and could have "knock-on" effects that could challenge the very "bread and circuses" culture that has diseased so! many of our larger universities and undermined the human capital investment engine of the US Economy that is higher education.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 5:55 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The proposed rating system for higher education needs far more research. It must be fair and include similar ratings for private institutions!

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 6:07 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This plan is not appropiate at all!
Students require internal supports and resouces in order to make progress. Simply looking at skewed data does not meet the needs of students or the institutions they attend. Did we not learn anything from this faulty system in the K 12 grades? Im stunned by this plan.....
Please come up with something more realistic and that works for all.

Constituency: Other (specify below)

Other Constituency (*if supplied*): Retired Career Counselor

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 6:49 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please raise the standards of education in the U.S. by raising the standards of policy being proposed regarding education.

Using poor data for high-stakes decisions is absurd and embarrassing. (The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.)

If we want our education system to be, first of all, effective for the students in our country and secondly, competitive internationally; we MUST create policy that is logical and based on strong and accurate data.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 08, 2015 11:07 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please stop this ratings system. It is punishing the community colleges that are the lifebloo o for poor communities.

Instead, investigate the for-profit colleges who are robbing these same communities.
Ellen Kerr

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Arielle Benjamin (b)(6)
Sent: Monday, February 09, 2015 9:04 AM
To: College Feedback
Subject: Feedback on College Ranking System

Good morning,

My name is Arielle Benjamin, currently a chemical engineer for a Fortune 500 company with a Bachelor's Degree from Howard University and a Master's Degree from Villanova University. Born and raised in New York City and a young woman of color, I am reminded daily that I am blessed, and also challenged to speak up for others who may not have had the opportunities I've had to become the person that I am today.

I am hoping that someone reads my commentary and takes this to consideration just as I've decided to take this new college rankings system to heart and hoping that this program will help parents and children make a decision that can really alter their trajectory throughout life. I am not a fan of 16 and 17 year-olds being forced to make choices that make or break their success (I am NOT the same person I was a decade ago when I chose Howard over the Georgia Institute of Technology), and yet I cannot deny it was my choice that led to where I stand today.

So my suggestion is this: add more parameters that focus on the social success of graduates. What percentage of the students are **giving back** to their community? What percentage are **serving their country** (USAID, Foreign Service Officers, Peace Corps, armed forces, etc.)?

College success cannot simply be based on scores and salary. As the federal government, I believe you have the power and ability to change the dynamic of how people see education. Growing up my family taught me that education was the key. It is the key, but not only to a higher tax bracket... it is the key to a platform that I've decided to use to give back. I am the diversity in my workgroup. And I believe that it was my undergraduate experience at Howard University that gave me the confidence to stand amongst the rest in spite of how different I look from those around me.

As a scientist, **I know** that having a category that is more qualitative than quantitative makes data analysis a huge challenge. But capturing the social currency of the leaders of the future is incredibly important as we plan for the America that we hope to become as our world continues to change. Thank you for your hard work and I believe that we can make college not just a feeder for labor, but a place where young adults are trained to be leaders for America and the global community.

Best,
Arielle Benjamin
(b)(6)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 9:13 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I am concerned about any proposal that uses measures that are difficult to come by in an objective way and uses them without knowing their import. For example the department is asking for input on how to weigh them, shouldn't there be clarity about that to start with?. Additionally, a one year snapshot doesn't tell us anything. And finally, similar attempts for K-12 with NCLB were not successful, so why do this for higher ed as well? and what about asking about the status of faculty as well?

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

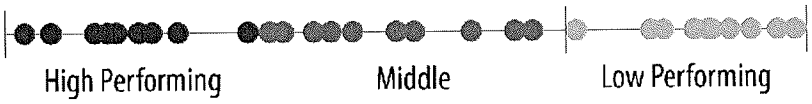
O'Bergh, Jon

From: James Mindreadytools (b)(6)
Sent: Monday, February 09, 2015 9:38 AM
To: College Feedback
Subject: Rating system feedback

To whom it may concern,

I appreciate the U.S. Department of Education's attempt to develop a new college ratings system. As I have recently gone through the process of helping my two children select a college I feel like an independent national college rating system would have been helpful. I read both the fact sheet and the detailed explanation of metrics and have several aspects of the rating system I would like to comment on.

- **On Use of Rating Categories**. While the desire to avoid "rankings" and false precision is laudable, the use of rating categories alone oversimplifies the decision and adds its own confusion to the consumers of the information. The use of three categories like you have proposed hides potentially important differences between institutions. It makes it impossible to see how close or far the institution is to the categorical boundaries. For example, Is a particular institution just across the high performing boundary or are they well within that category? The distribution of institution within a category may be larger than differences between categories. I would suggest that you provide a "Score" for each institution in addition to their rating category. That way consumers who want more in depth information are able easily access it. Scores also provide more granularity for tracking institution improvement over time. The use of scores also enables data based method for establish category boundaries.



- **Single Institution Rating**. While single institution level rating eases comparisons between institutions it does not provide all the information needed to achieve the goal of greater economic prosperity for all Americans. Nor will it help families make more informed choices during the college search and selection process. While a student gets their diploma from an institution, that is not the only factor that impacts their chance for economic prosperity. Choosing a major makes an even bigger impact on future earnings than deciding which school to attend. I would suggest that in addition to the institution score that major score (for that institution) also be provided. While an institution may rate highly globally, it may not do so well at the major level, which is the primary factor in post college job opportunities. US News and World rankings has a similar feature. While these major based scores are likely to be more variable (because of small sample size) they are critical to gauge a student's chance at economic success.

- Available On-Line Tools. While investigating institutions to attend. MY family made extensive use of the information available on http://www.payscale.com. They provide multiple ways of supporting comparisons between by type (public, private, engineering, sports oriented, etc.) as well as showing the earning potential for schools with and between these types.

I hope that you find my suggestions helpful. If you have any questions or would like to discuss this further please do not hesitate to contact me.

Sincerely,
James Gualtieri, Ph.D.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 9:41 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Double down on failed K-12 accountability: The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support
Focus on the wrong measures: We know that what gets measured becomes what counts. By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.
Use poor data for high-stakes decisions: The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.
Impose a plan that is not ready for prime time: By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 11:33 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: As an educator, we need support! There's too much focus on negatives that are inaccurate. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 11:43 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: 6 February 2015

The Honorable Arne Duncan Secretary
U. S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Secretary:

On behalf of Santa Clara University, a member of the National Association of Independent Colleges and Universities (NAICU), I offer my endorsement of NAICU's recommendations regarding the "College Ratings Draft Framework" released on December 19, 2014.

As mentioned in the NAICU recommendations sent to Secretary Duncan on January 30, 2015, I am particularly concerned that access to and success in higher education will be harmed by the creation of a simplistic rating system that places an overarching focus on metrics with little to no consideration of institutional mission. I strongly urge you to consider all the NAICU recommendations and use them to inform modifications to the draft framework.

Thank you for your attention.

Sincerely,

Michael E. Engh, S.J.
President

Constituency: Higher Ed Association/Organization

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 12:46 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I do not support much of the proposed college ratings system.

First, the Department is planning to rate every school the same way, regardless of mission, and tie funding decisions to those ratings. And the metrics it wants to use are incomplete and leave out important pieces of information. For example, the Department does not want to track race and ethnicity data, and it will not even rate many for-profit schools. Yet it wants to use graduate earnings and graduation rates to hold schools accountable, even though these measures don't capture the diversity of our higher education institutions' missions.

The Department would also calculate graduation rates by using data in the Integrated Postsecondary Education System, which only counts students who are first-time, full-time students, even though we know this definition covers fewer than half of all students.

Addressing these issues would put the ratings system more in line with my values.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 12:51 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please consider how this rating system will unfairly & negatively rate and impact community colleges. The majority of our students transfer. Community college will be negatively impacted if the results of the college ratings are used to determine financial aid for community college students.
Community colleges are required to accept everyone- even those students not prepared for college and those who will not be successful.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): adellc@bhc.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Jorgensen, Patti <jorgensp@fvtc.edu>
Sent: Monday, February 09, 2015 2:12 PM
To: College Feedback
Subject: Proposed College Ratings System

Following is my feedback to the proposed system:

- We understand the need to continue to make college choices more clear for families, but have concerns about attempting to distill the extremely diverse missions, cultures, types of training, etc. into singular ratings
- Even grouping 2-year and 4-year colleges into separate groups is not making appropriate rating comparisons. For example, Wisconsin's technical colleges and the University of Wisconsin 2-year colleges have very different missions. Groupings should be made based on mission as well as student demographics, size, types of degrees offered, etc.
- IPEDS, in particular, is very complex to work with, no details available about how data will be pulled, who will pull it, and how submissions to IPEDS and other national databases will be altered as a result of the national ratings system
- Much of the available data is lagging substantially, makes it difficult for colleges to make changes and influence ratings in a timely manner in the event that problems arise

Patti Jorgensen
Vice President of Student and Community Development
Fox Valley Technical College
(920) 735-5649

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 4:32 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: To the United States Department of Education:

I hesitantly applaud your effort to create an education rating system that will help all stakeholders make informed decisions. As a staff member of a predominantly two-year institution, I have read descriptions about the ratings and their intent. In light of a system being put in place, I agree that as many student characteristics as possible should be measured to help improve services for all, but I am concerned that the public won't fully understand these measures and that they will be used to help one group more than another. All metrics should be carefully analyzed and interpreted to create a balanced educational environment.

Addressing my concern about the public's understanding, I suggest each metric should include a thorough, but not too brief, description about not only what is measured but possible correlations (e.g. number of Pell Grant recipients vs. number of low income students). I believe the data should be disaggregated to allow for the public to answer a broader range of questions. An overall score would be too hard to determine as not all factors are weighted the same by all.

I firmly agree that these ratings should be used by schools to improve its services to all students. I understand the focus on allowing access to low income, first generation college, and other historically misrepresented populations. However, schools need to be careful not to create affirmative action policies. Academic and other institutional hiring criteria should be the standard used for acceptance or rejection, even if there is a greater percentage of one student group than another.

A thorough examination of Pell and other financial aid offerings should be completed so as to offer as much aid to qualified students as possible. Furthermore, any student receiving financial aid should be held to more strict rules than what is currently offered. One possible idea is offering financial aid payments throughout the semester, instead of one lump some at the beginning. I know some schools already do this.

Besides financial aid, other metrics need to be thoroughly analyzed for proper interpretation. Specifically, factors of why students drop out need to be considered when studying completion rates. Furthermore, using loan performance outcomes as a metric is not a fair measurement of the quality of an education. There are quite a few, expensive educational programs that may not lead to high paying jobs. Also, unexpected life circumstances and marrying into a poor financial situation may lead to a longer loan repayment period.

One of my biggest concerns is that all parties will focus too much on the given metrics instead of the quality of the education received. I do not meant to say that cost, graduation rates, and the like are not important. Given the steps the United States has recently made to improve education on all levels, I want all parties to strive toward improved critical thinking, metacognitive, application, and other higher order thinking skills. It is not just important to measure job placement rates, but how well applicants meet qualifications. These applicants will become stronger the more they are challenged in and outside the classroom. This will become more of a reality when a culture of education permeates this country as much as pop culture currently does. The United States needs to study the education systems of countries like Sweden to gain all perspectives and, thereby, create the best possible system for all students.

Constituency: Other (specify below)

Other Constituency (*if supplied*): College Staff

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 09, 2015 5:18 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: None of the problems of higher education will be solved by bringing the misguided "reform" of K-12 to its classes. If our higher education system is in crisis, the reasons have to do with widening income inequality, institutional racism, a lack of faculty governance, the ever-expanding range of highly-paid administrators, the refusal of American citizens to pay through taxes for the same education that was given to them as young people, and the fact that colleges feel forced to collude with corporations (to the point of naming faculty of the corporation's choice or producing research results that the corporation favors). These are indeed, terrible circumstances. Since when has blaming teachers and students become the way to solve them?
I hope the department is aware of the fact that its imposing of irrational "standards" on K-12 is so widely unpopular that parents in many places are in revolt. The same revolt will happen, and greater, at the higher ed level.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): wendy.schoener@umb.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Elle Chan <ec@mopsg.com>
Sent: Tuesday, February 10, 2015 2:15 AM
To: College Feedback
Subject: Enjoy up to 80% off ONE FC tickets this coming Valentine's Day!

Hi there,

My name is Elle, from Ministry of Photography, and we represent ONE Championship (ONE FC), the largest mixed martial arts promotion in Asia.

After selling out arenas in Singapore, Jakarta, Taipei, Beijing, Phnom Penh, Manila, and Dubai, ONE Championship is coming back to Malaysia to host the biggest mixed martial arts (MMA) event of the year in Kuala Lumpur on 13 March 2015 at Stadium Putra and we would like to invite you to catch this blockbuster event that promises a night of non-stop high-octane MMA action.

The fastest growing sport in the world today, MMA pits the best fighters from around the world against each other in hand-to-hand combat within a cage. Whether you are a fan of boxing, wushu, taekwondo or any other martial art, get ready to be entertained as the top fighters in each discipline prove their mettle on the largest stage in Asian MMA.

You've heard about it, you've felt the buzz, now experience MMA for yourself on 13 March with our newly launched Valentine's Day promotion and enjoy up to 80% off ONE FC ticket purchase for Gold, Silver and Bronze category. So now you can buy the tickets at only RM50 (Usual: RM168) for Gold, RM20 (Usual: RM108) for Silver and RM10 (Usual: RM58) for Bronze seats. This offer is limited to the first 100 tickets only and offer will end on 14 Feb! Hurry and grab your tickets now at http://www.mopsg.com/onefc

Sponsorship and corporate package enquiries are also welcome. Thank you and we look forward to hearing back from you soon. Have a nice day!

Warmest Regards,
Elle Chan (Ms)
Director of Events
Ministry of Photography
Website: http://www.mopsg.com/onefc
Facebook: http://www.facebook.com/groups/mopsg

To unsubscribe: http://www.mopsg.com/unsub/?id=collegefeedback@ed.gov

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 10, 2015 8:18 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: With all due respect, this seems like an arbitrary system designed to punish schools that arent willing to provide a cookie cutter education. Once again ED has focused so narrowly on a group of educators without looking at the big picture. These "reforms" are so obviously agenda driven by groups who have been able to profit from the belief that educators are something to be "fixed". Unfortunately Secretary Duncan is to busy trying to secure a pisition elsewhere once he leaves the Obama Admonistration then really trying to do any good. College professors are not the problem, k-12 educators are not the problem.
The special interest groups that stand to make huge profits off saying these groups don't work hard enough, teach well enough, and aren't innovative enough are , however, the problem.
Teaching at all levels is not about cookie cutter learning. This absurd idea should be dropped and this one size fits all approach and it's clearly punitive intent should be dumped into the nearest trash can.
Shame on the Department of Education and shame on Arne Duncan b

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 10, 2015 2:14 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Under this system, the same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

By focusing on outcomes such as graduation rates, this plan doesn't adequately acknowledge the diversity of missions of institutions, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.

This system is still in need of much revision, and its implementation needs to be held up, at least until a better system for collecting data is put into place.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): dbirchok@umich.edu

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Holler, Larry <Larry.Holler@SDSTATE.EDU>
Sent: Tuesday, February 10, 2015 6:36 PM
To: College Feedback
Cc: Chicoine, David
Subject: Comment on College Ratings Proposal, Faculty Senate, South Dakota State University
Attachments: APLU Core Concepts Endorsement (3).docx

On behalf of the Faculty Senate, South Dakota State University, please consider our comments on the Administration College Rating Proposal.

Sincerely,

Larry D. Holler DVM, PhD

President, Faculty Senate

South Dakota State University

FACULTY SENATE STATEMENT OF SUPPORT OF APLU'S "CORE CONCEPTS,"

AN ALTERNATIVE T0 OBAMA ADMINISTRATION'S "COLLEGE RATING" PROPOSAL

In response to the Obama administration's proposal to gather information in order to publically rate higher education institutions based on various measures of "affordability" and "value" (http://www2.ed.gov/documents/college-affordability/framework-invitation-comment.pdf), South Dakota State University's Faculty Senate shares the concerns of the Association of Public and Land-Grant Universities (APLU) over "the complexities of the suggested ratings system and the practical challenges of implementing it" (http://www.aplu.org/document.doc?id=5659). In addition, the Senate supports the APLU's efforts to establish an alternative plan, described in the "Core Concepts for Improving Institutional Transparency & Accountability: An Effective Alternative to College Ratings," particularly its call for "the creation of a student readiness adjustment, which would account for varying factors of an institution's student body." Such a metric, the APLU rightly explains, would "enable policymakers to judge institutions on an equal playing field." The Senate believes these "core concepts" provide a more realistic framework for achieving the desired goals of transparency and accountability to students, families, policymakers, and the general public.

FACULTY SENATE STATEMENT OF SUPPORT OF APLU'S "CORE CONCEPTS,"

AN ALTERNATIVE T0 OBAMA ADMINISTRATION'S "COLLEGE RATING" PROPOSAL

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 10, 2015 8:32 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: You have to be kidding! The Appr is already flawed, The Governor is just fighting against the teachers unions, and attacking the college for poor APPR scores that are not even worthwhile is crazy.

Constituency: Please Select…

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Czech-Mrochinski, Mary <mary.czech-mrochinski@marquette.edu>
Sent: Tuesday, February 10, 2015 9:17 PM
To: College Feedback
Subject: Marquette University- Postsecondary Institution Rating System Comment Letter
Attachments: Lovell- Duncan- PDF re Postsecondary Institution Rating System (PIRS)- Feb 11 2015.pdf; 20150121_NAICU_Ratings_Comment_Letter_4.pdf

Dear Department of Education:

Please see the attached letter of comment from Marquette University President Michael Lovell regarding the Postsecondary Institution Rating System.

Thank you!

Mary

Mary Czech-Mrochinski
Marquette University
Director of Governmental and Community Affairs
Direct: (414) 288-3969
Cell: (b)(6)
Main: (414) 288-7491
Mary.czech@marquette.edu

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President

Zilber Hall, Suite 441
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Milwaukee, Wisconsin 53201-1881

P 414.288.7223
W marquette.edu

February 11, 2015

The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Duncan:

On behalf of Marquette University and its more than 8,400 undergraduate students, I am writing regarding the President's call to establish a Postsecondary Institution Rating System (PIRS). Choosing a college is often a difficult decision for students and their families. Providing factual data to assist students and families weighing higher education options and making informed decisions is a laudable goal.

As a member of the National Association of Independent Colleges and Universities (NAICU) we endorse the January 30, 2015 letter from NAICU President David Warren on this topic; please see the attached copy.

Marquette University continues to do its part to keep college costs as low as possible; recently, Marquette announced its lowest tuition increase in dollars and percentage over the past four years. While the university is mindful of these costs to students and families, tuition covers just over two-thirds of the cost of educating a Marquette undergraduate; this gap is closed through the generous support of gifts from our philanthropic partners – our many alumni, parents, friends and supporters at corporations and foundations. Such institutional aid, combined with government grants and loans, allows Marquette to provide a world-class education to many low-income and first-generation students.

While the University applauds the President's effort to improve access, affordability, and readily accessible consumer information, we still have serious concerns that the creation of a simplistic college ratings system will have unintended consequences and negatively impact students and will be in direct conflict with the administration's goals.

Marquette University welcomes the opportunity to work with the Department to ensure that a pathway is available for all students to succeed and attain a postsecondary degree.

Sincerely,

(b)(6)

Michael R. Lovell

Attachment

NAICU

National Association
of Independent
Colleges and Universities

1025 Connecticut Ave. N.W.
Suite 700
Washington, DC 20036-5405

Tel: (202)785-8866
Fax: (202)835-0003
www.naicu.edu

January 30, 2015

Honorable Arne Duncan
Secretary
U. S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Secretary:

On behalf of more than 1,000 member institutions and associations of the National Association of Independent Colleges and Universities (NAICU), I first would like to say that we welcome the President's commitment to the broad areas of access, affordability, and transparency, especially in the form of consumer information. We also welcome the open invitation from the President for colleges and universities to work in common purpose with the Administration to address these areas and meet national and institutional goals.

NAICU is the national public policy association for the nation's private, non-profit colleges and universities. Our 963 member institutions include major research universities, church-related colleges, historically black colleges, art and design colleges, traditional liberal arts and science institutions, women's colleges, two-year colleges, and schools of law, medicine, engineering, business, and other professions.

As members of the Administration moved to implement the President's call to establish a Postsecondary Institution Ratings System (PIRS), NAICU appreciates the time and energy that they gave in soliciting opinions from a wide variety of stakeholders, particularly institutions, which would be affected by any federal ratings system.

We wholeheartedly agree that individuals ought to have ready access to the information they need to choose a college that meets their needs and aspirations. We are supportive of efforts by the federal government to identify the appropriate information and to make it more accessible, but we also believe the weighting and assignment of value to that information must remain squarely in the hands of individuals.

The federal government, with its access to millions of college aspirants, and its credibility as an unbiased, statistical resource, could play a key role in helping families sort through the many college choice options before them. This is not a new idea. In the 1998 reauthorization of the Higher Education Act, a bipartisan group of members of the House and Senate established COOL (now called College Navigator) just for this purpose. During the lead up to the 2008 reauthorization, Congress was not satisfied with COOL, and again set out to tackle the issue. When progress slowed, NAICU conducted focus groups around the nation with students and parents who were in the college search process.

The resulting, simplified consumer search tool, the University and College Accountability Network (U-CAN) is based on what individuals have said they need to help them make an informed choice. The U-CAN resource has the active participation of more than 600 independent colleges and universities, and has had nearly 4 million institutional profiles researched and viewed since its inception.

Even though there has been a serious commitment to consumer transparency by independent colleges and universities, there was concern among our members when the announcement of PIRS was made 18 months ago—given the lack of clarity about the components and intended uses of the proposed ratings system. Those original concerns have not been allayed by the "College Ratings Draft Framework" released on December 19, 2014.

The Administration seems to be reaching beyond its own ability to manage the information (as yet undetermined) it is asking to receive, by proposing multiple purposes of the ratings system: institutional improvement on access, affordability and outcomes; consumer information; accountability measures, eventually aligned to "ensuring wise and effective use of $150 billion in financial aid," and information for accreditors, states and others.

Most importantly, our members are concerned that the creation of a simplistic rating system will undermine the President's own access and completion goals – goals that are strongly shared by independent institutions. Access and success will be harmed—not improved—by the creation of a system that places an overarching focus on metrics with little-to-no consideration of institutional mission, and that has as its ultimate goal tying an institutional rating to the amount of federal aid a low-income student may receive.

Ironically, this initiative also appears to work at odds with other Administration goals to correct for the so-called "undermatching" of high achieving, low-income students with selective institutions. The component of the plan that would adjust outcomes for institutional-level characteristics, such as selectivity and endowment size, would have the effect of penalizing institutions that have been able to invest significant resources in the success of their students.

Our member presidents have been consistent in our belief that rating colleges is not possible, whether done by private commercial entities or by the federal government. Rating by federally defined peer groups, type, location, family income, student preparation, to name a few possible factors, becomes a configuration of numbers in a vacuum, devoid of context. To give the system any meaning, the federal government would have to assign its own values of what is important, and to what degree. The values that the federal government has an interest in, and their relative worth, may not be the same as those for a student who is searching for a school that best fits his or her needs. For example, that a college is related to a particular church or faith may be the most important factor to a particular student, but not a highly-rated value by the federal government.

NAICU

In the months leading up to the release of this draft framework, the Administration has attempted to allay colleges' and universities' concerns by indicating that any plan released would be a 1.0 version, leaving room for any gaps or inadequacies to be fixed later. This is a peculiar standard for federal data collection and release; and it is a dangerous underestimation of the power of the federal imprimatur. Even if it were possible for the federal government to identify a uniform combination of metrics that could be used to assess the value of every college in the country, the idea that it might release a poorly defined set of ratings is irresponsible.

If the objective is to provide a simplified consumer information tool, the Administration could develop a tool – as we did with U-CAN – which guides families by using some key metrics and factors about institutions. As we learned in our consumer research, to be helpful to consumers, such a system should also include qualitative information from the institution itself – such as mission and campus culture – while still remaining relatively brief. A main purpose of U-CAN is to help students and families make an initial decision about the institutions that merit further exploration as they seek their "best-fit" school.

The Administration has a separate opportunity to bring some long overdue recognition and support to those institutions that are helping first-generation-to-college students succeed. That could be done in a number of ways. From a public policy perspective, for example, the federal government could reinvest in the campus-based aid programs, and target that new money toward schools that are resource-poor because they serve and graduate more low-income students.

Finally, we must remember that many college students are non-traditional. They are not 18-22 year-olds, living on campus, and going full-time. More often than not, they are part-time, older, and have chosen an institution because of its geographical proximity. Much of this discussion is irrelevant to them, yet we continue to make public policy without taking this reality into account.

The Administration has a wonderful opportunity to help students and families who are weighing options in higher education to make better informed choices. Enabling them to go beyond the commercial ratings and rankings and rely on the facts would be a great service. We would wholeheartedly endorse such an effort, but we cannot support any effort that would substitute a federal rating for an individual's judgment about what is important and valuable in an educational experience.

Sincerely,

(b)(6)

David L. Warren
President

O'Bergh, Jon

From: Keith Leggett (b)(6)
Sent: Wednesday, February 11, 2015 8:03 AM
To: College Feedback
Subject: College Scorecard

Below is my comment on the Department of Education's proposed college scorecard.

As a member of the Board of Trustees for Mars Hill University, I am writing to express my deep concerns regarding the Department of Education's proposed college scorecard.

The Department of Education proposes to develop a ratings system that will identify colleges that provide good value aligned with three key principles that President Obama articulated: access, affordability, and outcomes.

However, it is my belief that this "one size fits all" scorecard will not achieve its intended goal of helping students and their families make an informed decision regarding various universities and colleges based on their affordability and value. In fact, it may provide misleading information resulting in bad decisions.

Measuring and comparing institutions based upon simplified data points does not fairly measure the effectiveness of a college or university.

The scorecard also lumps both private and public and large and small institutions of higher education into the same pool and fails to recognize the differences between these institutions.

In addition, I have concerns about some of the metrics proposed by the Department of Education. For example, under outcomes, the scorecard may include the earnings of graduates as one metric. The focus on graduate earnings could disadvantage institutions that mainly offer bachelor's degrees in the liberal arts relative to trade or technical schools. Also, choices about jobs will impact future earnings of graduates, which are largely outside of the influence of a college or university. Furthermore, this metric could impose additional costs on smaller institutions to track the earnings of graduates.

Additionally, Mars Hill University already submits to and attains institutional accreditation standards, plus a wide array of programmatic accreditations. This accreditation process is robust and looks at numerous factors that cannot be measured by this proposed college scorecard.

I see little potential that such a federal rating system would be helpful to potential students.

Sincerely,

Keith J. Leggett, Ph.D.

(b)(6)

O'Bergh, Jon

From: Johnson Sara A <JohnsonSaraA@jccmi.edu>
Sent: Wednesday, February 11, 2015 9:19 AM
To: College Feedback
Cc: Phelan Daniel J; DAVID BAIME
Subject: Ratings Framework Response - Jackson College
Attachments: Ratings System Response Jackson College.pdf

Good Morning,

Please accept the attached document in response to the Draft College Ratings Framework from Jackson College President, Dr. Daniel Phelan.

If there any questions, please feel free to contact me.

Sincerely,
Sara

Sara A. Johnson, M.B.A.
Chief of Staff
Jackson College
2111 Emmons Road, Jackson MI 49201
Phone (517) 796-8569
Fax (517) 796-8630
www.jccmi.edu

Jackson COLLEGE

February 10, 2015

Greetings,

Respectfully, I wish to enter my strong opposition to the draft College Ratings Framework System in its proposed format, approach, and data source utilization. The system as proposed will misrepresent colleges unfairly to students, parents, and the media regarding college data sets. I urge you to consider delaying proceeding with the system until a solid system of measurement tools and data sources are in place. I made this very request today to Under Secretary Ted Miller at a meeting of the American Association of Community Colleges and the Association of Community College Trustees at the Marriott Wardman in Washington D.C.

Although I support accountability and data submission, I believe the current proposal is flawed on a number of levels. For instance, to ensure labor market success is measured correctly, I strongly feel that the data source used should be the Social Security Administration wage calculations for accurate wage information. The National Student Loan Data Set (NSLDS) does not include representation of all students. Those on the lower end of the SES are disinclined to share personal information on the FAFSA. Likewise, students on the upper end of the SES don't qualify for financial aid. So, how is the NSLDS representative of the very unique population we serve?

The lack of comprehensive datasets in the draft system will not accurately reflect community colleges. Even though our data may be separated from our four-year counterparts, it still does not provide for the diversity of each institution and the rich demography of our students. For instance, students attending a community college in McAllen, Texas may very well have a higher incidence of students needing developmental education than a community college in Lincoln, Nebraska. Is there any benefit to be gained by comparing them? Consider also the proposed completion rate measure of 150% of "normal" time to complete a degree is very restrictive for community college students. These students are typically attending part time and working to support their families. Consequently, more appropriate measures could include the Voluntary Framework of Accountability (VFA), developed by and for community colleges, housed at AACC, as well as the National Student Clearinghouse (NSC).

Again, I reiterate my opposition to advancing the ratings system in its proposed form and ask for a delay for further development of optimum data sets, data sources, and the use of a pilot to evaluate the efficacy of the revised model. Proceeding with the current proposal is both reckless and bereft of proper preparation.

Please feel free to contact me with any questions at dphelan@jccmi.edu or (517) 787-0809.

Sincerely,

(b)(6)

Daniel J. Phelan, PhD.
President

Cc. David Baime, Senior Vice President for Government Relations, AACC

CENTRAL CAMPUS 2111 Emmons Road • Jackson, MI 49201-8399 • 517.787.0800 • www.jccmi.edu

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, February 11, 2015 11:10 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The U.S. A. must emphasize education and truly recognize the professionalism of the educators in our country. This profession has been diminished by our society so much that the public has no realistic view of how needed educators are in the world. Teachers, mentor, professors are much more valuable than electronics and computers; we need them to carry out the human factor in the real world1

Constituency: Higher Ed Association/Organization

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

O'Bergh, Jon

From: Jonathan Rothwell <jrothwell@brookings.edu>
Sent: Wednesday, February 11, 2015 4:01 PM
To: College Feedback
Subject: College ratings
Attachments: Rothwell--Measuring College Value Added--Feb 11.docx; Appendix--Measuring Value Added.docx

I'm an economist at the Brookings Institution. In the spring of this year, we will release a version of the attached report, which aims to provide comprehensive measures of the value-added of colleges, as well as other quality measures, with a focus on economic outcomes. Whether you use this method or something similar, I strongly recommend taking a value-added approach.

I hope you find this useful. I would be happy to do a presentation to your staff, if that would be helpful.

Best,

Jonathan T. Rothwell, Ph.D.
Fellow
Metropolitan Policy Program | The Brookings Institution
202.797.6314
twitter/@jtrothwell
Brookings profile
Google scholar profile

DRAFT WORKING PAPER NOT INTENDED FOR PUBLICATION

Beyond College Rankings: A Measure of the Economic Value-Added of U.S. Colleges

Jonathan Rothwell and Siddharth Kulkarni

February 2015

Executive Summary

The large economic benefits of completing a college degree are well known, and yet high and rapidly escalating costs deter many young people from entering or completing a degree program. The decision of whether and where to attend colleges is among the most important investments that individuals and families make.

Potential students possess diverse levels of academic preparation, interests, and other characteristics, all of which shape their economic outcomes after graduation. At the same time, colleges themselves also affect the success of students in important ways, such as the likelihood of graduation, which fields they study, and what skills they acquire.[1]

Despite the importance of individual institutions, little is known about how they compare along important dimensions of quality, potentially distorting investment decisions by individuals and the public. This is especially true for the nation's nearly 5,000 colleges that grant primarily two-year or shorter credentials. Together, they graduate nearly 2 million students annually (about 40 percent of all post-secondary graduates). Moreover, popular rankings of college quality, such as those produced by *US News*, *Forbes*, and *Money*, focus only on a tiny fraction of the nation's four-year colleges and tend to reward highly selective institutions over those that contribute the most to student success.

Drawing on a variety of government and private data sources, this report presents a provisional analysis of college value-added with respect to graduate economic success, measured by the incomes graduates earn, the occupations in which they work, and their loan repayment rates. As defined here, a college's value-added measures the difference between actual alumni outcomes (like salaries) and average outcomes for institutions with similar characteristics and students. Alumni outcomes are determined by student and institutional characteristics, observable qualities of the college, and unmeasurable "x factors." The measurable and unmeasurable qualities constitute the college's value-added relative to comparable institutions—not, to be clear, the value-added relative to forgoing a postsecondary education.

While imperfect, the metrics introduced here improve on conventional rankings in several ways. They are available for a much larger number of post-secondary institutions; they focus on the factors that best predict objectively measured student economic outcomes; and they attempt to isolate the effect colleges themselves have on those outcomes, above and beyond what students' backgrounds would predict.

This analysis finds that:

- Publicly available data from websites such as Payscale and LinkedIn can help measure and predict economic outcomes for graduates by institution.

- Three key college **quality factors** are strongly associated with graduates' economic outcomes. Colleges with a higher *curriculum value*—that is, where more students major in fields that lead to higher-paying professions, especially in STEM disciplines—typically have more economically successful graduates. The same is true for colleges with high-value *alumni skills* that employers demand, and for colleges with higher student *graduation rates*.

- Graduates of some colleges enjoy much more economic success than their characteristics at time of admission would suggest. These colleges generally perform well on the key quality factors of curriculum value, alumni skills, and graduation rates. Colleges with high **value added** on alumni earnings include not only nationally recognized universities such as MIT, Stanford, and Harvard, but also smaller institutions such as Rose-Hulman Institute of Technology in Indiana and Carleton College in Minnesota, as well as two-year colleges such as New Hampshire Technical Institute and Pearl River Community College in Mississippi.

- The college economic value-added measures developed in this report are available for a larger number of institutions, and more accurately predict alumni economic outcomes for students with similar characteristics, than conventional college rankings.

Measuring the economic value-added of colleges can provide additional valuable information to college administrators, students, families, and policy makers regarding critical public and private investment decisions. As data on students' eventual economic outcomes become increasingly available, researchers can expand and improve on the measures developed here to provide deeper insights into the economic returns those investments achieve.

Introduction

The economic benefits of a college education are widely recognized and quantifiable. For instance, compared to the typical individual with only a high school diploma, the typical bachelor's degree holder earns $1.19 million more, and the typical associate's degree holder earns $885,000 more, over their careers.[2]

Yet, coming out of the Great Recession, many young graduates were finding it difficult to acquire jobs leading towards a high-paying career path, especially if they were not completing degrees in high-demand fields like STEM (science, technology, engineering, and math) and business.[3] This led many to question the value of an increasingly expensive college degree and to call for greater transparency as to student outcomes after graduation.[4]

While higher education is enormously beneficial on average, individual outcomes for those pursuing higher education vary widely.[5] Students' eventual success differs significantly, among other things, across institutions of higher education, and researchers have identified a number of reasons why that variation might exist. Student characteristics matter, of course. A great deal of variation across institutions in alumni success owes to the fact that so-called "selective" universities invest significant effort into admitting only the students they believe will be successful both before and after graduation. For their part, students often apply to and enter schools that align to some extent with their academic ability and hence future labor market prospects. Many students, however, are simply unprepared to do well in a challenging college curriculum.[6]

Colleges themselves also make real and important contributions to student success.

There is strong evidence that schools matter greatly for their students' prospects of completing a degree. Many students simply do not graduate. For example, only 61 percent of bachelor's degree-seeking students finish their degree within twice normal time, and the rate is just 38 percent for those in two-year programs.[7] Policies such as reducing school costs and providing academic support seem to make an enormous difference in graduation rates. More selective universities often implement these policies to a greater extent, and students with identical qualifications graduate at much higher rates when they attend more selective universities.[8] This is true for low-income students, who also benefit from lower tuition expenses if they attend a selective university, because of the greater scholarship opportunities those institutions tend to provide.[9]

Aside from completion, a few studies have found that attending more selective schools raises future earnings, even for those with the same ability.[10] Other evidence suggests the differences in selectivity must be large to affect earnings of white or middle class students.[11] Nonetheless, there is very strong evidence that black and Hispanic students benefit from higher earnings after attending a more selective college.[12] In one experimental study of job applications, employers seemed to value candidates from more selective colleges and expressed less interest in candidates with degrees from online colleges, despite otherwise identical resumes.[13]

Aside from student support policies and rough measures of quality such as selectivity, schools also vary in terms of the curriculum or mix of majors they offer to students. While almost any course of study may be available to students at large public universities, this is not true of many smaller four-year colleges or community college programs. For example, many colleges specialize in distinct fields like the arts, healthcare, culinary studies, or STEM-focused programs. Thus, students attending these schools are destined to be better prepared for some careers over others, regardless of how their preferences may evolve. The decision to pick one field of study over another has profound effects on lifetime earnings, even for students with similar scores on standardized exams.[14]

Given the rising cost of higher education and important differences across institutions in student success, there is increasing interest in helping consumers and policy makers carefully evaluate institutions.[15] The Obama administration has taken steps to enhance consumer transparency with respect to higher education. As of this writing, the administration's college scorecard contains information on cost, graduation rates, and loan default rates. This information is helpful but provides a limited picture of the value that colleges deliver.

Of course, private companies offer their own versions of college ratings and rankings. The most notable are those issued by *U.S. News*, *Forbes*, and *Money*. Their rankings tend to be highly correlated but differences in criteria and weighting result in three distinct lists (Table 1). For example, Princeton and Stanford rank in the top five in all three lists. Yet Brigham Young University is ranked 62nd by US News, 79th by Forbes, and 9th by Money.

Table 1. Comparison of Popular Rankings of Universities by Criteria Used

	U.S. News	Forbes/Center for College Affordability	Money
Subjective reputation	Yes	No	No

Graduation rate	Yes	Yes	Yes
Post-graduate success	No	Yes	Yes
Selectivity of school	Yes	No	Yes
Cost or student debt	No	Yes	Yes
Class Size	Yes	No	Yes

All of these lists, especially those from *Forbes* and *Money*, use sophisticated statistical techniques and meaningful criteria, but there are various problems with them. Most seriously, there is no sound theoretical basis behind the rankings, nor justification for the dizzying combinations and weighting of diverse metrics into singular measures of quality. Some metrics these rankings include likely have no relation to objective outcomes. For example, both *US News* and *Money* use class size as a factor in their rankings. Yet there is little social science evidence showing that smaller class sizes predict greater learning or success at the college level.[16] In other cases, important metrics may be combined in strange ways that undermine their validity. *Forbes* and *Money* give weight to student debt, loan default rates, and to earnings, but they do not consider how these interact: If students are earning high salaries and easily making loan payments, then an extra $40,000 in debt may be irrelevant to their quality of life.

Crucially, none of these rankings effectively isolates a college's contribution to student learning. *Money*, for example, uses some value-added measures in its criteria, which adjust for student selectivity, but in other metrics, it gives schools credit for being more selective. Thus, its final ranking is a mix of both value-added measures and the selectivity of the school. Selectivity, measured by the admissions rate, is also directly included in the rankings by *US News*. This fuels an absurd competition among schools, by which they advertise widely so as to encourage even unqualified students to apply so they can drive down their admissions rates.[17] *Forbes* does not directly include selectivity measures, but does not adjust for them either. The result is that *Forbes* rankings are very similar to *US News* rankings, and both reward colleges who admit students with the highest probability of career success.

If these are errors of commission, college rankings also suffer from flaws of omission because many relevant data go either uncollected or remain hidden from the public. As a result, college rankings lack any direct measures of student learning or the content of the knowledge or skills learned. None even considers how students' fields of study relate to their preferred or eventual occupations.

Against all this, new advances in technology and business models, as well as state level policy reforms, are starting to increase transparency. Various human resources websites collect detailed economic information from millions of alumni and states are starting to disclose administrative data that link student earnings to colleges. Websites such as Payscale and LinkedIn collect salary and skills information with institutional detail for scores of graduates. College Measures publishes data showing earnings for recent graduates of colleges in six states. These data, while imperfect, provide new opportunities to assess college quality with respect to graduates' economic outcomes, for a much wider swath of institutions than conventional rankings cover.

This report builds on these advances to develop new ways of measuring the economic value that U.S. colleges provide. The next section briefly defines the concepts and methods used to measure aspects of college quality. The report then proceeds to show that the outcome measures used have empirical validity (in that they actually predict student economic outcomes); it then explains which factors determine

economic success and which schools tend to perform best on various predictors of alumni success; the final sections describe which schools add the most value to their students, and how value-added measures compare to popular rankings. Ultimately, these measures can help students make better choices, college and regional leaders assess where they stack up on important quality measures, public and private leaders and donors in higher education more effectively prioritize student success, and researchers improve their own methods for understanding how educational institutions affect individual and collective prosperity.

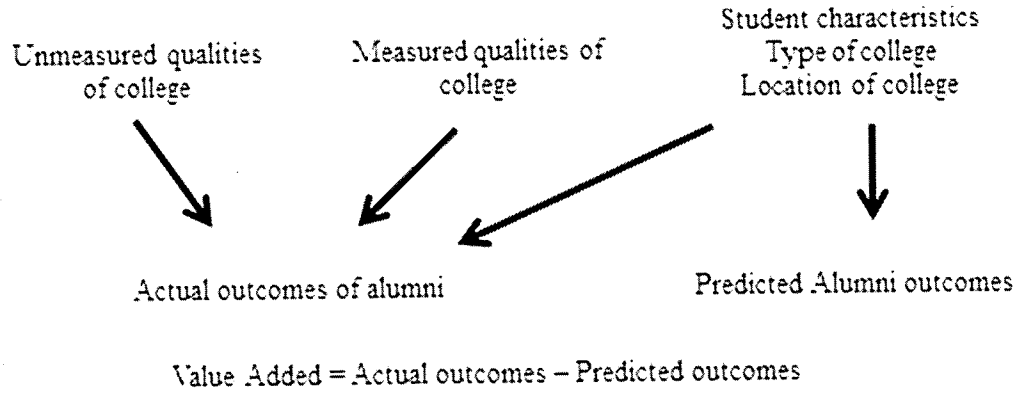
Methods

This section defines the metrics used to assess various aspects of college quality, how they were constructed, and where the underlying data came from. A technical appendix provides greater detail, along with econometric models used to generate the heart of the analysis.

The basic idea underlying this analysis is that student economic outcomes (like future salaries) are affected by student characteristics (such as their academic preparation, age, racial or ethnic background, and family income), the type of college (a community college or research university, for example), the location of the college (as in a big city with many jobs compared to a small town), and the quality of the college (See Figure 1). Quality, in this sense, is compared only across institutions with similar profiles, locations, and admissions strategies (e.g., selective or open).

Furthermore, quality can be measured only imperfectly. Some aspects of quality—such as the presence of a great president, development staff, or teaching faculty—cannot be measured, at least with existing data sources. Therefore, quality has measured and unmeasured components. The measured aspects of quality include things the college can control or improve upon using known strategies. These include how well it pays teaching faculty, how much aid it gives to students (a measure of the economic value offered to students), how its curriculum aligns with high-paying careers, and whether the college has effective strategies for helping students complete their degree program.

Figure 1. How value-added is calculated



Without knowing the quality of the college, in the ways described above, the college's student, institutional, and locational characteristics can be used to predict student economic outcomes after graduation. The difference between actual and predicted economic outcomes provides a measure of the college's value added, compared to other institutions.[18]

Value added is meant to capture the degree to which the college itself affects student economic success post-graduation. It represents the college's output, such as alumni earnings, less the college's inputs, which include the characteristics of its students at the time of admission, and its institutional type and location. The final value-added measure shows how far above or below the institution's alumni outcomes are compared to the average peer institution. It does not assess the value of going to that college as compared to forgoing a postsecondary education or the return on investment per dollar spent on education.[19]

This is not the first attempt to measure value-added across colleges. Education economists have used value-added models in the context of predicting wage earnings in Texas, where detailed administrative data was available at the student level.[20] Others have estimated value-added with respect to graduation for four-year colleges using college-level metrics from the Department of Education.[21]

The next section lists, defines, and briefly describes three important categories of indicators that make up the remainder of the analysis: graduate economic outcomes and associated value-added measures; student and institutional characteristics; and college quality factors that contribute to graduate economic success.

Graduate economic outcomes and associated value-added measures

This study calculates college value added separately with respect to three basic economic outcome measures for each institution's graduates: *alumni mid-career salary (available for 1297 institutions)*, *federal student loan default rates (available for 61666 institutions)*, and *occupational earnings potential (available for 2433 institutions)*. Final centile rankings will be made available separately for two-year and four-year colleges, but one can compare the value-added measures between them.

Alumni mid-career salary: Median total earnings by college for full-time workers with at least 10 years of experience. These data come from the website Payscale.com, which collects data directly from graduates who log on to the website and enter their information in exchange for a free "salary report." Mid-career earnings were chosen because they better approximate earnings over the course of one's working-career and were easier to explain statistically. Earnings are limited to alumni with a bachelor's degree for colleges that primarily award Bachelor's or higher degrees, and earnings data are limited to alumni with an associate's degree for institutions that primarily award two-year or lower degrees.[22] In this way, the earnings measure is not affected by the probability that alumni going on to earn higher level degrees from other schools.[23]

Federal student loan default rates: The percentage of a college's attendees who default on their federal student loans within the first three years after repayment begins. To minimize variance due to annual fluctuations for small schools, the total number of defaults from 2009 and 2014 was divided by the total number of borrowers during the years 2009 and 2011, where defaults were included only for the same cohort. Missing values were given to colleges with fewer than 10 borrowers or fewer than 30 borrowers if the number of borrowers comprised less than 5 percent of graduating students. These data come from the Department of Education.[24]

Occupational earnings power: The average salary of a college's alumni's occupations.[25] Alumni occupation data come from LinkedIn, and are used to weight earnings data (national wages by occupation) from the Bureau of Labor Statistics Occupational Employment Survey to arrive at an average

salary figure. For this measure, all alumni contribute to the final value, even if they have earned a higher degree from a different institution.

This occupational earnings potential measure expresses the average market value of the careers for which a college presumably prepared its graduates, and is more broadly available than the alumni mid-career salary measure derived from Payscale.

[SIDEBAR: ***Non-monetary value-added measures***

This study focuses on economic outcomes—such as salary—for a few reasons. Earnings is a major and important measure of well-being, earnings data are relatively precise and easy to obtain, and income and other labor market outcomes have important civic and public policy implications, in terms of their effects on other people and tax revenues.

At the same time, there is more to life than purchasing power. As it happens, the value-added method described here can be applied to any measurable outcome. For example, Payscale provides survey data by major and college on the percentage of graduates who believe their job makes the world a better place. The percentage of a college's students who complete degrees in fields such as theology, healthcare, education, and biology is closely associated with that value measure. Whether or not concepts like meaning, happiness, and the living of a good life can be validly measured is, however, beyond the scope of this paper.

College value-added, with respect to alumni mid-career salary: The percentage increase or decrease in mid-career salary above or below what is predicted based on student and school characteristics. The comparison is the average institution, so that a negative score means alumni are earning below the average institution with similar student and institutional characteristics. A negative score does not imply that the college's alumni would have been better off not attending.

College value-added, with respect to federal student loan defaults: The percentage point increase or decrease in federal student loan default rates above or below what is predicted based on student and school characteristics.

College value-added, with respect to occupational earnings power: The percentage increase or decrease in the average salary of the occupations in which alumni work above or below what is predicted based on student and school characteristics.

Student and institutional characteristics

The variables used to control for the characteristics of students at the time of admission and the type of institution they attend are derived mostly from the Department of Education's Integrated Postsecondary Education Data System (IPEDS), which requires colleges eligible for federal postsecondary financial programs to report detailed data. Some of the less familiar concepts are described in more detail below.

- The *Carnegie classification* of the college is based on its mission, administrative data, and awards levels. It is frequently used as a way to classify different institutions into similar categories for research purposes
- Student demographic data on *race*, *gender*, and *age*
- Colleges also submit financial aid data to IPEDS, which provides indirect information on student family incomes, which predict preparation for academic success. Pell Grant aid, for example, is strictly need based and decreases as family income increases. Therefore, the *average student's Pell Grant aid* provides an indication of student financial need (and, for that reason, is a slightly better predictor of student outcomes than the percentage receiving Pell Grants of any size)[26]
- The *local price index* is from the Bureau of Economic Analysis, and is meant to capture the local cost of living, for which housing costs are the most important. Since salaries for even non-specialized jobs are higher in expensive cities like New York, this is an important adjustment, since many graduates reside in or around the region of their college. *State* is also included to adjust for differences in state labor markets
- *Student test scores* refer to results from admitted students on the quantitative sections of the SAT and ACT (those sections are most predictive of student outcomes after graduation). Test scores on both exams were first standardized to have mean zero and a standard deviation of one. Then a weighted average was calculated using the percentage of admitted students who took each exam. For colleges with no admissions requirements or reported test score data, imputed test scores are used instead. The model used to predict student test scores is described in the appendix

Table 1. Control variables used in analysis to predict alumni outcomes

Student Characteristics	Type of college	Location of college
Percent of students enrolled part-time	Modal degree is one year	Local price index 2012
Percent of freshman from same state	Modal degree is post-bachelor's	State location
Foreign-born student share of enrollment	"Online" in name of college	
Asian student share of enrollment	Carnegie Classification	
White student share of enrollment	Percentage distribution of degrees granted by level	
Average age of students		
Female share of students		
Percent of students receiving no aid		
Pell Grant aid per student		
Imputed standardized math scores		
LinkedIn salary bias		

Finally, a variable referred to here as *LinkedIn salary bias* is included. Since two of the outcomes are measured using LinkedIn and Payscale, it is important to adjust for potential bias in the use of these social media websites.[27] The extent of the Payscale bias will be discussed below.

College quality factors

The analysis considers college "quality" factors as distinct from student and institutional characteristics, and measures of that success. Variables were considered potential quality factors if they met the following criteria: (1) it affects alumni economic performance, or is at least significantly correlated with it; (2) it is not a direct measure of economic success; and (3) it is something colleges can influence, at least partially, given their institutional focus (medical schools vs. culinary schools) and location. This limited the list of quality factors to these six concepts:

Curriculum value: The labor market value of the college's mix of majors. This is calculated by determining the national median earnings for all bachelor's degree holders by major, using the 2013 American Community Survey. A weighted average for each school is then calculated using the actual number of graduates in each major, with data from IPEDS. Non-graduates are not included in the analysis.

Share of students graduating in STEM fields: The percentage of graduates who complete a degree in science, technology, engineering, or math majors, based on IPEDS data. The calculation is limited to bachelor's degree awards for institutions that primarily grant bachelor's or higher awards, and it is limited to associate's degrees and lower awards for institutions that primarily grant such awards.

Value of alumni skills: The labor market value of the 25 most common skills listed on the LinkedIn resumes of alumni who attended the college. These skills were matched with data on skills and salaries advertised in millions of job vacancies, compiled by the labor market intelligence firm Burning Glass and purchased by Brookings for various research projects. The skills listed on LinkedIn were not necessarily acquired at the college.

Graduation rate, twice normal length: The percentage of enrolled students who graduate from the college in eight years for four-year programs and four years for two-year programs.

Average aid per student: Total financial aid provided by the college divided by the number of students.

Average salary of teachers: The average compensation of all instructional staff at the college.

Other variables were considered as potential quality or control measures but rejected because they did not improve the predictive power of the model, including: student to faculty ratio, average net cost of tuition, retention rates, transfer rates, percent of students using distance learning, for profit status of college, and the percentage of teachers with adjunct status.

Findings

1. **Publicly available data can predict the actual earnings of graduates**

Since neither colleges nor all but a few state governments provide information on the post-attendance economic outcomes of college students, assessments based on such information must turn to privately available sources. Payscale appears to be the most promising. In exchange for a free "salary report"—showing how a user's earnings stack up against peers in his/her field—anyone can create an account on Payscale after entering information on where they attended school, what they studied, and how much they earn.

There are a number of ways one can assess whether or not Payscale accurately captures the earnings of graduates—or whether the sample is statistically biased by the voluntary nature of its data collection.

Broadly, Payscale earnings by major for U.S. residents can be compared to similar data from the U.S. Census Bureau's American Community Survey (ACS), which samples 1 percent of the U.S. population.[28] The correlation between the two is what matters most for this analysis, since value-added calculations are based on relative differences between predicted and actual earnings.

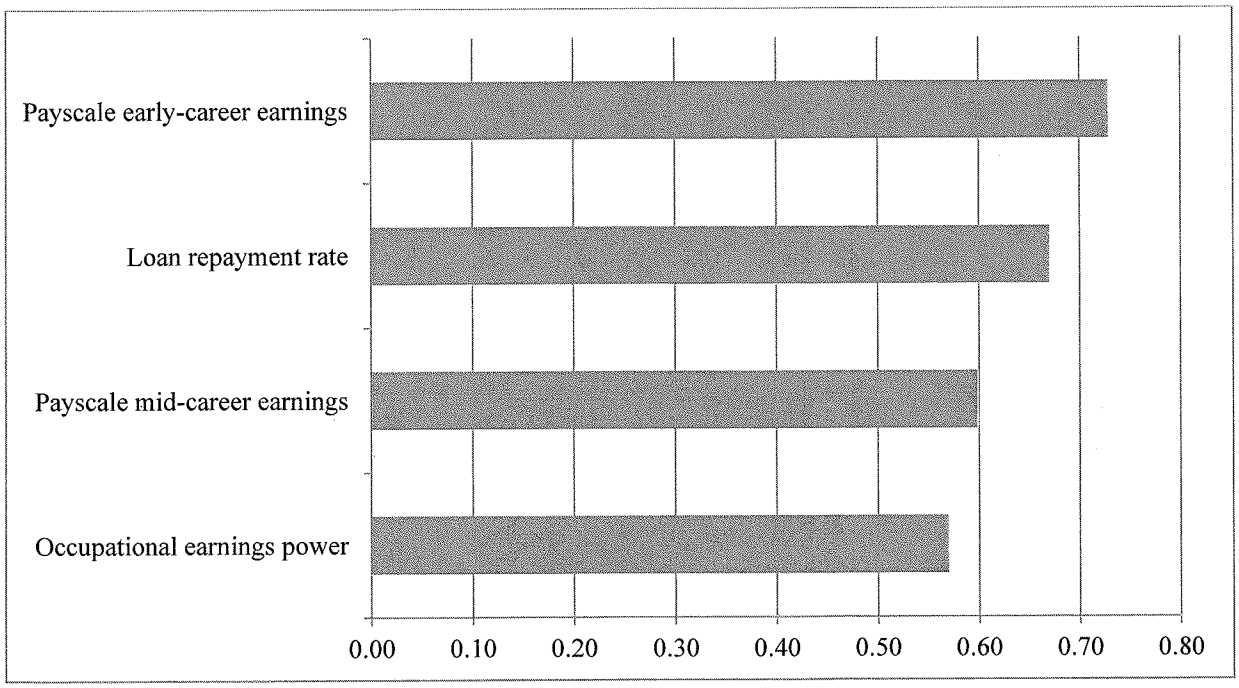
The correlation between bachelor's degree's holders on Payscale and median salaries by major from the Census Bureau is 0.85, across 158 majors matched between the two databases. Averaged across majors, the ACS median salary falls between the median early and mid-career salaries listed on Payscale. Specially, the ACS median is $12,000 above the Payscale early career salary and $18,000 below the Payscale mid-career salary. The salaries of associate's degree earners on Payscale by major are also highly correlated with the ACS data (0.76).[29]

At the college level, alumni mid-career earnings and other economic outcomes for graduates can be compared to other publicly available data in a limited number of cases. Some states report earnings data from unemployment insurance records, which are generated for almost every worker and are legally required to be accurate and timely. Among the small number of states that collect and publicly share this information for public colleges, the Texas Higher Education Coordinating Board (THECB) uniquely provides these data on its website in a format that is conducive to statistical analysis.

The THECB provides median earnings by institution and major for the fourth quarter of the year following student graduation. These records are limited in that they provide no information about how many hours the students are working and what their annual salary would be if they worked full-time. Moreover, since these data reflect students' first jobs after graduation, they are likely to greatly understate lifetime earnings potential, especially if the graduate plans on attending graduate school before starting his or her career. Nonetheless, the data are instructive.

The three economic outcome measures (alumni mid-career salary, federal student loan default rates, and occupational earnings power) all correlate highly with earnings immediately after graduation for Texas colleges (see Figure 2).[30] Early-career earnings from Payscale explain the early-career Texas earnings better than Payscale's mid-career earnings measure, as expected (with 0.73 vs. 0.60 correlation coefficients, respectively), since the Texas data contain income only just after graduation. Student loan repayment rates within the first three years of graduation (0.67) and occupational earnings power (0.56) also correlate well with income soon after graduation. Importantly, these strong correlations show that data from Payscale and LinkedIn, and data on student loan default rates, capture important aspects of graduate economic success.

Figure 2 – Correlation coefficient of median wages of recent Texas graduates with variables used in this report



Yet student test scores are also highly predictive of earnings, which raises the question: How much credit should a school get for the success of its graduates? To answer that, one needs a better understanding of what explains student economic outcomes after attendance. The next section addresses this.

2. A college's curriculum value, the skills its alumni possess, and its completion rates strongly predict economic outcomes for its graduates

Most economics research models predict workers' earnings as a function of their gender, years of experience, and human capital, measured by years of education.[31] Looking at Payscale's mid-career earnings for bachelor's degree holders by institution eliminates variation in workers' experience and years of education, and yet differences across institutions remain large. This section examines some of the factors that may explain these differences in economic outcomes across colleges.

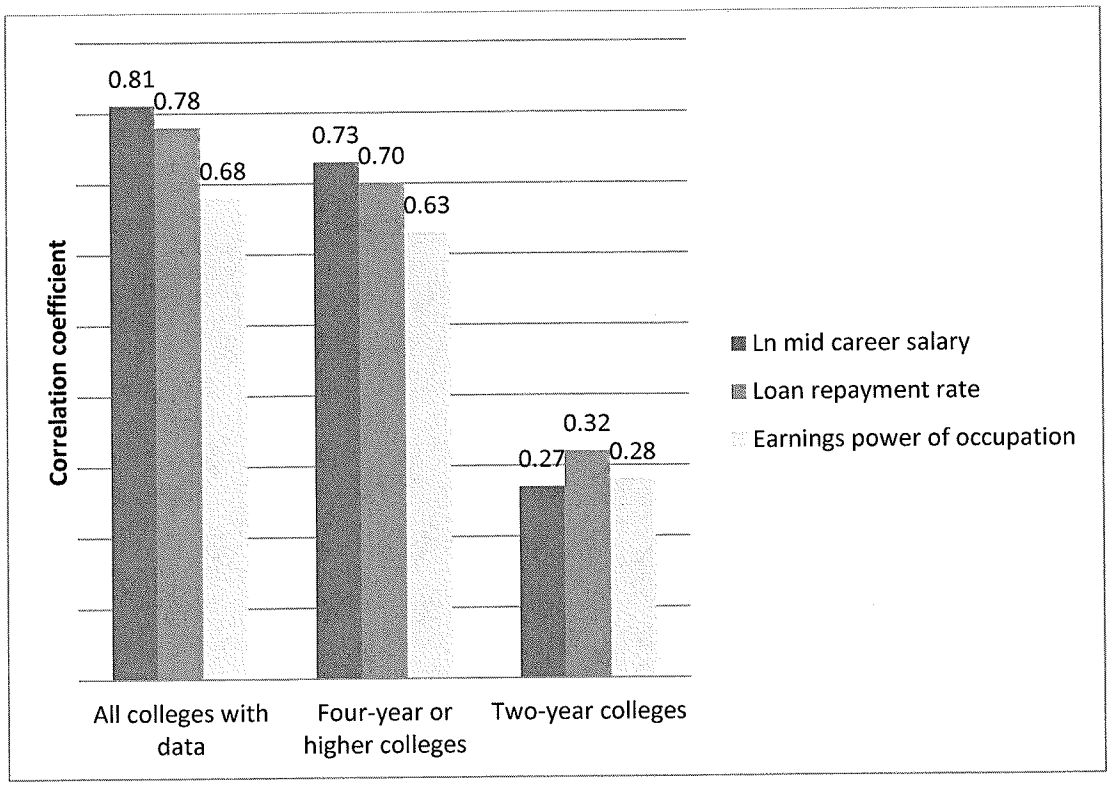
Student characteristics

Even among college attendees, student characteristics differ widely and clearly affect earnings after graduation. For example, students with higher cognitive scores—measured in a variety of ways, including college entrance exams—tend to earn higher salaries.[32] Likewise, students from lower-income families exhibit lower earnings. The race, age, and gender of students affect their later earnings as well.

For each of the three post-attendance outcomes measured here—mid-career salary, loan repayment rate, and occupational earning power—student test scores (math scores in particular) are highly associated (Figure 3). The correlation coefficient between math test scores and mid-career salaries is 0.81. It is only slightly lower for student loan repayment (0.78) and somewhat lower for the earnings power of the

occupations in which alumni work (0.68). Other characteristics, such as the percentage of students receiving Pell Grants, also correlate highly with these outcomes, though not as highly as student test scores. In all cases, however, the relationship between these measures and test scores is much closer for four-year colleges than for two-year colleges.

Figure 3-The correlation between student test scores and economic outcomes post-attendance



In addition to test scores, other demographic differences distinguish the ten colleges with highest and lowest earning alumni. The top-scoring schools—such as Cal Tech, MIT, Harvey Mudd, and Washington University in St. Louis, the University of Chicago, Harvard, and Princeton—have very low percentages of students receiving need-based financial aid under the Pell Grant program (13 percent), whereas most students in the bottom-scoring schools receive such aid (66 percent). The racial-ethnic composition is also much different. Blacks and Hispanics comprise just 5 and 6 percent of the student population in top-ten scoring schools, respectively, versus 69 and 12 percent in the bottom-ten scoring schools. Likewise, men comprise a higher percentage of students in the top scoring schools (53 percent) than in the bottom scoring schools (40 percent).

Institutional characteristics

Aside from student test scores, colleges have very different missions and specializations. Some focus entirely on training lawyers or doctors, while others specialize in cosmetology or religious vocations. Of course, schools also differ widely in the level of education they offer too. The Carnegie Classification