

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 13, 2015 3:37 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: February 13, 2015

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

Dear Mr. Secretary:

On behalf of the fourteen independent, not-for-profit institutions represented by the Association of Independent Colleges and Universities in New Jersey (AICUNJ), I am writing to share our concerns regarding the proposed Postsecondary Institution Ratings System (PIRS). Our member institutions of higher education actively support and strive to embody the Department's goals of access, affordability, and success. However, we firmly believe that a college ratings system will hinder us, rather than help us, to achieve these mutual goals.

1) Institutional Mission: As the Department recognizes on page five of the "Invitation to Comment," valuing diversity of institutional mission is key. Nevertheless, the Department's decision to categorize institutions as "two-year" or "four-year" does not suffice. Moreover, it is unlikely that any grouping system can adequately account for the myriad of types of colleges and universities, each with their own distinct strengths, values, and missions. The unparalleled diversity in American higher education includes public research universities, small liberal arts colleges, regional community colleges, faith-based institutions, historically black colleges and universities, women's colleges, etc., which cannot be satisfactorily captured in a grouping system, however nuanced.

2) Transparency: All of our institutions are fully committed to transparency, and we wish to provide potential future students with accurate, useful information so that every individual can find his or her best fit institution. Unfortunately, it is also possible to reach a point when an overabundance of information prevents consumers from making educated decisions, and we have arguably reached that point in higher education. With respect to PIRS, the vast majority of this "new" information is already available elsewhere. Students and families already have access to the College Navigator (ED and NCES), College Scorecard (White House), Net Price Calculators, College Affordability & Transparency Lists (ED), U-CAN – University and College Accountability Network (NAICU), Federal Financial Aid Shopping Sheets, etc. We would be interested in a study on the efficacy of the existing tools, rather than the creation of new ones. Information provided to students and families should be simple and of high quality. We must be wary of reinventing the wheel and overwhelming consumers.

3) Unintended Consequences: Institutions hoping to receive favorable PIRS ratings may be induced to take steps that ultimately hurt students and work against the shared goals of access, affordability, and success. Colleges wishing to "game the system" may:

- Admit fewer "risky" students who may not complete. Unfortunately, access and completion do not always go hand in hand. Frequently, if one goes up, the other goes down. If colleges will be penalized for matriculating non-completers, they will be reluctant to admit students who do not already demonstrate a track record of success.

- Admit low-income students to gain “credit” in the ratings, while offsetting these students with full-paying, wealthy students. The Department acknowledges this unconscionable possibility on page seven. This would make middle-income students very undesirable, would exaggerate the gap between rich and poor, and would erode the middle class, the very class that should “thrive” under President Obama’s college attainment plan.

If PIRS does come to pass (and we hope that it does not), in addition to the three main concerns outlined above, we also would like to stress the following:

- Any such rating system should not use forced distribution.
- “Credit” must be given for all transfers, including lateral transfers and transfers from four-year to two-year institutions. “Credit” should be given to both the sending and receiving institutions, regardless of completion.
- In the spirit of transparency, we would certainly support sharing disaggregated data with consumers.
- Clear definitions of terms such as “credit,” as in credit awarded to institutions under PIRS, “first-generation,” and “transfer” must be provided.

Since the Department also recognizes and acknowledges some of the above-mentioned dangerous potential consequences of PIRS, we request that the Department please reconsider the wisdom of a college rating system altogether. It may very well do more harm than good, pushing us all farther from our common goals of access, affordability, and success. Please feel free to contact us at any point for additional information. Thank you for your time and consideration.

Yours truly,
Jennifer Ann Short, Ph.D.
Director of Institutional Relations & Policy Analysis
Association of Independent Colleges and Universities in New Jersey

Constituency: Higher Ed Association/Organization

Other Constituency (if supplied):

User E-mail (if supplied): jshort@njcolleges.org

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

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, February 13, 2015 3:52 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I write as the President of York College in York, NE in response to your “College Ratings Draft Framework” proposed on December 19, 2014. While I share the President’s commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the “Draft Framework” and instead ask the Administration to work with college presidents to achieve these goals in a different way.

My institution’s mission is to transform lives through Christ-centered education and to equip students for lifelong service to God, family and society. We are a small institution that integrates character development into the educational experience. Our graduates are known for servant hearts and a strong work ethic. While we have many successful graduates, much of that success comes through their desire to make the world a better place which cannot be measured by the amount of income they receive. We pride ourselves in helping students throughout their education at York College, allowing our graduates to complete degrees with one of the lowest debt burdens among private, Christian colleges and universities. We also have the highest ratio of minority students (32%) of any college or university or in Nebraska.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education we provide into simplistic categories with no explanation. As your Department has recognized, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, yet while recognizing this reality, the Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while your Department has also acknowledged that an institution's rating could suffer from inaccurate data, you intend to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world – yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions like ours that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would respectfully ask that do not move forward with this ratings system and that instead you work with colleges to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

Dr. Steve Eckman
President
York College, York, NE

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): seckman@york.edu

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

O'Bergh, Jon

From: Eckman, Steven <seckman@york.edu>
Sent: Friday, February 13, 2015 3:53 PM
To: College Feedback
Subject: Ratings System

Honorable Arne Duncan
Secretary
US Department of Education

Dear Secretary Duncan,

I write as the President of York College in York, NE in response to your "College Ratings Draft Framework" proposed on December 19, 2014. While I share the President's commitment to the areas of access, affordability, accountability, and transparency, I disagree with the method put forth in the "Draft Framework" and instead ask the Administration to work with college presidents to achieve these goals in a different way.

My institution's mission is to "transform lives through Christ-centered education and to equip students for lifelong service to God, family and society." We are a small institution that integrates character development into the educational experience. Our graduates are known for servant hearts and a strong work ethic. While we have many successful graduates, much of that success comes through their desire to make the world a better place which cannot be measured by the amount of income they receive. We pride ourselves in helping students throughout their education at York College, allowing our graduates to complete degrees with one of the lowest debt burdens among private, Christian colleges and universities. We also have the highest ratio of minority students (32%) of any college or university or in Nebraska.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education we

provide into simplistic categories with no explanation. As your Department has recognized, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, yet while recognizing this reality, the Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while your Department has also acknowledged that an institution's rating could suffer from inaccurate data, you intend to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world - yet the ratings system attempts to reduce higher

education to a simplistic list of factors. I believe this will harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions like ours that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

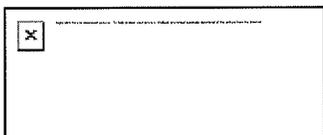
I would respectfully ask that do not move forward with this ratings system and that instead you work with colleges to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

Dr. Steve Eckman
President
York College, York, NE

--

Steve Eckman
President
York College, Nebraska
(402) 363-5621
seckman@york.edu



The mission of York College is to transform lives through Christ-centered education and to equip students for lifelong service to God, family and society.

O'Bergh, Jon

From: Beauregard, Lindsey A <LBeauregard@lasell.edu>
Sent: Friday, February 13, 2015 4:32 PM
To: College Feedback
Subject: Postsecondary Institutional Rating System Feedback
Attachments: Postsecondary Institutional Rating System.pdf

Attached please find a PDF letter with feedback on the Department of Education's "College Rating Draft Framework" from Lasell College. Please let me know if you need this document in another format or need any further information.

Sincerely,

Lindsey Beauregard

LASELL COLLEGE

Lindsey Beauregard
Assistant Director of Government and Community Relations
1844 Commonwealth Avenue
Newton, Massachusetts 02466
P: 617-243-2194
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Learn more about Lasell's community involvement [here](#).

LASELL COLLEGE

OFFICE OF DEVELOPMENT AND ALUMNI RELATIONS

PH: 617-243-2141
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February 13, 2015

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

Dear Mr. Secretary,

Lasell College is a private coeducational college located in Newton, Massachusetts, and our community believes in the importance of higher education. We also understand the need to provide prospective students and their families with an abundance of information so they are able to find the most appropriate college. Currently, the Department of Education is trying to find the right formula to address this need. We appreciate the opportunity to provide feedback on the Department's "College Rating Draft Framework" released on December 19, 2014.

The Lasell College community agrees with President Obama's objective to provide prospective students metrics on colleges' access, affordability and performance, however, we want to ensure that the Postsecondary Institutional Rating System (PIRS) does not replace individual choice or mislead consumers. Determining the value of an institution should not be made with a standard formula. Selecting the right college is a very personal decision that should be made by each prospective student and their family. That being said, we are concerned that a rating system, although well intentioned, will be an ineffective solution. Each institution has countless distinct characteristics such as, the student populations they serve, geographic locations and the areas of study they specialize in. While comparisons are great tools to assess which college is right for a student, reducing a college to a single or oversimplified rating would make it impossible to accurately compare them.

Many of the metrics proposed in the "College Rating Draft Framework" attempt to offer a one-size-fits-all solution. Comparing institutions in this way is like trying to compare apples to oranges. One example is the Pell Grant eligibility metric. Research has shown that Pell eligible students lack mobility and are regionally based in their college choices. To put this point into perspective, 55% of our students come from within the state; and our Pell participation rates exceed Massachusetts public and private 4-year-college median participation rates. However, when compared nationally, we fall below the national average. Thus it is easy to see that geography plays a role in understanding this metric. The PIRS, as is, would not be able capture or explain this distinction.

Another example is the metric for graduation rates. The appearance of low graduation rates can be misleading. Often institutions with lower graduation rates serve academically at-risk populations such as students with low SAT's scores, those who need extra study resources, are Pell eligible, or are first generation students. The draft proposal indicates that future State and Federal funding will be tied to how well a college is rated under the PIRS. This linkage could give colleges an incentive to change their enrollment standards and consequently make it harder for academically at-risk students to get in.

In addition to the misleading nature of the ratings, they will also be based off of data that is between one to two years old. This fact will handicap institutions that are making progress in improving metrics such

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as retention and graduation rates. For example, if the rating system was in place right now, consumers would see that Lasell's retention rate is 71.7% but we are actually at 75.2%. Our graduation rate would show as 52% while we are actually at 57% to date. The information that the consumer sees is not reflective of what is actually happening at the college.

There is also a financial burden to consider. Many small colleges do not have the staff to comply with even more required reporting. Colleges all over the country are already working with strained budgets, and adding additional staff to comply with these new regulations could mean raising costs for students.

A federal rating system should not replace individual judgment. An oversimplified rating system cannot capture all of the nuances and intangible aspects of the college experience, particularly for small private or liberal arts colleges who excel in academic rigor, mentorship, advising and connected learning but whose alumni may not land high salary jobs in the early years post-graduation.

Personal values also need to be considered when selecting a college. Geographic location, being "close to home," and a college's religious affiliation may be very important to some prospective students. A student's comfort level, happiness and engagement can factor into time to complete and can add value to one's college experience beyond what a metric could communicate.

In conclusion, providing consumers with an abundance of data to make an informed decision is necessary. However, we fear that the proposed plan for the PIRS will mislead consumers and hamper individual decision making. It is important for prospective students and their families to weigh all of their options and not rely on an oversimplified rating system to make this importance decision. Thank you for taking the time to consider our concerns. Please do not hesitate to contact us should you have any further questions or concerns.

Sincerely,

(b)(6)

Lindsey Beauregard
Assistant Director of Government and Community Relations
Office of Government and Community Relations
Lasell College
1844 Commonwealth Avenue
Newton, MA 02466

O'Bergh, Jon

From: jwall@brenau.edu on behalf of Schrader, Edward <eschrader@brenau.edu>
Sent: Friday, February 13, 2015 4:53 PM
To: College Feedback
Cc: Schrader; Jody Wall
Subject: DOE Proposed Ratings System for Higher Education



Sir/Madam:

This communication is in regards to the proposed federal college ratings system. As well intended as the premises may be in increasing access, affordability and outcomes, in my view this initiative will not achieve its stated purposes, but may cause irreparable damage or cause the demise of many smaller schools that provide an invaluable service to students and much needed economic stimuli to their communities.

While I do not object in theory to the intent – in higher education we all are concerned with providing a first rate education at an affordable cost – with more than \$150 billion in federal financial aid at play, this is not simply a theoretical exercise. Candidly, this is a high stakes endeavor that few of us in higher education think can be created or managed well by a federal government entity as evidenced by the government's struggle to implement and manage other far-reaching efforts, like health care reform. Federal government leadership is desperately needed in many areas, however, we have no confidence that the federal government is equipped – nor should it be in the business of – taking on the monumental task of a proposed college rating system.

Of particular concern is the inability of any ratings system to take into account the subtleties that schools in traditionally underserved higher education communities possess in serving first generation, minority and low income students who have a 90 percent dropout rate, compared to 50 percent for all students who enroll. Serving this high risk demographic is part of the mission of many schools, but it is challenging and expensive. A broad stroked rating system will place these schools at a disadvantage; particularly as future federal dollars are awarded based on graduation rates, which are higher at elite, already highly funded institutions.

Likewise, universities and colleges with a religious DNA have a tough balancing act between providing unencumbered academic experiences while embracing their faith traditions. These schools, too, have a subtle nuance in their missions that defy any broad-stroked rating system.

Through six regional accrediting bodies, we have entities in place – entities recognized by the U.S. Department of Education – to uphold higher education standards and to sanction those who fall short of these. As a board member serving my second term on the Southern Association of Colleges and Schools Commission on Colleges, and as a university president, I can assure you that this system serves the higher education community and its students well. With closer collaboration among these entities and the Department of Education, the three key objectives of access, affordability and outcomes could be addressed.

The American higher education system is the envy of the world. Why meddle with a system that is already the best? Federal interference and mismanagement could only stifle the ability to think creatively and the ability to hold on to the lead.

In American higher education, one size does not fit all. Our schools reflect and contribute to the vast diversity and skills of our citizenry. Indeed, our higher education system is one of the greatest advantages our country controls. In order to continue this coveted advantage, we implore you to simply step aside from this well-intended but misguided ratings effort.

Ed L Schrader, PhD

President

Brenau University

Ed L. Schrader, President
Brenau University
500 Washington St. SE
Gainesville, GA 30501
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O'Bergh, Jon

From: Ricardo Torres <rtorres@studentclearinghouse.org>
Sent: Friday, February 13, 2015 5:03 PM
To: College Feedback
Cc: Executive Team
Subject: Response to Department of Education new system of college ratings
Attachments: Response of the National Student Clearinghouse to the Department of Education_02.13.15.pdf

Attached please find the response of the National Student Clearinghouse with regard to the Department of Education's new system of college ratings.

Regards,

Rick Torres

Ricardo (Rick) Torres, President & CEO, **National Student Clearinghouse**
2300 Dulles Station Blvd., Suite 300, Herndon, VA 20171
o 703.742.4201 | skype: ricardo.d.torres | <http://www.studentclearinghouse.org>

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NATIONAL STUDENT CLEARINGHOUSE*

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ www.studentclearinghouse.org

February 13, 2015

Office of Post-Secondary Education
U.S. Department of Education

This is the response of the National Student Clearinghouse to the Department of Education "A New System of College Ratings – Invitation to Comment."

For more than 20 years, the National Student Clearinghouse has worked with institutions of higher education to assist them with the exchange of degree and enrollment information among institutions and with their state and federal regulators. In compliance with FERPA, the Clearinghouse acts as the agent or authorized representative of the institutions. We take our role as agent very seriously and our guiding principle is that the data entrusted to us is the property of the institutions and their students. Therefore, we do not believe it is within our role to opine on the need for the proposed ratings system. We do, however, wish to offer our comment on the section of the Department's document on data available for this effort.

First, we applaud the consideration in the proposal that "the Department may allow institutions to voluntarily submit their Student Achievement Measure (SAM) completion/transfer rate ... for calculation of specific outcome metrics for a broader cohort of students." As the Department points out in its document, there is a need to capture a broader measure of student outcomes than is available through the IPEDS "first time full time" measure. Allowing institutions to use other widely available metrics that include transfers and contemporary students who are not "first time full time" can provide a much more accurate measure to inform students of institutional outcomes.

In November 2014, we released our latest Signature Report, *Completing College: A National View of Student Attainment Rates*. The report's findings reiterate the need for developing measures that capture the complexity of students' postsecondary pathways. Developing new measures of student success outcomes will result in public and institutional policies that acknowledge and respond to student pathways that may involve mobility across institutional and state lines, part-time and mixed enrollment, a gender gap that varies by age, and entry into postsecondary institutions at a variety of different ages and life circumstances. This report confirmed our earlier research that one-third of all students transferred at least once within five years. It also documented that over one-fifth (22.4%) of students who completed a degree within six years, did so at a different institution from where they started. The number increases to over one-quarter (26.2%) after eight years. Not including transfers in any completion metric creates a significant opportunity for inaccuracy in measuring institutional performance. This type of inaccuracy risks perpetuating the pattern in which traditional postsecondary outcome measures consistently mislead the public about student success and, ultimately, about the value of the colleges and universities in supporting student success.

NATIONAL STUDENT CLEARINGHOUSE*

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ www.studentclearinghouse.org

Undersecretary Mitchell recently noted the possibility of including additional data sources, such as state databases. Again, we applaud this broader concept but must point out that our recent research indicates that there is a significant degree of student mobility that crosses state lines and is not captured in state databases. In recent work to assist two-year and four-year institutions exchange data to enable the award of “reverse transfer” degrees, we found significant interstate mobility among this cohort. Of the potential degree awardees we identified, over 800,000 had enrolled in institutions located in multiple states. Among students who began college in 2008, we found in our third annual national completions report that within six years of starting, 3.6 percent completed their degree in a different state from where they started. This amounts to roughly seven percent of all successful student outcomes in the cohort. Use of state databases would not account for interstate transfer mobility.

The Department’s document also points out the challenges posed by the data limitations for non-degree granting institutions. We note that there are also non-degree programs, offered by both degree and non-degree granting institutions, that can result in a certificate or certification issued by an industry organization or an individual company (such as specific certifications ranging from information technology to welding). Not capturing these credentials will limit the ability to fully measure the successful outcomes of students in these programs, and will limit the utility of the ratings not only for assessing the quality of the institutions that offer these programs, but for informing student choice for those seeking these credentials.

As the Department notes in limiting the scope of its initial assessment effort, there is an exponential volatility of student pathways that differ significantly from the traditional model. Our recent exploration of reverse transfer with multiple states, as cited previously, underlines the need to change systems and assessments of success to account for mobility. Also important to note is the growth of adult learners and others who use higher education to build specific skills, not achieve degrees, which can trigger significant wage gains. If we are to achieve a true and accurate picture of student outcomes, all these and many other variables in the rapid evolution of higher education will ultimately need to be addressed.

As noted above, it is not the place of the Clearinghouse to either support or dispute the need to create a System of College Ratings. We believe, however, that it is of critical importance that any such systems provide students and their families with an accurate and complete measure of institutional outcomes.

Respectfully submitted,

(b)(6)

Ricardo D. Torres
President and CEO

O'Bergh, Jon

From: Heather Bené <heather.bene@cu.edu>
Sent: Friday, February 13, 2015 5:25 PM
To: College Feedback
Cc: Abby Benson
Subject: CU-Boulder comments on proposed college ratings system
Attachments: CU-Boulder College Rating Framework response 2-17-15.pdf

Hello,

Please find attached official comments from the University of Colorado Boulder regarding the Department of Education's proposed college ratings system.

Please contact us if you have questions or would like additional information. Thank you for the opportunity to weigh in.

Regards,
Heather

Heather Bené
Federal Relations Associate, Office of Government Relations
University of Colorado
1779 Massachusetts Avenue NW, Suite 610
Washington, DC 20036
t 202 518 8702
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University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus



University of Colorado
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February 17, 2015

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

RE: A New System of College Ratings – Invitation to Comment

Dear Secretary Duncan:

On behalf of the University of Colorado Boulder (CU-Boulder), I am writing in response to the U.S. Department of Education's invitation to comment on the draft framework for its proposed college ratings system. CU-Boulder applauds the Administration's commitment to improve access, affordability, and student outcomes in college, and to emphasize institutional responsibilities in furthering these objectives.

At CU-Boulder we strive to provide the highest quality, affordable education to our students. Last year, the university participated in the White House Day of Action on College Opportunity, committing to significantly expand our CU Promise program, which provides need-based aid that covers all tuition, fees, and book expenses for our Pell eligible students. While CU-Boulder already boasts top graduation rates among public institutions in Colorado, the university recently announced an ambitious initiative to graduate 80 percent of students within six years – to maximize students' return on investment and lower their educational costs.

While CU-Boulder shares the Department's goals, we do not believe that a single institutional rating system will enhance those objectives to benefit students and their families. We endorse the concerns shared by the Association of American Universities' (AAU) in their February 3, 2015 comments to the Department. Like AAU, we are concerned that a single rating system cannot adequately reflect the diversity of higher education institutions and their missions, regardless of whether statistical models attempt to correct for this diversity. At CU-Boulder, we believe the diversity of the U.S. higher education system is one reason why it commands such a high level of respect around the world. The conceptual framework of the proposed rating system would effectively, though perhaps unintentionally, bound, constrict, and reduce that diversity in favor of uniformity – harming both students and the U.S. higher education enterprise.

We are likewise concerned by the metrics and data limitations in the proposed rating system. For example, many of the metrics rely on data collected from the Free Application for Federal Student Aid (FAFSA) and largely focus on Title IV aid recipients. These data do not reflect the full CU-Boulder student population, making it impossible to accurately benchmark the university's effectiveness in the areas of access, affordability, and outcomes, as well as inform prospective education consumers.

Many of the proposed metrics are new and have not yet been adequately vetted to determine their relative risks and benefits. Even established metrics, like the percentage of federal Pell Grant recipients, have their shortcomings. Pell, in fact, offers a narrow perspective on student access at CU-Boulder as many of our low-income students are not Pell eligible. CU-Boulder, like many institutions, awards many students

beyond the Pell threshold with institutional and state need-based aid, a demonstration of commitment to access and affordability that should be considered in the proposed framework.

Finally, we suggest that providing student support services to students, both within and outside higher education institutions, would enhance student success far more than investing limited federal resources in a single college rating model. However, if the Department makes these data available, we hope they will be incorporated into existing initiatives, such as the College Scorecard and College Navigator, to minimize confusion for students and their families.

Thank you for your ongoing efforts to expand college opportunity, ensure affordability, and boost degree completion at the nation's higher education institutions. We appreciate the opportunity to weigh in and look forward to working with you to advance these important goals.

Sincerely,

(b)(6)

Russell Moore
Provost and Executive Vice Chancellor for Academic Affairs
University of Colorado Boulder

O'Bergh, Jon

From: Kathleen Miner <kminer@alaska.edu>
Sent: Friday, February 13, 2015 6:01 PM
To: College Feedback
Cc: alex.ortiz@mail.house.gov; McCarthy, Karen (Murkowski);
peter_henry@sullivan.senate.gov; Carla Beam; dlmilke@alaska.edu;
pkgamble@alaska.edu; Dana Weekes; ckcollins2@alaska.edu; Gwen Gruenig;
University_of_Alaska_State_Relations
Subject: University of Alaska Comments on DOE's College Ratings System Proposal
Attachments: 021715 University of Alaska, Comments DOE's College Ratings System Proposal.pdf

Hello, Attached are comments from University of Alaska President Patrick K. Gamble on the Department of Education's College Ratings System Proposal.

Thank you for the opportunity to submit comments.

Kathleen Miner
Executive Assistant
University Relations
University of Alaska System
1815 Bragaw St. Suite 209
Anchorage, AK 99508
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February 17, 2015

Jamienne Studley, Deputy Under Secretary
U.S. Department of Education
Lyndon Baines Johnson Building
400 Maryland Avenue, SW
Washington, DC 20202

Re: College Ratings Framework Comments

Dear Deputy Under Secretary Studley:

The University of Alaska (UA) thanks the Department of Education for providing us and other education stakeholders with the opportunity to submit comments on its "College Ratings Framework" released on December 19, 2014.

UA recognizes the important Department of Education role in supporting prospective students and their families when making decisions about their educational paths. Along these lines, the Department also has a responsibility to institutions of higher education in presenting accurate information about our institutional characteristics and program value. As such, UA supports the many well placed efforts of the Administration to further consumer education through greater transparency. However, we have some concerns for the Department's college ratings system proposals, which we discuss in our comments. We hope you find our recommendations helpful and constructive, and we welcome the opportunity to talk through our comments with you.

A. ABOUT THE UNIVERSITY OF ALASKA

Established in 1917, UA is a land-, sea-, and space-grant institution. System-wide, close to 33,000 full- and part-time students are enrolled; nearly 21,000 students are pursuing hundreds of different degree, certificate, or endorsement programs. Study areas include short-course workforce training, associate degrees, bachelor's and master's degrees, as well as doctorates. Programs include a wide array of the sciences, engineering, resource extraction, teacher, and early childhood education, business, journalism and communications, aviation, health occupations, history, English, social sciences, the arts and humanities and many others.

The UA system consists of three separately accredited regional university centers: the University of Alaska Anchorage (UAA), the University of Alaska Fairbanks (UAF), and the University of Alaska Southeast (UAS), each with extended community campus sites comprising over a dozen across the state. These three regional universities, along with the statewide administration, make up the four major administrative units of the UA System.

B. RATING INSTITUTIONS

- **Rating Categories.** UA is concerned about how the ratings will translate to funding, and recommends that the Department establish clear and concise guidelines for how performance goals will be set and measured, and how institutions' specific ratings will impact availability of funding. It is difficult for UA to affirm that the categories "high-performing, low-performing, and those falling in the middle" are appropriate without an understanding of these guidelines and impacts.
- **Improvement over Time.** UA recommends that the Department identify and implement a methodology for providing accurate trend comparisons for institutions that may merge or separate over time, or undergo other structural changes that are currently not able to be accommodated or corrected for in IPEDS. Alternatively, the Department should hold institutions that have undergone restructuring harmless until baseline data has been rationalized.

The following metrics are examples that UA suggests have the potential to indicate institutional improvement over time:

- Net price by Quintile could indicate lower or higher cost of attendance.
- Completion Rates as well as quantities may act as a partial indicator of institutional quality.
- Transfer rates could be used in conjunction with completion rates to provide a better overall indication of student success. Institutions should receive credit for transfers among postsecondary institutions.
- Graduate School Attendance may also indicate institutional quality; increased graduate school attendance may be due to institutions providing a higher quality education which better prepares their undergraduates to pursue advanced degrees.

UA suggests that trend data be displayed as a running average of 5 consecutive years and include a confidence interval to indicate whether the change is statistically significant from the prior years' performance. This trend data should be expanded to 10 years for evaluating employment outcomes.

- **Institutions Included in the Ratings System.** The universities that comprise the UA system would not squarely fit into the two categories proposed by the Department, and UA does not support being grouped in this manner. As shown below in Table 1, over the past 5 years no UA institution would be categorized consistently from year to year under the proposed institutional grouping, especially if certificates are combined with associate degrees. For instance, UAA would be classified as a 4-year institution in FY11, a 2-year institution in FY12, and again be classified as a 4-year institution in FY13.

UA also requests that all institutions that receive federal funding should be included, especially if this rating system is going to be used as an accountability tool. Additionally, all institutions that receive federal funding are required to report data to IPEDS, and the NSLDS tracks all Title IV aid (loans and grants) from approval to closure. Therefore, as with undergraduate degree-granting institutions, these two sources should also be able to provide the same data for non-degree-granting institutions and graduate-only institutions that receive Title IV aid.

Table 1. Degrees, Certificates, and Endorsements Awarded by University and Award Level
 FY10 – FY 14

	FY10	FY11	FY12	FY13	FY14	% Change FY10-FY14
UA Anchorage						
Associate and below	895	957	994	1047	1133	26.6
OEC and Certificate	116	123	153	136	162	39.7
Associate	719	756	774	854	905	25.9
Bachelor's	920	1001	971	1064	1131	22.9
Licensure	60	63	66	64	98	63.3
Graduate	296	305	276	314	271	-8.4
Total	2,171	2,326	2,307	2,489	2,633	21.3
UA Fairbanks						
Associate and below	435	385	464	525	663	52.4
OEC and Certificate	66	54	59	80	126	90.9
Associate	204	233	226	283	333	63.2
Bachelor's	473	523	535	550	579	22.4
Licensure	34	35	30	37	44	29.4
Graduate	264	245	295	265	272	3.0
Total	1,206	1,188	1,324	1,377	1,558	29.2
UA Southeast						
Associate and below	105	178	212	224	311	196.2
OEC and Certificate	27	72	55	63	107	296.3
Associate	65	79	108	104	138	112.3
Bachelor's	105	92	106	143	145	38.1
Licensure	60	62	96	104	108	80.0
Graduate	107	137	129	154	153	43.0
Total	377	469	543	625	717	90.2
UA System						
Associate and below	1,435	1,520	1,670	1,796	2,107	46.8
OEC and Certificate	209	249	267	279	395	89.0
Associate	988	1,068	1,108	1,241	1,376	39.3
Bachelor's	1,498	1,616	1,612	1,757	1,855	23.8
Licensure	154	160	192	205	250	62.3
Graduate	667	687	700	733	696	4.3
Total	3,754	3,983	4,174	4,491	4,908	30.7

Source: Data supplied by universities via UA Information Systems: UA Decision Support Database (RPTP.DSLDMGR) FY10-FY14.
 Compiled by UA Institutional Research and Analysis.

- **Institutional Groupings.** The proposed grouping does not properly address UA's unique mission. As previously shown in Table 1, UA awards approximately the same number of 4-year degrees as it does 2-year-and-below, which is reflective of its mission. As Alaska's only public university, UA is committed to offering open educational access to all students, while overcoming significant challenges created by the state's geography and population. UA has three main campuses with each having satellite campuses spread out across the state, many of which are in remote communities far from roads. Students attending UA commonly take courses concurrently at multiple academic organizations during a specific term, either in person or via e-Learning.

In order to meet these challenges, UA's community campuses serve as extended access sites and do not function as typical community colleges in that degree programs offered at these sites are not restricted to associate's and below programs. While UA's main campuses offer a broad range of degree programs, including undergraduate certificates, associate, baccalaureate, post-baccalaureate certificates, Master's and doctoral programs, more than one-quarter of the students who attend UA are doing so as non-degree-seeking students.

UA suggests an alternative approach: for institutions that serve both 4-year and 2-year degree-seeking students, rate the institutions' 4-year programs separately from the institutions' 2-year programs. Rating institutions based on degree award levels will provide a more comprehensive view of how institutions are performing. Further, if non-degree-granting institutions are included in a future iteration of the ratings system, they should be included as a separate institutional group.

In terms of the Department accounting for differences in institutional characteristics, it is our position that factors that are out of an institution's locus of control, i.e. region (West, East Coast, etc.), academic preparation of students enrolled at an open admission institution, funding, etc. must be controlled for in comparison groups and institutions held harmless for serving unique missions. The factors appropriate to consider for comparison groups should be statistically determined through large data set modeling.

C. DATA SOURCES

- **Integrated Postsecondary Education Data System (IPEDS).** As it relates to the Department's intention to create a simple process for institutions to review their reported data and ensure accuracy of the ratings metrics, UA agrees. Annual ratings should be shared with institutions for validation and collaborative goal setting prior to being released to the general public. Additionally, given that the Department also plans to release all data used to construct the ratings to facilitate transparency, UA requests that such data be shared with institutions prior to being released to the public. UA seeks transparency in how the ratings are constructed. All data used to construct the ratings should be shared with institutions prior to being released to the public.
- **National Student Loan Data System (NSLDS).** Only about one-quarter of UA's undergraduates enrolled for-credit receive federal student aid each year. Therefore, UA does not support metrics that are based on such a small proportion of UA's overall student enrollment, and does not support using NSLDS data as part of the college ratings system as it will not accurately represent UA's actual performance.

Ideally, common student cohorts will be used for all metrics used in the rating system. For example, since the Average Net Price metric as available via IPEDS considers only degree-seeking, full-time, first-time freshmen who paid in-state tuition and received scholarship aid, then any metric based on NSLDS data should also be restricted to that same student subpopulation.

- **Alternative Data Sources.** The full range of data required to track and evaluate student access, affordability and outcomes is not currently available. Existing state-level longitudinal educational and employment data systems must be linked across states and expanded, also incorporating information on international education and employment. Participation in these systems should be mandatory for any institution or state receiving federal funding, if these systems are designated to be the data sources for ongoing performance metric evaluation and implementation.

Additionally, UA requests that the Department allow institutions to submit their Student Achievement Measure (SAM) completion/transfer rate, which provides a more comprehensive picture of UA student progress to earn a college degree or certificate. For example, SAM does not only report percentage of students who graduate from their first institution, but includes the percentage of students who are still working toward a degree and those who transfer to another institution. UAF has adopted the SAM model and the other Alaska universities are also considering doing so.

D. METRICS

- **Percent Pell.** UA recommends that this metric be used as a control factor rather than a performance outcome. In 2009, Mark Kantrowitz estimated that 40 percent of students did not apply for federal student aid nationally in 2007-08, stating that 2.3 million of those students would have qualified for the Pell Grant.¹ Nationally, Alaska ranks lowest in the number of students receiving the Pell grant, at 11 percent in 2012.² Furthermore, a recent UA study illustrated that Pell grant support is negatively correlated with the probability of graduation within six years for students who enter UA as first-time freshmen.³
- **Expected Family Contribution (EFC) Gap.** This metric appears overly complicated and the meaning and use of the metric is not clear. The Department should identify the best measure of socioeconomic status using valid statistical models. Additionally, we have concerns that including this metric would misrepresent access for institutions with low participation in federal student aid programs.

The State of Alaska and UA offer several scholarships and grants to resident secondary students for their postsecondary education, which offset their need for additional loan aid, including federal student aid programs. The amount of aid students are awarded by state, local, and institutional sources may meet the amount of aid needed, causing such students to become ineligible for need-based aid. Thus, this measure may be a disincentive for institutions to offer need-based financial aid. Further, the Department should account for differences in family size for any metric based on EFC.

If the Department decides to use EFC Gap, UA strongly advises against treating negative values as zero. Doing so will cause the average to be inappropriately and inconsistently weighted among institutions, rendering this metric useless. It is also important that negative numbers not be treated as zero because this would prevent an institution from knowing whether its average EFC gap is above or below the focal

¹ Kantrowitz, Mark. "Analysis of Why Some Students Do Not Apply for Financial Aid," (2009) available at <http://www.finaid.org/educators/20090427CharacteristicsOfNonApplicants.pdf>.

² Postsecondary Education Opportunity. "College Participation Rates for Students from Low-Income Families by State 1993 to 2012," (September 2013) pp. 1-20.

³ Watson, Adam. "Using Financial Aid Support to Model Probability of Student Success, Incorporating a Comparison of Predictive Accuracy of Logistic Regression and Gradient Boosting," (2011) available online at http://www.alaska.edu/files/swbir/Using_Financial_Aid_Support_to-Model_Student_Success.pdf.

EFC and by how much. If the Department decides to use EFC Gap, UA recommends instead using median EFC rather than average difference.

- **Family Income Quintiles.** Family income as self-reported by students on the Free Application for Federal Student Aid (FAFSA) is not a representative source of data, and UA does not support its use to measure an institution's enrollment of low- to moderate-income students. On average over the past 5 aid years, approximately one-third (or 15,232 out of 45,036 students) of UA undergraduates receive any type of financial aid, which is not representative of the overall UA student population. Moreover, further narrowing these financial aid recipients to those receiving federal aid represents just 25 percent (or 11,449 students) of the UA undergraduate population.

Additionally, it is likely that this metric will incentivize unintended consequences by encouraging institutions to enroll students who are at the upper end of the income distribution within each income quintile.

- **First-Generation College Status.** First-generation status is self-reported on the FAFSA and is therefore not reliable or a representative source of data. First-generation student cohorts should be considered in reporting requirements for retention and graduation, regardless of full-time or part-time status. Higher education is generational, so this should be reported for informative purposes only, rather than as an accountability measure. Postsecondary institutions have little control over attracting first-generation students.

Should the Department decide to include this metric, UA recommends that the Department consider alternative sources to collect such information given the limited availability of information. Student enrollment and degree data is obtainable via National Student Clearinghouse's (NSC) Student Tracker tool. One of the options available for Student Tracker is enrollment information for a student's siblings or parents.

However, UA advises against using NSC data, for multiple reasons. Under the Family Educational Rights and Privacy Act (FERPA), which allows parents and students to prevent institutions from disclosing directory information about them, nearly 5 percent of students nationally block their information. The directory information block rate for UA institutions are as follows:

- UA Anchorage = 1.07 percent
- UA Fairbanks = 9.95 percent
- UA Southeast = 8.19 percent

In 2013 NSC published *Completing College: A State-Level View of Student Attainment Rates*.⁴ Upon UA's request, NSC provided the data set they analyzed for Alaska. UA's validation efforts revealed that the UA enrollment estimate for first-time freshmen enrolled for fall 2006 based on NSC data was significantly greater than UA's actual first-time freshmen enrollment, 4,853 versus 3,055, respectively. NSC has not allowed or provided a mechanism for UA to remedy these figures in the NSC database. Therefore, before the Department can use NSC as a valid alternative data source, procedures must be established to ensure the alignment of NSC data with institutional data.

For future iterations of the ratings system, UA recommends that the Department control for factors related to access that are outside of an institution's control. Also, as noted earlier, UA is committed to offering open educational access to all students, while overcoming significant challenges created by the

⁴ National Student Clearinghouse. "Completing College: A State-Level View of Student Attainment Rates," (2013) available online at <http://nscresearchcenter.org/signaturereport6-statesupplement/>.

state's geography and population. Access as defined for UA includes factors such as proximity, provision of educational resources, and other enablers of postsecondary attainment taken for granted in most states and not recognized in the proposed federal measures.

- **Average Net Price.** UA recommends including the entire undergraduate student enrollment in the average net price, differentiating between resident and non-resident costs. Average net price as reported annually to IPEDS is defined above and is also restricted to students enrolled in the fall term only. This represents just 4 percent (or approximately 1,000 of 27,000 students) of UA's undergraduate fall 2013 opening enrollment, which does not accurately represent the institution as a whole.

For future iterations, UA recommends that the Department investigate alternative sources to collect such information.

- **Net Price by Income Quintile.** UA recommends that the Department not include this metric because this student subpopulation accounts for just 4 percent of UA's undergraduate population, net price by income quintile will not be accurately portrayed for the institution as a whole. UA recommends that a representative metric be used.
- **Average Loan Debt.** UA believes that average loan debt should not be included as a measure of affordability.
- **Completion Rates.** Reemphasizing UA's earlier concerns, UA is an open-access institution that serves all students regardless of whether they are adequately prepared for college. Therefore, UA requests that the Department use data elements and metrics that accurately control for the academic preparation level of incoming students to an institution, as these elements will provide a context in better understanding institutional performance, including graduation rates.

Additionally, UA's performance on this metric (as well as all proposed metrics) must be assessed separately for both four-year and two-year programs. Otherwise, UA is concerned that this metric will be misleading.

UA recommends that the Department not consider NSLDS as an alternative source for completion rates. Not only can the NSLDS only provide completion rates for approximately one-third of UA undergraduate students who received federal student aid, but completion rates for part-time students and transfers also will not be accurately estimated using NSLDS.

NSC could be used as an alternative for determining completion rates for transfers and part-time students. However, as previously discussed, UA advises against using NSC data due to known data quality issues. UA recommends developing a reliable data source for these metrics.

Additionally, UA encourages the Department to include reporting categories that would better, more accurately provide a comprehensive landscape of enrollment patterns and behaviors of the growing diversity of its higher education student population. For example, about half of UA's baccalaureate graduates did not start as first-time, full-time freshmen.

Below are five additional recommendations that either add to or modify currently reported graduation rates to better reflect diverse student populations and account for other metrics that measure student success/completion at institutions of higher education:

- Structure metrics based on academic year starting cohorts and calculate retention and graduation rates on an academic year basis (i.e., students who enroll in one or more terms in any given academic year are defined as the starting cohort. Of those students, those who enroll in one or more terms in the subsequent academic year are counted as retained, etc.).
- Differentiate cohorts based on the following attendance categories calculated over the academic career of the student – not just the first semester:
 - Exclusively full-time – consider a shorter timeframe (i.e., 125 percent of degree time)
 - Mix full- and part-time – range of 150 percent of degree time
 - Exclusively part-time – up to 250 percent of degree time
- Adjust all graduation rate calculations to count for both graduates and transfers to another institution as positive outcomes (i.e., success rate = graduates + transfers). Likewise, count students who transfer to UA in graduation rate measures of success.
- Include a metric on the proportion of graduates who go on to additional postsecondary training or degrees following graduation as an additional measure of success, including those who initially graduate with a degree other than that initially declared (e.g. a bachelor-degree seeker who earns a certificate before a bachelor degree is a success).
- Add a retroactive completion metric using graduates as the measurement cohort in order to gauge the effectiveness of advising, how well students are using degree completion plans, and the quality of academic programs. UA proposes “Graduation Efficiency” as the proposed measure, which UA defines as the ratio of the number of credits completed by an institution’s graduates, including transfer and institutional credits, to the number required for their degree program in any given academic year.
- **Transfer Rates.** UA supports the position that institutions should receive credit for lateral transfers, especially for students who eventually graduate, as well as credit for transfers between four-year institutions and students who transfer into and out of postsecondary institutions.
- **Labor Market Success.** UA does not think that the Department’s proposal achieves a balancing act by including the short-term indicator of substantial employment and a longer-term earnings measure. UA supports the use of a long-term earnings indicator only; experience has shown short-term indicators are too volatile to be reliable. Graduate earnings are primarily in the control of the graduate, rather than the institution from which he or she graduated. Employment data does not necessarily provide an accurate depiction of future expected student outcomes because many intangible factors play into a graduate’s decision of what career he or she decides to pursue (or not pursue) and what industry he or she decides to enter, for example. Additionally, income and employment outcomes must be reported in context of local, state, national and international job markets.

An alternative measure of labor market success is pre-training to post-training wage increase. Between FY10 and FY12, UA workforce training participants’ overall average wage per quarter increased between 25 percent and 30 percent after completing training in vocational education. The wage change was larger for participants who graduated than for those who left UA without graduating: 70 percent increase vs. 21 percent increase, respectively.

In terms of measuring earnings, UA thinks that labor market outcomes should be considered within a certain timeframe following exit from the university, rather than entrance. Students who attend part-

time often take significantly longer to complete their degrees than students attending full-time throughout the entirety of their undergraduate education.

Lastly, in terms of alternative data sources, UA recommends the Federal Employment Data Exchange System, which provides information on federal employment. The Department could also collaborate with state labor departments and the Internal Revenue Service.

- **Graduate School Attendance.** Graduate school attendance should be considered in conjunction with labor market performance, and UA recommends that the Department work to identify and/or develop reliable data sources for this purpose. Approximately 11 percent of UA's bachelor's degree recipients supplement their undergraduate education by earning graduate degrees within 5 years of receiving their baccalaureate; these students likely will not be found in the workforce specifically because they were successfully retained in postsecondary education as graduate students.
- **Loan Performance Outcomes.** UA does not support using loan performance as an indicator of institutional performance, and recommends that it not be included in the college ratings system. Many students transfer among one or more postsecondary institutions throughout their educational journey, amassing loan debt along the way. Institutions should not be held accountable for loan debt that was accrued before or after students transfer. Additionally, institutions cannot be held responsible for the financial choices and life decisions made by former students that may impact their ability to repay loans.

Along these lines, UA does not support using loan repayment measures to measure earnings and costs.

- **Performance over Multiple Years.** As previously stated, UA suggests that trend data should be displayed as a running average of 5 consecutive years and include a confidence interval to indicate whether the change is statistically significant from the prior years' performance. This time period should be extended to 10 years after exiting the institution for measurement of employment outcomes.

E. RATINGS STRUCTURE AND DESIGN

- **How It Fits Together.** Consumers may find it more informative to have the ratings disaggregated for the three categories (access, affordability, outcomes). UA recommends surveying consumers to find out what they want and need in order to evaluate institutions. UA also suggests that the Department conduct an initial pilot rollout, rating only those institutions whose student bodies are accurately, statistically represented by the available data.

Further, UA believes that between an individual or overall rating, that an overall rating would hide or otherwise distort an institution's performance on each of the individual metrics. As for combining some related metrics to allow for a more meaningful representation of performance than possible on a single dimension in isolation, UA thinks that this will be difficult to interpret.

- **Student Characteristics.** The ratings system should control for institutional diversity, selectivity, mission, student population, institutional financial position, state contribution to institution's instructional cost, availability of non-loan student aid, net cost, etc. in all performance comparisons. Any performance system must evaluate and periodically re-evaluate control factors for validity and adjust as needed.

Metrics should also account for student preparation level at the time of entry into the institution, for example: start the “time-to-graduation” clock after the student has completed any required remediation based on standardized skill assessments at the time of entry; or report on graduation rates separately for students who need remediation and those who do not.

One example of how institutional resources and student characteristics should be compared as part of the ratings system is the approach described in *Postsecondary Opportunity*'s November 2013 article on “Actual versus Predicted Institutional Graduation Rates”.⁵ This approach recognizes that the academic preparation level of incoming students to an institution has a much greater impact on individual student performance and institutional performance than student support programs of the institution itself, although UA notes that such programs are still critical.

The evaluation paradigm described in the *Postsecondary Opportunity* article places institutions with like student bodies and other characteristics into comparison groups, thereby providing an apples-to-apples comparison of institutional impact on student success. Individual institutional performance can then be compared to an overall expected performance level calculated for like institutions in single group. In presenting this information, metrics (i.e., student loan debt) could be identified that inform prospective students as to where an institution might fall – either to the left or the right of the expected performance line as referenced in the article.

Additionally, UA considers it essential that the Department disaggregate student data for comparison purposes by subgroups, especially for Alaska Native/American Indian students, including those who self-identify as multi-race. Subgroups that UA recommends, but should be validated through extensive statistical exploration, are:

- High level of indigenous populations, including Alaska Native, American Indian and Hawaiian Pacific Islander (may want to further disaggregate data to show diversity in this group population);
- Students who are not prepared for college-level coursework;
- Economically disadvantaged students; and
- Part-time students.

As for identifying which student characteristics are likely to vary the most between institutions within the same institutional groupings, UA thinks it is difficult to judge what student characteristics are likely to vary the most between institutions. Large data set modeling is needed to determine this. We do think, however, that the student characteristics important for all of the outcome metrics are gender, race and ethnicity, age, full-time/part-time status, and academic preparation at time of entry.

- **Existing Models of Consumer-Friendly Ratings Tools.** UA thinks the following online tool is particularly helpful for students and the public: <http://www.collegeview.com/collegesearch/index.jsp>.
- **Consumer Customization.** In terms of additional helpful categories by which to compare institutions, consumers will likely be interested in having the capability to compare institutions by sector, location, degree levels offered, selectivity, study fields, the availability of on-campus housing and dining, disability and special services.

⁵ Postsecondary Education Opportunity, “Actual versus Predicted Institutional Graduation Rates,” (November 2013) available at <http://www.postsecondary.org/articlesyearlist.asp?cat5='2013'#>.

As for the suggestion of custom weighting for metrics, ideally, the prospective students and their families will be able to use the information in the context of their personal situations and assess whether the investment in higher education is appropriate. Providing an overly complicated interface will likely serve to confuse consumers. Additionally, consumers may find it helpful to have access to disaggregated results by gender, race and ethnicity, in addition to Pell status.

As for other suggestions regarding the customization tool, UA recommends that the data be presented according to the different purposes of accountability and consumer education. There is a considerable amount of data that applies to both categories, and it must be presented differently for prospective students and their families versus other stakeholders. It is important for users of the information to be able to easily access the raw information in addition to the combined and normalized values.

- **Additional Information Provided by Institutions.** UA recommends that institutions be allowed to provide additional information and data that not only address contextual issues for each metric included in the ratings system, but also are included in the Department's overall ratings approach. At a minimum, each institution should be able to provide details about educational offerings, sector, selectivity, mission statement, and the web address for its homepage.

Once again, UA appreciates the opportunity to submit its comments on the Department's college ratings framework. If you would like to discuss our comments further or accept our invitation to discuss, please contact Carla Beam, Vice President of University Relations, at cjbcam@alaska.edu.

Sincerely,

(b)(6)

Patrick R. Gambrell
President, University of Alaska

O'Bergh, Jon

From: Rhosetta R Rhodes <rrhodes@whitworth.edu>
Sent: Friday, February 13, 2015 7:26 PM
To: College Feedback
Subject: Response to Proposed College Rating System Legislation
Attachments: US Dept of Education Ratings System Template Comments.doc

To whom it may concern:

Please accept this letter in response to the proposed College Rating System legislation. My contact information is below should you have questions or need additional information from Dr. Beck A. Taylor, President, Whitworth University. Thank you.

Rhosetta

Rhosetta Rhodes
Chief of Staff
Office of the President

Whitworth University | McEachran Hall 222
300 W Hawthorne Rd, Spokane, WA 99251
[509.777.4238](tel:509.777.4238) | rrhodes@whitworth.edu



WHITWORTH

AN EDUCATION OF MIND AND HEART

OFFICE OF THE PRESIDENT

February 17, 2015

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

Dear Mr. Secretary:

I write as the President of Whitworth University in response to your “College Ratings Draft Framework” proposed on December 19, 2014. While I share the President’s commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the “Draft Framework” and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

My institution’s mission is to provide our diverse student body an education of mind and heart, equipping our graduates to honor God, follow Christ and serve humanity. Whitworth's community of teacher-scholars is committed to rigorous and open intellectual inquiry and to the integration of Christian faith and learning. Consequently, our first –to- second year retention rate is 85% and we’ve been recognized as a top producer of students who received Fulbright awards for 2014-15. Whitworth is recognized on the 2014 President’s Honor Roll for Community Service, named Washington Monthly’s No. 1 master’s-level university in Pacific Northwest and ranked No. 3 in “U.S. News” rankings of best values in the West. We remain in the top 10 of annual rankings of best regional universities for the 15th year in row, and are listed as a top ten best value university in the West/Southwest. We have a stabilized enrollment model and have decreased tuition for the past two years. We are actively seeking new ways to make college affordable and accessible to students, while simultaneously providing a high quality education.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education we provide into simplistic categories with no explanation. As your Department has recognized and, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, yet while recognizing this reality, your Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in

Honorable Arne Duncan
February 17, 2015
Page 2

a way that is fair and effective. Further, and even more importantly, while your Department has also acknowledged that an institution's rating could suffer from inaccurate data, you intend to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world - yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would instead respectfully ask that do not move forward with this ratings system and that you instead you work with college Presidents to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

(b)(6)

Beck A. Taylor, Ph.D.
President

O'Bergh, Jon

From: Robin Dummer <rdummer@simpsonu.edu>
Sent: Friday, February 13, 2015 8:15 PM
To: College Feedback
Subject: Department of Education's proposed rating system
Attachments: Letter to Sec. Arne Duncan DOE Feb. 13, 2015 on rating system.docx

Please consider the feedback provided in the attached letter addressed to the Honorable Arne Duncan Secretary of the Department of Education.

Thank you.

Robin Keith Dummer, Ed.D.

Interim President
530.226.4130
530.226.4860 fax



February 17, 2015

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

Dear Mr. Secretary:

I write as the President of Simpson University in response to your “College Ratings Draft Framework” proposed on December 19, 2014. While I share the President’s commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the “Draft Framework” and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

My institution’s mission as a private Christian university is to develop graduates in mind, faith and character for a lifetime of world-changing service, and we accomplish this mission through delivering an education that is affordable, accessible, applicable and achievable. Fifteen percent of our traditional undergraduate students serve on international and domestic teams each year in response to global need. Thirty percent of our students are first generation, 61 percent meet TRIO criteria, and 99 percent receive institutional aid. We serve a six-county region in northern California which is home to a lower income population that is well below the California state average for bachelor’s degree holders.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education we provide into simplistic categories with no explanation. As your Department has recognized, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics. While recognizing this reality however, the Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while the Department has also acknowledged that an institutions rating could suffer from inaccurate data, it intends to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world - yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions such as Simpson University that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would instead respectfully ask that do not move forward with this ratings system and that you instead you work with college presidents to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

(b)(6)

Dr. Robin Dummer

Interim President
Simpson University

O'Bergh, Jon

From: John Jackson <jjackson@jessup.edu>
Sent: Friday, February 13, 2015 8:42 PM
To: College Feedback
Subject: College Ratings System

February 17, 2015

Honorable Arne Duncan

Secretary

U. S. Department of Education

400 Maryland Avenue, SW

Washington, DC 20202

Dear Mr. Secretary:

I write as the President of William Jessup University in response to your "College Ratings Draft Framework" proposed on December 19, 2014. While I share the President's commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the "Draft Framework" and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

My institution's mission is to partner with the church to equip transformational leaders, and we accomplish this mission through a variety of programs and services. Currently, 40% of our students receive Pell Grants and a host of our students are first generation. Our average graduate has 1/3 less debt than the national average. We are deeply committed to access and affordability.

As your Department has recognized and, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, yet while recognizing this reality, your Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while your Department has also acknowledged that an institutions rating could suffer from inaccurate data, you intend to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world - yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would instead respectfully ask that do not move forward with this ratings system and that you instead you work with college Presidents to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

John Jackson, PhD

President

Transforming Tomorrow...Today



John Jackson, Ph.D.

President

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To Give Online: www.jessup.edu/giving

Jessup Media Page: www.jessup.edu/media

O'Bergh, Jon

From: Voss, Todd <tvoss@swu.edu>
Sent: Friday, February 13, 2015 9:18 PM
To: College Feedback
Cc: slomaglio@cccu.org
Subject: Comments

February 13, 2015

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

Dear Mr. Secretary:

I write as the President of Southern Wesleyan University in response to your "College Ratings Draft Framework" proposed on December 19, 2014. While I share the President's commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the "Draft Framework" and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

My institution's mission is centered on training dedicated scholars and servant leaders committed to impact the world for Christ, and we accomplish this mission by offering all students access to high quality higher education but especially first generation and low income populations.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education we provide into simplistic categories with no explanation. As your Department has recognized and, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, yet while recognizing this reality, your Department prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while your Department has also acknowledged that an institutions rating could suffer from inaccurate data, you intend to go forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this variety that has made higher education in the United States the best system in the world - yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will irreparably harm higher education in the United States and will replace the values of students and families with the values of government. I believe it will make institutions that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would instead respectfully ask that do not move forward with this ratings system and that you instead work with college Presidents to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

Dr. Todd S. Voss

Southern Wesleyan University
Tvoss@swu.edu

O'Bergh, Jon

From: Pat McGuire <McGuireP@Trinitydc.edu>
Sent: Saturday, February 14, 2015 2:13 PM
To: College Feedback
Subject: Comment on College Ratings Framework
Attachments: Trinity President McGuire to Secretary Duncan 2 15 2014.pdf

Attached is my letter to Secretary Duncan commenting on the proposed College Ratings Framework.

Patricia McGuire
President
Trinity Washington University
125 Michigan Avenue, NE
Washington, DC 20017
202-884-9050
president@trinitydc.edu
www.trinitydc.edu



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February 15, 2015

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

Re: Proposed College Ratings Framework

Dear Secretary Duncan:

I am writing with regard to the proposed College Ratings Framework released in December 2014. I support the comments already submitted by the National Association of Independent Colleges and Universities (NAICU). While understanding all of the reasons why President Obama asked you to develop this plan, I urge you to withdraw the proposed framework for the Postsecondary Institution Ratings System (PIRS) because of serious confusion about the purposes and audiences for the ratings, and profound flaws in the proposed data sets that would form the statistical basis for the ratings. Moreover, in the largest sense, the plan arises from two very flawed assumptions: first, that it's legitimate for the federal government to direct consumer choices about college attendance, and second, that a single rating derived from a massive statistical algorithm can accurately reflect the entire mission, purpose, work and effectiveness of any college or university.

1. Confusing and Overly Broad Aims and Purposes

Concerning the fundamental purposes and audiences for the ratings: the "Framework" document sets forth this rather remarkable list of aims:

"The system aims to: (1) help colleges and universities measure, benchmark, and continue to improve across the shared principles of access, affordability, and outcomes; (2) help students and families make informed choices about searching for and selecting a college; and (3) enable the incentives and accountability structure in the federal student aid program to be properly aligned to these key principles." (Framework, p. 1)

Meanwhile, the website <http://www.ed.gov/collegeratings> that links to the PDF Framework states the purposes somewhat differently, and even more broadly:

The purposes of the ratings system are:

- *To help colleges and universities measure, benchmark, and improve across shared principles of access, affordability, and outcomes.*
- *To provide better information about college value to students and families to support them as they search for select a college,*

- *To generate reliable, useful data that policymakers and the public can use to hold America's colleges and universities accountable for key performance measures. In the future this can be used to help align incentives for colleges to serve students from all backgrounds well by focusing on the shared principles of access, affordability, and outcomes; ensuring wise and effective use of \$150 billion in financial aid.*
- *In addition to federal efforts, and those of individual institutions, we believe the ratings system can help inform policy, accreditation and funding decisions by states education authorities, policies and practices of accreditors and others.*

The latter two bullet points, above, are not specifically included in the listed aims of the Framework, though perhaps they are implied. But because they are even broader and more complicated, their appearance on the website list of aims further illustrates the problem of confusion of purpose and audience. If there is not even one clear statement of purposes at the outset, how can the system make any sense?

Moreover, all of these stated aims and purposes, taken together, illustrate the fundamental problem of vagueness of purpose, overly broad regulation trying to address too many issues that are not necessarily endemic to all of higher education, and too many audiences that have many different informational needs. What prospective students and families need to know is very different from the information that accreditors need, for example and that information is also different from the kind of information that states or Congress may require.

The very idea that all of the disparate audiences named in the purposes with their different data needs will have exactly what they need when the Department of Education mixes all the data together in a massive algorithm that produces a single rating makes absolutely no sense. The concept fails any test of logic whatsoever, cheapens the very complexity of the data that different audiences really do need, and insults the mission and purposes of institutions of higher education that cannot be reduced to some least common denominator produced by regulators.

The problem of muddled and confused purposes of the rating system grows on p. 2 of the Framework immediately under the heading "B. Characteristics and Purposes of the Ratings System." That section states,

"A critical purpose of the ratings system is to recognize institutions that are succeeding at expanding access, maintaining affordability, and ensuring strong student outcomes and setting them apart from institutions that need to improve. By shedding light on key measures, the ratings system will support greater accountability and incentivize schools to make greater progress in these areas of shared priorities, especially at serving and graduating low income and first generation students and holding down the cost of college." (Framework, p. 2)

So, in this section, the entire purpose of the ratings now becomes coercive: the federal government will force colleges and universities to admit certain kinds of students whether or not the institutions are equipped to educate those students successfully. And, having forced schools to admit students regardless of the institutional mission, the government will then “shame” those who are unable to be as successful in educating those students as the federal government thinks they should be.

The Framework is completely uninformed by any real life experience among institutions that actually do serve large populations of low income students. Such institutions --- including my own, Trinity in Washington --- have a good deal of data and information that the federal government could learn from. Indeed, we share our data and assessments all the time with our accreditors, and moreover, we are constantly examining the data and assessment results because we want to improve all of the time quite separate and apart from any governmental cudgel forcing us to do so.

Unfortunately, however, while the Department has given the appearance of welcoming comments and listening to practitioners, the Framework reveals that the exercise was not totally sincere. The Framework continues the original obtuse insistence on the idea that the federal government knows better than institutions, themselves, how to serve students well. This is simply wrong. Moreover, the methodology the Framework proposes is more likely to harm both institutions and students rather than to solve problems, change behaviors, reduce costs, or ensure that students make better choices. Students, by the way, are unlikely to make any choices based on this new system --- student choice is influenced by many factors but rarely government dictates.

2. Fundamentally Flawed Data Sets

At a number of meetings where I have heard Department officials discuss PIRS, I have heard the statement repeated often that despite the fact that everyone agrees that IPEDS data is in terrible shape, the Department fully intends to use the data it has regardless of the quality of the data. “We have to start somewhere,” is the reply often given to challenges about the data.

I would give a student an “F” if she used bad data as the basis for any paper. Moreover, I would challenge her ethics if she really knew the data was flawed.

Using bad data to judge institutions in ways that could be very harmful to institutional reputations is a shameful breach of trust, unethical and unworthy of any legitimate governmental or research purpose.

Even if some data is at least basically good, using data in weird ways for purposes for which the data was not originally collected also has serious ethical problems.

The Framework approaches the entire business of higher education with a mid-20th Century mindset, and the data collected about institutions in IPEDS reflects this mindset, which has been where the Department of Education has been for quite some time.

So, to begin with, the Framework proposes to group institutions as “Two Year” and “Four Year” institutions. That very language reflects realities from the 1950’s that are simply not appropriate for 2015 and beyond. Here’s what that outmoded language classifying institutions by antiquated ideas about time-to-degree ignores:

- Non-traditional students make up the vast majority of all student populations today, by the Department’s own data more than 70% of all undergraduates have non-traditional characteristics; among many other characteristics, the plain fact is that vast numbers of students attend part-time, stop out and return, and otherwise have pathways to degrees that take longer than the aristocratic ideal of 2 years for associate and 4 years for baccalaureate degrees;
- The 2-year/4-year ideals are from the old aristocracy who had nothing else to do while going to school; today, even 18 year-old students have children and work full-time, thus attending in different patterns; but the Framework --- like the Department, itself --- assumes the most traditional elite models as the norm, which they are not;
- Many, many once-traditional colleges and universities now have blended models that incorporate all forms of educational experiences that cannot be measured in traditional ways; for example, my own institution, Trinity in Washington, offers associates as well as bachelors and masters degrees, and has a full-time daytime undergraduate program and a part-time evening and weekend program; our students cross-boundaries and often enroll at the same time at local community colleges to pick up credits, “swirling” across institutions as they have time and money to attend class while living life.

The antiquated thinking revealed by the “Two-Year” “Four-Year” language exposes the most significantly flawed factoid in the entire IPEDS system: the graduation rate. For many years, the Department has acknowledged the fact that the graduation rate is simply wrong. Measuring “first-time full-time” students who stay at the same institution and graduate in 4-6 years might be a measure of something --- brand loyalty? few distractions in their lives beyond college? low risk on the part of Admissions? --- but it is hardly a measure of student success OR institutional effectiveness. Among other things:

- The IPEDS graduation rate treats as drop-outs students who actually continue in other schools and earn degrees;
- Treating transfers-out as somehow an institutional deficiency is wrong; students transfer for many reasons and, quite often, the first institution is happy to work with a student to find the best next step in their academic journeys;

- IPEDS pays no attention at all to the students or institutions that receive a large number of transfers-in, hence creating a false impression of actual degree attainment.

The proposed Framework talks about many other data points that might be included in the algorithm: Percent Pell, EFC Gap, Family Income, First Generation, Average Net Price, etc. Each of these metrics, if they exist in any sensible way at all, has problems in the formula. But more seriously, to propose somehow dropping all of these into a blender to come up with an institutional rating makes little sense for institutions, consumers, policymakers or researchers. Each data point may have an interesting story to tell, but collectively, the data creates more fog than clarity.

Finally, in all of this, there is the overarching question of the appropriate role of the federal government, the potentially serious costs of this plan for both the government and institutions, and the harm that may come to the very students and institutions that the federal government says it wants to help. In thinking about these issues, I necessarily think of my own institution, Trinity Washington University.

Trinity's story is one of massive institutional change and transformation over the last two decades. Originally a very small, very elite Catholic women's college founded in 1897 because Catholic University would not admit women back in that day, Trinity thrived in its unique niche until the wave of coeducation the 1960's and 1970's nearly forced closure. Instead, spurred by the religious commitment of the Sisters of Notre Dame de Namur who founded Trinity College, to work for action for social justice, Trinity refocused its historic mission to women on the women who needed us most in the District of Columbia and metropolitan Washington region.

Trinity today educates a student body that is 95% African American and Latina students, mostly very low income; 85% of freshmen this year are Pell grantees, with a median family income of \$25,000. Trinity is not a wealthy institution, but we leverage the little we have with charitable scholarship resources and federal financial aid to help our students pursue their dreams. We know quite a lot about what it takes to help a low income student become a college success story. We also know a great deal about the pitfalls, byways and rest stops. We might do well by some of the data used in the ratings, but we might do poorly on some other data points, but here's what we know:

1. We care more about the quality of our entire institutional experience for our students than any federal agency or accreditor will ever care. We are the first to impose very high standards on ourselves. The very idea that, absent regulation, we do not care is absurd.
2. We are a very lean institution with very little money to spend on yet more administration. We focus our resource on those faculty and services that will create student success. We know that every federal mandate comes with a price tag that we have to absorb and

Letter to Secretary Duncan
February 15, 2015
Page Six

we are worried that the ratings will be more expensive than anyone knows because in all of the rhetoric from the Department, no one has provided any cost information. You expect us to provide cost data all of the time, where is yours?

3. Our students choose Trinity because (a) we are a women's college, (b) we are a Catholic college open to students of all faiths who love our spiritual center and values, (c) we care for every student here very carefully and with a great deal of personal service, (d) we are particularly mindful of the stresses on women with children who want to come to college, (e) we have great health services and academic support services, (f) we are well respected among the schools and community organizations of D.C. and Washington for our values and high academic standards, (g) we provide a safe and respectful learning environment that brings out the best in each student, (h) we do our best to help every student to manage the costs of attendance, and (i) we have strong connections with employers through internships and relationships all over town and our students quite often have their first jobs even prior to graduation.

While the ratings may collect some data on the latter two points on cost and job placement, in the most modest way that will not truly capture the full nature of even those facts, in the larger sense the ratings will be completely silent on the values, environment, programs and services that make Trinity such a compelling choice for the students who do come here. I use our own example not to advertise Trinity, but to illustrate the simple fact that one size does not fit all, and across the nation there are thousands of colleges and universities like Trinity that are absolutely right for the students who choose them, whose characteristics are impossible to collect, aggregate and rate in a federal data system.

The federal government should not be in the business of telling students which colleges to attend. The federal government is in no position to judge the academic quality of a college or university. While recognizing that the federal government has some legitimate interest in accountability for the investment of taxpayer dollars in student financial aid, that particular kind of accountability is ill-served by the massively complex, expensive and utterly confused rating system reflected in the Framework.

Step back, simplify, take a more humble approach. Do not waste more tax dollars, our institutional dollars, and any more of our precious time on this ratings scheme.

Sincerely

(b)(6)

Patricia McGuire
President

O'Bergh, Jon

From: Martin, Christopher R <cmartin@semo.edu>
Sent: Sunday, February 15, 2015 1:22 PM
To: College Feedback
Subject: Comments on College Rating System Framework
Attachments: SE Response to Proposed College Rating System.pdf

This correspondence will serve to attach comments from Southeast Missouri State University regarding the proposed College Rating System framework. Please let me know if you have any problems with the attachment. If you have any questions or would like to discuss these comments further, please do not hesitate to contact me via this email or by phone at 314-225-1753.

Regards,

Chris

Chris Martin
Director of Corporate & Governmental Relations
Southeast Missouri State University
16020 Swingley Ridge Road, Suite 145
Chesterfield, MO 63017
Office: (636) 778-1058
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February 13, 2015

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

Via Email: collegefeedback@ed.gov

Dear Secretary Duncan:

As the President of Southeast Missouri State University, I wish to provide the following comments on the U.S. Department of Education's (Department) proposed College Rating System framework. Southeast Missouri State University (Southeast) is located in Cape Girardeau, Missouri, which is about 115 miles south of St. Louis. We are located in the "bootheel" of Missouri, placing us near the borders of Illinois, Kentucky, Tennessee and Arkansas. We are a four-year regional comprehensive public institution of higher education and I am proud of Southeast's rich history of producing graduates that become successful business leaders, health care providers, entrepreneurs, athletes, entertainers, and so much more.

At Southeast, we have always been committed to providing a quality, affordable, and accessible education for all students. Despite, declining state appropriations directed towards higher education in Missouri, Southeast has experienced twenty (20) years of consecutive enrollment growth and fourteen (14) years of record-breaking enrollment. I attribute this success not only to the value and quality of a Southeast education but also to our commitment to have open dialogue and transparency in all that we do.

As you can see, Southeast agrees with the goal of the Department to make attainable the dream of a college of degree to all those who seek it. In accomplishing this goal, we share the Department's belief that as a public institution of higher learning, we must be held accountable to some extent for the outcomes of our students, and we must be transparent in our work. To that end, I applaud the Department for taking this step to device a system that seeks to help institutions improve their performance and help students and parents make informed decisions. However, I write today to express some of my concerns with the proposed College Rating System framework released by the Department.

A Rating System Must Encompass All Institutions

If the proposed Rating System is going to accomplish the broader goal of promoting accountability and transparency, it must include all institutions of higher education. While it makes sense to

include predominantly four-year and two-year institutions, I am troubled that Graduate-degree only and non-degree granting institutions will not be included in the initial version of the ratings. If the purpose of the system is to provide information to student and families as they search for a college or university and to benchmark and improve access across the shared principles of access, affordability and outcomes, all institutions must be included. I applaud the Department for drafting a framework that avoids a numerical ranking system and one that will group like institutions based on institutional characteristics, missions and student populations, however, I urge the Department to consider widening the net before the final framework is released.

The Proposed Metrics and Data Sets Leave Room for Error

While I believe the Department's proposed rating system is well intentioned, the materials released are void of detail and lack specificity. The seventeen page framework released by the Department contains more commentary than specificity. By the Department's own admission, there are at least twelve (12) areas of the proposed framework that need further analysis. In addition, the Department's commentary indicate that at least six (6) of the fourteen (14) proposed metrics have the potential to convey unreliable information. Thus, it is my belief that the current framework as outlined by the Department raises more questions and concerns than laying the foundation for a credible, informative, and resourceful tool for institutions, students, parents, and higher education stakeholders alike.

I also have concerns about some of the data proposed to be collected under the framework. Much of the data already exists in the public domain. In fact, the Department admits that in the first year, the data will be pulled from those existing data sources. Why then, create another reporting structure that institutions must comply with? We already submit significant amounts of data to Department so I urge the framers to develop a final rating system that avoids any additional data collections. Further, the system as outlined sets up the possibility that one set of information could work to the disadvantage of certain institutions. For example, Southeast is located in the Delta Region, which is one of the most impoverished regions on the nation. Our students that return to their communities in our region may take jobs similar to their peers in larger metropolitan areas; however, their salaries may not be as high. In addition, because of our origin as a teachers college, Southeast has a strong history of producing quality teachers to work in diverse schools across Missouri, our region, and the nation. If the Department then places a heavy reliance on such factors as salaries and placement, Southeast's rating could potentially be jeopardized simply for dutifully serving our region and fulfilling our mission to prepare students for such critically important professions as teaching and many others.

Because of the concerns outlined above related to data availability, quality, reliability, and the potential for unintended consequences, I urge the Department to give careful consideration to this area in formulating the final version of any rating system.

A New Rating System Will be Unduly Burdensome

The proposed framework will place a significant burden on Southeast and all the other higher education institutions across the country. The unknown costs, compliance burdens, and privacy implications are daunting to think of. Nowhere in the Department's proposed framework does it

discuss the cost of implementation, nor is there a mention of potential federal assistance to individual institutions for compliance. The Administration and Department consistently talk about the need to limit the student loan debt in our nation; however, no one talks about the continual decline of money allocated by states to higher education despite the layers of bureaucracy and compliance that have been added over the years. The result of a new unfunded mandate by the federal government will be fewer financial resources available to classroom instruction and campus improvements, and a greater financial burden on students to cover the deficit caused by this new system.

I have been President of Southeast Missouri State University for 16 years, and I support any efforts within the higher education community to increase transparency, promote accountability, and work towards solutions that ensure all students have access to a quality and affordable higher education experience. However, I do not believe this can be accomplished in the Department's existing proposed framework. I applaud the Department for listening to feedback from the higher education community and including some of those responses in its initial framework, however, the collaboration and dialogue must continue. If there is anything that Southeast Missouri State University can do to assist the Department in this effort, please do not hesitate to contact me at 573-651-2222.

Regards,

(b)(6)

Kenneth W. Dobbins
President
Southeast Missouri State University

cc: The Honorable Roy Blunt, United States Senate
The Honorable Claire McCaskill, United State Senate
The Honorable Jason Smith, United States House of Representatives
Muriel Howard, Ph.D., President, American Association of State Colleges & Universities

O'Bergh, Jon

From: Andrea Cook <ACook@warnerpacific.edu>
Sent: Sunday, February 15, 2015 7:02 PM
To: College Feedback
Subject: College Rating System comment
Attachments: College Rating System comment letter 2-17-15.pdf

Andrea P. Cook, Ph.D.
President
Warner Pacific College

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Portland OR 97215
www.warnerpacific.edu





February 17, 2015

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

Dear Mr. Secretary:

I write as the President of Warner Pacific College in response to the “College Ratings Draft Framework” proposed on December 19, 2014. While I share the President’s commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the “Draft Framework” and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

My institution’s mission states that “*Warner Pacific is a Christ-centered, urban, liberal arts college dedicated to providing students from diverse backgrounds an education that prepares them to engage actively in a constantly changing world,*” and we fulfill this mission by enrolling an increasingly diverse, low-income and first generation student population. In fact, our fall 2014 entering freshman class was 55% students of color. Our overall institutional ethnic and racial diversity totaled 40% for both our traditional and adult degree programs, increasing from 11% just seven years ago. Additionally, currently nearly 60% of our students are the first in their family to attend college, and 60% of our undergraduate students qualify for Pell Grants. While our student population continues to diversify, we are also seeing increasing graduation rates. Because of our growing success, we prepare many of our students to lead and serve through helping professions such as education and social service, rather than seeing significant numbers of our graduates going into the professions such as law or medicine. Our hope is that our graduates will make up the next generation of diverse leaders for their communities of color and our city. Thus, it is our expectation that they will not be among the highest paid in our country’s economic strata. A rating system based on the income and graduate school attendance of graduates seems to ignore the significant contributions an institution like ours is making in changing the realities of educational and economic opportunity for students from the most underserved and disadvantaged populations.

In addition to serving matriculating freshmen, Warner Pacific College serves a significant complement of community college transfers (40% of those enrolled in our traditional program and 90% of our undergraduate adult degree program students). Recently, we compiled information on the graduation rates for students who transfer to our institution having completed at least 30 credit hours from a community college. The results showed that over the past 10 years, 90% of these students completed their program of study and graduated from Warner Pacific College.



Warner Pacific College has worked hard to maintain the affordability and access of our private liberal arts education by taking action in 2008 to reduce our tuition by 23% and we continue to price our tuition at a rate that runs approximately 30% lower than the national average tuition for 4-year private colleges. We recognize the importance of access as well as the critical consequence of achievement of a baccalaureate degree.

While we collect several data metrics proposed for consideration in the rating system, more than half of those listed cannot currently be measured. It seems unreasonable to expect that a system can be developed and implemented in the timeframe proposed (by the 2015-16 academic year) when the data is not readily available to report to the Department of Education.

I oppose the proposed system because while there is no evidence that it will achieve its stated goals, it will have a significant negative impact on my institution because it will reduce the holistic nature of the education Warner Pacific College provides into simplistic categories with no explanation. As your Department has recognized, there is much nuance to each institution based on their various missions, locations, demographics, and other unique characteristics, and yet while recognizing this reality, the Department of Education prepares to go forward with this system before providing any additional details about how this ratings system will address these complexities in a way that is fair and effective. Further, and even more importantly, while the Department of Education has also acknowledged that an institution's rating could suffer from inaccurate data, plans are moving forward recognizing this reality, with no remedy or review process in place.

Institutions of higher education are complex institutions with different missions that serve students with different needs, backgrounds, and aspirations – it is this diversity of educational opportunities and contexts that have made higher education in the United States the best system in the world – yet the ratings system attempts to reduce higher education to a simplistic list of factors. I believe this will harm higher education in the United States and will compromise the needs of students and families with the values of government. I believe it will make institutions that serve unique populations less able to do so without having their reputation tarnished, and that it will not serve students or their families well.

I would instead respectfully ask that do not move forward with this ratings system and that you instead you work with college Presidents to identify the best practices from institutions that meet our mutual goals of serving students and their families well, and collaboratively design together a plan to help all institutions better meet these shared goals.

Sincerely,

(b)(6)

Andrea P. Cook, Ph.D.
President of Warner Pacific College

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Sunday, February 15, 2015 7:30 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Education, especially higher education, is the future of our country. We must do everything possible to support our colleges and the students. Do not use the failed K-12 rating system to rate our colleges.

Constituency: Other (specify below)

Other Constituency (if supplied): Retired 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: Monday, February 16, 2015 8:57 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The main feedback that we, as a college have, would be to focus on ensuring accurate data, consistency in the way colleges provide data, and data integrity. We also suggest having just one tool rather than having this new report as well as the College Score Card, etc.

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): dellinger.dewey@gaston.edu

--

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

O'Bergh, Jon

From: Crystal B. Ellerbe <cellerbe@uno.edu>
Sent: Monday, February 16, 2015 9:32 AM
To: College Feedback
Subject: Comments from the University of New Orleans on the Postsecondary Institution Ratings System Framework

February 16, 2015

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

Dear Mr. Secretary:

The University of New Orleans (UNO) is pleased to provide feedback on President Obama's proposed college rating system. I applaud President Obama's goal of keeping higher education affordable and accessible for all.

The State of Louisiana is unique in many ways. We are proud of our rich cultural heritage and the dimension we collectively add to the United States of America. One specific example of how we are unique is our policy on tuition and fee authority for public colleges and universities. Louisiana is the only state in the country where tuition setting authority rests solely with the state legislature. Both the state house and state senate must each approve – by a two-thirds vote – not only any tuition increase but also any fee implementation. Under this structure, Louisiana's public higher education institutions are not in a position to ensure affordability.

Theoretically, the state legislature would act on behalf of their constituents to keep college costs down or face retribution at the polls. In recent years, however, our legislature has approved both tuition increases (of up to 10% each year) as well as diverting revenues derived from the tuition increases away from college campuses. In effect, students at most Louisiana public universities paid a higher price for their education at the same time the legislature drastically cut general fund support to the campuses. Our policy makers authorized a price hike and then used the new tuition revenue to plug other budget holes. Campuses charged higher prices and didn't get to keep the money. At the same time, statewide admissions standards increased and further challenged our ability to recruit new students. On the heels of receiving the deepest cuts to higher education of any state in the union over the last eight years, Louisiana's public colleges and universities are now potentially facing new sanctions by the federal government for outcomes over which they have no control.

While the issues outlined above are unique to Louisiana, I would also like to comment on other elements of the college rating system proposal that are more universal in nature. Please consider the following:

Enrollment

Institutional enrollment may not be useful in determining the quality of the student experience or academic programs offered. As UNO has experienced significant declines in enrollment since Hurricane Katrina in 2005, we have also seen student: teacher ratios improve. Retention rates may be a more useful metric to inform prospective students and families about how well students succeed and progress at the institution. In Louisiana, there has been an attempt to incentivize success rather than enrollment. In recent years, the formula for distributing state general funds to campuses

in Louisiana has shifted from being based on enrollment on the 14th class day to enrollment at the end of the semester. We get paid according to how many students complete coursework, not how many enroll.

Context

My understanding is that the President's proposal would place campuses in one of three categories according to how they measure against certain data points. My experience with students leads me to believe that broad categorizations across institutions may not be useful or informative. This approach measures institutions according to data that do not take into account the specific mission of each institution. A one-size-fits-all approach does not highlight the academic or research strengths of individual institutions. Under the current proposal, my institution would be compared to ivy league schools and HBCUs though we serve vastly different constituencies and purposes. It might be useful to consider peer groups as part of a rating system for a more "apples to apples" approach. The Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), our accrediting agency, requires comparisons to peer schools as part of the accreditation process, so these comparison groups already exist.

Burden

As alluded to above, another important reason to consider incorporating elements of an existing evaluation system into a federal rating system is that it would likely meet with less resistance from university administrators. Though participation in the accreditation process with SACSCOC is mandatory, the costs of doing so come out of each school's budget. UNO already pays fees to maintain its association with an accrediting body and incurs significant costs to undergo evaluation every ten years in order to maintain accreditation. Since accreditation is necessary for eligibility to receive student financial aid, it could be argued that an unfunded regulatory mandate already exists for higher education evaluation and that the proposed rating system would duplicate the regulation and add another unfunded mandate. A far less burdensome approach from the campus perspective would be for the federal government to derive a system that coordinates among the accrediting bodies and makes accreditation information available to prospective students and families in a user-friendly format. This approach has two advantages. It provides an alternative to creating a second unfunded mandate for campuses, and it adds value to the accreditation process for which we already expend significant resources.

Thank you for taking my views into consideration.

Sincerely,

Peter J. Fos, Ph.D., MPH
President

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THE HEARTBEAT *of*
the CRESCENT CITY

O'Bergh, Jon

From: President's Office <president@ad.nmsu.edu>
Sent: Monday, February 16, 2015 10:21 AM
To: College Feedback
Cc: president@nmsu.edu
Subject: NMSU response to APLU alternative plan
Attachments: NMSU Response_001.pdf

Attached is New Mexico State University's response to the APLU's response to Obama Administration's College Ratings Framework.

Office of the President
New Mexico State University
MSC 3Z
P.O. Box 30001
Las Cruces, NM 88003-8001
575-646-2035

New Mexico State University ~ All about Discovery!



Office of the President

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president@nmsu.edu

February 16, 2015

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

Dear Secretary Duncan:

On behalf of New Mexico State University (NMSU), a land grant university that is recognized by the federal government as Hispanic serving, and by the Carnegie Foundation as High Research Activity, I am writing in response to the Department's request for public comment on the New System of College Ratings Framework. In short, New Mexico State University strongly supports the comments you received from the Association of Public and Land-Grant Universities (APLU).

I will not repeat the concerns and suggestions of APLU other than to note that NMSU, too, is strongly supportive of transparency and accountability, but shares APLU's concerns that a federal rating system would produce misleading information and ultimately could incentivize the distortion of institutional priorities.

I would also add that should the transparency measures advocated by APLU be adopted, it will be important to create exact definitions for "median net price by income level", and it will be imperative to allow systems that include community colleges, such as NMSU, to report loan repayment rates not as a system, as is our current practice, but as separate campuses. As you are well aware, community colleges serve large numbers of at-risk students and tend to have higher loan default rates than four-year institutions. Using the combined loan repayment rates for systems with four-year and two-year campuses provides a misleading picture of loan repayment rates for each campus to prospective students.

The proposed measures of the labor market also do not reflect the benefits that accrue to students and to society when students elect to serve in the military, attend graduate school, care for family, or work for non-profit and service organizations such as Teach for America. The ratings system should not penalize institutions when their students choose these options after graduation.

Thank you for considering my comments and for your commitment to improved transparency and accountability in higher education, goals that I share.

Sincerely,

(b)(6)

Garrey Carruthers, Ph.D.
President and Professor of Economics

C: APLU
Lewis-Burke

O'Bergh, Jon

From: Christopher Simmons <chris.simmons@duke.edu>
Sent: Monday, February 16, 2015 11:26 AM
To: College Feedback
Subject: Duke University feedback on proposed federal rating system for post-secondary education

Thank you for the opportunity to provide comments on the Department of Education's draft ratings framework, "A New System of College Ratings."

Duke University shares many of the Administration's goals including increasing the enrollment and retention of under-served and first-generation students and providing all students and families with good and accurate information and data about our nation's colleges and universities. However, we do not agree that the current proposal of a federal rating mechanism will provide any assistance or information that could be used by students, families or universities to accomplish these goals. Instead, the current proposal, as we understand it, will provide data on only a limited number of students based on metrics that are, in some cases, highly questionable and problematic.

Under separate cover you have received extremely detailed comments from the Association of American Universities (AAU) and we closely associate with their analysis and concerns.

At Duke, we strive to enroll high-achieving students from all economic backgrounds. However, we know that the many of the students qualified to enroll at Duke, especially those from economically challenging backgrounds, simply do not apply. Our goal, like the Administration's, is to change this course and each year we reevaluate our admission and financial aid strategies to make some additional headway on this perennial challenge.

The Administration's ratings system, as currently described, will do little to assist these students. Instead, it is quite possible that if a student were to rely on such ratings and provide it with any sort of credence, it may not be in his/her best interests. The current framework simply does not provide an accurate picture of any institution, and hence, could be of a great disservice.

Christopher Simmons

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O'Bergh, Jon

From: Mary Nguyen Barry <mary.barry@edreformnow.org>
Sent: Monday, February 16, 2015 11:35 AM
To: College Feedback
Subject: Education Reform Now's Comments on the President's Proposed College Ratings System
Attachments: Education Reform Now College Ratings Comments.pdf

Dear Secretary Duncan:

Attached are recommendations from Education Reform Now regarding the President's proposed college ratings system. Overall, we are broadly supportive of the general concept and need for a federal college ratings system. We applaud the Secretary's leadership and careful effort in establishing a system that will provide critical information not only to students and families making tough decisions about where to go to college, but also to colleges and policymakers to assist them in improvement and accountability efforts. We encourage the Secretary to proceed expeditiously and not let the perfect be the enemy of the good.

Sincerely,

Mary Nguyen Barry, Policy Analyst, Education Reform Now
Michael Dannenberg, Director of Strategic Initiatives for Policy, Education Reform Now

--
Mary Nguyen Barry
Policy Analyst
Education Reform Now
mary.barry@edreformnow.org

EDUCATION REFORM NOW

February 16, 2015

The Honorable Arne Duncan
Secretary of Education
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202
collegefeedback@ed.gov

Dear Mr. Secretary:

We write regarding the President's proposed college ratings system on behalf of Education Reform Now. For the last several years, we have worked with and studied a variety of college rating systems and relevant databases. Most recently, we published *Tough Love: Bottom Line Quality Standards for Colleges* making use of both.

Our employer, Education Reform Now, is a non-partisan, non-profit public policy organization committed to ensuring all students access a high-quality public education regardless of race, gender, geography, or socioeconomic status. Our organization believes that Americans of all ages – from cradle to grave – deserve full and fair access to quality education opportunities.

As requested, this letter provides comments to the college ratings system framework published on December 19, 2014. Overall, we are broadly supportive of the general concept and need for a federal college ratings system. Despite improvements over the past 50 years since the passage of the Higher Education Act of 1965, the American higher education system calcifies economic inequality rather than acting as an engine of socioeconomic opportunity. College access for students from low-income families has improved, but the gap in degree completion rates between those from low and upper income families has grown (bottom income quintile as compared to top income quintile). Rising net prices, driven by state funding cuts to higher education, have outstripped growth in wages for the poor, working-class, and even middle-income families. The result is heavier debt burdens, especially among low-income families, that are exacerbated by low completion rates and a long time to degree even among those who do complete.

We recognize that not all institutions of higher education contribute equally, nor solely, to overall postsecondary education underperformance. There are high-performers – colleges that buck the trend and enroll and serve students from low-income families well – as well as low-performers – colleges that act as “engines of inequality,” “college dropout factories,” or “diploma mills.” That’s why we agree with the Department of Education’s (ED) proposal for a three-tiered performance ratings scheme whereby institutions are rated as “high-performing,” “low-performing,” and middle. It’s much easier, in the initial rounds, for ED to identify the “best and worst” colleges and to leave more nuanced gradations for later iterations of the ratings system.

Education Reform Now's Comments on the Department of Education's College Ratings System

The three-tiered rating system lends itself to rapid accountability provisions. We've suggested previously that federal government at least begin the accountability process by identifying the "worst of the worst" colleges on a variety of access, success, and post-enrollment success metrics.¹ Absent improvement after time and support, these "engines of inequality," "college dropout factories," and "diploma mills" should lose access to certain federal grant, loan, and tax benefits. At the very least, they should be subject to a loss in competitive standing when pursuing non-formula based discretionary grant funding *and* separately, heightened scrutiny, including Department 'program reviews' of regulatory compliance.

In the sections below, we outline recommendations for several key areas that could be strengthened to help ensure creation of a ratings system that is fair and helpful to students and institutions.

I. Judging Institutional Performance

We support ED's initial decisions to focus on undergraduate degree granting institutions and to judge two-year degree granting institutions separate from four-year degree granting colleges.

We support the Department's decision to judge two-year degree granting institutions separate from four-year degree granting colleges, with different metrics in certain cases to ascertain access, affordability, and success performance. There are data quality concerns that vary by institution level, such as data that rely on the Free Application for Federal Student Aid (FAFSA) that may necessitate different metrics. More importantly though, the missions of two-year degree granting colleges are much more complex than four-year degree granting colleges, including transfer to a four-year degree granting institution, short-term job training, and non-degree lifelong learning opportunities. These complexities counsel for different metrics from four-year colleges, whose degree-oriented missions are much clearer.

Likewise, ED should treat non-degree granting institutions differently, because their mission is different from that of degree-granting institutions: they offer short-term job training and certification programs of various lengths. We believe it is would not be feasible to rate these *institutions* until comprehensive data on program length is available and that gainful employment standards previously identified by the Department are suitable in the meantime. Once adequate data is available, however, we recommend ED revisit its decision on whether to include non-degree granting institutions in its base ratings system to identify high, middle, and low-performing institutions.²

¹ Michael Dannenberg and Mary Nguyen Barry. Tough Love: Bottom-Line Quality Standards for Colleges. *The Education Trust*, June 2014. http://www.edtrust.org/tough_love

² ED should also consider expanding the ratings system in future iterations to include graduate schools.

ED should not adjust outcomes for student characteristics or institutional mission.

We cannot stress enough our philosophical opposition to ED's consideration of proposals to adjust institutional outcomes based on personal student characteristics or institutional mission. The Association of Public and Land-Grant Universities (APLU), for example, has called for a "risk adjustment" for student characteristics. We believe such adjustment consecrates a different set of expectations for different groups of students based on immutable characteristics, such as race and gender, and could allow colleges to escape responsibility for providing quality service to every student they voluntarily enroll. It is what former President George W. Bush referred to as "the soft bigotry of low expectations."

Never before has there been any outcome adjustment in federal higher education policy based on income or immutable student characteristics. In fact, the Obama administration firmly rejected this approach in the past during the gainful employment debates.³ ED insisted back then that it was appropriate to hold all institutions to certain minimum standards irrespective of student demographics. ED should apply that same principle in the context of a ratings system applicable to all degree-granting institutions of higher education.

As an alternative to risk adjustment based on immutable student characteristics, ED's rating system should embrace the use of "peer institution groupings" to facilitate a comparison of outcomes among similar colleges serving similarly academically prepared students. We recommend ED construct two sets of peer groups for each institution: a "base" one for accountability purposes and a separate, "tailored" grouping for consumer purposes. Only the base accountability peer group should determine each college's ultimate rating (high, middle, or low). The tailored grouping should be disclosed to consumers and others as supplementary information for them to use in choosing where to enroll.

From an accountability perspective, it makes little sense to compare graduation rates at a college like Southern Vermont College with those at Harvard University. Those two schools enroll students with completely different levels of academic preparation, not to mention they are institutions with vast differences in size, wealth, and selectivity. But it makes all the sense in the world to compare Southern Vermont College to similar colleges that serve similarly prepared students. When one does a peer institution comparison, you can see that at best, Southern Vermont does a middling job of educating its students – only one-third (35 percent) of full-time students graduate within *six years* of initial enrollment. It does a terrible job with its underrepresented minority students: only 17 percent graduate within six years.

A peer comparison analysis of Southern Vermont College would ask why do similar colleges, like Anna Maria College and American International College, both in nearby Massachusetts, graduate their first-time, full-time students at much higher rates? Anna Maria graduates nearly half of its students (47 percent) and one-third of their minority students (31 percent). And though American International has similar overall graduation rates (39 percent) to Southern Vermont College, they

³ See: <https://www.insidehighered.com/news/2015/01/30/ed-dept-ratings-framework-ignites-new-questions-over-adjusting-student-outcomes>

Education Reform Now's Comments on the Department of Education's College Ratings System

graduate their minority students at a rate over twice as high (38 percent). Both of these colleges also serve high proportions of low-income, underrepresented minority students with low academic preparation.

Whereas a risk adjustment analysis model embraces different and lower expected outcomes for some students based on race, for example, the proffered peer institution comparison technique avoids the embrace of artificially deflated expectations and allows ED to identify extremely low- and extremely high performers. Our previously published analysis using this technique found that **9 times out of 10, a college with a graduation rate below 15 percent falls in the bottom of its institution peer group.⁴ Coincidentally, four-year schools with graduation rates below that 15 percent mark also happen to equal the bottom five percent of four-year colleges overall in terms of completion – precisely the same demarcation ED has used in the elementary and secondary education context for identifying persistently poor performers in need of intervention.ⁱ**

In constructing institution peer groups for accountability purposes, we recommend examining institution characteristics such as median levels of academic preparation of enrolled students, as measured by high school average GPA and SAT/ACT score, and institutions' size, sector, funding, and student-related expenditures per full-time equivalent (FTE) undergraduate.⁵ Almost all of the student and institutional characteristics we refer to are available in the Integrated Postsecondary Education Data System (IPEDS), with the exception of high school GPA among college freshmen, status as a commuter campus, and admissions selectivity. That data, however, is available from Peterson's Databases, College Board, and Barron's Profiles of American Colleges, respectively. ED

⁴ To illustrate, consider the following examples:

- 1) Private Truett-McConnell College in Georgia was at the bottom of Southern Vermont's peer group with a 9 percent six-year graduation rate. Meanwhile, peers like Averett University in Virginia and Cazenovia College in New York graduate their students at much higher rates (40 percent and 47 percent).
- 2) Texas Southern University (TSU), a public university in Houston, Texas, has a 12 percent graduation rate. Peer colleges - like Prairie View A&M and North Carolina Central University - graduate their students at rates more than three times as high, at 36 percent and 43 percent.
- 3) Even the for-profit, Phoenix-based Western International University with its 3 percent graduation rate, can look up to the higher graduation rates of many of its for-profit peers.

See: Michael Dannenberg and Mary Nguyen Barry. *Tough Love: Bottom-Line Quality Standards for Colleges. The Education Trust*, June 2014. http://www.edtrust.org/tough_love

⁵ We suggest adapting a model similar, but not identical, to what is used in the College Results Online data tool: Its peer groups are created based on the following institutional characteristics: IPEDS data include the estimated median SAT/ACT of the freshman class, sector, number of full-time equivalent undergraduates, student-related expenditures per full-time equivalent undergraduate, percent of undergraduate students age 25 and over, and percent of undergraduates who are enrolled part-time. High school GPA among freshmen is available from Peterson's Databases; status as a commuter campus is available from the College Board with missing data imputed with IPEDS data (ratio of dorm capacity to total undergraduates; a college is designated as commuter if the ratio is equal to or below 0.4); and admission's selectivity data from Barron's Profiles of American Colleges. For more detail, see: <http://collegeresults.org/aboutthedata.aspx#section-5>

Education Reform Now's Comments on the Department of Education's College Ratings System

can follow a similar methodology to that used by College Results Online (CRO) in developing base peer groupings.⁶ CRO's peer groups, developed to predict graduation rates, has been peer reviewed and in use for over 10 years.

With respect to ratings for accountability purposes:

1. **Within each peer group, ED should identify high, middle, and low performers among the ultimate outcomes it chooses for access, affordability, and success.** We suggest the following indicators within each metric of performance:
 - a. **Access:** (1) Pell enrollment among full-time freshmen and among undergraduates; (2) First-generation status only if the data is consistent and available
 - b. **Affordability:** (1) Net price among Title IV low-income students (students from families in the bottom two income quintiles \$0-\$49,000)
 - c. **Success:** (1) First-time, full-time graduation rates; (2) New IPEDS Outcome Measures; (3) Vertical transfers at two-year colleges; (4) Student loan repayment rates.
2. **To guard against perverse incentives, ED ratings should reward successful access, affordability, and success outcomes among underrepresented students, such as racial minorities, low-income students, adult students, and upward transfer students.** ED's rationale for adjusting for student characteristics was to avoid discouraging institutions from admitting and enrolling disadvantaged students. But this is not the only way to guard against perverse incentives. Indeed, many states' performance-based funding systems – like those in Tennessee, Ohio, and Indiana – provide bonus points or give extra weight for these students' achievements. Tennessee, for example, provides a 40 percent premium for metrics achieved by underserved students.⁷
3. **Once peer groups are constructed for accountability purposes, ED can measure an institution's improvement over time** by examining changes in its position within its peer group (e.g. top third, middle third, or bottom third). We recommend providing at least three years to measure change over time as colleges can fluctuate in any one year. A longer timeframe, such as five years, could also be an option if ED wants to ensure the change is stable. Consider the following examples:
 - A college that shows improvement over time may rise from the bottom of its peer group to the middle or the top of its peer group. San Diego State University (SDSU) was in the bottom third of its peer group in 2002, with a 38 percent six-year graduation rate. Between 2003 and 2004 SDSU rose to the middle of its peer group.

⁶ See: <http://collegeresults.org/aboutthedata.aspx#section-5>

⁷ See: http://hcmstrategists.com/wp-content/themes/hcmstrategists/docs/Indiana_Report_12.pdf

Education Reform Now's Comments on the Department of Education's College Ratings System

Ever since 2005, SDSU has consistently been in the top third of its peer group with a graduation rate now at 66 percent.⁸

- A college that regresses over time may fall from the top of its peer group to the middle or bottom. The University of Maryland at Eastern Shore was in the top third of its peer group from 2003 to 2005 with a graduation rate in the low 40 percent range. But starting in 2006, it started slipping to the middle third of its peer group with a graduation rate in the mid 30's; by 2009 through to 2012, it has fallen to the bottom third of its peer group with a graduation rate hovering around 31 percent.⁹
- Some colleges may show no change at all. Texas Southern University, for example, with its 12 percent *six-year* graduation rate, has consistently been in the bottom of its peer group over the last ten years.¹⁰ As a matter of fact, for most years it was dead last in its peer group.

At the same time it creates and uses a base institution peer grouping for accountability purposes, we suggest that ED consider creating a second tailored peer group for presentation purposes to consumers. This second information-purpose only peer grouping would provide each college's rating as compared to other colleges likely to be in a student's choice set as opposed to a set of similar colleges that serve similarly academically prepared students. A student's choice set – which may be driven by factors like geography or reputation – likely differs greatly from a national peer group of similar colleges.

To encourage positive decision-making, we think it would be beneficial to students and families if they can see how their institution of interest compares to other institutions to which they're likely to apply. These peer groups can be constructed in one of three ways, based on: (1) groups of colleges that students list on their FAFSA applications; (2) groups of colleges that students list on their SAT applications with College Board; or (3) a combination of both. These data sources provide a concrete way to determine where students are most likely to apply and will provide a more tailored presentation to understand and act upon their college's rating.

II. Data Sources

ED should not base ratings on supplemental data institutions provide; it should *only publish supplemental or explanatory information that institutions supply.* The value of the ratings system is that it will provide a streamlined comparison of institutions based on common metrics, definitions, and sources. If colleges choose to submit supplemental or explanatory information via the Student Achievement Measure or institution data held by federal or state agencies, we recommend ED present this information in a clearly defined separate section, perhaps in the catch-

⁸ To see SDSU's improvement over time, adjust the "Year" drop-down menu at the top of the screen from 2012 to 2002. See: <http://collegeresults.org/search1b.aspx?institutionid=122409>

⁹ To see the University of Maryland at Eastern Shore's regression over time, adjust the "Year" drop-down menu at the top of the screen from 2012 to 2003. See: <http://collegeresults.org/search1b.aspx?institutionid=163338>

¹⁰ See: <http://collegeresults.org/search1b.aspx?institutionid=229063>

Education Reform Now's Comments on the Department of Education's College Ratings System

all "Additional information provided by institutions" described by ED on page 17 of the ratings framework, but not rely on it for ratings themselves, because the information presented does not allow for widespread institution-by-institution comparisons.

Data from the National Student Loan Data System (NSLDS) should be used to calculate loan repayment rates at the institution level, but should not serve as an alternative indicator to completion rates when it comes to measuring student success.

Several data limitations exist that should preclude ED from calculating institution success rates using only NSLDS data. First, there is no straightforward way to track cohorts of students within the NSLDS system. Cohorts can only be created by observing when a student receives financial aid, but this could lump together students who started college in different years. Consider, for example, a student who receives financial aid as a freshman and a student who receives financial aid as a sophomore but not a freshman.

The larger limitation is that NSLDS data only captures institution performance with respect to student aid recipients. While we admit that this is a compelling population of interest and important to break out given the federal government's mandate to protect the public fisc, NSLDS data *alone* provides too incomplete of a picture of institution success for accountability purposes. It would not include students who only received institutional or state-sourced funds, students who complete the FAFSA but don't receive any aid, self-pay students, students with Parent PLUS loans, or students who receive full scholarships.

NSLDS does, however, supply an excellent data source to calculate student loan repayment rates at the institution level – an indicator of institution success that should supplement data on completion rates. This is a metric that is desperately needed to quantify the success of the federal investment and to ensure students attend colleges where they have a minimum level of protection in their ability to repay student loans.

III. Proposed Metrics: Access

To rate how well individual colleges do in making higher education broadly available, ED should utilize as an indicator of access both the percentage of Pell Grant recipients among all undergraduates and the percentage of Pell Grant recipients among full-time freshmen.

We support ED's proposal to use the share of all undergraduate students who receive Pell Grants at each given institution of higher education as an indicator of access. But the variable does not strictly measure access as success is also entwined in the indicator. Since Pell Grant recipient students tend to have higher withdrawal rates, they are less well represented among upperclassmen.¹¹ As a result, measuring the percentage of Pell students among undergraduates indicates not only access, but also how well a college is retaining Pell Grant recipient students and to what extent four-year

¹¹ According to estimates from the Beginning Postsecondary Students (BPS) survey, full-time Pell recipients are nearly twice as likely as non-Pell recipients (30.6% vs. 15.9%) to drop out and not re-enroll anywhere within six years of initial enrollment. This gap is much larger at four-year institutions (22.9% vs. 10.4%), but still big at two-year institutions (38.5% vs. 26.3%).

Education Reform Now's Comments on the Department of Education's College Ratings System

colleges are accepting transfer students who are also Pell Grant recipients. These are important indicators of access (as well as success), but ED should supplement them with an additional measure on the percentage of Pell Grant recipient students enrolled among full-time freshmen -- a variable available in IPEDS.

Including data on the colleges' enrollment of first-generation students is helpful as an indicator of access, but only if ED makes it a mandatory question on the FAFSA or requires institutions to report this metric via IPEDS and if ED provides a standard definition.

ED has proposed using parental education level data gleaned from FAFSA applications as an indicator of college access, but the relevant question currently is voluntary for families to answer. Unless families are required to answer the question, the FAFSA does not make for a feasible data source to facilitate institutional comparisons. The only alternative is for ED to require institutions to report data on first-generation status via IPEDS.

Either way, ED would also have to provide a standard definition for the term "first-generation." No current standard exists. While a definition exists for the TRIO programs (neither parent has a bachelor's degree or higher), a variety of other interpretations have been used: e.g. neither parent has pursued a degree program beyond high school; neither parent has a vocational certificate or associate's degree; or neither parent has pursued any education beyond high school. Consistent data, regardless of source, is necessary for this indicator of access to work in a ratings system design for accountability and consumer choice purposes.

IV. Proposed Metrics: Affordability

ED's rating system should only make use of the Title IV student generated net price data for the bottom two family income quintiles (\$0-\$49,000).

ED's ratings system should only make use of the Title IV student generated net price data for the bottom two family income quintiles, because Title IV recipients are less represented in higher income brackets. Data from the National Postsecondary Student Aid Study (NPSAS) show that whereas over three-quarters of first-time, full-time students in the bottom two income quintiles are Title IV recipients, only between two-fifths and two-thirds of students in higher income quintiles receive Title IV aid.

Family Income Quintile	Received Title IV Federal Aid (%)
Bottom: \$0 - \$24,500	84.7%
Second: \$24,501 - \$49,000	78.3%
Third: \$49,001 - \$80,000	64.8%
Fourth: \$80,001 - \$117,500	50.9%
Top: ≥ \$117,500	42.2%

*Notes: Figures are filtered for certificate- or degree- seeking students, a requirement for Title IV aid.
Source: U.S. Department of Education, National Center for Education Statistics, (NPSAS:12)*

Education Reform Now's Comments on the Department of Education's College Ratings System

Title IV data density is worse in the two year sector. There, only approximately two-thirds of first-time, full-time students in the second income quintile receive Title IV aid even though nearly all such students should be eligible for significant Title IV benefits.¹²

Family Income Quintile	Received Title IV Federal Aid (%)					
	Public Two-Year	Private Non-profit Two-Year	Private For-profit Two-Year	Public Four-Year	Private Non-profit Four-Year	Private For-profit Four-year
Bottom: \$0- \$24,500	83.5%	81.7%	81.4%	87.1%	84.8%	87.2%
Second: \$24,501- \$49,000	70.0%	68.5%	65.7%	83.9%	89.5%	82.9%

V. Proposed Metrics: Success

Any ratings system must include data on first-time, full-time (FTFT) students overall and subgroups of FTFT students broken out by major race, gender, and Pell Grant status categories.

Current FTFT graduation rate data that is accessible via the IPEDS Graduation Rate Survey (GRS) provides immensely valuable information, and should not be disregarded despite limitations that it does not measure success with part-time and transfer students and treats all students who leave school as dropouts even if they re-enroll elsewhere. While colleges may vary widely in their enrollment of FTFT students, this variable provides a solid comparable measure to determine how colleges serve this “base group” of students to graduation day. These students, after all, comprise first-time college-going students who have dedicated themselves to full-time study at an institution that has full ownership of them upon matriculation. Just like no major subgroup should be ignored, success or failure with FTFT students should not be discounted.

To those who contend that IPEDS institution graduation rates should not be used because they do not incorporate part-time or transfer students, we respond that the subset of FTFT students is the *easiest* to graduate. Part-time students by definition take longer to complete and overwhelmingly tend to complete at substantially lower rates.¹³ Transfer students generally do complete at higher rates, but many still have complications with credit articulation and transfer.¹⁴ In fact, an Education Trust analysis of graduation rates at over 150 public four-year colleges show that graduation rates

¹² Please note that the income quintiles we refer to differ slightly from the static income levels currently provided in IPEDS (\$0-\$30K, \$30K-\$48K, \$48K-\$75K, \$75K-\$110K). We derived our income quintile estimates from the most recent 2012 NPSAS survey. We suggest ED devise a method whereby income quintiles are reflected dynamically in IPEDS, rather than remain static for every annual IPEDS administration.

¹³ Alexandria Walton Radford, et al., Persistence and Attainment of 2003-04 Beginning Postsecondary Students: After 6 Years (NCES 2011-151) (Table 1).

¹⁴ Education Trust analysis of freshmen and transfer graduation rates in the Access to Success (A2S) database.

Education Reform Now's Comments on the Department of Education's College Ratings System

typically remain the same, or even decrease, with the inclusion of transfer and part-time students. That's because including transfer students generally only nudges overall graduation rates up by a percentage point or two and including part-time students generally reduces graduation rates.¹⁵

Using IPEDS data, we recommend ED judge institutional performance based on how colleges graduate FTFT students at various time points: 100 percent and 150 percent of regular time for students at two-year degree granting institutions and 100 percent, 125 percent, and 150 percent of regular time for students at four-year degree granting institutions. 100 percent of regular time is still the standard assumption for most students and very few students graduate after the 150 percent of timeframe.¹⁶ Students need to know what their likelihood is for graduating in a reasonable timeframe upon entering.

Improvements in the IPEDS completion metrics that are due in 2017 and include data on both FTFT and non-FTFT students will be helpful supplements to the current FTFT graduation rate measure. But these new metrics should not replace use of current FTFT graduation rates as a measure of success, because even with improvements expected IPEDS completion indicators will still be very limited.

The National Center for Education Statistics (NCES) is in the process of implementing a new survey, entitled Outcomes Measures (OM), as part of the IPEDS 2015-2016 winter data collection process. As described in the Technical Review Panel 45 report, "the new outcome information is designed to provide consumers, policymakers, and researchers context for and an alternative to the graduation rates calculated for the purposes of the *Student Right to Know and Campus Security Act* of 1990."¹⁷ The survey will provide supplemental data on the entire degree/certificate-seeking student population, including full-time, first-time students; part-time, first-time students; full-time, transfer-in students; and part-time, transfer-in students.

While the expected new data will undoubtedly provide helpful supplemental data to FTFT graduation rates, it's important to recognize that it is a very different indicator of college success that has many limitations:

- **It will report data on the number of students who receive *any award, regardless of the initial degree intent*.** While ultimate degree production can be a useful measure to capture, focusing solely on the receipt of any award regardless of initial intent can set a dangerous precedent whereby colleges may get credit for a lower credential conferred when a student was in fact striving for a higher and different credential. This may lead colleges to push

¹⁵ Michael Dannenberg and Mary Nguyen Barry. Tough Love: Bottom-Line Quality Standards for Colleges. *The Education Trust*, June 2014. http://www.edtrust.org/tough_love

¹⁶ Education Reform Now analysis of all Title IV participating institutions in the 2013 IPEDS. Among approximately 3,200 four-year colleges, graduation rates only tick up by 2.6 percentage points between the 150 percent mark and 200 percent mark; among approximately 2,200 two-year colleges, graduation rates only tick up by 4.2 percentage points between the 150 percent mark and 200 percent mark.

¹⁷ See: https://edsurveys.rti.org/ipeds_trp/documents/TRP_45_Summary_for_Posting.pdf

Education Reform Now's Comments on the Department of Education's College Ratings System

disadvantaged students out of a higher-degree program and into a lower credential if they deem students are not likely to succeed.

- **It provides an overly lengthy time period to count ultimate award outcomes: six years and eight years for both two-year and four-year colleges.** This amounts to effectively giving a 600 percent and 800 percent timeframe for completion at two-year colleges, and a 150 percent and 200 percent timeframe for completion at four-year colleges. While we recognize that it may take students different time spans to complete a degree, 100 percent of regular time is still the standard assumption for many students and families. In fact, completing in 200 percent to 800 percent of regular time is as much an indication of institution failure as it is of success. We recommend that a standard of 100 percent time and 150 percent of time should be used for rating two-year degree granting institutions and a standard of 100 percent of time, 125 percent time, and 150 percent time should be used for rating four-year degree granting institutions.
- **Critically, the new 2017 IPEDS data is not expected to be disaggregated by race/ethnicity or gender, let alone by race *and* gender.** Disaggregated data is crucial to identify achievement gaps within and among institutions of higher education and to provide tailored information to consumers. Future accountability efforts will not be feasible without data disaggregated by race/ethnicity, gender, race and gender, and Pell Grant receipt. We must ensure that colleges serve all groups of students reasonably well. Disaggregated data on institution performance is essential to meeting that goal.

Given these limitations, we strongly recommend ED to not replace the graduation rate (GR) component from the GRS survey with the OM component in its college ratings system. To realize the full value of OM measures, we recommend expanding the GRS survey to match these new OM student populations (non-FTFT).

With respect to transfer outcomes, ED's rating system should not give 'sending colleges' credit for lateral or reverse transfers; only vertical ones. All colleges, regardless of mission, should be required to report transfer-out rates in IPEDS and subsequent completion results should be attributed to the second institution, not the first.

We submit that it is only appropriate for two-year degree granting colleges to receive credit for a vertical transfer up to a four-year degree granting institution, since they have an explicit mission to prepare students for transfer to a four-year degree granting college. ED's ratings system should not reward any other transfer outcomes (lateral or reverse). Thus moving forward, we recommend that all colleges, regardless of mission, be required to report in IPEDS the number and percentage of students who transfer-out. We submit that it is necessary and a helpful data point to show consumers how many students from each cohort leave an institution for whatever reason. Once a student transfers in, IPEDS and ED's ratings system should ensure that subsequent "credit" for completion also transfers to the college that accepts them.

Education Reform Now's Comments on the Department of Education's College Ratings System

Finally, we submit that student loan repayment rates are a critical indicator of institution success and should be incorporated in ED's final rating system. Given that the federal role in higher education revolves so heavily around student financial aid and student loans in particular, loan repayment rates should be viewed as a critical indicator of an institution's success in terms of protecting the public fisc and taxpayers writ large from unwise public investments. Loan repayment rates are also a critical indicator of institution quality from the perspective of individual students. Students who cannot meet their education debt obligations either because they earn a degree with little economic value or because they earn no degree at all confront life-damaging consequences of bad credit, inability to take on future debt, and wage and tax return garnishment. We therefore recommend that loan repayment rates be incorporated into ED's rating system.

Mr. Secretary, we applaud your leadership and careful effort in establishing a college ratings system that will provide critical information not only to students and families making tough decisions about where to go to college, but also to colleges and policymakers to assist them in improvement and accountability efforts. Education Reform Now is happy to discuss any of the recommendations contained in this letter in further detail, and we are willing to help the Department in any way we can during this important process. We encourage you to proceed expeditiously and not let the perfect be the enemy of the good.

Sincerely,

Mary Nguyen Barry
Policy Analyst
Education Reform Now

Michael Dannenberg
Director of Strategic Initiatives for Policy
Education Reform Now

¹ For example, the State Fiscal Stabilization Fund within *The American Recovery and Reinvestment Act of 2009*, the School Improvement Grant, and 2009 Race to the Top required grantees to focus on the persistently low-achieving schools – the bottom 5 percent – as a condition to receive federal dollars. More recently, both the waiver application granting states flexibility from the Elementary and Secondary Education Act's (ESEA) accountability provisions and the 2013 Senate ESEA reauthorization bill required states to identify and support "priority schools," those that had been identified as the lowest achieving 5 percent of each Title I elementary and secondary schools in the state.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 16, 2015 12:54 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Yavapai College stands with AACC in its concerns about the proposed federal college ratings system. We will address our particular concerns in hopes that these issues will be addressed prior to the launch of a system that will otherwise trigger unintended consequences that may reduce access or lower the quality of higher education in the United States.

How the System Will Rate Institutions

The Department's intent to use a three-level system of high-performing, low-performing, and those falling in the middle will paint institutions so broadly as to misrepresent the majority of what an institution does. For example, since Harvard University has such limited access, should they be ranked as low-performing? This illustrates that any threshold established by the Department will fail to account for compensating factors that may allow an institution that fails to meet an access threshold to be considered worthy of federal support. Similarly, Yavapai College's open enrollment mission and service to a community with a very high population of retirement age citizens taking coursework for enrichment may disadvantage our college if the thresholds are set, as most are, with Ivy League missions in mind.

The unintended consequence of any such rating system will be the homogenization of American higher education. The diversity of American Higher Education is its strength, so standardization by definition will weaken education in our country. Any rating system that is ultimately launched must only compare each institution to its previous self and not to other institutions with different missions and different service areas. Improvement over time; What metrics over what time period?

The strength of the system of regional accreditation has traditionally been its ability to measure each institution based on that institution's expressed mission. Ratings should be measured on metrics determined through the accreditation process to demonstrate the institution's status in regard to achieving its mission. Metrics should be measured on an on-going basis and made public on an on-going basis along with analyses of the factors that impact the metrics.

Institutions that will be included in the ratings system

The description of the institutions to be included reveals the principle problem with the rating system. The descriptors "Predominantly four-year institutions and "Predominantly two-year institutions" reveals the Department's awareness that institutions are complex, multi-faceted organizations with more than one goal. To rate an institution based on a portion of its mission is to drive the institution away from its mission and to divert its resources toward the achievement of federally-prescribed priorities. The Department cannot advance a system that fundamentally changes institutions without reducing diversity, choice, quality and affordability in the higher education sector.

Institutional Groupings

The Department's suggestion that there are only two kinds of institutions in the nation suggests a frightening unfamiliarity with American higher education. Efforts to pursue more "granular groupings" still implies an assumption that two community colleges with identical missions would be similar, when those institutions are defined more by the communities they serve than they are by their mission statements. Once again, grouping schemes will always reduce diversity and therefore reduce choice, quality and affordability in higher education.

A new focus for the Department of Education

After two decades of federal efforts to make Americans question whether education is worth the money, the Department of Education has succeeded in reducing support for education throughout the nation. Never have Americans been so proud of being uneducated. Never have teachers been so poorly regarded. It is time to stop

creating suspicion and start creating support. The Department of Education should re-assess its own mission and move from policing education to promoting it.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): Stuart.Blacklaw@yc.edu

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

O'Bergh, Jon

From: Ashley Swift <aswift@micua.org>
Sent: Monday, February 16, 2015 2:22 PM
To: College Feedback
Cc: Tina Bjarekull; Matthew Power
Subject: MICUA Response to DOE Rating System
Attachments: MICUA Response to DOE Rating System.pdf

Good afternoon,
Please find attached the Maryland Independent College and University Association's response to the Department of Education's proposed college ranking system.

Thank you.

Ashley Swift
Administrative Assistant
Maryland Independent College and University Association
60 West Street, Suite 201
Annapolis, MD 21401
Tel: 410-269-0306
Fax: 410-269-5905
Website: www.micua.org

M

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MEMBERS

Capitol Technology University

Goucher College

Hood College

Johns Hopkins University

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Stevenson University

Washington Adventist University

Washington College

AFFILIATE MEMBERS

Ner Israel Rabbinical College

St. Mary's Seminary & University

February 16, 2015

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

Dear Secretary Duncan:

On behalf of Maryland's sixteen independent colleges and universities, thank you for the opportunity to provide feedback on the Department's proposed rating system. MICUA member institutions share the President's commitment to access, affordability, and transparency and firmly believe that reliable comparative data and information is critical to allowing students and their families to find a "best fit" college.

It is precisely this belief that makes MICUA and its members extremely concerned about the proposed college rating system. It is nearly impossible to distill one of the most important and personal decisions in life down to three categories provided by the federal government. Such a simplified approach does a disservice to and offends the intellect of the students and families making decisions about one of the most important decisions they make in their lives.

Maryland has a dynamic and nimble higher education system that allows the full range of higher education opportunities and experiences for students who choose to go to school here. A federal rating system built on a handful of factors is very likely over time to result in greater standardization, less innovation, and a smaller range of options for students to pick their "best fit" college experience. MICUA is equally concerned with the proposed system's attempt to adjust outcomes for institutional level characteristics, such as selectivity and endowment size. Access and success will be limited, not broadened, under any such proposal. Ultimately, students who are economically disadvantaged will have fewer educational opportunities and less financial aid.

MICUA also has grave concerns about the proposed data and categories in the federal rating system, particularly the desire to tie ratings to the earnings of students immediately after graduation. The emphasis on earnings suggests that institutions producing graduates who go into lucrative fields will be regarded as more valuable than institutions that graduate students who go into public service, teaching, community engagement, or other service industries. The emphasis on short-term earnings ignores the lifelong importance of higher education. Moreover,

this measure fundamentally mischaracterizes the essence of a broad and high-quality educational experience, which must include critical thinking, civic engagement, global awareness, cultural understanding, and advancement of knowledge. A federal rating system that penalizes those who are willing to forego some personal financial reward for the common good is inherently perverse. Many of our institutions produce some of the brightest minds in public service and those same institutions would be punished under the proposed rating system.

Maryland's independent institutions fully support open and transparent access to reliable and useful information to assist students and families in making informed decisions. This is why MICUA is a strong proponent of NAICU's U-CAN initiative. U-CAN provides a breadth of consumer information in a straight forward and objective way. It balances the quantitative and the qualitative aspects of college in a way that recognizes there is value to both. U-CAN was developed with significant input from families and extensive focus groups to determine what information families want when they select among a diverse array of college opportunities.

MICUA has tremendous concerns that the proposed rating system doesn't recognize that a large number of students are not four-year, on-campus students in their late teens and early twenties. Many college students are attending solely based on physical proximity to their nearest college opportunity. The proposed rating system seems to forget that the demographics of students have changed dramatically and students who choose their schools as a result of geographic proximity could wind up being inadvertently penalized.

The clear solution to the multiple problems that plague the proposed rating system is simply to abandon it and focus on what is most critical to securing greater access and choices in higher education -- sufficient need-based student aid. MICUA firmly supports additional efforts to expand access to need-based student aid, because it benefits those who need it most and trusts individuals to make value judgments on the worth of a college experience.

Thank you for the opportunity to comment on the proposed rating system. MICUA looks forward to working with DOE to increase accountability, transparency, and openness, but greatly hopes that it is not through the current proposed rating system.

Sincerely,

(b)(6)

Tina Bjarekull
President, MICUA

cc: Presidents of MICUA Member Institutions

O'Bergh, Jon

From: Wyatt H. Colclasure II (b)(6)
Sent: Monday, February 16, 2015 3:04 PM
To: College Feedback
Subject: Comments on A New System of College Ratings
Attachments: Comments on System of College Ratings.pdf

The attached comments are prepared based on my perspective as a trustee at an independent college.

Comments on A New System of College Ratings – Invitation to Comment

GENERAL

The Department owes it to affected colleges to present a system that is well thought out, complete, and validated before it is implemented. But in several places the proposed System creates as many new questions as it answers. Consequently it is difficult to provide specific and targeted comments on a proposed System that is itself described in ambiguous and questioning terms. Examples of the problem are phrases such as “how they might fit together” on page 2 and also page 8. The document describes itself as a framework (“This document provides a bigger picture framework that will further guide the development of version 1.0.”) with similar references on pages 4, 5, and 17. All this leaves confusion whether we are being asked to comment on a framework of something yet to be developed or a System, a term that implies something that has been developed and is being submitted for validation. As another example the word “might” is used 17 times in the document’s 17 pages, a frequency that suggests even those developing the document are unsure how to proceed. On page 8 it says “We are also exploring family income quintiles as a possible measure...” which amplifies the uncertainty of direction by those charged to develop the System.

The document describes a System that clearly is not ready for implementation. Given the high level of questions still being proposed internally in the document itself there is no realistic prospect the System, even as version 1.0, will be ready to implement by the 2015/2016 school year. The most likely result of an attempt to do so will be much wasted effort and expense on the part of colleges subjected to it.

EXAMPLES

The comments that follow are presented as examples supporting the general or summary comments above but are not exhaustive.

First the framework needs to resolve its purpose and approach. The Background section discusses benchmarks over three principles of access, affordability, and outcomes; making informed choices; and incentives and accountability. The grouping itself suggests two very different applications – perhaps even purposes – of the System and this causes confusion in the result. The first and third groups or principles center on involvement by the Department relating to the operation and funding of the colleges themselves. Only the middle one directly addresses the choices that students and parents must make. These are widely different considerations and trying to satisfy both of them with the same System is sure to cause confusion and complexity, as the difficulty and delay experienced so far give testimony. (Note that after almost six years there are only “promising signs” of progress.) A suggested approach to avoid this confusion is to clearly separate the parts of the System intended to support government involvement from those intended to provide information for parents and students to select their college.

The first and third principles presented (access, affordability, and outcomes; and incentives and accountability) are matters that can be addressed on a large scale via a national ranking. But a national comparison quickly loses meaning for many potential students. Part of access is driven by geography. Recruiting data show that the large majority of a college’s students come from a

radius of a few hundred miles of the campus. Many of the reasons are simple, such as how far the student desires to be from home and the increased cost of commercial travel incurred by longer distances. Another reason is that students pursuing continuing education or career change are usually constrained by employment and family responsibilities. So for most students any broader rating is irrelevant as far away schools can't be considered.

The narrative of the proposed System makes it clear that the accountability criterion refers to federal funding, not family funding. As expressed it is a valid concern but one that exists largely outside the student and family. For them either they are able to get a loan or they are not; they don't see the government's broader aspects of accountability. Said another way, the first and third considerations involve primarily the government-school relationship. Only the middle consideration, making informed choices, directly involves the student and family. One should expect that the factors to be considered are significantly different and then, further, that a different approach is needed. The proposal needs to make the distinction clear, probably by being divided into two separate parts. Make the distinction clear between the procedures intended to guide government decisions and those intended to support student choice and decisions.

In the metrics section (page 6) there are several discussions about how the dividing lines are to be set and the impact of scores next below or next above the selected threshold value. Since there will always be a score next under and another next above any point selected the value of the discussion isn't clear. If it is worry that schools will adjust their acceptance policies to game the system, the rejoinder is that they can game the system regardless what values are selected. One likely result is to increase the middle band in an attempt to avoid complaints, but the more that is done the less it provides meaningful selection information for students – purportedly a purpose of the System.

The discussion of a *Labor Market Success* metric (page 11) addresses, but does not resolve, the balance of addressing short term vs. long term earnings results. There is an apparent bias toward the long term, which is described as 10 years or more. (“...but long-term earnings outcomes more closely correlate with an individual's lifetime earnings and are thus a better proxy for career success.”) The proposal does not describe how this will be done, rather it discusses potential approaches and the difficulty of doing it at all. Note also that the discussion implicitly assumes there is an identifiable career track that can somehow be correlated to institutional performance. Given the frequent job changes of today's graduates such a correlation will be difficult and likely impossible to develop and validate.

The discussion on **Institutional Groupings** (page 5) settles on two year and four year groups, “due to differences in missions.” But the idea of mission seems to involve artificial external assignment rather than something the institution determines, or what the student perceives as useful. The artificial and external assignment idea is amplified by the discussion at the top of the page that assigns two/four-year designations based on arbitrary percentages. There is another implicit assumption that the student body is fresh from high school, enrolling full time, and accurately predicts their eventual course of study. This assumption falls apart for any school that has more than a smattering of non-traditional students such as part time students who also work full time, degree completion students, and adult students who take courses in additional areas of

interest in the best tradition of a life time learner. As a result the proposed Groupings do not accurately reflect the situation at many colleges.

SUMMARY

Overall, the System attempts to do too many things at once and has not yet managed to present a coherent structure, let alone the details necessary to accurately describe and validate whatever it is. The proposal is disappointingly insufficient to describe what is being proposed. Given the time and resources spent getting this far it seems highly unlikely that a workable version 1.0 can be prepared by the beginning of the 2015/2016 school year. Recommend that the Department first resolve answers to its own questions and then release a proposal with enough detail so those impacted can make a rigorous evaluation and provide specific comments on the proposed System.

O'Bergh, Jon

From: Carolyn Corley <ccorley@webster.edu>
Sent: Monday, February 16, 2015 3:10 PM
To: College Feedback
Subject: Webster University PIRS Comments
Attachments: Webster University.PIRS comment.Elizabeth J. Stroble.Feb 2015.pdf

Attached please find PIRS comments from Webster University president, Elizabeth (Beth) J. Stroble. Please don't hesitate to contact me if there are any issues with the submission.

Thank you,
Carolyn Corley

Carolyn Corley
Associate Vice President
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February 16, 2015

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

Dear Secretary Duncan:

I am submitting the following comments regarding the Postsecondary Institution Rating System draft on behalf of Webster University. We were pleased to see the substantive changes to the original model that have been incorporated based upon the comments of many interested parties and we applaud the Department for its energetic efforts to engage a wide audience in this important conversation.

Webster echoes several of the concerns expressed by the National Association of Independent Colleges and Universities (NAICU) that a rating system that emphasizes metrics outside of the context of mission can very easily undermine the goals of student access and success. While the proposed changes to the latest version begin to address the challenge of mission and context, we see little indication that the changes will go far enough to equip the PIRS to serve as a consumer research tool in addition to its role as a government accountability measure.

In recent comments, Assistant Secretary Mitchell has acknowledged that the PIRS does not aim to be comprehensive. The PIRS, as structured, will serve to recognize excellence and call out under-performing institutions in the broad areas of access, affordability and outcomes, with a goal of keeping the number of institutions in the high and low-performing categories relatively small with the bulk of institutions falling into a broad "middle" category. Identifying the high and low functioning operators is a worthy goal and the ongoing refinement of the data to support this system, including broadening of IPEDS to include part-time and transfer students, is a good in and of itself. I would caution however that the proposed use of state level data to address shortcomings in the existing federal data sets will introduce additional inconsistencies and errors of interpretation in ratings that have the potential for harm to perception of an institution's value.

My belief is that the Department's focus on access, affordability, and outcomes, while fitting for accountability purposes, does not adequately reflect the realities and concerns of the students and families who are considering college. Students make their decisions based in large part on geography, program availability and the many of components that make up campus culture, including institutional mission.

470 E. Lockwood Ave. St. Louis, MO 63119-3194 USA
www.webster.edu

Home Campus: Saint Louis, MO, USA

The Honorable Arnie Duncan
February 16, 2015
Page Two

In the upcoming effort to launch the PIRS, it would serve users well if the Department would be explicit about the PIRS' limitations as a consumer research tool. The PIRS should rightly be cast as a government accountability measure. The landing page of an eventual PIRS site might even reference other consumer oriented sites, such as NAICU's UCAN, which provide additional information and context to help inform families wishing to make comparisons among colleges.

The official imprimatur of the US government on a college rating system will be enormously influential – it is worth getting right. I believe that this end may be more achievable if the system is presented to the public explicitly as a government accountability measure and when it is based on the cleanest, most consistent data available. When it comes to helping families decide among colleges, the PIRS needs to be presented as a very basic tool within the context of the larger universe of consumer research instruments that address the additional variables that are of paramount concern to students and families.

Thank you for the opportunity to comment on this worthy effort.

Sincerely,

(b)(6)

Elizabeth (Beth) J. Stroble
President

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 16, 2015 3:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: February 16, 2015

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

Dear Secretary Duncan:

I am submitting the following comments regarding the Postsecondary Institution Rating System draft on behalf of Webster University. We were pleased to see the substantive changes to the original model that have been incorporated based upon the comments of many interested parties and we applaud the Department for its energetic efforts to engage a wide audience in this important conversation.

Webster echoes several of the concerns expressed by the National Association of Independent Colleges and Universities (NAICU) that a rating system that emphasizes metrics outside of the context of mission can very easily undermine the goals of student access and success. While the proposed changes to the latest version begin to address the challenge of mission and context, we see little indication that the changes will go far enough to equip the PIRS to serve as a consumer research tool in addition to its role as a government accountability measure.

In recent comments, Assistant Secretary Mitchell has acknowledged that the PIRS does not aim to be comprehensive. The PIRS, as structured, will serve to recognize excellence and call out under-performing institutions in the broad areas of access, affordability and outcomes, with a goal of keeping the number of institutions in the high and low-performing categories relatively small with the bulk of institutions falling into a broad "middle" category. Identifying the high and low functioning operators is a worthy goal and the ongoing refinement of the data to support this system, including broadening of IPEDS to include part-time and transfer students, is a good in and of itself. I would caution however that the proposed use of state level data to address shortcomings in the existing federal data sets will introduce additional inconsistencies and errors of interpretation in ratings that have the potential for harm to perception of an institution's value.

My belief is that the Department's focus on access, affordability, and outcomes, while fitting for accountability purposes, does not adequately reflect the realities and concerns of the students and families who are considering college. Students make their decisions based in large part on geography, program availability and the many of components that make up campus culture, including institutional mission.

In the upcoming effort to launch the PIRS, it would serve users well if the Department would be explicit about the PIRS' limitations as a consumer research tool. The PIRS should rightly be cast as a government accountability measure. The landing page of an eventual PIRS site might even reference other consumer oriented sites, such as NAICU's UCAN, which provide additional information and context to help inform families wishing to make comparisons among colleges.

The official imprimatur of the US government on a college rating system will be enormously influential – it is worth getting right. I believe that this end may be more achievable if the system is presented to the public

explicitly as a government accountability measure and when it is based on the cleanest, most consistent data available. When it comes to helping families decide among colleges, the PIRS needs to be presented as a very basic tool within the context of the larger universe of consumer research instruments that address the additional variables that are of paramount concern to students and families.
Thank you for the opportunity to comment on this worthy effort.
Sincerely,

Elizabeth (Beth) J. Stroble
President

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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

O'Bergh, Jon

From: Nancy Moody <nmoody@tusculum.edu>
Sent: Monday, February 16, 2015 3:31 PM
To: College Feedback
Subject: College Rating System Comments
Attachments: Letterhead form.pdf

Nancy B. Moody, PhD
President

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Greeneville, TN 37743
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nmoody@tusculum.edu
www.tusculum.edu

TUSCULUM
COLLEGE
ESTABLISHED 1794

February 16, 2015

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

Dear Mr. Secretary:

Thank you for the opportunity to offer comments on "A New System of College Ratings" and for your responsiveness to prior concerns raised relative to higher education. Tusculum College appreciates the struggle with the launching of a rating system as it relates to establishing what metrics to use, to the application of the same metrics for a wide variety of institutions that serve an extremely diverse population, and the limitations of data collection and analysis.

Tusculum College may reflect the concerns of numerous small private liberal arts institutions located across the country and are concerned that a mandate has been issued requiring the implementation of a rating system that has been, at best, poorly conceived that will negatively impact many institutions, and more importantly, students, American citizens, who will serve as the foundation for the future. Those likely to be negatively impacted are institutions, similar to Tusculum College, that serve underserved populations, particularly low-income students who are afforded an opportunity to attend college because of institutional resources and funding that are dedicated to allow them the opportunity for a better future. The harm that will result from implementing a system using similar metrics to determine the value of an education that is provided will likely result in irreversible harm to institutions and to students. Please avoid this irreparable damage by proceeding cautiously in making any decision about one of our greatest resources – human capital.

Tusculum College is similar to many other institutions of higher education that serve the underserved with:

- 66% of Pell eligible students
- 46% from families with less than \$30,000 annual gross-adjusted income
- 46% of first generation college students
- 33% of students who are considered both 1st generation and low income
- 40% of undergraduate students in Fall 2014 who had a zero EFC
- 73% of undergraduates eligible for TRIO-Student Support Services, but only 24% of SSS-eligible students are currently being served by the college's 2 TRIO-SSS grants (314 of 1,289 eligible)
- Over 99% of residential students and 84% of GPS students receive some form of financial aid

TUSCULUM
COLLEGE
ESTABLISHED 1794

Honorable Arne Duncan
February 17, 2015
Page 2

- 85% of Tennessee students come from counties in Appalachia
- 20% of adult students attend part-time due to family and work demands
- Over 40% of adult students are married

Any rating system of the effectiveness of an education should measure the movement of students among institutions. All institutions involved in the awarding of credits for any student completing a credential should be acknowledged as contributing to the student's success which would require improved data systems, data collection and analyses to provide inclusive outcomes. Inclusive would require better monitoring and tolerance of strategies such as transferring, stopping out, and reducing course load to part-time students who should not be counted as failures for the student or the institution. Such a system would acknowledge the complexity of life and allow for flexibility enabling many more students to complete their course of study.

Tusculum College heeded the administration's urging to establish Dual Enrollment programs with local high schools. The calculation of dual enrollment students, who do not receive Pell funding, should not be calculated in the overall enrollment on which Pell percentages are based.

Tusculum College appreciates the opportunity to comment on behalf of the people who we seek to serve, citizens of the United States of all ages and others who have historically been underserved and have no voice. Thank you.

Sincerely,

(b)(6)

Nancy B. Moody
President

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 16, 2015 3:37 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Office of the President
Tusculum College
60 Shiloh Road
Greeneville, TN 37743

February 16, 2015

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

Dear Mr. Secretary:

Thank you for the opportunity to offer comments on "A New System of College Ratings" and for your responsiveness to prior concerns raised relative to higher education. Tusculum College appreciates the struggle with the launching of a rating system as it relates to establishing what metrics to use, to the application of the same metrics for a wide variety of institutions that serve an extremely diverse population, and the limitations of data collection and analysis.

Tusculum College may reflect the concerns of numerous small private liberal arts institutions located across the country and are concerned that a mandate has been issued requiring the implementation of a rating system that has been, at best, poorly conceived that will negatively impact many institutions, and more importantly, students, American citizens, who will serve as the foundation for the future. Those likely to be negatively impacted are institutions, similar to Tusculum College, that serve underserved populations, particularly low-income students who are afforded an opportunity to attend college because of institutional resources and funding that are dedicated to allow them the opportunity for a better future. The harm that will result from implementing a system using similar metrics to determine the value of an education that is provided will likely result in irreversible harm to institutions and to students. Please avoid this irreparable damage by proceeding ! cautiously in making any decision about one of our greatest resources – human capital.

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- 20% of adult students attend part-time due to family and work demands
- Over 40% of adult students are married

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Sincerely,

Nancy B. Moody
President

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): nmoody@tusculum.edu

--

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

O'Bergh, Jon

From: Rivers, Nancy A. (nan9k) <nan9k@eservices.virginia.edu>
Sent: Monday, February 16, 2015 5:05 PM
To: College Feedback
Cc: Cordingley, Katie (Kaetlyn@lewis-burke.com); Quintal, Miriam; Sullivan, Teresa A. (tas6n); de Bruyn, Anthony Paul (apd5b); Matthew H. Charles (mhc8r) (mhc8r@virginia.edu); Adkins, Lee Ann (Lee Ann) (laa7b); Rivers, Nancy A. (nan9k); Stovall, George A. (gas5a); Citro, Michael J. (mjc2w)
Subject: College Ratings System Comments - University of Virginia's submission
Attachments: 2015-0211Draft letter on college ratings system v2 jb with TAS SIGNATURE.pdf

Please accept the attached correspondence from President Sullivan, University of Virginia, in response to Secretary Duncan's recent call for comments regarding the College Ratings System. Please do not hesitate to call me if I can assist in anyway.

Thank you for your consideration.

(b)(6)

Nancy Rivers
Chief of Staff for the President
Associate Vice President for Administration
Office of the President
University of Virginia
434.924.3337 (president's office main desk)
434.982.2662 (direct line and voice mail)
nan9k@virginia.edu



UNIVERSITY of VIRGINIA

OFFICE OF THE PRESIDENT

February 13, 2015

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

Dear Secretary Duncan:

Thank you for the opportunity to provide feedback to the Department of Education (ED) on the proposed college ratings system. Founded by Thomas Jefferson in 1819, the University of Virginia (U.Va.) is a public research university that educates leaders who leave the University well-prepared to shape the future of the nation. In maintaining our public mission, we are strongly committed to meeting the financial needs of our students, while providing a world-class education.

We support and join with the broader comments submitted by the Association of American Universities (AAU) and the Association of Public and Land-grant Universities (APLU). We appreciate the focus on access and affordability, particularly since we have met 100 percent of our families' demonstrated need since the inception of our *AccessUVA* financial aid program in 2004-2005. U.Va. currently invests over \$55 million per year of its own institutional funds to meet this commitment. Within that context, we offer the following comments on the proposed college ratings system, in the following key areas:

- **Institutional Grouping:** We are concerned that the proposed grouping of institutions into two categories, one for two-year institutions and one for four-year institutions, fails to account sufficiently for the unique missions and student populations of the various colleges and universities throughout the United States. U.Va. recommends using the categories from the Carnegie Classification of Institutions of Higher Education as a model. This classification was first established in 1970, has been updated six times to reflect institutional changes, and has been used widely in higher education as a way to represent and control for institutional differences.
- **Ratings Categories:** We believe scores should be presented individually for each metric, as well as an overall total. This would allow for the ratings system to be used as a consumer tool for prospective students and their families to identify their individual priorities by institution. If some metrics are to be differentially weighted, it is critical that the weighting methodology be transparent and justified.

Madison Hall

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- **Metrics:**
 - *Financial Aid:* Approximately one in three U.Va. undergraduate students receives some type of need-based financial assistance in a typical year. This aid is composed of grants, work-study, and need-based loans, from federal, state, and institutional sources. Within the ratings system, the level of need-based institutional aid that an institution provides should be considered, in addition to federal and state aid. We believe it should be made clear if ED intends to differentiate between an institution's contributions to need-based and merit-based aid in its analysis.
 - *Pell Grants:* We would like to see the proportion of Pell recipients at a school presented in a time series, rather than a snapshot of an individual student cohort for a single year. With its institutional commitment to meet 100 percent of demonstrated need, U.Va. has nearly doubled its proportion of Pell recipients since 2006. Any institution that has focused on increasing access for underrepresented populations should have its results reflected in the measures.
 - *Average Net Price:* Again, we recommend examining average net price over a period of time versus a single snapshot per year.
 - *Family Income Quintiles:* While this metric has the possibility of providing useful information, particularly for students from low- to moderate-income families attending an institution, we believe the term "income" should be narrowly defined to report accurately on student-family populations. Current sources of information on family income, which contain data only on students who complete the Free Application for Federal Student Aid (FAFSA), are a serious concern. Such data cannot accurately represent the true distribution of students by family income quintiles.
 - *First Generation College Status:* We recommend that the Department consider reporting the number of first-generation students in terms of institutional improvement over time.
 - *Completion rates:* U.Va. supports the concept of the graduating institution receiving credit for lateral transfers to reflect its growing population of community college transfer students. We also support the use of the Student Achievement Measure (SAM) in place of the limited data available from Integrated Postsecondary Education Data System (IPEDS).

- **Data:** Due to the absence of one central source of credible information on several of the proposed metrics, we are concerned about the reliability of data on certain proposed metrics, such as labor market success. We have a strong commitment to public service at U.Va., and we oppose the use of any metric that would serve as a disincentive to service. For example, in 2012, U.Va. had 69 alumni who were working overseas for the Peace Corps. Since the Peace Corp's inception in 1961, more than 1,000 U.Va. alumni have served. Similarly, 524 alumni have served as teachers in Teach for America. U.Va. was one of the top 10 institutions for Teach for America in 2013. Military service is another valuable national service but is not compensated as well as comparable civilian occupations.

Furthermore, we believe that the consideration of data from IPEDS and National Student Loan Data System (NSLDS), which provide information only for financial aid recipients, are far too narrow in scope. In addition to data from IPEDS and NSLDS, we request that the Department allow institutions to supplement with institutional data or data from the Common Data Set, which will project a more accurate view of the institution and its students.

One suggestion is to make better use of the data that are already provided to parents and students. For example, the College Navigator website already contains a wealth of information and allows for families to compare key indicators across institutions online. These data could be rebranded in accordance with the goals of transparency to ensure that families know where to find the data and understand how to use them, particularly families with lower incomes and no previous college experience.

We share the Department's goal of increasing transparency and improving access to higher education. We remain concerned, however, that the proposed rating system will provide a limited view of each unique institution and its contributions to its student population and its greater community. We look forward to working together as the process moves forward, and we are grateful for the opportunity to provide feedback.

Very truly yours,

(b)(6)

Teresa A. Sullivan
President

O'Bergh, Jon

From: Susan Stitely <ssitely@vermont-icolleges.org>
Sent: Monday, February 16, 2015 5:39 PM
To: College Feedback
Subject: Comments on the Proposed Federal Rating System for Higher Education
Attachments: RatingtoUSDOE2015.pdf

Please find attached comments submitted on the proposed federal rating system for higher education institutions.

Susan Stitely | President
Association of Vermont Independent Colleges | PO Box 254 | Montpelier, Vermont
05601 | 802.828.8826 | ssitely@vermont-icolleges.org | www.vermont-icolleges.org



ASSOCIATION OF VERMONT
INDEPENDENT COLLEGES

...independent thinking for a collaborative world

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Bennington College
Burlington College
Champlain College
College of St. Joseph
Goddard College
Green Mountain College
Landmark College
Marlboro College
Middlebury College
New England Culinary Institute
Norwich University
Saint Michael's College
S I T
Southern Vermont College
Sterling College
Vermont College of Fine Arts
Vermont Law School

ASSOCIATE MEMBERS
Albany College of Pharmacy
and Health Sciences
Union Institute & University

February 16, 2015

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

Dear Mr. Secretary:

I am writing on behalf of the nineteen Association of Vermont Independent Colleges' members regarding our grave concerns with the proposed federal rating system for higher education institutions. A rating system seriously risks harming not only Vermont students, colleges, and communities but also colleges across the nation by distorting the values it purports to measure and by relying on data that has limitations as recognized in the Department's December 19th Invitation to Comment.

Vermont's private higher education institutions support transparency and accountability regarding higher education. Several initiatives have recently been implemented that provide transparency and accountability including the College Scorecard, the Financial Aid Shopping Sheet, and Net Price Calculators. We support the inclusion of additional relevant data but cannot support the federal government placing a value on the data.

We very much appreciate the Department's engagement of the higher education community and the time and thought that has gone into the Departments efforts. For every proposed metric mentioned in the Invitation to Comment, there is a qualification that the data has limitations. The Invitation also recognizes there are many elements of education that are intangible or not amendable to a quantitative rating. To base a rating system on flawed data does a great disservice to students and institutions.

As of now, the Department is proposing only two categories of institutions; predominantly four-year institutions, which are colleges that primarily award baccalaureate degrees and above; and predominantly two-year institutions, which are degree-granting colleges that primarily award associate degrees and/or certificates.

Such broad categories highlight the impossibility of making meaningful distinctions between institutions for rating purposes. For example, in Vermont we have one of seven in the nation's work learning institutions with just over 100 students. How could such an institution be compared to Arizona State? How could one of the few institutions that serves students with learning disabilities be rated against all other two-year institutions?

Once you start the process of rating institutions, you run into the very difficult question of defining value. Will the rating system change with each new administration's values? Again, we have no objection to making the data available to the consumer, but they should determine what is valuable to them individually.

A student is most likely to succeed at a college that is the best "fit" for him or her. We would not want to see situations where students are discouraged from attending a best-fit institution because the federal government has made a negative value judgment about that institution. Moreover, one of the great strengths of American higher education is the diversity of institutional choice it offers. A rating system built around a handful of factors is likely over time to lead to greater standardization and less innovation.

We ask that you not subject our colleges to a flawed rating system. Our colleges have been stretched hard through the economic downturn, yet we still served our socio-economically diverse students. We fear such rating system would result in unintended negative outcomes of significant scope, including the possible closure of small colleges.

Sincerely,

(b)(6)

Susan Stitely
President

Cc: Senator Leahy
Senator Sanders
Representative Welch

O'Bergh, Jon

From: Brahm, Gary <brahm@brandman.edu>
Sent: Monday, February 16, 2015 5:53 PM
To: College Feedback
Subject: College Ratings Comments

The college ratings present an important opportunity to help the students, especially those most in need of help, to make a better choice of which institution to attend. I have the following recommendations:

- **Expand Institutional Groupings to include a group of institutions serving non-traditional students** - The largest and fastest growing area of higher education is non-traditional students. Commercial school rankings are almost exclusively dedicated to assist first-time freshmen who are going to college directly from high school. Many non-traditional students are first generation college students whose families are unable to provide useful guidance and who are long past the days when they can seek guidance through their high school network. In the absence of an independent ranking, and without the benefit of consistently applied measures of student success, non-traditional students do not have the tools to select an institution where they are likely to be successful. Unfortunately, many rely on aspirational marketing campaigns to select an institution.

A large portion of non-traditional students are diverse, high-need, first-generation students who have suffered tremendous hardships by making a poor selection of which institution to attend. Providing these students guidance can be the most significant, immediate, tangible benefit of the college ratings.

- **Student Loan Repayment Information** – The vast majority of non-traditional students return to higher education to improve their financial situation. An important measure of the value of that education is the student's ability to repay student loans. Student loan debt has become the largest form of consumer loans, larger than credit card debt, and going into default as the result of non-payment could mean financial ruin for the student and family. It is just common sense that the value of the degree needs to enable the graduate to earn enough to pay for that degree.

The Department of Education publishes a three-year cohort default rate for each institution participating in Title IV funding. This rate will become less useful as more students use income based repayment. However, it is important for students to know if the investment in education will pay for itself. Accordingly, in addition to the three-year cohort default rate, the ratings should also include the percentage of students who are:

- Using income based repayment
 - In deferral
 - In forbearance
- **How Each Tuition Dollar is Spent** – While different institutions have different cost structures, the percentage allocation of each tuition dollar could be helpful information in selecting an institution. I would suggest that the ratings include the percent of each tuition dollar spent on the following categories:
 - Instruction
 - Academic support
 - Student support
 - Institutional support
 - Service

- Research
 - Marketing
 - Surplus or profit
- **Transfer Graduation Rates** - The vast majority of non-traditional students attend more than one institution in their quest to earn a degree. The transfer graduation rate will enable these students to compare institutions to see where they are most likely receive the support they need to graduate.

I have followed the recent press on how ratings might damage the educational opportunities for underrepresented students. Actually, it is underrepresented, first-generation, students who have suffered greatly by not having the transparency that ratings will provide. I applaud your efforts to persevere on this important initiative.

I would be willing to provide any assistance that you would find helpful.

Sincerely,

Gary

 **Gary Brahm**
Chancellor and CEO

Brandman University
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Irvine, CA 92618
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T 949.341.9824 F 949.754.1331
A member of the Chapman University System

O'Bergh, Jon

From: KC Perlberg <vpga@asmsu.msu.edu>
Sent: Monday, February 16, 2015 7:39 PM
To: College Feedback
Cc: Teresa Bitner
Subject: College Ratings Feedback
Attachments: ABTSCommentDoc.pdf

Good Evening,

The attached document represents public feedback to the Department of Education on the proposed college ratings framework on behalf of the Association of Big Ten Students, which is comprised of the respective student governments of the fourteen Big Ten universities. It was composed by a special committee and approved by the Big Ten student body presidents.

We look forward to seeing the progress made on the college ratings framework. We would be eager to continue this conversation process and can be reached at the contacts below. On behalf of the students of the Big Ten Conference, we thank you for the opportunity to offer our opinion on this matter.

Signed,

ABTS Comment Committee

KC Perlberg, Chairman, Michigan State University
Charmaine Wilson-Jones, University of Maryland
Nicholas Wilson, University of Maryland

Contacts:

KC Perlberg
Vice President for Governmental Affairs
Associated Students of Michigan State University
308 Student Services Building
East Lansing, MI 48824
Cell: (b)(6)
Email: vpga@asmsu.msu.edu

Teresa Bitner
Executive Director
Association of Big Ten Students
Email: vpaa@asmsu.msu.edu



Comment on Proposed College Ratings Framework

Purpose

Since its inception, the Association of Big Ten Students has provided a voice for the over half a million Americans enrolled in our member institutions. Central to our mission has been a focus on the accessibility, affordability, value, and long-term effects of higher education in America. To this end, we are pleased to take advantage of the Department of Education's offer to issue a public comment on its proposed college ratings system framework.

The following document was authorized at the January 2015 ABTS Conference in Evanston, IL, and is a summary of the discussions and research of a number of ABTS representatives since that time. Our intent is to assist the Department in its continued development of a ratings framework and to provide direction to elements of the framework in which we see potential, as well as those for which we seek further clarification. It is our hope that conversation surrounding the framework's evolution will continue even after the comment period ends on February 17th 2015.

Comments

The Department's proposed ratings system places a strong commitment to "[helping] students and families make more informed choices during the college search and selection process." To this end, we are encouraged by efforts to increase transparency, especially financial transparency, throughout the higher education landscape.

We appreciate the suggestion to use metrics including frequency of Pell Grant usage among students and average loan debt. While these metrics have their limitations, they are well-known, reputable measures. We seek greater clarity from the Department regarding how the frameworks would work through some ambiguity within these measurements. For example, we would find it valuable to know how the ratings would reconcile Average Net Price with economic and utility variance in the value of a wide variety of housing and student service options at universities across the country. Such clarity would strengthen the Department's ability to provide transparency on the vital question of college affordability.

However, we observe a two-pronged approach to creating transparency in the document informed by a philosophy, one that needs further clarification. The first facet is the aforementioned financial transparency, which we generally view favorably. The second is the provision of a value-based rating system, the metrics of which are derived from varied measures of institutional "value". To this portion of the ratings framework we recommend caution. We believe that any attempt to measure the consumer value of an institution inherently makes certain presuppositions of the intrinsic value of higher education. In this case, such measurements presume that higher education's most valuable purpose lies in how it affects the preparedness and economic impact of the workforce it prepares. These are vitally important considerations, but not the most important for young students and their families in making decisions about where to attend college, which the Department has valued highly in its statement of purpose.

By contrast, the Association of Public and Land-Grant Universities (APLU) has presented its own statement on evaluating the value of institutions of higher education. The report spends a great deal of effort balancing the different benefits that result from pursuing a college education, including Human Capital vs. Economic and Public vs. Personal benefit. By doing so, the APLU recognizes that, while the prospects of gainful employment should be recognized as a vital component of a quality education, other concepts such as social consciousness, personal health habits, and a greater diversity of individual skills can be just as valuable to the individual and, when taken in aggregate, have an equally positive effect on both the economy and national civic life.

Yet the Department of Education's inclusion of metrics like graduate school attendance, completion rates, and other factors is based on a retrospective and economically-centered viewpoint. This limited view of the higher education experience would inevitably favor institutions specializing in more lucrative fields, such as finance

and business, at the expense of institutions that specialize in other fields, such as teaching. We suggest that a clearer statement of how the Department views these metrics and their inherent value as measurements of higher education quality would be valuable.

In applying this concern to the metric of Graduate School Attendance, we would recommend examining the rate at which students are admitted only after applying, rather than measuring the rate as a whole. This allows for the ratings to gauge how an institution prepares its students for postgraduate education without penalizing the school for students that may choose not to pursue an additional degree.

The department acknowledges the need to account for the diversity of students and institutions alike, but its plan to accomplish this seems more conceptual than functional at this time. Without a more complete indication of how it will account for such variables, we believe it premature to include such measurements of "institutional value" as described above. However, with greater clarity of process, such an inclusion may become appropriate.

It seems most effective for the Department to instead focus its efforts on providing a clearer examination of the financial realities imposed by various colleges and universities, such as their average levels of debt and the rates of student loan defaults. These measurements are both more explicitly quantifiable and accurately measured than other questions of inherent institutional value and have the added benefit of being more closely related to the realm in which the federal government, by the Department's own admission, can have its most effective impact on the system. That is to say, "[ensuring] the wise and effective use of the \$150 billion invested in the federal student aid program annually...[and investing] federal aid where it will do the most good."

Next Steps

We appreciate the opportunity to lend the voice of the students to this important discussion. It is our hope that we may continue to partner with the administration in seeking to renew the health and value of our rich tradition of higher education. In doing so, we look to leave for our peers who will follow us an even more stable and effective learning community. We encourage the Department to reach out to us should there be any way in which we can be of assistance and look forward to our continued partnership.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 16, 2015 9:13 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: To Whom it May Concern,

I would like to comment on the newly proposed system of college ratings. In general I do not oppose the stated purpose behind what the Department has suggested. However, I do have some concerns regarding the adequacy and the unintended impact that such a reporting system may generate. As someone who currently works at a midsize public community college, I question whether primarily relying on graduation rates alone to evaluate the outcomes for two-year institutions will accurately represent the performance of an open enrollment institution.

There are several reasons why I share this concern with you. To start, it is important to keep in mind how small the first-time, full-time, degree-seeking population is at our institution compared to our overall student population. At our institution, this particular student population only accounts for roughly 6% of the total enrollment at any given time and as such, to primarily judge the performance of an entire institution by this small group of students may not be representative of the student body as a whole. For this reason relying on these numbers may mislead the public for whom this ranking system is intended. The second concern is in regard to the effect of remedial education on graduation rates. As you know, the likelihood of students graduating on time is significantly lower for students who require remedial education. Because many community colleges have open-access policies and do not set entrance requirements, unlike many four-year institutions, using graduation rates alone to assess the effectiveness of the "outcomes" section is, in part, a judgment of the local secondary education system. I respectfully argue that to place the blame for low graduation rates entirely on the community college is misleading the public. The third issue I would like to bring up relates to dual credit and early college programs. Dual credit and early college programs are becoming increasingly popular in our state as a means to decrease the time it takes a student to earn postsecondary credentials. Yet due to the methodology of how the graduation rates are calculated, the institution's success in helping these students isn't taken into account in the reported percentages.

While the Department does recognize the shortcomings of using graduation rates as outcome indicators, it did not propose an alternative to this measure. For my part, I am not proposing to exclude graduation rates. Instead, I would like to request adding the number of students who graduated with a certificate or degree annually compared to the total degree-seeking population as a supplemental measure, so as to account for all the students who earn a degree but are not included in the first-time, full-time, degree-seeking cohort. I think this number would better represent the mission of a community college, as opposed to focusing solely on graduation rates. This could also address the issue of data lag that is inherent in using a cohort model, as you would have to wait three years to calculate the graduation rates.

On a separate matter, I would also like to comment on how the Department proposes to calculate affordability measures. I think using the average net price is the right approach. However, these figures includes the cost of living, which is outside of the control of postsecondary institutions. For example, during the academic year 2013, our tuition and fees were only 5.2% of the total cost of attendance and 9% of room and board. However, if the institution is ranked based on the total cost of attendance this could convey a distorted picture to the members of the public. Instead, I would like the Department to consider using actual tuition rates and fees to measure the affordability of an institution.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): yash.morimoto@sfcc.edu

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

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, February 16, 2015 10:25 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The Pennsylvania Commission for Community Colleges offers the following comments on the draft college ratings system framework.

The Commission appreciates the U.S. Department of Education's goal to present information to the public that will increase transparency and meaningfully inform student choice. The Commission supports both of these goals. However, we also believe that the draft ratings system framework does not accomplish either, and may very likely result in more confusion and less choice for the public. The Commission recommends that the Department cease the implementation of the ratings system. However, if the ratings system is to move forward, the Commission recommends (1) elimination of the performance categories, (2) a delay in implementation until appropriate data sets can be identified (3) reporting of individual metrics, and (4) allowing institutional to submit supplemental information, all of which are further explained below.

(1) Performance Categories (high-performing, low-performing, and those in the middle). The Commission does not recommend the use of broad performance categories. These categories provide little information for students, who in all likelihood, will pursue specific aspects of an institution. The consolidation of all programs into a single grouping does not provide students information they need to be informed about their particular course of study. In addition, small differences in performance, particularly at the margins of the groupings, could result in institutions being placed in different ratings categories.

(2) Data. The Commission is concerned about the relevance of the data being proposed to populate the ratings system. Both NSLDS and IPEDS have significant limitations and do not reflect the breadth of the community college student population. The Commission recommends the use of more relevant data points, including those that are included in the Voluntary Framework for Accountability.

(3) If the U.S. Department of Education believes that it is important to move forward with the ratings system, the Commission urges the department to move away from single overall institutional ratings and move toward as many individual metrics as possible. If the Department's goal truly is to inform the public so students may make informed decisions, the presentation of individual metric data is critical. If metrics are combined into a single rating, it is substituting the department's judgment for that of the public. The public should be able to make decisions about institutions based on their own priorities/metrics, and those priorities/metrics will be different among the population. Therefore, it is imperative to present many data points, rather than a single rating.

(4) Supplemental Information. The Commission recommends that institutions be permitted to submit explanatory information that is easily accessible by the public.

Thank you for your consideration of these comments.

Constituency: Higher Ed Association/Organization

Other Constituency (if supplied):

User E-mail (if supplied): ebolden@pacommunitycolleges.org

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

O'Bergh, Jon

From: Debra Humphreys <Humphreys@aacu.org>
Sent: Tuesday, February 17, 2015 6:32 AM
To: College Feedback
Cc: Debra Humphreys; Carrie Johnson
Subject: Feedback from AAC&U on Proposed College Ratings System
Attachments: AAC&U Board of Directors February 2015 Statement on Proposed Ratings System.docx

See attached for submitted comments on behalf of the board of directors of the Association of American Colleges and Universities.

Feel free to contact us at 202-387-3760 or humphreys@aacu.org should you have any questions.

AAC&U Board of Directors Feedback on US Department of Education College Ratings Framework

On behalf of the AAC&U board of directors, we are pleased to provide feedback on the proposed "College Ratings Framework" formally released on December 19, 2014.

As we have noted in previous statements, the Association of American Colleges and Universities (AAC&U) supports the broad goals of the ratings framework—especially goals related to making "college more accessible and affordable" and ensuring that "all students graduate with a quality education of real value."

Moreover, we commend the Department of Education for its openness to engaging with the higher education community to explore the limitations and many potential unintended consequences that might result from rating colleges and universities using the limited data systems currently available. We appreciate, in this context, the fact that the proposed metrics related to post-graduation salaries have moved in a productive direction away from simplistic measures of recent graduates' mean earnings.

Despite the good faith effort to elicit guidance from the higher education community, however, the AAC&U Board of Directors continues to believe that the project of "rating" entire institutions is fundamentally misconceived—and potentially misleading. As we have said in previous public comments, the true "value" of college comes from the learning gained, and from the difference that learning makes across the lifespan, in graduates' economic, civic, and personal development. Higher education also makes a crucial difference to the economy, with areas well-served by higher education demonstrably more likely to be growing economically and in terms of civic vitality as well. Finally, higher education's research and development accomplishments have been fundamental to U.S. success in the global community and economy.

Because the public value of higher education is so multi-faceted, AAC&U holds that it is impossible to reasonably "rate" the "value" of entire institutions of higher education using the limited data points presented in the proposed framework. We, therefore, do not believe the proposed rating system is appropriate nor will it meet the stated goals articulated for it.

We understand why the Department of Education has chosen to focus on only a few sets of data points since even those few are complex and would need careful weighting to be informative. Still, the ordinary person will rightly assume that, if the federal government is "rating" colleges, universities, and community colleges, it must have reached a judgment about the quality of their educational programs.

The public will be wrong in this assumption. In this sense, the entire project is misleading rather than illuminating for students, families, and the public—and for policy leaders as well.

The Department is correct to avoid any effort to "rate" the quality of learning or of the different degree programs offered by individual institutions. With students majoring in literally hundreds of different areas of study, there is no way that a ratings system could meaningfully "compare" different institutions' educational performance.

And yet, because the data being proposed for inclusion do not address the most important aspects of the value of pursuing and attaining a college degree, the ratings project has no capacity to guide students wisely in their efforts to obtain a quality degree.

While we oppose the ratings framework as proposed, we do believe that the US Department of Education could and should use the publication of “selected indicators” in a narrower way to steer students away from institutions that have demonstrably bad records in serving the low-income students who most need the added advantage of an opportunity-expanding college education. Institutions that have 1) few graduates; 2) high levels of student debt and debt defaults; and 3) few graduates earning a living wage following their time in college are clearly bad prospects for low-income (and other) students, and bad priorities for the investment of public dollars.

We, therefore, urge the Department to target any “ratings system” it might develop more narrowly on whether institutions are actually expanding opportunity for low-income students, singling out for low ratings those institutions that are failing low-income students while receiving significant public investment of tax dollars intended to expand their educational opportunities.

As AAC&U begins its Centennial year of dialogue focused squarely on advancing inclusive excellence in higher education, we urge the Department to continue its focus on ensuring that our entire higher education system improves its capacity to serve well students from lower income groups and from racial and ethnic groups traditionally less well-served by education. It is fully in the public interest to target investments and accountability systems toward these students—and to provide data about how well they are served by our nation’s higher education institutions. These students surely need educational opportunity more than ever and, given clear demographic and economic shifts, our nation’s entire future success—both in its democracy and its economy—will depend on how well we educate these students. We welcome—and will heartily support—any efforts to target the ratings system and/or other educational incentive programs toward providing meaningful access to higher education institutions that have proven track records of educating effectively and fully students from low-income groups and from underrepresented groups.