

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Monday, January 12, 2015 2:18 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** When rating community college, your system must be nuanced concerning completion rates. A significant portion of the student body at community colleges have no intention of transferring to a four-year school, but may simply take courses for personal growth, or never intend to earn an A.A. degree: completion for those students means finishing the course work. The community college serves the community in more ways than simply granting degrees and the rating system should reflect that complexity. In some cases transfer students do not finish an A.A. degree at the community college before they transfer to the four-year institution for various reasons. Again, the rating system must clearly distinguish or track the students who move to the Bachelors institute without earning an A.A.; those students complete the coursework they need—prerequisites or general education—in order to advance. If the metric simply measures completion! of a degree, then the community college early transfer student will not be counted as a "completion" of intended goals.

So, the rating system for the community college must be much more complex and nuanced considering that the goals and intention of the students is also much more complex and nuanced.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** Daniel Flowers <dflowers@saintmarys.edu>  
**Sent:** Monday, January 12, 2015 4:46 PM  
**To:** College Feedback  
**Cc:** Carol Ann Mooney; Vicki Briggs  
**Subject:** Draft College Ratings Feedback  
**Attachments:** SMCFeedbackDOERatings.pdf

Good Afternoon,

Please find attached the official feedback from Saint Mary's College, Notre Dame, IN to the Department's draft proposal on college ratings issued in December 2014.

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Thank you for welcoming feedback.

Daniel

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Daniel R. Flowers  
Director of Institutional Research  
Saint Mary's College  
165 Le Mans Hall  
Notre Dame, IN 46556  
(574) 284-4574

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SAINT MARY'S COLLEGE  
NOTRE DAME • INDIANA

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January 12, 2015

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Under Secretary of Education, Dr. Ted Mitchell  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Dr. Mitchell:

Saint Mary's College, Notre Dame, IN would like to thank the Department of Education for their draft proposal on the College Ratings released in December 2014. We are also appreciative of the opportunity to offer public comment. Saint Mary's College is a four-year, Catholic, residential, women's liberal arts college offering five bachelor's degrees and more than 30 major areas of study, such as business, nursing, art, chemistry, and social work. We have three main comments we would like to share.

(1) The first relates to how institutions will be grouped for comparison. We do not believe it is sufficient to only divide two-year and four-year institutions but believe at a minimum, institutions should be further divided by status as public or private institutions. For example, it would not be realistic to compare net-price at a public institution for students paying in-state rates to those at private institutions. This comparison would not control for-public subsidies that allow for reduced in-state tuition and unfairly disadvantage private institutions in any comparison.

(2) We would like to praise the Department of Education for their measure on earnings. We agree that this method of setting a minimum threshold for earnings and considering the percentage of graduates earning above the threshold controls for institutions with programs that do not traditionally have high starting salaries (i.e. social work, education, etc.). A simple median or average earnings of an institution's graduates would not adequately control for institutions with significant enrollments in such programs. We would also suggest consideration be given to controlling for graduates who voluntarily do not enter the workforce (perhaps to raise children or to engage in non-paid volunteer work). In fact, some of these graduates may even be working part-time, but we still do not believe it would be appropriate to consider their earnings in the same way as those who have pursued and secured full-time employment. We would hope that such graduates would not be considered as "below" the earnings threshold since these activities are frequently a conscious choice.

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Saint Mary's College • Notre Dame, Indiana 46556-5001

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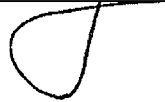
[saintmarys.edu](http://saintmarys.edu)

(3) We hope the Department of Education considers allowing institutions to provide contextual information and/or data to the DOE supplied metrics when released to the public. We would also advocate early access to the metrics prior to public disclosure in order to provide institutions adequate time for such context to be provided once the DOE metrics are released publicly.

Again, we thank the Department for their efforts and willingness to consider feedback.

(b)(6)

Carol Ann Mooney  
President



Daniel R. Flowers  
Director of Institutional Research

CAM:vb

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Wednesday, January 14, 2015 10:43 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I have strong interest in the positive outcomes that can be achieved by the proposed college rating system.

I would like to participate in the review and public comment.

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I have one daughter who completed a BS degree, another daughter is struggling to complete a Computers Science degree and a son who is in the NAVY and has enrolled in several classes  
I also have taught in the Community Colleges for 14 years and operated my own commercial training business for 20 years prior to that.

I have a strong opinion about how colleges fail students. Primarily by not insisting upon psychometric attitude and personality profiles to identify sets of aligning degrees from which students can choose their primary major plan of study. Current practices completely ignore the proven capability of psychometric evaluation and the result is a very hap-hazard exploration of likes and dislikes by taking a variety of classes and then switching majors.

This results in a zig-zag pattern that demoralizes students and pumps up their time to completion as well as the cost of tuition to achieve completion and for sure hightens the risk of dropping out.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Wednesday, January 14, 2015 12:37 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** It really bothers me that young people are boxed into the idea that university must fit into a four year academic undergraduate career. For my children, university was a time of self discovery and learning that they used to shape who they are today. My children always said that the fact that college was expensive taught them the value of their liberal education. A very crucial part of their success at the university and in their professional lives and development beyond college was their active engagement in opportunities that went beyond college classes. They studied languages, studied abroad for one semester, engaged in music groups, cross-cultural organizations, and studied very hard with professors who cared deeply about their learning. I think a rating system must measure student engagement in learning opportunities campuses provide as well as the sense of purpose they see in learning about a broad set of areas of study (our world is complex and we need people who can understand and solve problems in complex ways).  
Thank you for reading my message!  
Simone

**Constituency:** Parent

**Other Constituency (*if supplied*):**

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

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**O'Bergh, Jon**

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**From:** Robinson, Linda <Linda.Robinson@montgomerycollege.edu>  
**Sent:** Thursday, January 15, 2015 10:13 AM  
**To:** College Feedback  
**Subject:** comments- College Ratings

Many of these measures are based on data reported on FAFSA form. At the community college level, there are significant number of middle income level students who do not complete a FAFSA and there are other students as well that do not. Won't that skew the results? I am a counselor at a community college so I am speaking from firsthand knowledge.

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Also, I have concerns about the use of the word "consumer" in reference to education. What are we losing as a society where everything is reframed as a relationship between "consumer" and market? This is a broader problem in American culture; the loss of humanistic values and quantification of that which is unquantifiable. All these measures will not truly reflect the transformative experience that occurs in the classroom; nor will it truly reflect the value of education beyond the narrow lens that is being applied here- the goal of increasing the dollar value of the individual -how much is he or she contributing to labor and production and how much monetary compensation is that individual able to obtain throughout their lifetime. By creating these very metrics, as a government representing the people, we are in effect, proclaiming that education, like everything else in the USA, is also a commodity. A question to ponder- what kind of society do we continue to create? Are we really that surprised by the fall out in terms of our social problems- the alienation of individuals, the increasing levels of mental health problems, broken families, etc?

Robinson  
Professor/Counselor

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, January 15, 2015 6:31 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** It would better (and less costly for the taxpayer) for the government to inform and educate its consumers (students and parents) as to what (the government) deems a quality education and let the consumer decide than to further burden higher education institutions with more federal compliance regulation that unnecessarily drives up the cost of education and has no meaningful impact. It's the same process consumers use when voting for their elected officials. ~~We make even less informed decisions when we vote. Perhaps the~~ government should seek input from the American taxpayer on what should constitute a ratings system for the effectiveness of it federal government. Elected officials would have a better idea of what colleges and university have to go through to comply with new rules of a higher education rating system. Elected official would be taken off task from governing while they devote time to measuring and reporting their effectiveness, just like educational institutions do. Like the Feds holding Title IV funds from colleges and universities in ransom for federal compliance, all taxpayers would get a reduced tax rate when the federal government falls below threshold on a government effectiveness ratings system (GERS). Honestly, the most unreliable systems for measurement are when humans measure the effectiveness of other humans. You're setting up a system where the real outcomes will be graduates sitting around talking about which institutions they graduated from while asking if you want fries with that burger. We already have plenty of college graduates who can't find decent-paying jobs because our elected officials are devoting their time and energy to finding out what kind of school they graduated from rather than creating the kind of jobs that graduates from all colleges and universities would be happy to work (to help pay off their student loans.) The complexity of this is beyond the capacity of our elected officials.

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** Halleran, Michael R <halleran@wm.edu>  
**Sent:** Friday, January 16, 2015 3:42 PM  
**To:** College Feedback  
**Cc:** Halleran, Michael R  
**Subject:** comments

Thank you for the opportunity to comment on the proposed college ratings framework being developed by your office.

Let me first say that, like all (or at least I hope all) university leaders, I support transparency and providing useful information to potential students and their families. As you recognize, there is no single set of data that covers all the relevant issues and no single metric that is without problems. Higher education is a complicated beast and what we can most effectively do is make available relevant data and let students interpret them to for their circumstances.

Of the proposed metrics, I would urge in particular that you develop those on loan performance outcomes, graduate school attendance, and the EFC gap. What I urge strongly against is trying in any way to aggregate (and weight) these metrics to some common score. This is the chief limitation of the rankings of USNWR and other such outlets, namely that they arbitrarily assign value to particular data and then by formula compute the findings. Doing this would undermine considerably the value of the data you are providing and, I fear, trivialize your work, making it reducible to a formula-driven number of limited meaning or value. In fact, I would even suggest that it's problematic to refer to these data as "ratings," as rating implies an explicit or implicit value. For example, in the case of post-graduate income, is a higher income a good, bad or indifferent outcome? Too many variable go into these initial salaries that one can't say – without knowing *all* the variables. A school with a high percentage of engineering students will have higher entry-level salaries than one that has large numbers working for NGO's. I would urge that you come up with a different and neutral word/rubric for what you are in fact presenting – that is to say, data. This horse may be too far out the barn door but it would add credibility to your important efforts.

Thank you again for this opportunity and please let me know if I can provide you with any further information.

Sincerely,  
Michael Halleran

*Michael R. Halleran*  
*Provost*  
*The College of William & Mary*  
*Williamsburg, VA 23187*  
*757-221-1993*  
*[halleran@wm.edu](mailto:halleran@wm.edu)*

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Saturday, January 17, 2015 12:39 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** As a land-grant, public research university, we welcome the opportunity to participate in a fair assessment of, and share data regarding, student success at the University of Connecticut. Having reviewed the tentative framework of the proposed College Ratings System, we have several observations and concerns.

~~The proposed system seems to be unnecessarily complex, involving multiple layers of reports and data requests with few data elements finalized, and even fewer that are measurable. The plan also fails to address important regional and state differences, regarding demographic data like low-income students and students of color.~~

If a primary purpose of this ratings plan is to measure the impact and reduce the cost of a college or university education on low-income and first-generation students, we would ask that the most important issues be the ones addressed first: retention and graduation rates for all students and diverse subpopulations. At UConn, we are proud of our 93% first year retention rate for all students and equivalent rate for students of color, as well as our most recent four-, five- and six-year overall graduation rates of 70%, 81% and 81%, respectively. To us, these are critical data points that should be primary in rating all universities and colleges. We also believe the various missions of higher education institutions should be considered more thoughtfully and taken into account in any new ratings system.

Critical questions that need to be asked include: How many low-income and first-generation students are applying to, and being accepted at, graduate school? How are Research I institutions encouraging high potential low-income and first-generation students to pursue Master's Degrees or attend medical and professional schools?

We also do not see the need for an additional tool for evaluative processes that might emerge from this rating plan, when the U.S. Department of Education already has two in existence: the College Scorecard and College Navigator. These existing tools can be used to integrate any new ratings system that is developed. In fact, the College Scorecard system already reports on the most critical aspects of the new rating system, in our opinion, retention and graduation. Finally, many students and their families have difficulty using these tools, so any new tool must be simpler to use, not redundant and not more complex.

Thank you. We hope you find this input useful.

Wayne A. Locust  
Vice President  
Enrollment Planning & Management

Sally Reis  
Vice Provost  
Academic Affairs

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

**User E-mail (if supplied):** wayne.locust@uconn.edu

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Saturday, January 17, 2015 4:58 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Regarding the ratings system metrics, I would argue the intangible components of student satisfaction need not be correlated to federal funding, but should be included as a part of the overall database. Without this information, the prospective students for any institution will not have a full image of the quality of the institution they are about to attend, especially for schools where the satisfaction of the student body is not going to be clearly broadcast in an unbiased way for the future students to include in their decision-making process.

To illustrate, consider a school where health services has a continually poor track record of treating students in a timely manner. This issue won't be apparent on a financial accessibility level, but this could be a crucial factor for a student with a chronic illness or condition that would require more attention. Alternatively, if student organizations are not given the resources they need to fulfill all campus wants, then the institution is not meeting its end of the bargain in providing a space where students can grow and develop in all of their skills.

Given these examples, and the fact that the idea of the university is increasingly becoming more and more of a costly investment into a business, it is important to protect the consumers (students) and give them the capability to rate their institutions, as well as an open forum for public opinion (that which is often kept hidden by the institutions that they attend).

In simpler terms, the metrics already outlined (using Pell, EFC, etc.) are all useful and should be the primary tools used by legislators since these are all quantifiable values that can drive meaningful policy; however, in addition to the quantified metrics, a section for each institution's ratings should also include the qualified metrics acquired from a student survey (overall student satisfaction, quality of specific campus services, satisfaction with administration, truth in advertising, etc.) and present these on a 1-5 scale or something identical to show how students perceive their institution after having already attended the institution for any period of time. This survey could be added to the FAFSA renewal form so that annual updates on institutional effectiveness can be aggregated and pooled into the databases used for students, parents, and all other interested parties.

By using a system of this design, legislators and policy-makers will be able to measure the success of an institution—and the students, parents, other parties will simultaneously be better protected as consumers from making a choice about an institution that does not meet their needs.

**Constituency:** Student

**Other Constituency (if supplied):**

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

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