



Independent Colleges of Washington

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

January 28, 2015

Dear Mr. Secretary;

I write on behalf of the members of Independent Colleges of Washington, the 10 private non-profit liberal arts colleges in Washington state. Thank you for the opportunity to respond to the President's proposal to establish a Postsecondary Institutional Ratings System.

This is a very ambitious project, but its purpose to "combat rising college costs and make college affordable" is at odds with this effort which will increase costs as colleges seek to comply with yet another rating system.

A simplistic rating system will undermine our country's access and completion goals – goals that ICW colleges not only share but goals at which we excel. The average family income of students at our colleges is less than the state's median family income; 30% of our students are low-income (Pell Grant and State Need Grant eligible), 26% of our undergraduates are first generation, and 28% are students of color. With this broadly diverse mix of students, as a sector we have the fourth highest completion rate in the country while also responding to Washington's need for science, technology, engineering, math, and health degrees.

This is a great success story, but each of these 10 colleges accomplishes these successes very differently. This rating system reduces their success to a number that misses the context in which they work, diminishes the value of diversity of opportunity, and will likely penalize institutions that have invested significant resources in success of first-generation and low income students.

While we are all seeking innovative ways to respond to the educational and economic needs of the country, this proposal will drive innovation and diversity from the higher education system. Colleges will be penalized for work with non-traditional populations (e.g., age, academic preparation, working adults) and through nontraditional structures.

The proposed step of tying federal student aid to a subjective and likely arbitrary rating of "best value" is irresponsible. "Value" is different to different individuals. For instance, one student may place greatest value on the competitiveness of his or her preferred academic program, while another desires a more hands-on internship opportunity, for another learning in a faith-based environment is most important, and for yet another close interaction with faculty is the top value. Tying student aid to a governmentally assigned value is going too far.

We support efforts to provide an unbiased, statistical resource to help families sort through the many choices they have. But we cannot support an effort that would substitute a federal rating for an individual's judgment about value in the education experience.

Sincerely,

(b)(6)

Violet A. Boyer
President and CEO

Gonzaga University·Heritage University·Pacific Lutheran University·Saint Martin's University·Seattle Pacific University
Seattle University·University of Puget Sound·Walla Walla University·Whitman College·Whitworth University

O'Bergh, Jon

From: Gwendolyn Davis <gwenpdavis@nc.rr.com>
Sent: Tuesday, January 27, 2015 7:46 PM
To: College Feedback
Subject: Proposed Ratings System and Categories

Following are the comments I attempted to send using EDgov blog; however, the submission never succeeded:

I am very concerned about ratings that reflect such measures as EFC gap, family income quintiles, and net price by quintile because there is a danger of creating public perceptions of colleges for "poor" versus "well-to-do." Information such as number/percentage of Pell-eligible students and first-generation students is already available and provided by most colleges. Most colleges already provide to prospects information about percentages of costs met by financial aid. Numerous organizations and colleges provide prospects with information about prospective earnings related to different academic majors and professional fields. While "labor market success" may sound good to policy makers, potential earnings is not the most important factor to most students when they are selecting colleges or academic majors. Although you acknowledge the importance of accounting for the diversity and complexity of our system of higher education and that many factors contributing to quality are intangible or are not amenable to comparable quantitative measures, even such broad labels as the three you are considering will not provide a positive service to the public or the institutions of higher education: listing institutions as "low-performing" or even "those in the middle" will have nothing but deleterious influences. Most students and parents are unlikely to have the background for and willingness or time for delving into all that would be required to properly interpret such ratings or labels. Even policy makers would be in danger of misinterpreting such ratings because of inadequate time or expertise in the areas proposed as the basis for such ratings.

Gwen Davis
GwenPDavis@nc.rr.com
919-782-0112



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

Dear Mr. Secretary:

I am writing to endorse the recent comments sent to you from NAICU president David Warren regarding the proposed federal rating system for post-secondary education. As the president of a health science college I am concerned with the lack of differentiation among four year institutions in the proposed rating system. Our college is small and is very different from the larger four year institutions in multiple areas ranging from the background of the students we serve to the size of our endowment fund. Comparing our institution to a larger four year institution is definitely akin to "apples to oranges." Yet we serve a large number of first generation students and work albeit with limited funds to help them achieve success through degree completion. I am concerned that an unfair comparison to a much more advantaged institution could jeopardize our ability to continue to serve these students. The vast majority of our students receive some form of federal or state aid or loans. I am concerned that the proposed measures particularly categorizing our college with all four year institutions could jeopardize our future students' ability to receive this aid.

I certainly endorse all of Mr. Warren's points and in particular want to express concern for the combination of all schools without differentiation. I believe the measures you have proposed cannot be universally applied and therefore much more consideration must be given to a methodology that takes into account the differences among our wealth of institutions of higher education.

Sincerely,

(b)(6)

Kimberly Johnston Ed.D

O'Bergh, Jon

From: Johnston, Kimberly A. <kajohnston@methodistcol.edu>
Sent: Tuesday, January 27, 2015 4:43 PM
To: College Feedback
Subject: college rating system
Attachments: DOE response rating system.pdf

Please find attached my comments to the proposed college ratings system. I endorse NAICU President Dr. Davis Warren's comments in his recent letter to you. In addition I have some points that I believe are critical in determining what data is utilized for these ratings and the proposed very general categories into which colleges will be placed for comparison purposes. Thank you for your attention to my comments.

Dr. Kimberly Johnston

Kimberly A. Johnston Ed.D, CNE
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O'Bergh, Jon

From: Paige, Br John <JPaige@hcc-nd.edu>
Sent: Monday, January 26, 2015 4:47 PM
To: College Feedback
Cc: Paige, Br John
Subject: feedback on the proposed college rating system

To Whom It May Concern,

As the CEO and President of a 4-year, private, Catholic, baccalaureate institution of higher education, I have grave concerns about the proposed framework for a federal government rating system. In fact, such a system as proposed does NOT account for the diversity and complexity of the nation's higher education entities, and is a particularly egregious measure for non-profit private sector institutions such as the one I represent. The "broadbrush" measures proposed to rate colleges will generate information that is generally useless to interested students and families. I fully endorse the comprehensive critique of the proposed measures as submitted by the National Association of Independent Colleges & Universities (NAICU) in their January 30, 2015 letter to Secretary Duncan.

Furthermore, the long-anticipated regulations on teacher preparation stand to significantly restructure the 160 Catholic institutions such as ours with a teacher preparation program. In particular, the proposed use of K-12 test scores as a measure of the quality of a teaching program's graduates clearly promises to threaten our Catholic mission to serve in high-need areas.

In short, both proposed measures are flawed approaches that ignore the reality of how to define college success in the United States today -- a meaningful endeavor that informs the mind, uplifts the spirit, and instills in the heart a broader sense of the world. Religious-based higher education institutions like ours--which emphasize different outcomes than what is deemed "success" by these government measures--and the students and families who choose such an education for religious purposes, may be disserved by such a rating system.

Thank you for the opportunity to offer comment on this proposed rating system.

Sincerely,
John R. Paige CSC, Ph.D.
President
Holy Cross College (IN)

O'Bergh, Jon

From: May, Susan A <may@fvtc.edu>
Sent: Sunday, January 25, 2015 4:16 PM
To: College Feedback
Subject: Feedback on College Rating System

Since the website would not process the submission of my comments, I will provide them here. Thank you.

- Community and technical colleges are designed to meet the needs of their local communities, making comparisons through any rating system virtually impossible and quite often, irrelevant.
- Rating the effectiveness of institutions, given the wide range of student diversity and mission complexity, is very misguided.
- Two-thirds of degree seeking students at our technical college attend part-time, so many of the measures simply don't apply to the majority of our student body.
- There needs to be strong coordination and correlation with the numerous and growing number of State performance-based funding systems.
- A federal college rating system is completely unnecessary given all of the other quality and performance standards institutions are expected to meet through State legislatures and regional accrediting authorities.
- 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.
- Transfer rates are typically contrary to the missions technical colleges and this data is also very difficult to capture.

Dr. Susan A. May

President
Fox Valley Technical College
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Visit my blog: [A blog by FVTC President Dr. Susan May](#)

O'Bergh, Jon

From: Helm, Dr. Hunt C. <hhelm@bellarmine.edu>
Sent: Friday, January 23, 2015 2:47 PM
To: College Feedback
Subject: PIRS

Bellarmino University in Louisville, KY, believes that the federal government's effort to develop a college ratings system is doomed by definition and should be abandoned. College ratings systems cannot be valid or reliable because they inevitably assign arbitrary weights to criteria that usually measure proxies for quality (not quality itself), and then aggregate those bogus measures into one ultimately meaningless numerical score. Ratings systems cannot adequately consider many of the most important factors for any student choosing a college, including mission, curriculum, geography, extra-curricular opportunities and personal fit.

We do believe in transparency for consumers (for example, a link to the Net Price Calculator is not only on our home page, but is prominent on virtually every page of our web site; and we participate in the University and College Accountability Network (U-CAN), which is based on what individuals have said they need to help them make an informed choice.

Students and families must have the information they need, and that information must be clear and accessible to all. But students and families must weigh it for themselves. Any ratings system will create a tempting but misleading short cut in the college choice process, and will not help advance our shared goal of equity in access to higher education.

Hunt Chouteau Helm, Ph.D.

Vice President for Communications and Public Affairs

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O'Bergh, Jon

From: Scott Flanagan <sflanagan@edgewood.edu>
Sent: Wednesday, January 28, 2015 5:42 PM
To: College Feedback
Cc: tim@naicu.edu
Subject: DoC comments on next steps in creating a federal rating system for post-secondary education
Attachments: College Rankings - Scott Flanagan.pdf

Greetings,

I am respectfully submitting comments regarding the December 19 notice on the next steps in creating a federal rating system for post-secondary education.

Sincerely,

Scott Flanagan, Ed.D.
President
Edgewood College
(608)663-2262



Edgewood College, rooted in the Dominican tradition, engages students within a community of learners committed to building a just and compassionate world. The College educates students for meaningful personal and professional lives of ethical leadership, service, and a lifelong search for truth.



EDGEWOOD COLLEGE

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January 28, 2015

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

Office of the President

Dear Mr. Secretary:

Affordability, access, and attainment in postsecondary education are all worthy goals expressed by the President which I can wholeheartedly support. Unfortunately, I do not believe the proposed federal rating system advances these important goals.

First, the idea that colleges and universities can be rated along a set of uniform criteria is terribly flawed. Each of the colleges and universities in this country has a unique mission, which will manifest itself in different results. It would be foolish to rate technical colleges, for example, for the number of their graduates who pursue graduate degrees—that is not part of their mission. The strength of American higher education is found in its diversity. A one-size fits all ranking system devalues this diversity, potentially putting at risk the financial health of vibrant, important institutions.

Similarly, the idea that students and families should make decisions based on a fixed set of criteria is equally flawed. As an enrollment professional with over 20 years of experience, I have seen first-hand the unique nature of each student's decision-making process. While there are a number of commonalities, each decision is unique. It is not possible, therefore, for any uniform rating system to actually be helpful in influencing college decision-making; in fact, a rating system could contribute to poor decision making based on the relative importance of any one student's situation. In this way, the rating system works against a worthy educational goal.

Further, this proposed rating system reflects a compilation of information that already exists in a wide variety of sources. Students and families have access to this data, which they can use as they see fit—not as deemed appropriate by the federal government—to inform their decisions. In the case of many traditional undergraduate and first generation students, family members and parents may play central roles in the college decision process, and may have different criteria than a student might. Efforts such as U-CAN, already in place, allow for this customization. Once again, a uniform approach would work against the process of individual decision-making that optimizes college choice.

The President should be applauded for his efforts to support higher educational attainment for all citizens. The proposed rating system, unfortunately, does not support those efforts.

Sincerely,

(b)(6)

Scott Flanagan, Ed.D.
President
Edgewood College



O'Bergh, Jon

From: Thomas Dunne <tdunne@fordham.edu>
Sent: Thursday, January 29, 2015 4:43 PM
To: College Feedback
Subject: Comment on College Rating System

Dear Mr. Secretary:

Fordham University, the Jesuit University of New York, is committed to the discovery of Wisdom and the transmission of Learning, through research and through undergraduate, graduate and professional education of the highest quality. Guided by its Catholic and Jesuit traditions, Fordham fosters the intellectual, moral and religious development of its students and prepares them for leadership in a global society.

Fordham recognizes the difficulties faced by today's students applying for college. We wholeheartedly agree that they ought to be able to access information that will allow them to make a wise and informed decision about where to pursue their higher education. The institution a student chooses to attend has the potential to significantly impact his or her future. Presently, college-bound students have available to them an enormous amount of information on colleges and universities, which at first glance can appear daunting. We believe the Department's proposed rating system tool has the potential to help those students find the institution that not only best fits their needs but also shape them into the people they want to be.

With respect to the proposed rating system, Fordham is particularly interested in how students will be able to search for colleges and universities that not only fit certain quantitative criteria but also metrics of a more qualitative nature, which some students will find of equal, if not more, importance. To that end, Fordham applauds the Department's accounting for, as you say, "differences in institutional characteristics and mission" in determining how institutions could be grouped together. As a Jesuit University in the Catholic tradition, we at Fordham consider our mission to be substantially different from a number of colleges and universities, and the proposed rating system should take that into consideration when grouping institutions together. Therefore, in response to the Department's request for "additional information provided by institutions," Fordham recommends that an institution's religious tradition, religious affiliation, and mission statement be added to the categories able to be searched by students.

Sincerely,

Thomas Dunne

Vice President for Administration

O'Bergh, Jon

From: Cynthia Moore <cynthia@naicu.edu>
Sent: Friday, January 30, 2015 11:04 AM
To: College Feedback
Subject: College Rankings
Attachments: NAICU Ratings Comment Letter.pdf



National Association
of Independent
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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 the more than 1,000 member institutions and associations of the National Association of Independent Colleges and Universities (NAICU), and in conjunction with the undersigned associations, 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.



Honorable Arne Duncan
January 30, 2015
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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. At the same time, some of the most important institutions in our nation are relatively unknown and resource-poor colleges that have a historic mission of successfully serving underserved, underfunded, and underprepared students. Both sorts of institutions play a critical role in contributing to the wide array of opportunity, diversity, and choice that makes the American higher education system the best in the world.

This is but one small example of why 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.

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



Honorable Arne Duncan
 January 30, 2015
 Page 3

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, NAICU

Association for Biblical Higher Education
 Association of Independent Colleges of Art and Design
 Association of Reformed Colleges and Universities
 Conference for Mercy Higher Education

Council for Christian Colleges and Universities
 Council of Independent Colleges
 Lutheran Educational Conference of North America
 The New American Colleges and Universities
 UNCF

O'Bergh, Jon

From: President <president@whittier.edu>
Sent: Friday, January 30, 2015 6:15 PM
To: College Feedback
Subject: Whittier College - PIRS
Attachments: Whittier College - PIRS 0115.pdf

Please see attached my letter urging support of NAICU's proposal and discouraging any effort that would substitute a federal rating system for an individual's judgment about what is important in an educational experience.

Sharon D. Herzberger

President

Whittier College

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January 30, 2015



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

Dear Secretary Duncan:

To begin, we would like to say that we at Whittier College welcomes 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.

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. However, we also believe the weighting and assignment of value to that information must remain squarely in the hands of individuals, rather than a postsecondary institutional rankings system (PIRS).

We are concerned that the creation of a simplistic rating system will be detrimental towards the President's own access and completion goals, which are shared by Whittier College. The proposed system will place a focus on metrics with little consideration of our mission. In the case of Whittier College, our mission is to educate a diverse group of students in an atmosphere where they can learn, acquire skills, and form attitudes and values appropriate for leading and serving in a global society. We are successfully carrying out our mission in ways that cannot be taken into account by the PIRS system.

One of the core traits of our college is how we serve a diverse community. We are proud of our newly acquired AANAPISI designation. In addition, Whittier is recognized as a Hispanic Serving Institution, with a Hispanic student enrollment of 38% - larger than in the California State University system (33%) or the University of California (18%). Furthermore, students of color constitute about 60% of our student body, making the College – according to *U.S. News & World Report* – one of the most diverse national liberal arts colleges in the country.

The Administration has stated that it wished to correct for so-called “undermatching” of high-achieving, low-income students with selective institutions. However, 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. There is a widening gap between wealthy colleges and universities and those with lesser endowments. Correlating college quality with endowment size will only widen this gap, and give a false image about financial aid to incoming students.

For example, although Whittier does not have as large an endowment as the wealthiest schools, we provided over \$18 million in College-funded grant and scholarship aid to 640 Latino students in 2013-2014. This translates into an average grant award of \$28,000 per student, over 70% of tuition. Although this is a generous amount of aid that could make college affordable to low-income students, they might not know it is available based solely on what can be seen using the PIRS system.

Colleges like Whittier have been consistent in our belief that rating our institutions 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.

An increasing number of students are choosing to attend Whittier based on location and accommodations we make for commuter students. Whittier is committed to providing well qualified transfer students an affordable opportunity to earn their degree from a four-year College, and deliberately has grown the transfer population to nearly 20% of the entering class. Most importantly, the College has created partnerships with regional two-year colleges that guarantee admission to these well qualified students, serving as a model for other liberal arts colleges.

If the objective is to provide a simplified consumer information tool, NAICU could develop a tool – as we did with U-CAN – which guides families by using some key metrics and factors about institutions. 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 four million institutional profiles researched and viewed since its inception.

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. At Whittier, our commitment to diversity is something we would want the chance to express with both quantitative and qualitative information. 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.

Whittier College supports the NAICU’s proposal 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 or the reduction of so much critical information to one rating.

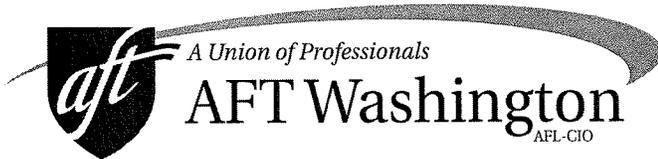
Sincerely,

(b)(6)

Sharon D. Herzberger
President

O'Bergh, Jon

From: AFT Washington <AftWashington@aftwa.org>
Sent: Friday, January 30, 2015 6:57 PM
To: College Feedback
Subject: Feedback on College Rating System
Attachments: Secretary Duncan re College Rating System 013015.pdf



Dear Secretary Duncan,

I am writing to you on behalf of the members of AFT Washington, educators who work in early education, the K-12 system, and higher education. We have seen the increased focus on "accountability" at all levels of education as well as the negative impact of misguided assessment systems. The proposed regulations for teacher preparation programs are just such a system.

AFT Washington objects to any type of assessment tool designed for one purpose and used for something else. As educators, we know that assessing student progress is best done with a carefully crafted tool designed to identify areas of strength and areas needing extra attention. Punitive assessment rarely assists the learner in their quest for growth. The same holds true for programs; measures such as those included in the proposed regulations are not only unhelpful, they will also have a negative impact.

For example, standardized student tests were not designed to measure teacher preparation programs and employment rates are the result of many factors, but not the quality of a teacher preparation program. Neither of these criteria will assess the quality of a program.

Furthermore, imposing punishment works against the goal of increasing a highly-qualified teaching pool, particularly a pool of teachers prepared to teach in schools with challenges such as poverty or many families who have been marginalized by race, immigration status, or other factors. The proposed rating system incentivizes colleges to focus on preparing students to teach in more privileged schools, rather than run the risk of suffering from low ratings having nothing to do with the quality of their program. As well, restricting access to financial aid is the wrong direction; providing greater support to students and programs will allow students to focus more on their studies and programs to ensure implementation of the best practices for teacher preparation.

The proposed regulations are also troubling in that they follow a dramatic decline in state funding over the last 30 years and substantial increases in tuition in recent years - these factors cannot be ignored when strategizing how to strengthen teacher preparation programs.

Policy makers and law makers want to see greater accountability in education. They want to measure and count progress as if education were a business. The fact that education is filled with human beings who bring a wide range of strengths, challenges, and unique qualities to the

table is ignored and simplistic approaches, which actually undermine programs and the students, are adopted. Meanwhile, these same policy and law makers would never recommend to a struggling business to disinvest as a way of growing stronger. Why, then, do these proposed regulations do just that?

On behalf of the membership of AFT Washington, I urge you to re-think the approach of the Department of Education in rating teacher preparation programs. I also urge you to bring faculty expertise into the task at hand, specifically their expertise in curriculum development and assessment. Faculty are highly invested in their program mission and in their students' success. Please support them in their effort to fulfill the potential of the former and contribute to the latter.

Sincerely,

(b)(6)

Karen Strickland, President
AFT Washington, AFL-CIO

KS/cr
opeiu8/afl-cio

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O'Bergh, Jon

From: Jonathan Brand <jbrand@cornellcollege.edu>
Sent: Monday, February 02, 2015 3:17 PM
To: College Feedback
Subject: Comments from Cornell College (Mount Vernon, IA)

On behalf of Cornell College, I appreciate having the opportunity to comment on the U.S. Department of Education's emerging rating system. At a high level, we applaud the Department for seeking feedback from colleges and universities, among others. We would like to present one major concern that we have about the specifics of the proposed system for your consideration. Cornell College is a high quality national liberal arts college with a long history of successful graduates. Cornell College prepares students for life beyond their college years and entry into careers, graduate and professional schools, and public service.

We think that it is a serious flaw in the proposed rating system that it does not take into account the quality of the learning experience or measures of student learning. Thus, the current proposed Department of Education rating system does not adequately seek to measure the learning that occurs while students are enrolled, which is our central mission (and presumably of most higher education institutions). In addition, measuring students' entry into the workforce and their level of pay is not necessarily a measure of the quality of the educational institution, unless the institution is focused simply on job training. This metric applied to all institutions reduces the value of education to a utilitarian model rather than the Jeffersonian ideal of an educated populace needed for an effective democracy.

The Department of Education has also encouraged colleges and universities to measure learning, themselves, as a complement to the proposed federal rating system. This approach is flawed too. It is unrealistic to believe that colleges and universities will measure learning, individually, in a manner that would be helpful to prospective students and their families because such measurements would necessarily lack uniformity across higher education. It would be hard for families to truly compare institutions. The Department of Education should seize this opportunity to help all colleges and universities reach agreement on commonly accepted learning outcomes and related measurements of them.

No doubt, it is laudable that the Department of Education recognizes that its proposed rating system will have flaws and, thus, be revised in the future. We are, however, very concerned that this approach ignores the considerable inertia that will be generated by "Version 1.0" of the rating system. A seriously flawed rating system will be both powerful and immovable. A more responsible approach is to eliminate any major and material flaws that the Department of Education recognizes at this time; one of the most noticeable is the absence of a metric related to the quality of the educational experience.

When the Department of Education announced its plans to develop this rating system, I submitted a piece to Huffington Post on it. In that article, I wrote:

“A body outside of higher education needs to alter the paradigm around higher education, so that students and their families can educate themselves about the qualities of an institution, not just its reputation or ranking. Students and their families need appropriate information, and they should include the measurements the President is proposing, such as an institution’s graduation and transfer rates and its graduates’ earnings and percentage of advanced degrees. However, measuring what graduates do after college will not suffice. We also must measure what students do while in school. All institutions should uniformly measure and share their students’ success as shown by the percentage of students who take writing-intensive courses, engage in community service, learn to work in teams, or apply their in-class experience through off-campus internships. Though there is significant criticism of input measurements, such as the academic qualifications of incoming students, these measurements are also valuable for prospective students and families assessing fit with a particular school. After all, students can learn as much from their peers as from their professors; thus, knowing about the quality of the student body is helpful information.”

You can read the entire piece at: http://www.huffingtonpost.com/jonathan-m-brand/resolving-higher-educations-challenges_b_4861024.html.

Thus, we strongly encourage the U.S. Department of Education to consider tackling the deeper but more important issue of learning outcomes across higher education.

Thank you for your consideration.

Sincerely, Jonathan Brand, President, Cornell College (Mount Vernon, Iowa)

O'Bergh, Jon

From: Hunter Rawlings <hunter.rawlings@aau.edu>
Sent: Tuesday, February 03, 2015 12:10 PM
To: 'collegefeedback@ed.gov'
Cc: Mollie Benz-Flounlacker
Subject: AAU Submission of Comments on New System of College Ratings
Attachments: Ltr_Rawlings to Dept of Ed Chair_PIRS.pdf

Dear Secretary Duncan,

Thank you for reaching out to the Higher Education community for comments on the New System of College Ratings. Please find attached the comments from the Association of American Universities, a nonprofit association of 60 U.S. and two Canadian preeminent public and private research universities. Please let me or my colleague Mollie Flounlacker, mollie_benz@aau.edu, know if you have any questions.

Sincerely,

Hunter R. Rawlings III
President
Association of American Universities

Visit the AAU website at www.aau.edu or follow us on Twitter @AAUniversities.



ASSOCIATION OF AMERICAN UNIVERSITIES

February 3, 2015

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

Dear Secretary Duncan:

The Association of American Universities (AAU), a nonprofit association of 60 U.S. and two Canadian preeminent public and private research universities, is responding to the Department of Education's draft ratings framework, entitled "A New System of College Ratings — Invitation to Comment." We applaud President Obama's focus on college access and affordability at a time when Americans are concerned about the cost of a college education, the impact of student loan debt, and future employment prospects. AAU member institutions strive to provide the highest quality education possible and to make it affordable through a range of cost-savings measures, substantial institutional financial aid programs for low- and middle-income students, and creative use of technology.

AAU has submitted two previous sets of comments on the proposed rating system: on December 2, 2013 and January 24, 2014.¹ This response builds upon those comments. At the highest level, we continue to question whether the three stated objectives of the rating system — information for students and families, benchmarking for institutions, and accountability for federal student aid spending — can be met with a single tool, and whether a rating system is the best or most appropriate way to meet any of the objectives. We do not endorse a new rating system, and we are concerned that a rating system does not reflect the diversity of higher education institutions and their missions, and may confuse and mislead prospective students.

Providing students and families with clear, accurate, and useful information about higher education institutions is an appropriate federal role, given the significant investment the U.S. government makes in student financial aid. Likewise, the federal government has an interest in identifying bad actors among higher education institutions. But it is inappropriate for the federal government to rate institutions. Moreover, unlike the many college rankings and ratings that have proliferated in the media, this rating system would have the imprimatur of the federal government and the unbiased and authoritative image it conveys. As such, the potential for harm is considerable.

The Department's framework does not yet provide all the detail needed to evaluate a specific rating system proposal, and in this response we highlight some areas where tough choices must be made. We urge the Department to provide an opportunity for

¹ Available at <http://www.aau.edu/WorkArea/DownloadAsset.aspx?id=14835> and <http://www.aau.edu/WorkArea/DownloadAsset.aspx?id=14930>, respectively.

Boston University
Brandeis University
Brown University
California Institute of Technology
Carnegie Mellon University
Case Western Reserve University
Columbia University
Cornell University
Duke University
Emory University
Georgia Institute of Technology
Harvard University
Indiana University
Iowa State University
The Johns Hopkins University
Massachusetts Institute of Technology
McGill University
Michigan State University
New York University
Northwestern University
The Ohio State University
The Pennsylvania State University
Princeton University
Purdue University
Rice University
Rutgers, The State University
of New Jersey
Stanford University
Stony Brook University –
State University of New York
Texas A&M University
Tulane University
University at Buffalo –
State University of New York
The University of Arizona
University of California, Berkeley
University of California, Davis
University of California, Irvine
University of California, Los Angeles
University of California, San Diego
University of California, Santa
Barbara
The University of Chicago
University of Colorado, Boulder
University of Florida
University of Illinois, Urbana-
Champaign
The University of Iowa
The University of Kansas
University of Maryland, College Park
University of Michigan
University of Minnesota, Twin Cities
University of Missouri, Columbia
The University of North Carolina at
Chapel Hill
University of Oregon
University of Pennsylvania
University of Pittsburgh
University of Rochester
University of Southern California
The University of Texas at Austin
University of Toronto
University of Virginia
University of Washington
University of Wisconsin - Madison
Vanderbilt University
Washington University in St. Louis
Yale University

public comment on a full and complete rating proposal before such a system goes live, and — given the timing — we do not believe it is wise to rush any rating system to completion before the start of the 2015-2016 academic year.

We would like to offer some comments and suggestions on the rating system generally, and then some comments and suggestions on data and metrics.

Comments on the rating system

We believe that the issues of rating categories, institutional groupings, and the available level of customization on the tool — all issues the Department has requested feedback on — are closely interrelated. The Department plans to divide institutions into three performance categories. It is not clear from the framework document how the Department plans to create these divisions. Will they be created relative to the total number of institutions, ranges in the metrics (individual or somehow combined), or some extrinsic factor? Will the divisions be equal or unequal?

Once divided, institutions will be categorized as high-performing, low-performing, and those falling in the middle. Such division and categorization may amplify small and arbitrary distinctions, while hiding most variation within each group.

Currently, the Department plans to separate four-year and two-year universities in presenting the ratings, and has asked for feedback on what other groupings might be used. Considering four-year universities alone reveals systematic variation in possible metrics (e.g., percent Pell, graduation rates, average net price) that are sector-dependent. It's not clear what will be achieved by grouping publics, private non-profits, and for-profits together and obscuring this variation. But dividing institutions into too-granular groupings, while maintaining the current proposed categorization, risks classifying high-quality institutions as "poorly-performing" (we presume, based on the framework, that institutions' ratings will vary depending upon the institutional grouping used).

The "best" institutional groupings for the Department to include depend upon the use to which the ratings will be put. Consumers, policymakers, and institutions themselves will all care about different groups of institutions. More customization of metrics and weights will likely be useful for consumers, but may change institutional results, making them relevant only in the context of that particular customization, and not necessarily otherwise descriptive of the institution. Chances are that any institution, with the right institutional grouping and metric weights, could be classified as "poorly-performing."

Consistent with our previous sets of comments, we urge more information be provided in any rating system. Providing disaggregated data would be more useful for consumers and institutions, and would avoid the tricky issues associated with weighting and combining metrics.

We support looking at institutional improvement over time, but it's unclear how this will work in the context of rating categories. An institution could exhibit a great deal of improvement without moving between categories. Alternatively, a small change may shift them. Even no change could move an institution when categorizations are based upon relative standing or performance. And top-performing institutions may have limited opportunity for improvement, for which they should not be penalized.

We appreciate the Department's recognition that annual fluctuations in the values used in any rating system may provide a misleading picture. Averaging values across years may help address these issues.

Finally, we would like to respond to the section of the framework about adjusting outcomes for student and institutional characteristics. We oppose such adjustments. We believe that adjusting outcomes is antithetical to the consumer information objective of the rating system. As noted in the framework itself, there are inherent dangers in adjusting outcomes for institution-level characteristics (such as state funding, endowment size, etc.). Rather than increasing transparency, adjusting outcomes risks turning the ratings system into a black box that neither consumers nor institutions fully understand. It is difficult to see how institutions would gauge improvement, or consumers understand their choices, if a complex regression model is first applied to student or institutional characteristics. (An adjustment that allowed an institution to compare itself to others while "factoring out" differences in student body socioeconomics, demographics, and academic characteristics is far beyond what existing data will allow and what the Department is considering, and such adjustment would not be appropriate for a consumer information tool.) Any student-level regression model, if based on FAFSA information, runs into the limitations we discuss in more detail in the next section. Such data may not be representative of the entire undergraduate student body, and may represent the student body at different institutions in different ways. It would be essential to understand and correct for biases in FAFSA data before using such a model. On the institutional side, including factors like endowment size in the regression would penalize schools who may be using that wealth for financial aid ... this is especially problematic given the issues with the data sources like FAFSA, NSLDS, and IPEDS when it comes to representing students who do not receive federal aid. We also question whether the regression model would change each time data or metrics were updated. If so, results could be unstable and difficult to compare between years. But if not, older models may not be best-suited to current data.

Comments on data and metrics

The Department is considering using some existing metrics (e.g., percent Pell, graduation rates, and average net price) as well as some new metrics. The limitations in existing metrics are well-known. A significant portion of the variables in IPEDS are restricted to include only certain students, such as first-time full-time or those receiving Title IV financial aid. One concern is that the whole undergraduate student body is not represented in these variables. A deeper concern, especially relevant in the context of a rating system, is that not all institutions are represented equally. Institutions with a relatively small proportion of students receiving federal aid — even if the cause is a particularly generous institutional aid policy — may not be accurately reflected in these variables.

The Department's effort to think about how to use existing data sources, such as NSLDS and the FAFSA, to construct new and potentially useful metrics is laudable. Here, however, the concern is amplified. These data sources are also restricted to certain types of students. FAFSA completion rates vary by sector and level of institution,² and even for those who fill it out, FAFSA data are only tied back to particular institutions for Title IV aid recipients. Biases in the data from these sources are even less well-understood, to our knowledge, than those in IPEDS variables. The Department itself recognizes some of these limitations in the framework, which we appreciate. We understand the Department is on an expedited timeframe to establish a rating

² <http://www.finaid.org/educators/20091014fafsacompletion.pdf>

system, but putting new metrics to use before they have been adequately studied risks doing a disservice both to consumers and to institutions. Generally, we continue to encourage the Department to allow institutions to review their reported data before a rating system is published.

Below we include comments about specific metrics under consideration:

Percent Pell

Percent Pell is the most complete, accurate, and well-understood of the metrics the Department is considering. That being said, it is worth considering looking at both percentages and numbers of Pell grant recipients. We believe that these figures should be compared to the overall population of Pell-eligible students, not necessarily all undergraduates. Looking at Pell recipients also provides a narrow view of access, in that it potentially ignores a large population of low-income, middle-income, and first-generation students who should be part of any access equation. Many students who do not qualify for Pell grants still face considerable financial need. Information on institutional need-based aid should also be included, as it demonstrates institutional commitment to access and affordability. Some contextual information (e.g., comparisons to state or regional demographics) would give Pell grant figures more meaning. Finally, we would like to point out that the number of Pell recipients is limited, and by including this metric in a rating system, the Department is essentially encouraging institutions to compete for them.

EFC (Expected Family Contribution) gap and Family income quartiles

These are, as far as we can tell, new and untested metrics that rely on data from FAFSA and NSLDS. EFC, in particular, is difficult to understand. We have pointed out above that it would be desirable to study these possible metrics before including them in a rating system. Family income quartiles will be available only for students who fill out the FAFSA and receive Title IV aid. Likewise, the Department has stated in the framework that EFC gap “may misrepresent access for institutions with low participation in federal student aid programs.” This is likely to apply to many AAU universities because of their generous institutional aid policies. For example, 15 AAU universities, or one-quarter of our U.S. membership, have less than 25% of their undergraduate students receiving student loans.

First-generation college status

This metric again relies on FAFSA data with its concomitant limitations. Additionally, the way the question currently reads may not distinguish first-generation college students from those whose parents completed some college. The FAFSA question currently reads: “What is the highest school your father/mother completed?”, with the following potential answers: Middle School/Jr. High; High School; College or beyond; or Other/unknown. If a parent did not complete college but attended some college, the box “High School” would need to be checked since that is the highest level completed.

Average net price and Net price by quintile

Average price and net price by quintile are restricted to first-time, full-time students receiving grant or scholarship aid and those receiving Title IV federal aid, respectively. They are also restricted to in-state students at public universities. Net price by quintile provides more information than average net price, which we support, yet in the context of a rating may not accurately reflect those institutions with relatively low percentages of students receiving federal aid due to institutional aid policies.

Completion and transfer rates

As we pointed out in previous comments, we believe the Student Achievement Measure (SAM) provides more comprehensive information on completion/graduation rates than those provided by IPEDS,³ and we strongly support the use of SAM by institutions. The Department is also considering developing a new rate based on NSLDS data, which would include part-time and transfer students but exclude students who do not receive federal aid. As mentioned earlier, this may exclude large numbers of students at AAU universities. We do not believe transfer rates should be used to rate four-year institutions, and we note that many institutions do not report transfer numbers on IPEDS. By reporting outcomes for transfer students (i.e. whether they are still enrolled or have graduated), SAM handles such students in the optimal way.

Labor market success

We applaud the Department for expressing a more sophisticated view toward labor market success than simply focusing on short-term earnings at the institutional level. As we and others have pointed out, earnings vary between programs and majors in a more meaningful way than they vary between institutions, and we continue to strongly discourage looking at earnings at the institutional level. A threshold measure of “substantial employment” could serve to identify bad actors without placing an undue emphasis on salaries, though such an approach would serve little additional purpose. Many decisions need to be made before such a measure could be used, including the appropriate level for benchmarking and the reliability of and biases in any data sources the Department would use to get the data. Use of the federal poverty line, or any other benchmark, would need to be adjusted for geographic cost-of-living variation. Short-term labor market outcomes may say more about economic conditions than about institutional performance, so we prefer taking a longer view in terms of the timing of looking at earnings.

The Department must be very cautious in not introducing perverse incentives through this measure. In our previous comments we emphasized the differences between disciplines, as well as the low earnings of individuals who are in the process of earning higher degrees in fields, like many STEM fields, that require long training periods. Even within disciplines, however, the potential for perverse incentives exists. Consider an education program that can place its graduates in well-paying suburban school districts or lower-paying urban school districts. An emphasis on earnings may be at odds with societal benefits.

Graduate school attendance

Graduate school attendance is an important piece of information for students and consumers. However, it's not practical to include this information in a rating system for two reasons. First, it's not clear what a “better” institutional outcome in terms of graduate school attendance is, and consumers are more likely to care about attendance at the program level than at the institutional level. Second, using data on loans from NSLDS to determine graduate school attendance would exclude most students pursuing doctorates, especially in the STEM fields. Data from the National Postsecondary Student Aid Study indicates that less than 25% of research doctoral students take Stafford loans, and in the sciences the figure is less than 10%. While we do not encourage its use in a rating system, we point out that the National Science Foundation's Survey of Earned Doctorates includes both baccalaureate institution and field of degree for those who earn doctorates at U.S. universities.

³ <http://www.studentachievementmeasure.org>

The Department has asked for examples of online tools that are particularly helpful for students and the public, and in that regard we highlight the seekUT tool developed by the University of Texas system.⁴ This tool allows current and prospective students to explore a variety of outcomes (including employment, earnings, and debt) by institution and program. seekUT is not a rating system and would not work as one, and its strengths are illustrative of some of the weaknesses of a rating approach. seekUT allows data to be accessed at a level of detail meaningful for students, includes appropriate nuance (e.g., earnings are provided one, five, and ten years after graduation and earnings percentiles are shown to give some idea of ranges), breaks data down at geographic levels that matter to students, and provides auxiliary data (e.g., job projection statistics from the Bureau of Labor Statistics) that may be helpful for students looking to the future. While some of the underlying data could potentially be used for purposes other than consumer information, seekUT does not attempt to simultaneously fulfill these purposes. One limitation of seekUT is that it includes earnings data only for those employed in Texas. For institutions sending a large number of graduates of out of state, and especially if the destination of students is not random, these kinds of data are limited. seekUT is very straightforward about the limitations of the data used.⁵

Thank you in advance for your consideration of AAU's views. We look forward to a conversation in the coming months about how we can enhance college access and promote college completion while protecting the integrity of federal student aid funding and encouraging states to reinvest in public higher education. There is an appropriate federal role in providing students and their families with clear, accurate, and useful information. We welcome the opportunity to continue to work with the Department to consolidate and streamline existing consumer disclosures.

Sincerely,

(b)(6)

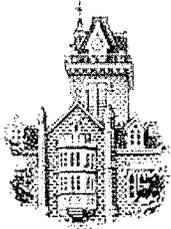
Hunter R. Rawlings III
President
Association of American Universities

⁴ <http://www.utsystem.edu/seekut/>

⁵ http://www.utsystem.edu/seekut/about_the_data.html

O'Bergh, Jon

From: Gordon, Stephanie <SGordon@bethanywv.edu>
Sent: Tuesday, February 03, 2015 2:05 PM
To: College Feedback
Subject: Letter from Bethany College President Scott D. Miller
Attachments: Bethany College.pdf



Bethany

A Small College of National Distinction

Please see that attached letter from Bethany College President Scott D. Miller.

Thanks,

Stephanie

Stephanie Gordon
Assistant to the President
Bethany College
Bethany, WV 26032

Phone: 304.829.7115
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OFFICE OF THE PRESIDENT

February 3, 2015

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

Dear Mr. Secretary:

As a member of the National Association of Independent Colleges and Universities (NAICU), Bethany College wishes to support the points outlined in President David L. Warren's communication to you of January 30, 2015, in regard to the Administration's proposed Postsecondary Institution Ratings System (PIRS). Be assured that our College, and every other institution that we know of, agrees with the broad goals of college access, affordability, and transparency for student consumers and their families. I personally have stressed these points in my own communications to current and prospective Bethany College students, to our Trustees and constituent groups, and to the public in general. I believe that we all benefit from a well-considered examination of the real and perceived value of a college or university education. The notion of value, as you would expect, is often determined solely by the individual student consumer, corresponding to personal inclinations, backgrounds, goals, and other life values.

We are concerned, therefore, that there are currently more questions than answers regarding the direction that the Department of Education is likely to take in creating the proposed rating system that seeks to define "value." As we examine certain factors being considered for inclusion in the ratings, the fundamental premise—that such a system can be created and would be useful both as a consumer information tool and as a federal accountability system—remains deeply troubling to us.

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.

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 NAICU did with U-CAN – which guides families by using some key metrics and factors about institutions. As NAICU learned in its 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)

Scott D. Miller, Ph.D.
President of Bethany College
smiller@bethanywv.edu



HAMLIN
UNIVERSITY

Dept. of Education
OS-ES-CCCU

2015 JAN 30 AM 9: 59

January 22, 2015

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

Dear Mr. Secretary:

On behalf of Hamline University and the vast majority of our undergraduate students who receive some form of federal student aid assistance to attend the university, I write in support of the NAICU position taken in the Dr. David Warren's recent letter to you concerning establishing a federal ratings system. As the oldest university in Minnesota, which has been serving first-generation and low-income students since its founding in 1854, we take exception to this proposal. Although a ratings system may be well-intentioned in its purpose, this one lacks a plan for data collection and reliable metrics that further our mission to be transparent and accessible to high ability students who have significant financial need to attend college.

As president, I fully support the statement in Dr. David Warren's letter to you as follows:

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.

Your immediate attention to our concerns about the proposed ratings system under development would be appreciated, as the uncertainty it is generating at Hamline and among our colleagues in peer institutions intrudes on our institutional and strategic planning for the future of our students.

Sincerely,

(b)(6)

Linda N. Hanson, EdD
President

cc: Dr. David Warren, president, NAICU

Office of the President

MS-C1914, 1536 Hewitt Avenue, Saint Paul, MN 55104-1284 p: 651-523-2202 f: 651-523-2030 president@hamline.edu www.hamline.edu

O'Bergh, Jon

From: Jan Maher (b)(6)
Sent: Tuesday, February 03, 2015 6:28 PM
To: College Feedback
Subject: Please consider....

I hold a PhD. I have had a long and successful career as a teacher, writer, and artist-in-residence. From what I can tell, I would be counted as a failure in the proposed system for rating colleges. I attended my first college as an early entrant. I stayed a year. They don't get credit for the fact that I eventually finished my degree and went on to obtain two others. I attended my second college for a year. They don't get credit for anything either. I'm not sure, but it sounds like the college I got my undergrad degree from wouldn't get any credit for my attendance and graduation there.

I now teach at a very small college. Many of our students come for a year or two and transfer to other colleges. We do not get credit for that. Many of our students transfer in from other colleges. We do not get credit for that.

Students who begin and end their undergraduate degrees at the same institution are more likely to be students who don't have to take time off for family or financial reasons. Colleges that serve upper income students are, therefore, obviously more likely to have better retention rates. It doesn't mean they are better colleges. It just means they have students who can afford to attend.

In the interest of fostering better outcomes for our nation's youth, and particularly for those who are historically underserved, please don't end up shutting down the small colleges that are often enabling the first step these students take to become educated at the college level,

Sincerely,

Jan Maher

[Heaven, Indiana is now available on Kindle](#)

O'Bergh, Jon

From: Stan Carpenter <scarpenter@nscs.edu>
Sent: Tuesday, February 03, 2015 3:41 PM
To: College Feedback
Subject: Nebraska State College System
Attachments: Letter to Studley 2_3_15.pdf

To whom it may concern:

Attached please find a letter I sent to Deputy Under Secretary of Education Jamiene Studley to provide additional feedback on PIRS. If you have any questions, please contact me at 402-471-2505.

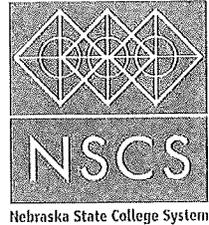
Sincerely,

Stan

Stan Carpenter
Chancellor
Nebraska State College System
(402)471-2505

Nebraska State College System

Stan Carpenter, Chancellor System Office 1327 H Street, Suite 200 P.O. Box 94605
Lincoln, NE 68509-4605 Phone: (402) 471-2505 Fax: (402) 471-2669
www.nscs.edu



February 3, 2015

Ms. Jamiene Studley
Deputy Under Secretary of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Ms. Studley,

As the Chancellor of the Nebraska State College System, I am writing to comment on the Department of Education's January progress report on the Postsecondary Institution Ratings System (PIRS). Published goals of the ratings system include measures to help institutions around the United States benchmark and improve their performance as it relates to access, costs, and outcomes which, in turn, will influence students and their families to make informed decisions when choosing a college. While I recognize that this has been a long and arduous task for you and your staff, I again wish to express my concerns about emerging details and the, perhaps unintended, negative consequences the rating system will have on individual colleges and universities.

As I developed my Chancellor's Report (a copy is included with this letter) for the Nebraska State College System (NSCS) Board of Trustees last fall, I was faced with a daunting task. The goal of the Report was to provide an overview of the many successes experienced by students, faculty and staff at the member institutions of the NSCS, i.e., Chadron, Peru and Wayne State Colleges. The task of narrowing down the items to include in the report proved to be much more difficult than I had anticipated. Short of having developed a "coffee-table type book of 100's of pages," I knew I had to select items that were representative of the myriad of possibilities that take place each and every day at our colleges. This Report represents many of the reasons students choose to attend Chadron, Peru and Wayne State Colleges.

My fear, as I have stated before, is that the metrics chosen for PIRS will not provide an accurate portrayal of colleges and universities across the nation, not just the Nebraska State Colleges. We know that PIRS is not to be the only source used by students and their families. However, can a system as proposed reach students from all backgrounds? Can it adequately portray the available scholarships and grants, some unique to particular colleges, which make college affordable? Can it separate the small four-year teaching institutions from the large four-year research institutions?

From our conversations, I hope that I have conveyed to you the importance that I place on accountability and transparency for the NSCS. My concerns with PIRS is not that we have measures to address our successes, but that the nuances to all measures be carefully examined so that none favor one type of institution over another, for example, the size of the institution skews the results in one direction or the other.

Three colleges. Thousands of opportunities.

CHADRON STATE. PERU STATE. WAYNE STATE.

The Nebraska legislature is in full session while I write this letter. With the introduction of new legislation related to state appropriations, funds used to pay for scholarships, construction proposals and numerous accountability measures, I often have the opportunity to testify before the education committee or one of the other standing committees. This year, we have 19 new Senators which means I have many opportunities to tell the NSCS story. The Senators, the new Governor and Lt. Governor, and many other decision makers received the NSCS Report I mentioned earlier. I want to make sure you, along with Nebraska's political arena, have the opportunity to read about what makes the NSCS special to our students and their families, our communities and regions, and the state of Nebraska and beyond. I know that the State Colleges have a long future ahead of them, and I will continue to lead our efforts of accountability and transparency as long as I am Chancellor. Our story goes beyond a set of numbers and statistics. Each and every story has a face behind it, sometimes the face of an entire community.

As I have said before, I have great regard for the work undertaken by you and your colleagues. I applaud accountability as a cornerstone for every enterprise. There is no doubt that we use data to improve recruitment, retention and persistence. The State Colleges have long participated in continuous improvement models acknowledging our strengths and weakness. These efforts are locally driven as well as through our commitment to regional and national accreditation.

At the risk of being repetitious, I am very concerned about any rating system that would primarily use measures that are simply mathematical equations that attempt to compare institutions through a one size fits all model. Results from "a one size fits all model" cannot measure an institution's true value nor its ability to change a life – or to change many lives. The metrics and the definitions that are used, the institutions that are included in the rating system and how they are categorized, and the time frame for gathering metrics and allowing for trends are, in my mind, critical to the final rating system that is developed. Unfortunately, much about the proposed PIRS rating system remains unclear. And, the rating system as it has been described appears to contain a complex set of metrics that will result in misrepresentations and incorrect interpretations. Perhaps even more damaging than helpful, the rating system includes policies that limit the educational opportunities of the very populations we strive to educate, i.e., first generation students, diverse populations, and the middle class families.

As my parents told me, "The hard decisions are also the best decisions because nothing in life comes easy. You have to work hard for what you want." I believe this is especially true for the work you and your staff have undertaken. Once, again, I offer you and your team my assistance in any way you deem helpful. Let's make sure what we do is good for our students, their families, our colleges, and our states. To do anything less means we have not yet made the hard decisions.

Sincerely,

(b)(6)

Stan Carpenter
Chancellor

cc: Board of Trustees
Presidents

O'Bergh, Jon

From: Wendy Fitzgerald (b)(6)
Sent: Thursday, February 05, 2015 2:08 PM
To: College Feedback
Subject: Comment on New Ratings System for Higher Education

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-constructed, 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 education.

Thank you for your attention to my views.

Professor Wendy A. Fitzgerald, Retired
Troutdale, OR

(b)(6)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 2:08 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This system is very similar to the same system that has failed K-12 students over the past 12 years. "Accountability" doesn't necessarily lead to improved results – on the contrary, it often leads to unneeded disruption of schools, students' education, and the links between communities and schools.

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 draft and the framework are both far too sketchy, and are a clear sign that the entire plan isn't ready for prime time, and won't be until damage is done to colleges and universities. Please put this ill-advised plan on hold, and focus on giving schools and students the support they 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: Thursday, February 05, 2015 2:03 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.

Margaret Young
Concerned Pinole Citizen

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 1:54 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please do not use my tax dollars to implement this system of evaluating colleges. I especially take umbrage at the provision to collect data on the earnings of graduates. This plan is not ready to be implemented in 2015/16.

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: Borley, Scott A. <borley@fvtc.edu>
Sent: Thursday, February 05, 2015 1:22 PM
To: College Feedback
Subject: Feedback re: College Rating System proposal

Good afternoon,

I am a Dean of the Business Division at a local community college in Wisconsin. After reading the FAQ document on the US Dept of Education website regarding the establishment of a college rating system, I have a couple concerns that I'd like to share.

Although we fully understand the need for increased transparency, and we all embrace the notion of continuous improvement, I have a concern with grouping all 2-year colleges and 4-year colleges into similar buckets. In Wisconsin we have two-year colleges that have a very different mission than that of our community colleges and any rating system created needs to take into consideration the differing missions of 2-year colleges. Additionally, about two-thirds of our student body attends college on a part-time basis so some of the measures simply won't be applicable. Finally, in Wisconsin we already have increasing performance-based funding measures being implemented through the State so I question if a National/Federal rating system is even valid or justified?

Thank you for taking the time to hear my feedback.

Kind regards,

Scott Borley
Dean - Business Division
Fox Valley Technical College
1825 N Bluemound Drive
Appleton WI 54912-2277
P: 920-996-2983

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 1:19 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I can't think of anything worse than applying a similar flawed accountability system to higher education that we currently use in K-12 schools. End it all.

Sincerely,

Chris Buttimer
Ed.D. Candidate, Harvard Graduate School of Education
Ed.M. ('10), Harvard Graduate School of Education
Ed.M. ('06), UMass Boston

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 1:14 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This is absurd because it does not account for the diversity of majors and different aptitudes required for each one.

Constituency: Other (specify below)

Other Constituency (if supplied): Retired University Professor

User E-mail (if supplied): jjalstr@ilstu.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 1:13 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Is it really necessary to have a rating system for colleges and universities? Why not just let the colleges and university rate themselves? Dishonest ratings will be more easily discovered.

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 1:08 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Support our schools with funding, not with another rating system. Colleges are already ranked and accountable to their customers – students and parents. The rating systems do not work. It is too complex and will lead to more problems.

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: Thursday, February 05, 2015 1:05 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Go back to the drawing board! Your new rating system is off. You need to continue to collect and track data on racial and ethnic groups to monitor how accessible higher education is. Also, incorporating "accountability" requirements similar to the K-12 schools is a recipe for disaster. The whole dynamic of student to school interaction is different than K-12. Please go back and revise!

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 12:57 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This has not worked for elementary education, so it will not work for higher education, either!
Let's find a system that helps both students and educators!

Constituency: Other (specify below)

Other Constituency (if supplied): Retired Educator

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: Carol Belcher (b)(6)
Sent: Thursday, February 05, 2015 12:52 PM
To: College Feedback
Subject: Re: Out of Office: public comments

Dear College Feedback:

As much as I support the President in his mission, I need to make two additional comments.

1) "Pay college for performance" is conceptually and practically problematic. First, it is the student who ultimately performs. Second, basing funds to the colleges on student "performance" will most likely, based on knowledge of the American culture, lead the colleges to engage in short-sighted management tactics that place the burdens on the teachers without providing teachers with the resources and environment that are actually conducive to good teaching. Why not focus on identifying, recognizing, and inculcating the best practices of really good teachers? They're not a secret. If the profile and esteem of teachers and teaching is not raised and respected, then education as a whole suffers and students understand that they are merely pawns in the labor-management struggle between teachers and schools. Regarding the primarily private vocational schools that have a reputation for "ripping off" students, that is more properly addressed by good enforcement of laws to combat fraud that are already on the books, and investigating and promulgating as much accessible, transparent knowledge and information as possible about schools and careers to students, their families, and the public. Government, I believe, is more suited to these roles.

2. ENSURE LIFELONG LEARNING. As technology and globalization results in ever increasing rates of change in the way people live, learn, and work, people will need the abilities and resources to change their knowledge base and acquire new skills THROUGHOUT THEIR LIVES. How many times have each of us been required to invent ourselves anew to face the challenges of modern life? It is becoming no less important in the work and professional world as in other aspects of our lives. Community colleges in particular have been and should be supported to expand their roles in serving lifelong learners. An important side benefit to this is the opportunity for intergenerational learning and community.

Thank you for your consideration.

Truly Yours,
Carol Belcher

On Thu, Feb 5, 2015 at 9:27 AM, College Feedback <collegefeedback@ed.gov> wrote:

Thank you for your email to the U.S. Department of Education. We appreciate your interest in President Obama's plan to create a better bargain for the middle class by making college more affordable.

As you know, a college degree is the best investment students can make in their own future. Education beyond high school is the key to the middle class and a highly educated workforce is vital to our economic strength and success. But despite historic investments and reforms, attending a college has never been more expensive, and the ever-growing lack of affordability is making college increasingly inaccessible for Americans. To curb rising college costs, encourage colleges to improve, and empower students and families with the information they need to make informed decisions about which college to attend, President Obama has articulated an ambitious agenda for postsecondary education: 1) Pay colleges for performance; 2) Promote innovation and competition; and 3) Ensure that student debt remains affordable.

The Department is committed to an extensive public conversation about the President's agenda to make college more affordable. Your comments will help inform the Department's work on this important effort. Visit <http://www.ed.gov/college-completion> for more information.

Thank you for your interest.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 12:48 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Thank you for your sincere efforts, but this proposal should be put on hold until extensive changes can be made. This approach, exemplified by the ratings systems imposed on pre-college level schools, will be just as irrelevant a time-, energy-, and money-waster when applied to institutions of higher education. Please consult people who really know what's needed to improve education, and stop blaming schools and teachers by focusing on superficial and easily measurable numbers that look good in a bar graph.

Constituency: Other (specify below)

Other Constituency (if supplied): public high 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: Carol Belcher (b)(6)
Sent: Thursday, February 05, 2015 12:28 PM
To: College Feedback
Subject: public comments

Here are my comments:

Educational "accountability": There are so many variables in human learning -- some susceptible to human measurement, many not. The most powerful are still beyond our knowing or understanding: what motivates or inspires a human to learn? what is needed in order for the mind or the body to finally "click in" in understanding? There are also enormous economic, social, emotional, and psychological factors in play that influence whether a good learning and studying environment is possible for any particular child. The most important tools that we know about are inherently subjective and at odds with a bean-counting based approach to the so-called evidence based accountability standards. It is a sad commentary on current educational philosophies on the ascendancy that they trumpet these so-called evidence based standards using only the poor amount of evidence and measurement that humans are currently capable of, instead of building on the wisdom of teachers of the ages. Human beings are not robots or computer that we can somehow program successful AI software into. Human beings need and deserve a human education, as do human teachers. The modern fad for crisis capitalistic style management techniques employed for teachers will only bring about disaster and suffering for those who are unable to afford private schools for their children, and education under such policies will stunt rather than inspire our children. I wonder if that isn't the point.

This plan is punitive for schools that do not score well. Why would you do that? How does that help? Who are you really punishing?

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.

~
PS - My comments on the website failed to submit so i am sending this independently.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 12:25 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Stop the efforts of BIG BUSINESS and their influences on the educational system of the nation.

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 12:25 PM
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.

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- 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: Thursday, February 05, 2015 12:25 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Your plan to rate colleges and universities is flawed. It is inaccurate and incomplete and seems to be in a rush to cut funding. Our institutions need support, not punishment and the same goes for students.

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: Thursday, February 05, 2015 12:15 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.

The Department of Education 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.

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: Cristina Bordin <cristinb@stedwards.edu>
Sent: Thursday, February 05, 2015 12:09 PM
To: College Feedback
Subject: College Rankings - Comment from St. Edward's University

Hello, the online form found at <http://www.ed.gov/blog/collegeratings/> is not working properly; comments are not being submitted (this is the message that comes up: Failed to send your message. Please try later or contact the administrator by another method). Therefore, I'm sending the message below on behalf of Dr. George Martin, president of St. Edward's University. Can you please acknowledge that you receive this email. Thank you, Cristina

On behalf of St. Edward's University, I'm writing to endorse NAICU's comments dated January 30, 2015. St. Edward's University serves a diverse student body and is committed to providing a rigorous, values-based education. We are deeply concerned with the December 19, 2014, notice about the next steps in creating a federal rating system for post-secondary education. Most importantly, we are concerned that the creation of a simplistic rating system will jeopardize the President's access and completion of goals that we strongly share. The proposed rating system will likely tie an institutional rating to the amount of federal aid that low income students may receive. Student access and success will be harmed, not improved, by the creation of a system that places an overarching focus on metrics with little consideration for institutional mission.

In fact, this initiative seems counterproductive to the Administration's goal of placing high achieving, low-income students with selective institutions. As NAICU stated, "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."

We urge the Department of Education to seriously consider NAICU's January 30, 2015, response in order to successfully continue serving our diverse and underprivileged students and working towards a more educated population.

George E. Martin, Ph.D.
President, St. Edward's University

Cristina Bordin
Chief of Staff, Liaison to the Board of Trustees and Sustainability Coordinator
St. Edward's University
President's Office | 3001 S. Congress Ave. | Austin, TX 78704
Tel: (512) 464-8893
<http://think.stedwards.edu/sustainability>

 Please consider the environment before printing

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:56 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. I 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 is failing our K-12 schools, students, teachers 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 fails to 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 fails to 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 Post-secondary 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 to be used: 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 stop on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

Constituency: Higher Ed Association/Organization

Other Constituency (if supplied):

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:55 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Be sure to take a good look at Community College, including their costs and fees.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:51 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This rating system is under-developed and not ready for implementation. There are too many unanswered questions. Even more important, the implemented evaluation system replicates the same failed policies implemented to evaluate K-12 education. Both as a parent and an education, I have seen negative impacts on multiple schools and districts with the most negative effects being felt by impoverished and minority schools. When these policies have not worked, why are we expanding them to higher ed? Instead, policy makers should stop de-funding public education.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:48 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I CANNOT SAY IT ANY BETTER THAN THIS: 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.

EX: I teach high school students. Some are so far behind in UNITS due to family adversity and other circumstances, that it would be far more beneficial for the student to pursue a GED and Community College Skill-Trade. But, because the high schools School Performance Score will suffer if the student gets a GED; the counselors push for the student to stay in school, even if it means taking 5 or 6 years to graduate. (In reality, the student would be much better off earning a GED and Trade).

Constituency: Other (specify below)

Other Constituency (if supplied): Virtual Program Instructor

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:47 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: As a public school teacher I have seen the failure of accountability systems. I have seen that these systems increase paperwork. Many hours tracking students time that could be better used supporting children and teaching them skills. All I see is a constant push for higher level requirements for children at a younger and younger age with no improvements later on. The results show no increase in test scores and a constantly changing curriculum with teachers gaining no experience in skills because of. Constant beauracracy tracking and changes to what needs to be taught. These new accountability measures will just have more colleges decreasing programs and increasing class sizes. Decreasing more full time professor jobs. So no don't put in stricter college oversight. It will be more wasted money that could be used better to help more students go to and graduate from college, thereby getting good jobs decreasing poverty cycle. Becoming co! ntributing members to society. This is dollars better spent

Constituency: Please Select...

Other Constituency (if supplied): Public school professional

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:46 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: Parent

Other Constituency (if supplied):

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:43 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please make sure there are other metrics for completion than the IPEDS Graduation Rate. I'd hate to hurt a school's ranking by going back some day and not counting as a graduate. I really like the sound of the NLSDS description.

As well, the labor market success metrics should be compared to both a hard figure (double the poverty level looks nice) as well as a relative measure against the typical pay in the chosen fields.

Constituency: Member of the Public

Other Constituency (if supplied):

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:42 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I do not believe this we need this generic rating system. I do not support this move.

Constituency: Member of the Public

Other Constituency (*if supplied*): Secondary Education

User E-mail (*if supplied*):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:30 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: You acknowledges that many of the measures proposed are inaccurate or incomplete, but plan 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.

Constituency: Other (specify below)

Other Constituency (if supplied): Daughter of a Teacher, very concerned about education.

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:28 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: 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.

Constituency: Other (specify below)

Other Constituency (if supplied): High School Counselor

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:23 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Please stop punishing students and schools and invest in helping them instead. What you're proposing will NOT work. Also, put people in charge of doing it who are experienced educators, who know what is needed.

Thank you,

Constituency: Other (specify below)

Other Constituency (if supplied): elementary music teacher

User E-mail (if supplied):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Thursday, February 05, 2015 11:19 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: This needs to stop! You can not evaluate all teachers the same way when the variables for each teacher are very different! We need to fix all the issues that impact poor results. Certainly educators are not the cause for the issues discussed here.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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O'Bergh, Jon

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Sent: Thursday, February 05, 2015 11:14 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:

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Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied):

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