

**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 11:13 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** It seems to me that the three criteria the President has listed are not the focus of the new ratings system. My overall objection is that while his are optimistic in nature and emphasize diversity, affordability and student success, the ratings system seems to be punitive in attitude and quite negative. I tutor English/writing at two colleges and see firsthand students' needs and courage in seeking help. So often the encouragement I can give represents those intangibles that cannot be quantified. I hope, therefore, that we FINALLY introduce into our whole educational system (K-12 included) a new, expansive, helpful, optimistic and realistic effort. Thank you.

**Constituency:** University Staff/Faculty

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 11:12 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Pay for better education by doing the following:

- (1) Ending all of America's overt and covert wars of fascist capitalist aggression.
- (2) Removing the entire fascist capitalist war machine, i.e. the American military, from the Middle East, North Africa, South America, Europe and the Western Pacific.
- (3) Drastically downsizing the fascist capitalist war machine which takes 60% of the federal budget.
- (4) Ending all of the pork-barrel new weapons programs for the fascist capitalist war machine. The primary reason for developing weapons is to provide a market for American armaments corporations.
- (5) Closing all 900+ foreign military bases used by the fascist capitalist war machine.
- (6) Outlawing and disbanding all of the extremely expensive private fascist armies such as Academi, DynCorp, Blackhawk, et al. Academi formerly was XE Services, before that it was Blackwater..
- (7) Ending all military aid for the Philippines, Egypt, Israel, Iraq, South Korea, Taiwan, Columbia, Honduras, Tunisia, Jordan, Yemen, et al.
- (8) Ending all subsidies for the very profitable oil, natural gas and coal corporations, the nuclear power industry, the very profitable large agricultural corporations, et al.
- (9) Dismantling the huge and growing federal police-state security apparatus.
- (10) Ending the extremely wasteful and ineffective war on drugs.
- (11) Shutting down all of the illegal foreign prisons operated by the CIA.
- (12) Shutting down the US Army's notorious Western Hemisphere Institute for Security Cooperation (WHINSEC), formerly known as the School of the Americas (SOA). WHINSEC trains police and military officers for fascist capitalist Central and South American governments that use them to brutally suppress political dissent .
- (13) Maintaining the separation of church and state and ending all federal Faith-based initiatives. In other words, get the federal government out of the business of promoting religion. The christian churches are very profitable capitalist business operations that can afford to finance their extremely reactionary parochial schools.
- (14) Drastically raising the taxes on the obscenely wealthy pro-fascist capitalist class, their extremely profitable pro-fascist capitalist corporations and their highly overpaid pro-fascist corporate management.
- (15) Ending the military build-up for a war with Syria, and/or Iran, and/or North Korea, and/or Venezuela, and/or China, and/or Russia.

(16) Disbanding the fascist capitalist war machine's United States Northern Command (USNORTHCOM). The original and only purpose of USNORTHCOM is to brutally suppress all legitimate dissent by the working class.

(17) Consolidating the corrupt and redundant Bureau of Alcohol, Tobacco, Firearms and Explosives (BATF) with the equally corrupt Federal Bureau of Investigation (FBI).

(18) Drastically raising the excise taxes on all automotive fuels, alcohol and tobacco.

(19) Ending all of the fascist capitalist war machine's no-bid contracts, particularly those for the private fascist armies such as Academi, DynCorp and Blackhawk.

(20) Passing the proposed Tobin Tax. The proposed Tobin Tax would be a financial transaction tax (FTT) of approximately 0.5% on all speculative transactions. The average investor and pension funds would be exempted.

(21) Imposing a stiff federal severance tax on all off-shore oil.

(22) Eliminating the tax-free status of the very profitable National Football League (NFL).

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 11:08 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The testing / rating fad in current educational "reform" is just that: a fad. This piggy-backs on the deluded MBA-consciousness notion that everything is measurable, and the measurement does not change what's being measured. That's not true even for physics (ask Dr. Heisenberg).

It's worth noting that the foundation of "scientific management" that has brought us to this awful state is a series of con jobs. Yes, that's right, Frederick Winslow Taylor cooked the books on his "science" of management that is the foundation of the MBA programs throughout the world. (See Matthew Stewart's "Management Myth" work in this connection. For example: <http://www.theatlantic.com/magazine/archive/2006/06/the-management-myth/304883/>)

I'm not saying science has nothing to contribute, but the genuine science observes that what really correlates with educational outcomes is childhood poverty, not testing, or merit pay or charter schools.

Let's keep our eye on the ball here, shall we?

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 11:02 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 should not be extended to higher education. Instead of focusing on initiatives that will support student success, the proposed plan 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. This plan does not include the support measures that we know are needed for students to succeed. 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 has also 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:** University Staff/Faculty

**Other Constituency (if supplied):**

**User E-mail (if supplied):** [galminas@nsula.edu](mailto:galminas@nsula.edu)

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:57 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I find it hard to support a system that punishes colleges for others skill levels. Just like the APPR. I am graded on 40% of other teachers tests, and not on my own work / curriculum.

**Constituency:** Other (specify below)

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

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:57 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions. The department's proposal would:  
**Double down on failed K-12 accountability:** The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

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

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

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

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:57 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Instead of focusing on a system that tries to shame institutions into changing their behavior, the department should reconsider this college ratings plan and focus instead on initiatives that will support our nation's higher education system.

The plan wants to skip collecting race or ethnicity data, which will make it impossible to track racial and ethnic disparities.

One of the metrics the department would like to use is graduate earnings, but as we know from our own lives, those who work in public service make less than they would in the private sector. This could create a perverse incentive that encourages institutions to divest from programs in teaching, social work and the humanities in order to pursue a higher rating.

The department wants to look at graduation rates by using data in the Integrated Postsecondary Education Data System, which only counts students who are first-time, full-time students, even though we know that this definition covers fewer than half of all students, and even though this measure fails to acknowledge the diversity of the missions of our higher education institutions.

The plan largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and valueless degrees.

**Constituency:** Parent

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

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:55 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The Department of Education proposed plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system is a grave error. 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 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 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:** Other (specify below)

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

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:56 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Why do you want to apply the same logic to colleges and higher learning that you have applied to primary and high school teachers? Have you taken notice how teachers are not allowed to teach their students according to their circumstances? Do you know that teachers are only teaching students the knowledge to pass your standardized tests and not what they should really be teaching them? Only the teacher has the knowledge to know how to teach their own students. Many students don't learn the same way. There is no standardized way to teach ALL STUDENTS. All students are not the same and a teacher needs to teach them in the way their students can learn. Why punish teachers, for knowing their own students. What kind of teachers will you have, who will only be teaching them enough to pass the standardized tests, to prove their knowledge?

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:50 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Arne Duncan is a 21st century Benedict Arnold and he MUST pay for his crimes against America's children, parents and teachers in his puppet role as Secretary of the DOE. The Department of Education MUST be abolished and the states MUST be in charge of public education without interference from the White House or Congress.

Public funds must not go to corporate Charters and vouchers. Billionaires, for instance, Bill Gates, Elli Broad, the Koch brothers and the Waltons, must be stopped from buying policy and elections that lead to the destruction of our democratic public schools.

School boards MUST be elected by the people and not appointed by governors who are owned by billionaire oligarchs.

**Constituency:** Other (specify below)

**Other Constituency (if supplied):** Former teacher, student, parent, U.S. Marine, combat vet and voter.

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:50 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:** Parent

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:49 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Here in Louisiana the DOE is working on the matter of revising the curriculum of our state colleges. They are removing duplicate instructional programs throughout the state, to be more cost effective as a system, but with our TOPS program which allows more students to partake in a college education with out the restriction of the cost associated, those students are being denied access now that the degree programs are only offered at certain state institutions. This is defeating the goal of TOPS; to ensure that anyone who wants to go to college can without the tuition being an issue.

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:48 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Can we rate out government?

**Constituency:** Parent

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:48 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Test scores of students have nothing to do with teachers And/Or the Universities they graduate from.

This data is a waste of taxpayer dollars and will not serve to change, challenge or correct anything!

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:47 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I teach at Antelope Valley College, a community college in Lancaster, California.

Your ratings are devastating for the community college system. Our students often work, have children, and/or come into the system well below college Readiness.

I myself took 7 years to complete community college before I transferred to university. I worked full time and I had a baby. I wanted As only. So I took 2 classes per semester, never summer school and I graduated from university summa cum laude.

By your measures, my community college and I were failures?

The students I teach have far greater challenges than I have. If the government is willing to provide them living stipends, free child care, free legal counsel, stable housing, excellent high schools, mental health counseling, and food, then perhaps that would start to stabilize their lives and we could teach them all on equitable grounds.

My point is that there are too many factors and obstacles for student success in higher Ed that are profoundly beyond the control of the school or the teacher.

Your rating system is a fail.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:44 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:41 AM  
**To:** College Feedback  
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**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

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**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:39 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** This proposal will NOT improve higher education. Stop punishing higher education based on the already failing K-12 design.

**Constituency:** Member of the Public

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

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:38 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:37 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** By using unreliable, incomplete data to evaluate our higher education facilities, the department is saying that they are not really interested in evaluative processes as much as discrediting the facilities. For-profit institutions are not subject to these inquisitions, so they will appear to be above reproach. These are all code words and processes for privatization of higher levels of education. Too bad that our department of education engages in these inept (really corrupt) practices by misusing statistical data.

**Constituency:** Other (specify below)

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:36 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** 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. And what gets measured is usually what can easily be measured, however trivial it may be. 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 implementation: 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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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 10:32 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Stop punishing our higher education institutions and instead fund our students' futures. You ARE NOT qualified as educators to be making educational decisions!

**Constituency:** Other (specify below)

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:31 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Our nation's public education system has been under attack for more than 30 years now, ever since a Nation At Risk was issued and interpreted to mean that bad teachers are the reason for poor student performance. Trying to put the higher ed schools that train teachers under the same scrutiny and place the blame with teacher preparation is just another salvo in a failed war.

Might I point out that, according to current rhetoric, the last 30 years of changes to education have not improved outcomes one bit. Following further down the same path would therefore, seem pointless to anyone truly interested in improving student outcomes.

Second, might I also point out that the original interpretation was flawed, and so is the current rhetoric. Teachers account for a rather small percentage of student achievement, and the new PARCC tests have no track record whatsoever that proves they are reliable over time or have any validity in calculating teacher effect on student scores.

Finally, I would like to remind the Education Department that it has the responsibility to address the real issues of public education. The Department is NOT a conduit for educationists and profiteers to funnel taxpayer dollars into private bank accounts and corporate profits. Tackle the real issue: Parenting, poverty, inadequate funding, and the children themselves ... the conditions they grow up in and survive in the remaining 16 – 17 hours a day. Then, and only then, you will see results.

**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 10:27 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Stop listening to the corporate education reformers, and ask the tenured staff at respectable institutions that aren't bought by those same reformers. It's simple, campaign donations from these types mean their interests are not in line with your constituents.

**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 10:25 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** There are serious flaws in the assumptions underlying the data selected for review. Omitting racial and ethnic data severely skews the results. Likewise excluding data from for-profit entities will create false baselines and comparisons.

The same can be said about only tracking first-time, full-time students. Both my daughters took more than four years to graduate and were enrolled part-time for portions of their undergraduate career. The financial realities of higher education costs force significant portions of students to postpone and extend their time as undergraduates, a decision that has little if anything to do with the quality of instruction received.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:23 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

**User E-mail (if supplied):** [lsendlenski@sagharborschools.org](mailto:lsendlenski@sagharborschools.org)

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:22 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I teach at the University of Michigan Dearborn. My students are drawn from a different pool of students than those at the University of Michigan Ann Arbor. My students are admitted with lower high school GPAs and ACT scores. Over half of my students are part-time, many of whom work 20-40 hours per week. If the success of my University is rating on graduation rates in the same pool as Ann Arbor students, UMDearborn will receive a lower ranking. This is further impacted by the dramatic differences in Pell grant eligibility between the 2 universities, 16% for Ann Arbor and 42% for Dearborn. Any ranking system that does not account for these differences will be grossly inadequate, and unfairly harm the reputation of UMDearborn.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:22 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

**Constituency:** Other (specify below)

**Other Constituency (if supplied):** 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:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:22 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:21 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** To the Federal Dept. of Education:

To extend the same type of accountability system that has failed our K-12 schools to higher education makes no sense. 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. 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 among institutions of higher education, particularly those of community colleges, which are designed for open access. At the same time, by not collecting race or ethnicity data and by excluding most for-profit colleges from the system, the data collected will be incomplete.

The Department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the Department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who in fact 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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## O'Bergh, Jon

---

**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:21 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Instead of increasing assessment and using bogus quantitative measures, the way to improve higher education is to reinvest in it, without a hierarchical reward system, whereby all public institutions of higher education and all private non-profit institutions of higher education would receive the funds necessary to provide good education.

We must disclaim the business model of higher education that favors administration, in favor of student- and faculty-centered governance.

To standardize higher education would be to render it mediocre.

**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 10:19 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I write to express my strong disapproval of the Department of Education's proposed plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. If this plan is put into place, the institutions that rank poorly according to these dubious outcome-based metrics could lose funding in the future. I urge the department to focus on initiatives that will support, not punish, our nation's higher education institutions.

It is ludicrous to extend the same type of accountability system that has failed our K-12 schools to higher education. Instead of focusing on initiatives that will support student success, this plan would merely punish 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. Those of us who actually work in higher education know what it takes for students to succeed, but this plan does not include that support

The plan also focuses on the wrong measures: 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.

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

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 support we know students need to succeed.

Sincerely,  
Jeffrey Bean  
Associate Professor of English  
Central Michigan University

**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 10:18 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I understand that the Department is considering a rating system of higher education schools that would not track race and ethnicity, while it would consider graduate earnings. The outcomes of such a ratings system are quite predictable: deep-pocketed private institutions will probably rank better than public institutions or even private institutions that serve a more diverse student population. Higher education institutions that serve struggling working class students, especially those from immigrant backgrounds, will be punished if their students are not making high corporate salaries within a few years. This is not way to rank the effectiveness of higher education! Many students, especially first-generation college students, struggle to graduate within five years (while working several jobs and and handling family responsibilities). When these students are successful, they very often are determined to give back to their families and communities by choosing meaningful jobs in education, healthcare, and social services, for which the salaries are not necessarily impressive. The rankings you are proposing would punish schools that educate these kinds of students, while rewarding those who are privileged to educate better-prepared students who choose high-salary corporate careers. I also understand you are not even considering including for-profit institutions, which really do need some kind of accountability standard.

Is this the way to support US higher education and student learning? No. I urge you to reconsider the proposed ranking system, and focus on policies that would effectively support US higher education and student learning.

**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 10:17 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** This is the same type of accountability system that has failed our K-12 schools, 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, confusing 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.  
Lucas

**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

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:12 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The Department of Education should focus on initiatives that will support, not punish, our nation's higher education institutions. The Department's current proposal would:

1. Double down on failed K-12 accountability.

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

2. Focus on the wrong measures.

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

3. Use poor data for high-stakes decisions.

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

4. Impose a plan that is not ready for prime time.

By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year.

The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:09 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:08 AM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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**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:** Other (specify below)

**Other Constituency (if supplied):** K-12 Teacher

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

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

## O'Bergh, Jon

---

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

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

**Double down on failed K-12 accountability:** The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well.

It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

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

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

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**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

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**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:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 3:22 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** T-Theresa Potter <TPotter@ferrum.edu>  
**Sent:** Thursday, February 05, 2015 3:40 PM  
**To:** College Feedback  
**Cc:** T-Jennifer Braaten; T-Douglas E. Clark; T-Kimberly P. Blair  
**Subject:** Proposed Federal Rating System - Response from Ferrum College  
**Attachments:** letterheadpres-Ferrum College-scorecardresponse.doc

Dear Mr. Gomez,

Attached please find the requested comments/response from Ferrum College President Jennifer Braaten to the proposed federal rating system/scorecard for colleges and universities.

Please let us know if we can provide further information. We also submitted a slightly abbreviated version of this letter to [www.ed.gov/blogs/collegeratings](http://www.ed.gov/blogs/collegeratings).

Best regards and thank you so much for allowing Ferrum College to respond and express our grave concerns about this.

Theresa Potter

**Theresa Potter**

Special Assistant to the President  
& Liaison to the Board of Trustees  
Ferrum College  
P.O. Box 1000  
Ferrum, VA 24088  
Office: 540-365-4201  
Email: [tpotter@ferrum.edu](mailto:tpotter@ferrum.edu)  
Visit us on the web at [www.ferrum.edu](http://www.ferrum.edu)





*Ferrum College*

*President's Office*

February 5, 2015

Robert Gomez  
Director of Higher Education Outreach  
Office of Communications and Outreach  
United States Department of Education  
400 Maryland Ave, SW  
Washington, D.C. 20202

Dear Mr. Gomez,

Thank you so much for seeking comments on the draft framework for President Barack Obama's proposed college ranking system. I believe it is important for the Department of Education to have as much feedback as possible and to understand that many institutions such as Ferrum College will suffer unintended collateral damage from this effort, as will many of our students, nearly one third of whom identify as minorities.

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

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

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

In matters that an institution can control, Ferrum, like most southern public and private colleges and universities, is accredited by SACS (Southern Association of Colleges and Schools) and fares well in recognized core requirements and assessment standards such as quality of faculty, student learning outcomes, academic programs, library holdings, institutional integrity and financial viability.

Ferrum College, P.O. Box 1000, Ferrum, Virginia, [jbraaten@ferrum.edu](mailto:jbraaten@ferrum.edu), 540-365-4202

Like other NAICU members who support non-profit institutions like ours, we collectively believe that, as President Barack Obama has stated, "In America, our diversity is a strength, not a weakness." In addition, Ferrum College, along with the presidents of forty-nine Virginia public and private colleges and universities, sent a letter in July, 2014 to the Virginia Congressional Delegation, the U.S. Secretary of Education, and the Governor of Virginia stating our collective "serious reservations about" ratings and scorecards. We are pleased that the responses we have received to date, from Congressmen Robert Hurt and Bob Goodlatte, are in strong support of our position.

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

Mr. Gomez, I would be most happy to meet with you or others regarding this proposal, and to outline in person the reasons why this proposed ranking system or "scorecard" will have potentially disastrous consequences for institutions of higher education such as ours, who have never veered from our mission of affordability, opportunity and accessibility. I also invite you to make a personal visit to our campus to meet our deserving minority and need-based students and see firsthand how implementation of this plan could irreparably harm the very students who, without institutions such as Ferrum, would simply not be able to achieve the American dream of a college education.

(b)(6)

Jennifer L. Braaten  
President, Ferrum College

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 3:41 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The department is planning to rate every school the same way, regardless of mission, and tie funding decisions to those ratings. And the metrics it wants to use are incomplete and leave out important pieces of information. For example, the department does not want to track race and ethnicity data, and it will not even rate many for-profit schools. Yet it wants to use graduate earnings and graduation rates to hold schools accountable, even though these measures don't capture the diversity of our higher education institutions' missions. And it would calculate graduation rates by using data in the Integrated Postsecondary Education System, which only counts students who are first-time, full-time students, even though we know this definition covers fewer than half of all students.

**Constituency:** Member of the Public

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:03 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.

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:09 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The design of the new college rating system is another example of a corrupt government administration trying to weaken the educational system in the state. When is it time to stop blaming teachers and start holding individuals accountable for what they do or don't to at school?

**Constituency:** Member of the Public

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:11 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Please Do Not:

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

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

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

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

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:21 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** This is the same type of accountability system that has failed our K-12 schools and 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. Educators know what it takes for students to succeed, but this plan does not include that support.

Educators 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.

While the department acknowledges that many of the measures it is proposing are inaccurate or incomplete, apparently 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:** Higher Ed Association/Organization

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:28 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I have a neice and a nephew, both Hispanic, who did not receive enough support to succeed on their third year of college. They both dropped out. Each child was the first in their family to attend college. Their mothers were high school graduates but their fathers were not. These students did not have the cultural, academic or financial support to keep going. Universities must be held accountable for the support they give children with this type of background. Unfortunately the priorities set by the universities often don't include these students. They assume that it is a lack of interest on the part of the student when it is really a culture issue. Students and parents don't know where to go for help. They are used to failing in the systems. We can't improve our communities if our children are allowed to fail.

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:34 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** These accountability measures are nowhere neR ready, will penalize community colleges and other institutions that work with at risk students, and will threTen to deform curricula and learning in the way that the obsession-with-testing failed strategy has has deformed and hurt K-12 students and teachers.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 4:40 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Educating young people involves so much more than statistics and arbitrary bottom line numbers currently being used to drive our secondary and post secondary education institutions. In America, public education should encompass building communities and embracing creative thought and caring for one another – from families to students to teachers to university professors to industry and beyond. The data driven testing, scoring, comparing, profit – minded number crunching that does not consider the divergent unique histories of our individual institutions undermines the value of our greatest human capitol-bright American minds which are pawned at the expense of political and corporate special interests. We need collaboration of leaders in industry with universities and government to work together to provide platforms for college graduates to enter the workplace. Competition between institutions based on federal dollars which ta! bulate performance and graduation rates of first time college students with statistic driven data that is misguided) only undermines and demoralizes those committed to teaching and those committed to learning. No educational institution exists without tremendous giving by many who care about the welfare of our nation and the need for our people to have hope.

**Constituency:** Please Select...

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:02 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. I teach in a community college. Many of these students can't take a direct path to a degree. They take a class a semester or they just take the classes they need to acquire a skill. Therefore, graduation rates don't adequately measure the value of a community college.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:10 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I agree with the followings statements. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

**Constituency:** Other (specify below)

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:24 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I think you need to tell the President that it takes more time to develop a fair and accurate rating system at this moment. First it would make sense to research what data are available and then decide if a fair rating system can be developed from that information or if you need to ask schools to keep additional data. In addition schools dedicate themselves to different populations with different needs, so a fair and accurate system needs to take that into account as well.

I would guess that a person with a degree from SUNY Stony Brook is more likely to get a good job faster than a community college grad. Even comparing community colleges is not necessarily comparing the same student population. You are being driven by politics to do a poor job. Does not that distress you?

**Constituency:** Member of the Public

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:27 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** In my opinion that measure does not reflect all the diversity that are in all the states. I don't think is not even a 80% effective to the whole institutional system. Let's stop doing a deserving to our students. Look at the reality of a nation that is rich in diversity and let's keep creating good programs to achieve the performance for our students.

**Constituency:** Other (specify below)

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:32 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I taught high school for 35 years and am delighted not to have to do it anymore. You and other politicians have ruined the work we did with your endless, counterproductive testing, and I'm disgusted that you're at it again for colleges. You'll mess them up just as you messed up public K-12. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

**User E-mail (if supplied):** [safutrell@ucdavis.edu](mailto:safutrell@ucdavis.edu)

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 5:33 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Yes is true for so many years you have been using the system of accountability and so far is not improving and you keep design a rating system that is ineffective and does not help the real issues of a modern society of today. Start working in creating programs to help the diversity of our nation and stop designing rating system that help only a few.

**Constituency:** Other (specify below)

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 6:21 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

**Constituency:** Other (specify below)

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

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

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**O'Bergh, Jon**

---

**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 6:28 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Design a rating system that is clear, fair, and focussed on helping children.

**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 6:29 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** For starters, graduation rates are NOT a valid measure of success. Learning is. In my area, it is not unusual to find high school graduates who do not know that \$.25 is 25 cents. That is at least partially the result of using irrelevant metrics.

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** (b)(6)  
**Sent:** Thursday, February 05, 2015 6:49 PM  
**To:** College Feedback  
**Subject:** Higher Ed assessments

Since we cannot always measure what is important, we make important what we can measure.

The simple "accounting" system proposed for higher ed is a naive reduction to "what can be measured" and will prove both unproductive and harmful.

Students aren't widgets; education is not easily reduced to measurable, numerical data, but that has been the unfortunate trend for the last 15 years. Do not continue to compound the difficulty of assessing educational efficacy by utilizing simplistic, reductive metrics.

**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 6:52 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Please stop using funding threats and single points of data when looking at school or teacher performance. It is a complex issue. Threatening funding is detrimental to institutions trying to create learning environments and attract the next level of great educators.

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 6:53 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** As first grade public school teacher in an urban school I see the destruction of neighborhoods slowly happening.

As a parent of two public school children I see the narrowing of learning to bubbling tests.

As a taxpayer I see money going to private for profit companies with no results for the common good of society  
Stop the corporate reforms

I agree with these points

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:** Other (specify below)

**Other Constituency (if supplied):** Parent, teacher, and citizen

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 7:17 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** 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 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 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 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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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 7:44 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The faulty accountability system used for K-12 schools won't work on higher ed either. You can't confuse accountability with improvement.

Just because you can measure it doesn't mean that it matters; outcomes such as graduation rates doesn't acknowledge the diversity of missions of institutions.

Using poor or incomplete data for high-stakes decisions is bad management and leads to major mistakes. Your plan just isn't thought out. Get it together before you try to implement it.

**Constituency:** Member of the Public

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 7:58 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Administration and policy makers have been making poor decisions for the education of our children/students. When resources, people and money, are put in the class rooms where it is needed! As a Professional Educator, Pre-K – 12 and Higher Education levels, too much money is wasted on administration and poor programs that have not delivered. The problem lies on all levels, national, state and local! Our education system ranking has dropped significantly over the last 5 to 6 decades! When are the proper decisions going to be made? When all professionals are include in the decision-making, better results will occur! We can build good performers!

**Constituency:** Member of the Public

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 8:05 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Rating schools based on income makes no sense at all is learning only about money and do jobs who make little matter less is a school not as good because it graduates teachers who make less than lawyers?

**Constituency:** Member of the Public

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 8:07 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** Please support programs that reward, not punish higher education institutions.

**Constituency:** University Staff/Faculty

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

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 8:34 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The department's proposal would:

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

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

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

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

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 8:39 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** education is the future of our country, not investing in education in a big way is a bad idea

**Constituency:** Member of the Public

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 9:26 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** This ratings system is not "clear, fair, and focused". It does not take into account the variety of students who study at community colleges. It has not been well researched. It is likely to cause the same problems that Race to the Top and its boost to the poorly created Common Core Standards. This initiative will merely exacerbate the problems with which our public K-12 schools are now struggling. If you really want to help colleges, you need to allow open meetings where and when decisions are being made. You need to allow people DIRECTLY involved, such as students, parents and faculty to generate guidelines.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 9:41 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The Department of Education has proposed a plan to rate colleges and universities using the same type of accountability system that has failed the K-12 education system. The institutions that rank poorly on these outcome-based metrics could lose funding in the future. We want the department to focus on initiatives that will support, not punish, our nation's higher education institutions. The department's proposal would:  
**Double down on failed K-12 accountability:** The same type of accountability system that has failed our K-12 schools would be extended to higher education. Instead of focusing on initiatives that will support student success, this plan is meant to be punitive for schools that do not score well. It also confuses accountability with improvement. There is no established link between accountability measures and program improvement; there is only an assumption that one will produce the other. We know what it takes for students to succeed, but this plan does not include that support

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

**Use poor data for high-stakes decisions:** The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated Postsecondary Education Data System graduation measure, which only includes first-time, full-time students, who account for fewer than half of all students.  
**Impose a plan that is not ready for prime time:** By producing such a loose framework, acknowledging the unreliability of available data, and asking for suggestions on what other measures should be included, the Department of Education has made clear that its plan is not fully formed. Yet it still intends to have a ratings system in place for the 2015-16 school year and hopes to tie the outcomes to funding decisions beginning with the 2018-19 school year. The department should hit pause on this ill-conceived plan and instead focus on providing the supports we know students need to succeed.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:09 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I like to take college courses at my local community college for my own benefit. I have a job and do not need a degree. To judge colleges by the number of graduates is absurd. I will never graduate from my local community college because I don't need a new career. I am also advising my children to take courses there. They will also not need a degree so they will not need to graduate. Please do not support this completely illogical legislation.

**Constituency:** Parent

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

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:14 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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

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

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

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

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

**Constituency:** Parent

**Other Constituency (if supplied):**

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

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**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:24 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** I endorse the following ideas, and these are the comments I submit for the public record regarding the U.S. Dept. of Education's proposed college ratings system.

The proposed system is flawed in the following ways because it would:

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

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

**Use poor data for high-stakes decisions:** The department acknowledges that many of the measures it is proposing are inaccurate or incomplete, but it plans to use them anyway. For example, the department has suggested looking at graduation rates by using the Integrated 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 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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## O'Bergh, Jon

---

**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 10:52 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** The department is planning to rate every school the same way, regardless of mission, and tie funding decisions to those ratings. And the metrics it wants to use are incomplete and leave out important pieces of information. For example, the department does not want to track race and ethnicity data, and it will not even rate many for-profit schools. Yet it wants to use graduate earnings and graduation rates to hold schools accountable, even though these measures don't capture the diversity of our higher education institutions' missions. And it would calculate graduation rates by using data in the Integrated Postsecondary Education System, which only counts students who are first-time, full-time students, even though we know this definition covers fewer than half of all students.

This rating system could be in effect as early as the 2015-2016 school year, with the goal of tying the ratings to funding for the 2018-2019 school year.

the accountability measures that failed K-12 education will fail higher education too.

We believe these problems need real leadership and solutions. We must invest in higher education, make college affordable and increase wages for all Americans. Let's reclaim the promise of higher education for all students.

**Constituency:** Other (specify below)

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

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

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**O'Bergh, Jon**

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**From:** Kenneth Stevenson (b)(6)  
**Sent:** Thursday, February 05, 2015 11:22 PM  
**To:** College Feedback  
**Subject:** The cost of a technical degree vs a four year university degree.

I was a teacher at a local technical college that could only give students an associates degree upon course completion. The college relied mainly on technical certifications from companies that tested students knowledge of their subject. Some examples of these companies are Microsoft, Cisco and Sun Micro-systems. Today due to the HIGH cost of a university degree, many employers are selecting students from these technical colleges rather than a four year degree. The cost of a college degree is way out of line for the education the student receives.

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Sent via EmailTray, my personal email concierge.  
Get yours at <http://www.emailtray.com>

**O'Bergh, Jon**

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Thursday, February 05, 2015 11:27 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

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

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.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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## O'Bergh, Jon

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

**User Comment:** I recommend that it is not the details of this plan but rather going ahead with the plan itself that should be reconsidered. Instituting the same kind of accountability plan that has failed in the K-12 sphere makes no sense. If the improvement of higher education is the real aim, then a plan should focus on initiatives that will support student success. Instead, 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.

More specifically, the department has identified several data points it wants to collect for this system, but much of this plan seems to emphasize the wrong outcome, and there are some glaring omissions. It wants to skip collecting race or ethnicity data, which will make it impossible to track racial and ethnic disparities. One of the metrics the department would like to use is graduate earnings, but as faculty and graduates such as myself know from our own lives, those who work in public service make less than they would in the private sector. This could create a perverse incentive that encourages institutions to divest from programs in teaching, social work and the humanities in order to pursue a higher rating.

Also, the department wants to look at graduation rates by using data in the Integrated Postsecondary Education Data System, which only counts students who are first-time, full-time students, even though we know that this definition covers fewer than half of all students, and even though this measure fails to acknowledge the diversity of the missions of our higher education institutions. Yet, at the same time, the plan largely excludes for-profit colleges, which we know are often some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and degrees with questionable value.

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

I strongly suggest that, instead of focusing on a system that tries to shame institutions into changing their behavior, the department should reconsider this college ratings plan altogether and focus instead on initiatives that will support our nation's higher education system and its learners.

**Constituency:** University Staff/Faculty

**Other Constituency (if supplied):**

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

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