

O'Bergh, Jon

From: Katherine Fell <fell@findlay.edu>
Sent: Tuesday, February 17, 2015 7:36 AM
To: College Feedback
Subject: Feedback regarding proposed college rating system

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

Dear Mr. Secretary:

As the president of The University of Findlay, a private, not-for-profit institution in Ohio, I welcome the invitation to provide feedback regarding the latest version of the proposed college rating system released on December 19, 2014. In addition, I respect the Administration's desire to assist students and families in making an informed decision regarding their college choice. Also, I wish to commend the USDE for continuing to seek feedback from institutions and other stakeholders regarding the proposed rating system.

Not only as a private-university president but also as a graduate of three public universities and the mother of six children who have attended both private and public higher education institutions, I support the effort to make available information that students and parents need--all the information they need in deciding the best fit for them. However, a rating system may cause more confusion rather than less by oversimplifying the many factors each prospective student must consider in her or his choice among schools.

I believe we can accomplish the goal of transparency more effectively by clearly stating the student-success results each institution attains or falls short in attaining in the context of that institution's mission, its students' levels of pre-college preparation, its location, the number of Pell eligible students enrolled, its academic programs, the leadership positions of its alumni--a full list of essential points for an informed decision on the part of students and families. I do not believe the federal government or we leaders of institutions need to impose our own interpretation of these clear and useful factors. I urge you to trust prospective students to decide which of these factors are most important to them. Together, we could focus our efforts to provide them the information they need to rate our colleges and universities for themselves.

I understand that in some cases, students have been exploited by unscrupulous "educators." I hope you will sanction those who are guilty, and I believe you can do so within the authority you already have and without a nationwide rating system.

By far, most of my higher education colleagues and I see student success as our highest calling. We pledge to remain faithful to that calling and to work with you to understand better why many students who begin college do not finish with a degree or a successful career. That is a fair question, but I do not believe a college rating system will answer it. We must work together to find the answer.

Sincerely,

Katherine Fell

President
The University of Findlay

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Findlay, Ohio 45840

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O'Bergh, Jon

From: O'Bergh, Jon
Sent: Tuesday, February 17, 2015 8:21 AM
To: College Feedback
Subject: FW: PBA Comments on the Department of Education's Proposed Framework Final
Attachments: PACEAA - College Ratings Comments PBA Final 2 15 2015.pdf

Sent from my Windows Phone

From: Johns, David
Sent: 2/15/2015 6:30 PM
To: Mitchell, Ted; Studley, Jamie; Freeman Hrabowski
Cc: O'Bergh, Jon; Perrotti, Carmine; Gunja, Mushtaq; Coles, Shelly; Harris, Khalilah
Subject: PBA Comments on the Department of Education's Proposed Framework Final

OUS,

Attached are the comments from the Initiative's Presidents Board of Advisors regarding the proposed College Ratings Framework. Should you have questions or need additional information please do not hesitate to contact us.

David

David J. Johns
Executive Director
White House Initiative on Educational Excellence for African Americans
(202) 205-9853 office
(202) 617-1515 blackberry
Follow Us on Twitter @ AfAmEducation <https://twitter.com/afameducation>
Visit Us Online @ <http://www.ed.gov/edblogs/AfAmEducation>

Memorandum: Presidents Board of Advisors Comments on the Department Of Education's proposed College Ratings Framework

Submitted February 2015

Comment on the Administration's College Ratings Framework (Release: 12/19/14)

In December 2014, the Department of Education (The Department) released a College Ratings Framework (Framework) for developing the college ratings program that is designed to “expand college opportunity by recognizing institutions that: excel at enrolling students from all backgrounds, focus on maintaining affordability, and succeed at helping all students.” The Department is considering a Framework that groups and compares schools with similar missions and provides institutions in those groupings three ratings levels: high-performing, low-performing, and those in the middle. The department has laid out a list of potential metrics that might include: percentage of students receiving Pell; expected family contribution gap; family income quintiles; first-generation college status; average net price; net price by quintile; completion rates; transfer rates; labor market success of graduates; graduate school attendance; and loan performance outcomes.

The members of the White House Initiative on Educational Excellence for African Americans Advisory Commission (Commission) strongly support the President's goal of increasing access, affordability, completion, and post-graduation success. As a country, we must ensure that all students, their families, and the nation all benefit as we increase the numbers of our citizens going to and successfully completing post-secondary programs of value (those that lead to certificates, credentials and degrees with family sustaining wages and opportunities for advancement, at a minimum). We ask that as the Administration continues to develop and implement the Framework, those involved remember that one size does not fit all when considering performance—this is especially true considering the diversity of higher education institutions in America as well as among the students served. The Commission commends the Department for taking additional time to solicit additional public input on the ratings system, first proposed in August 2013. The Commission encourages the Department not to rush to implement a ratings system by the 2015-2016 school year. It is most important to get the ratings system right. As the President and the Department further refine their approach to this ratings Framework, the Commission asks that careful attention is paid to the following:

- The Framework should not harm as a group those institutions that serve low-income and minority students.
- A flawed federal ratings system, based on inaccurate information, that does not reflect the diversity of higher education institutions and the students they serve could actually discourage students from pursuing an education at an institution that may, in fact, be a better fit for them than one with a higher rating. In addition, it could incentivize institutions to minimize their enrollment of at-risk students. The negative consequence

would be diminished access to education for at-risk students, undermining the President's higher education goals.

- Performance outcome metrics must reflect the “degree of difficulty” that a variety of Institutions of Higher Education, including HBCUs and others, face in educating economically and educationally disadvantaged students. Performance outcome metrics must be adjusted for inputs such as the socio-economic composition of student populations, level of student academic preparedness, and institutional financial resources. Apples-to-apples comparisons are essential to avoid penalizing institutions that serve high proportions of at-risk students, considering that these inputs can vary tremendously across institutions.
- Institutions that are supporting low-income and minority students' well, and doing so with a higher than average proportion of such students and lower than average institutional resources to support them, should be recognized and rewarded. Strategies should include awarding Pell grants bonuses, allocating funds to scale up best practices and increasing federal campus based student aid.
- The Federal government, state governments, and the institutions themselves must invest in interventions that move the needle of college access and completion. These interventions include early and personalized college counseling in middle and high school, reducing the complexity of federal student aid forms that are a barrier to low-income student enrollment, more support services to students in high school and continuing through freshman year, and additional federal financial assistance targeted to the most needy students to help them access and complete college at a college or university that best meets their needs.
- The Framework should give credit to institutions that that: (1) work with challenging secondary schools to increase the preparation of students for college, and (2) help high school students in the process of applying to college and applying for financial aid (including completion of the FAFSA)
- The Framework should give credit to institutions that reach out to and support the success of (1) students who require remedial/developmental study, (2) transfer students, and (3) non-traditional (age) students

Beginning in 2018, the Department plans to use the ratings program as a basis for distributing federal student aid. The Commission has reservations about this approach, which turns the ratings framework into a high stakes proposition for both institutions and students. In general, the Framework should not be “punitive” but rather provide information to identify **both** institutions that can be rewarded for good work and institutions that, with more institutional, infrastructural, and programmatic support, could do more to assist students, particularly those in need of support for access and completion. Some institutions would like to do more and be “high-performing” but are constrained due to lack of capacity or resources. Punishing them would be counter-productive and has the potential unintended consequence of harming the very students the ratings Framework was designed to help.

The College Ratings Framework must take into account the “degree of difficulty” an institution has in educating its students. As Michael Lomax, president of the United Negro College Fund and member of the Commission recently wrote about the college ratings framework, “the draft metrics suggest that the college rating system will not genuinely reflect the degree of difficulty in educating disadvantaged students. The metrics emphasize retention and graduation rates, for example, without acknowledging that at-risk students disproportionately require remediation and significant institutional financial aid to remain in school and finish in a timely fashion...”¹

On behalf of the members of the White House Initiative on Educational Excellence for African Americans Advisory Commission and the many students, families, communities and institutions we serve and support we thank you for serious consideration of these recommendations. The future of American society is inextricably linked to the future of those institutions serving students from low-income and working class families in America. We encourage the Federal government to develop and support partnerships with these institutions focused on strategies to ensure that many more students graduate.

Sincerely,

The members of the Presidential Board of Advisors, The White House Initiative on Educational Excellence for African Americans.

¹ Michael L. Lomax, “A proposed federal college rating system could hurt disadvantaged students,” *Washington Post*, January 1, 2015. http://www.washingtonpost.com/opinions/a-proposed-federal-college-rating-system-could-hurt-disadvantaged-students/2015/01/01/572b50a8-9112-11e4-a900-9960214d4cd7_story.html

O'Bergh, Jon

From: Rachel Zinn <RachelZ@workforcedqc.org>
Sent: Tuesday, February 17, 2015 11:05 AM
To: College Feedback
Cc: Michelle Massie; Christina Lindborg Pena
Subject: PIRS comments
Attachments: PIRS comments submitted by WDQC_Feb2015.pdf

Attached please find comments on the proposed Postsecondary Institution Rating System. Thank you for the opportunity to provide input into this crucial process.

Rachel Zinn, Director
Workforce Data Quality Campaign
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Washington, DC 20036
rachelz@workforcedqc.org
202-223-8355, ext. 113

Visit our website at www.workforcedqc.org, or follow us on:





WORKFORCE
DATA QUALITY
CAMPAIGN

To: The Honorable Arne Duncan
Secretary of Education
From: Workforce Data Quality Campaign
Re: Postsecondary Institution Ratings System
Date: February 17, 2015

U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan,

Workforce Data Quality Campaign (WDQC) – a non-profit initiative that promotes inclusive, aligned, and market-relevant education and workforce data – has been encouraged by the Department of Education’s efforts to solicit feedback from the community throughout the process of developing the Postsecondary Institution Ratings System. We hope these comments will inform the next phase of the ratings development.

WDQC promotes the use of data to ensure that all of our nation’s education and training programs are preparing students to succeed in a changing economy.

We appreciate your efforts to think creatively about data sources and emphasize labor market success in the ratings system. We hope WDQC can serve as a reliable resource for you as the Department continues these endeavors.

The proposed ratings system splits metrics into three categories and lists possible metrics in each category. WDQC is especially pleased to see labor market success listed under the “Outcomes” category. We encourage the Department to maintain this metric as it focuses attention on improving employment outcomes and ensuring that postsecondary education provides students with a measurable return on their investment.

Specifically, the Department is considering looking short-term at measures that would determine if former students are making above an established threshold, such as 200 percent of the federal poverty line, while also stressing the importance of an individual's potential lifetime earnings.

We share the opinion of our partners, the Institute for Higher Education Policy, that these alternative ways of presenting labor market data could serve different purposes in the ratings:

- *Consumer Information*: The ratings should inform students of the post-collegiate employment and earnings outcomes associated with particular institutions or programs of study. Labor market data, including average earnings at varied periods after graduation, can be especially useful in educating students about their career prospects as they search for colleges, make borrowing decisions, and choose programs of study.
- *Accountability for “Substantial Employment”*: The ratings could identify programs or institutions that clearly do not lead to labor market success, demonstrated by earnings below a bare minimum threshold.

At a time when the vast majority (86 percent) of college freshmen in a UCLA survey cite being “able to get a better job” as a very important reason for their decision to go to college, the Department should move forward with efforts to measure salient labor market outcomes in contextualized ways.

If you have any questions or would like additional information about WDQC, please contact Rachel Zinn, Director, at: RachelZ@workforcedqc.org or 202-223-8355 ext. 113.

Thank you for your leadership and we appreciate the opportunity to comment.

Sincerely,

Workforce Data Quality Campaign

cc: Hon. Ted Mitchell, Under Secretary of Education
Hon. Jamiene Studley, Deputy Under Secretary of Education

O'Bergh, Jon

From: rob.dixon@mccatoday.org
Sent: Tuesday, February 17, 2015 11:10 AM
To: College Feedback
Subject: Comment on Draft College Rating System
Attachments: Draft College Rating System Comments - MCCA.pdf

Please see the attached letter regarding the proposed college rating system.

Thanks,

Rob Dixon
Executive Director
Missouri Community College Association
O: 573-634-8787
C: 417-598-0290
F: 573-634-8865
rob.dixon@mccatoday.org

mcca MISSOURI COMMUNITY COLLEGE ASSOCIATION

February 17, 2015

U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

To whom it may concern:

Please accept this letter in response to the U.S. Department of Education's request for comment regarding the proposed draft college ratings system framework.

The Missouri Community College Association represents twelve community college districts and over 110,000 credit hour students across our state. For over 50 years, MCCA has supported the community college mission of affordability and accessibility in higher education.

The Presidents and Chancellors of Missouri's community colleges support the American Association of Community Colleges' (AACC) opposition to the proposed federal ratings system framework, as the information provided by AACC mirrors the sentiments of our association. AACC's comments on this matter have already been submitted to the U.S. Department of Education.

Ultimately, we are concerned that the "one size fits all" approach evident in the proposed framework is not appropriate to evaluate the wide variety of colleges across the nation and our state. Colleges vary widely on many factors. Because of the significant differences among and between colleges and universities, a federal ratings system would contribute to unfair comparisons and evaluations, without providing relevant data for student-consumers.

Please feel free to contact us, if you would like to discuss this matter further. We appreciate the opportunity to submit comments.

Sincerely,

(b)(6)

Rob Dixon
Executive Director
Missouri Community College Association

O'Bergh, Jon

From: Elizabeth.Iadarola <Elizabeth.Iadarola@thecormacgroup.com>
Sent: Tuesday, February 17, 2015 11:14 AM
To: College Feedback
Subject: College Ratings Feedback from Colorado State University-Global (CSU-Global)
Attachments: CSUGlobal Feedback.docx

To Whom It May Concern:

Good morning. Please find attached Colorado State University--Global's submission for feedback on the College Ratings Framework.

CSU-Global is the first 100 percent online, fully accredited state university in the United States. Created in 2007, our mission is to facilitate adult success in a global marketplace through career-relevant education including bachelor and master degrees.

Please let me know if you have questions or would like additional information regarding how the proposed framework would affect our students.

Sincerely,
Elizabeth Iadarola

Elizabeth Iadarola
Senior Advisor
The Cormac Group
1730 Rhode Island Avenue, NW
Suite 317
Washington, DC 20036
202.467.4700

A New System of College Ratings – Feedback from Colorado State University-Global Campus

Percent Pell (page 7): The use of just Pell grant recipient data as a measurement of Access does not provide a full snapshot of an institution's work to provide access. Additionally, the justification provided in the proposed system addresses traditional-aged students, not the large and growing population of nontraditional students. More accurate information on Access should include:

- Admissions criteria and outcomes: acceptance rates (number of applicants vs. accepted students for admissions); admissions policy (e.g., no criteria for admissions vs. standardized exam scores & GPA)
- Diversity of Population: income, race, gender, first-generation students

First-Generation College Students (page 8): The use of the FAFSA to identify an institution's enrollment of First-Generation students is insufficient as First Generation students are less likely to apply for Federal Aid due to lack of understanding regarding Federal Aid and inherent cultural differences (lack of trust of government, loans are negatively perceived) and language barriers which prevent understanding of the FAFSA form.

Average Net Price (pages 8 & 9): A more accurate and clear calculation would only consider Direct Costs towards education (Tuition, Fees, Books) - it should not consider potential grants and scholarships. This would allow students and families to know what the actual out-of-pockets costs would be for each school. Finally, to ascertain the effectiveness of institutions in retaining students and helping them successfully complete their degrees, the Average Net Price should be based on the 'cost of education per credit hour received'. This calculation would look at the total number of credit hours attempted over a year at the University by revenue divided by the number of credit hours received. This figure would help to discern the actual cost per credit hour that students are paying on average. For example, students are sometimes charged for a flat fee to attempt up to a certain number of credit hours (e.g., \$6,000 for 18 credits, the per credit hour charge for 18 credits is then \$334; however, if the student only completes 6 credits the per credit hour cost would actually be \$1000 per credit hour earned).

Average Loan Debt (page 9): We agree with the proposal NOT to include Average Loan Debt as a measure of affordability as institutions cannot control the amount students borrow (those amounts are set by the Dept. of Education). If the ALD metric is used, we request that it be calculated based on where the student is currently enrolled, not based on average loan debt acquired in total through the life of the student.

Transfer Rates (page 10). To address the posed program questions: a) Institutions should not receive credit for lateral transfers (2-yr or 4-yr institutions) as it does not encourage them to retain students which is fundamental to student educational success and degree completion; b) 2-year institutions should not be held accountable for the completion or non-completion of a degree at the 4-year institution. They should only receive the credit for the transfer to the 4-year institution if the student completed the 2-year program.

Labor Market Success (page 11): We concur with the proposed metrics and processes for measurement. In addition, it is important to have a measure of employment (e.g., employed students vs. unemployed students) that highlights if graduates from the school are able to obtain employment if they are actually seeking to be employed.

Graduate School Attendance (page 12): We disagree that in general, data on an institution's ability to move students into a graduate program within any length of time does not unequivocally serve in the best interests of students unless the program is specifically preparing them to work in a field that requires graduate school (e.g., medicine, law, psychology) as it could further increase their debt load without a compensatory return.

Loan Performance Outcomes (page 12): We concur with the proposed program's approach to this metric.

Key Questions (page 14): We do not believe that a single rating system serves the purpose of the College Ratings proposal. We believe that ratings should be provided on Access, Affordability, and Outcomes as separate data points and not combined between categories.

Key Questions (page 15): Based on our institutional data, we know that student characteristics of tenacity and determination/goals, along with the quality of the institution in its instruction and student support, have the most significant impact on student success. Utilization of the regression-adjusted outcome measures is not a reliable and valid way of providing clarity and transparency.

Institutional Characteristics (page 15): The size and projected growth of nontraditional learners warrants the inclusion of the 'nontraditional' characteristic for those institutions with more than 50% of their student body being nontraditional.

Key Questions on Consumer-friendly Ratings Tools (page 16): Government-driven marketing campaigns have proven to be successful in past areas (e.g., stop smoking, wearing your seatbelt). College Navigator is a relatively fair tool that institutions widely use as a trusted source of information and it is a matter of getting consumers to use it. In particular to current reports: 1) IPEDS is limited to only Fall cohort reporting for First-Time-First-Year-Freshman and given today's flexibility in term scheduling, it is no longer an complete report of student success; and 2) NSLDS and FAFSA provide data only for financial aid recipients and applicants and therefore for most schools does not provide a complete reflection of an institution's student success.

Additional Information (page 17): Inclusion of institutional missions, visions, values, and student resources would be valuable, along with URLs to institutional website. We do not support the category for open-ended information as the multiple and disparate variables and factors may defocus areas of importance and create consumer confusion (institutions can/do provide additional information on their websites and other information pieces).

O'Bergh, Jon

From: Julie Bolduc DeFilippo <JBolduc@wheelock.edu>
Sent: Tuesday, February 17, 2015 11:24 AM
To: College Feedback
Subject: Comments of President Jackie Jenkins-Scott
Attachments: Testimony of Pres. Jackie Jenkins Scott - 2.17.15.pdf

Hello,

Please find attached the comments of Wheelock College's President Jackie Jenkins-Scott pertaining to the college rating system framework proposal.

Thank you,

Julie Bolduc DeFilippo, MSW
Government and Community Relations Manager
Department of Government & External Affairs, and Community Impact
Wheelock College
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Boston, MA 02215
Phone: 617.879.2431
Email: jbolduc@wheelock.edu

WHEELOCK COLLEGE

February 17, 2015

Secretary Arne Duncan
United States Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Secretary Duncan,

Thank you for the opportunity to respond to the Department of Education's (DOE) request for feedback pertaining to its draft of a college ratings framework. On behalf of Wheelock College, I thank President Obama for his leadership on college access and affordability as well as for DOE's consideration of previous comments submitted by me and other stakeholders on this topic.

Wheelock College is a small, private, nonprofit higher education institution in Boston with a public mission *to improve the lives of children and families*. Students who come to Wheelock are passionate about making a difference. They are teachers, social workers, child life specialists and advocates.

In line with Wheelock's social justice driven mission, I support transparency and information sharing that aids families and students in making informed decisions about college. To that end, I commend DOE for taking a step away from numerically ranking colleges against one another in this latest version of the college ratings framework. I also support the value this version of the framework places on institutional efforts to attract, retain and graduate low-income and first-generation college students. At Wheelock, thirty-five percent of the entire undergraduate body receives Pell grants. The population of Pell grant students at Wheelock is comparable, and in some cases, exceeds that of public higher education institutions in Massachusetts. In addition, forty-one percent of Wheelock's 2014 first year entering class was first-generation college students, an increase of ten percent over a five year timeframe. The percentage of Pell grant and first-generation college student populations are important measures of access as a great deal of individualized attention and support on the part of higher education institutions, particularly small ones, is required to ensure this populations' persistence towards on-time completion of college. Moreover, in order to address inequalities and opportunity gaps in this nation, there must be a deep commitment among institutions of higher education to open their doors to underserved populations and support their future success. These measures further incentivize colleges and universities to take on that mission.

However, as DOE moves forward to develop its college ratings system, I once again join colleges and universities across the nation in expressing some concern that the draft framework could not reliably and validly assess the true value of the nation's diverse higher education institutions. Overall, the proposed metrics, primarily based in finances and outcomes, could overlook the intrinsic elements unique to every higher education setting that students can only acquire at a particular school, and could be an essential factor in determining their success towards completion and work post-graduation. I reiterate my previous comments to DOE that college is not simply a financial decision – it is a decision about location, personal family needs, institutional philosophies and mission, college culture, student life, education rigor and support, future

WHEELOCK COLLEGE

professional aspirations and much more. Any system endorsed by the federal government to help families assess the value of a college or university must try to offer this comprehensive insight.

Specifically, DOE's proposed performance metrics, such as post-graduate earnings, continue to raise concerns I joined other stakeholders in previously voicing. Due to Wheelock's unique mission and commitment to social justice, our graduates often enter fields that do not pay high salaries, such as social work, teaching, counseling, and youth advocacy. Our graduates follow Wheelock's mission to improve the lives of children and families by making this a better world – there is no more noble cause. As education and human service professionals, the salaries of our alumni are much lower than graduates of colleges that focus on business, finance, technology and the like. DOE must take this fact into account. I also recommend that DOE consider ways to capture institutional progress overtime. Wheelock has made significant progress in terms of its four year college completion rate while increasing its Pell grant and first-generation college student population over the last five years. The draft framework currently has no way to account for this accomplishment. Furthermore, while I am pleased that DOE no longer seeks to rank colleges, further clarification is needed around the formula that will be used to determine an institution's rating on the proposed three-tiered system and if such a rating will be given for each metric or as an overall institutional rating based on performance across all the metrics.

I also ask DOE to consider expanding its set of metrics, such as accounting for levels of civic engagement by students, faculty, staff and alumni, student satisfaction with their institution and/or students who transfer yet complete their education at another institution. In order to do so, the system must have access to diverse data sets beyond the Institutional Postsecondary Education Data System and National Student Loan Data System. The National Student Clearing House could be considered. In addition, DOE should broaden groupings beyond two-year and four-year institutions. Wheelock's mission, academic offering and student body is radically different from Harvard University, for example. Institutions should be categorized with those similar in student body, purpose, academic offerings and the like.

Lastly, I understand that it is the Department's intention to publish the first addition of the rating system beginning in the 2015-2016 academic year. With many elements of the rating system requiring further clarification and consideration, such as those herein, I urge the Department to allow additional time to finalize this framework so it can meet its intended purpose of accurate information sharing to multiple audiences.

Again, thank you for the opportunity to provide thoughts on a critical issue facing colleges, universities, families and students across the nation. I am available to provide additional feedback or to answer questions at any time. I can be reached through Marta Rosa, Wheelock College's Chief Diversity Officer and Senior Director of Government & External Affairs and Community Impact, at mrosa@wheelock.edu or 617-879-2314.

Sincerely,

(b)(6)

Jackie Jenkins-Scott
President

O'Bergh, Jon

From: Kuhns, Claire <Claire.Kuhns@cccs.edu>
Sent: Tuesday, February 17, 2015 11:42 AM
To: College Feedback
Subject: Comments on New System of College Ratings
Attachments: 2015.Feb 16 - Ltr to US Dept of Ed re New System of College Ratings - Comments.pdf

Sent on behalf of Dr. Nancy J. McCallin, President, Colorado Community College System ...

Please see the attached comments regarding selected elements of the proposed new system of college ratings.

Thank you -

Claire

Claire Kuhns

Office of the President

Colorado Community College System

303.595.1552

303.620.4043 (fax)

claire.kuhns@cccs.edu



COLORADO COMMUNITY
COLLEGE SYSTEM

Dr. Nancy J. McCallin, President

February 16, 2015

United States Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Via Email: collegefeedback@ed.gov

RE: New System of College Ratings – Comments

To Whom It May Concern:

On behalf of the Colorado Community College System (CCCS), I am providing comments regarding selected elements of the proposed new system of college ratings. The Colorado Community College System comprises 13 community colleges in Colorado. Together we make up the state's largest system of higher education serving over 134,000 credit students annually.

As for the proposed college rating system, CCCS shares the opinion of the American Association of Community Colleges (AACC) that community colleges are not easily rated due to their extreme diversity in enrollment characteristics, student demographics, program offerings, geographic locations, financial resources, and campus organizational structures. This is true within our own system, where we have significant differences among our rural and metro colleges. CCCS individual college headcount enrollments range from about 1000 students at Lamar Community College to over 29,000 students at Front Range Community College. We have single-campus colleges and multi-campus colleges, as well as residential campuses and commuter campuses. Given this wide variance within community colleges – which is evident within our own system – we share AACC's skepticism about a college rating system.

An additional concern with the proposed ratings system is that we believe these ratings will perpetuate a stigma upon colleges who serve disadvantaged and less prepared students and they may act as deterrents to colleges serving these students. This would be particularly true if Pell grants and federal loan default rates are tied to the ratings. Meanwhile, we know that most of our students are place bound - meaning that they will likely attend their local community college regardless of the rating it receives. Since 75% of our students have work and family commitments, they will not move to colleges because of ratings, and thus would be penalized in the event that their local college rating falls and their Pell grants decrease. Indeed, more than 90% of our students say that location is one of the top three reasons they attend their local community college. The other two reasons are the quality of programs offered and the overall affordability of the college.

Given our concern with the proposed college ratings system, we offer the following comments:

Institutional Groupings

We support the Department of Education's plan to group two-year institutions separately from four-year institutions. While we acknowledge the difficulty of further delineating within groups, we support the concept of additional breakdowns which account for institutional differences according to such factors as degree and program mix and also geographic location (rural, urban, and suburban).

Percentage of Students Receiving Pell Grants

We agree that the percentage of students receiving Pell grants at a college is the most commonly available measure for student access. However, it does have limitations. As noted in the background information provided by the Department of Education, there are "arbitrary distinctions between students from families with very similar family resources" and not all low income students apply for financial aid. Nevertheless, as Pell enrollment is readily collected and uniformly understood, we support the use of this metric as long as it is utilized consistently and appropriately and its limitations are noted.

Expected Family Contribution Gap

While we understand the intent of this new measure for determining the socio-economic status background of students, we have reservations about including this metric in the ratings system. Based on the Department of Education's own background information, it appears that this metric will be complex and will have limitations related to the numbers of students at an institution who receive Pell grants or federal loans. Because this metric is based only on those students who apply for federal financial aid, it does not account for the many students who complete a FAFSA and qualify for Pell grants or loans, but do not use them. We also question the validity of this metric when not all students who are eligible for Pell grants or loans actually request or receive them.

Family Income Quintiles

Our position on this metric is neutral. We believe that this measure would be easier to obtain and understand than the Expected Family Contribution Gap and could help in providing information about the socioeconomic diversity of a college's students. As in other measures relying on FAFSA data, this metric's limitation is tied to the number of students at a college who apply for financial aid.

First-Generation College Status

We have no major concerns with this metric, although it is limited to data only from students who have applied for federal financial aid.

Average Net Price

Although we have no major concerns with the average price data as it is currently used for information for students and parents, we do question the inclusion of this metric into a college ratings system. Our concern is that many of our system colleges are "commuter" campuses and consequently have no way to control the costs of off-campus housing. Again, while this metric is helpful for general information purposes, it presumes colleges can control room and board costs, which colleges without campus-supported housing cannot do.

Completion Rates

Our understanding is that this measure will count only first-time, full-time community college students who graduate within three years. Given that nearly 75% of CCCS's students are part-time, that over 50% have attended another institution of higher education, and also that many of our students transfer before graduating, we are very concerned that this measure is not a true indicator of completion rates. Indeed, the first-time, full-time CCCS student cohort is less than 9% of our overall enrollment. Although higher education institutions will begin reporting completion outcomes for part-time and transfer-in students to IPEDS, we would like to see how these data are documented and reported before making a decision on whether or not we support their inclusion in the proposed college rating system. When including part-time students, only 14% of our students would be covered in this metric. How can a rating system be valid that uses metrics that apply to only 14% of our student population?

Transfer Rates

It appears that the Department of Education is giving consideration to expanding the definition of this metric to include community college students who transfer to a four-year institution before completing a degree or certificate at a community college. We strongly support the adoption of this expanded definition and the use of the National Clearinghouse data for this purpose.

Labor Market Success

As a community college system, we understand that a key part of our mission is to prepare students for jobs and the labor market. This is especially true for students in our career and technical education programs. The dilemma we face is that the labor market is extremely variable in terms of salaries and job opportunities. The reality is that some occupations – in which there is demand from both employers and students - simply do not pay well (child care, social services and paralegal, for example). To develop one measure that incorporates all of these labor market variables seems to be extremely complex. Our anecdotal data from visiting with students in our career and technical education programs is that they are more interested in knowing the current and future wage information for their specific programs. Consequently, we are more inclined to support a labor market metric if it is program-based, rather than college-based. Additionally, it may be more appropriate to provide students with program-based labor market information within the gainful employment data already required, rather than in a college rating system.

Loan Performance Outcomes

Given that the Department of Education already publishes and holds colleges accountable for their cohort default rates, we do not believe that loan performance outcomes need to be included in the proposed college rating system. To some degree, the metrics related to average net price and labor market success are subsumed in any measures tied to loan performance, and are likely more important to students. Additionally, we continue to be concerned that colleges have a very limited ability to impact whether or not students repay their student loans, the maximum loan amount a student takes out, and to whether or not the amount is necessary for a student's education.

We appreciate the opportunity to provide these comments to the Department.

Sincerely,

(b)(6)

Nancy J. McCallin, Ph.D.
President

O'Bergh, Jon

From: Michael Rose <mrose@nacacnet.org>
Sent: Tuesday, February 17, 2015 12:31 PM
To: College Feedback
Subject: NACAC Comments on the Department's College Ratings Proposal
Attachments: NACAC_Commnets_Ratings_February2015.pdf

Attached, please find comments from the National Association for College Admission Counseling on the Department's proposed College Ratings Plan.

Thank you.

Mike

*Michael Rose
Assistant Director for Government Relations
National Association for College Admission Counseling
1050 N. Highland Street, Suite 400
Arlington, VA 22201
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National Association for College Admission Counseling

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February 17, 2015

The Honorable Arne Duncan
Secretary
US Department of Education
400 Massachusetts Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

On behalf of the National Association for College Admission Counseling (NACAC), thank you for your work on behalf of our nation's students. We appreciate your efforts to improve college access and affordability for all students and to protect students and taxpayers from waste, fraud and abuse.

Founded in 1937, NACAC is an association of more than 14,000 members, including college admission staff and school counselors, who work with students making the transition from high school to postsecondary education ("college"). NACAC is committed to maintaining professional standards that foster ethical and social responsibility among those involved in the college application and enrollment process, as outlined in the NACAC Statement of Principles of Good Practice, which may be accessed on our website (www.nacacnet.org). Through our advocacy efforts, we are also dedicated to ensuring that all students have access to high quality school counseling to help them make informed decisions as they prepare for and pursue college or career.

NACAC initially expressed concerns about a federal college ratings system in September 2013, which accompany this correspondence. Since then, the Request for Information (RFI) issued in December 2014 and the Department's responses ("Response") included in the RFI add to our concerns that this rating system, while well-intentioned, poses more potential risks that rewards for students and taxpayers.

The Department rightly points out that the "federal government has a unique responsibility to both students and taxpayers to ensure wise and effective use of the \$150 billion invested in the federal student aid program annually." NACAC strongly supports that effort, but believes that priority should be placed on ensuring that the Department focuses adequate attention on quality controls before entering into more complex analyses of college performance. Through its program integrity controls, the Department should place added emphasis on identifying poorly performing institutions, put them on notice and, when appropriate, discontinue the use of federal dollars at those institutions.

Rather than implementing a ratings system that the Department itself admits is imperfect, NACAC encourages the Department to utilize its existing regulatory tools, coordinate with other agencies of jurisdiction (for example, the Department of Justice, the Department of Veterans Affairs, the Department of Defense, Federal Trade Commission and the Consumer Financial Protection Bureau) and, if necessary, hire additional staff to monitor and enforce program integrity controls. Furthermore, NACAC supports strengthening the Department's abilities to include, among others, setting up an enforcement unit that closely monitors real time information about rapid enrollment increases, sudden changes in default rates, and other key data. To this end, NACAC supported The Students First Act (S 406, 113th Congress, sponsored by Senator Frank Lautenberg), which, if enacted, would be a more effective tool than the proposed rating system.

NACAC appreciates the Department's avoidance of an ordinal ranking system. However, regardless of what it is called, the system will be prone to gaming and/or fraud by colleges because of the stakes involved. The proposed rating system will result in an atmosphere in which dollars are more important than student success; college employees will be under immense pressure to manipulate data to ensure continued access to federal financial aid. Absent stronger program integrity controls, the incentive to "cheat" will compound existing challenges with misrepresentation to students and the federal government. This pattern has already been widely documented in numerous reports from the media, government investigations and other sources.

The RFI notes that the rating system is one of several tools developed by the Department, many of which are underutilized. We believe that these very important consumer tools, all of which NACAC has supported, should be given greater attention and promotion by the Department to ensure that they are not an afterthought to a much more controversial and problematic ratings system. NACAC research finds that new federal resources can take three to five years to gain traction among school counselors. Even when most counselors are aware of a federal resource, the amount of effort needed to maintain awareness and utility is high. NACAC recommends that the Department redouble its efforts to promote the laudable resources already developed to students, families and educators.

In addressing the reasons for designing a rating system, the Department writes, "In and of itself, expanded information around a small number of critical measures, with appropriate attention to institutional variation, can be useful to the general public...." Information, in and of itself, is not necessarily useful to students and families, particularly those who are first-generation, underserved, low-income, or otherwise unfamiliar with the postsecondary search, application, and enrollment process. Data need interpretation, and NACAC encourages the Department to work with Congress first on improving the data used to measure college performance and track student progress across institutions, and second on assisting school counselors understand, disseminate, and explain what is and is not revealed by the data. NACAC believes the Department already possesses tools, such as the College Navigator and College Scorecard, which can be used to help achieve this. In addition to misinterpretation, information without context is ripe for misrepresentation. NACAC has strong concerns about this, which are discussed below.

The RFI also appears to place a high priority on enrolling low-income students without ensuring strong controls for fraud or willful negligence in regards to student success. While NACAC strongly supports efforts to enroll low-income students in college, we believe that enrollment alone is not sufficient: institutions must also foster student success. It is well documented that there are numerous unscrupulous institutions that enroll millions of underserved students without regard to their ability to succeed. This is especially of concern when many of these institutions manipulate completion rate data, a practice that has been demonstrated in numerous investigations.

From our perspective, the lack of sufficient outcomes-based information in the current framework is a critical flaw. Information such as student loan default rates and debt burden are important contextual cues for students and families, as well as the Department, as to the financial feasibility of higher education. In addition, the absence of strong counterweights to enrollment criteria in a ratings system will give a significant boost to institutions that enroll large numbers of low-income students, but that may have a miserable performance record.

The Department does indicate that it is considering including short- and long-term employment measures. NACAC is pleased that the Department wants to use employment data, but we believe that this must be done with nuance

and caution. As is widely known, some unscrupulous institutions regularly manipulate employment data for their graduates by placing them in short-term positions, designed to last just long enough for the job to count as successful employment. In discussing how horizontal and vertical transfers should impact institutional ratings, the Department acknowledges that it is difficult to know what credit to give to whom when for student success. Similar concerns arise when considering employment outcomes. Unfortunately, many institutions that receive federal funding fail to prepare their students for careers, despite promising lucrative futures. Because of state licensing laws and regulations, some of these graduates may not even be qualified to practice their desired profession if they possess a degree from an unaccredited or unauthorized program. If a graduate re-enrolls at a licensed, approved institution and later finds gainful employment in his or her field, how will the Department ensure that the first institution does not receive credit for this employment under the Department's long-term employment measure?

NACAC is also concerned that unscrupulous institutions, which have an enormous amount of marketing power (exponentially larger than the Department's capacity), will use the rating results to trumpet their high scores for 'access,' while burying the fact that they would almost certainly rate in the 'low-performing' category on the Department's list were more outcomes taken into account.

The Department intends to incorporate institutional characteristics into the rating system. While NACAC applauds the Department for attempting to bring more nuance to the data, we have concerns about how some institutional characteristics will be applied to the rating system. For example, the Department commented on the possibility of using data on selectivity and standardized test scores as proxies for the academic preparation of the student body. Substantial research reveals that a student's achievement in high school coursework is the best indicator of student academic achievement. While admission officers utilize standardized tests such as the SAT or ACT as one factor in admission decisions, NACAC members regularly caution against over-reliance on test results for high-stakes decisions. One of the strengths of the American higher education system is that its institutions vary widely by mission, personality, and other qualities -- all of which the Department has acknowledged. Consequentially, some institutions may attract a much narrower applicant pool than others, although the academic preparation and success of the students is comparable. Using selectivity as a measure in the college rating system will not only conflate selectivity with quality, it could also encourage institutions to pursue methods of artificially inflating their application numbers, a practice rewarded by many commercial college rankings.

Thank you for your work on behalf of students. We look forward to collaborating with the Department on its many other initiatives to promote college access and success. Please contact our Assistant Director for Government Relations, Michael Rose (mrose@nacacnet.org), if you have any questions about our recommendations or our legislative priorities.

Sincerely,

(b)(6)

Joyce Smith

O'Bergh, Jon

From: Anna Cielinski <acielski@clasp.org>
Sent: Tuesday, February 17, 2015 12:43 PM
To: College Feedback
Subject: CLASP comments on the college rating system draft framework
Attachments: CLASP ratings system comments submitted.docx

Attached, please find comments from the Center for Law and Social Policy (CLASP) regarding the draft framework on a college ratings system. Please contact me with any questions.

Best regards,
Anna Cielinski



Anna Cielinski

Senior Policy Analyst, Center for Postsecondary and Economic Success
CLASP | 1200 18th Street NW | Suite 200 | Washington, DC 20036
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CLASP Comments on the College Ratings System Draft Framework
Submitted to the Department of Education on February 17, 2015

The Center for Law and Social Policy (CLASP) is pleased to offer comments on the Department of Education's draft framework for a college ratings system. CLASP—a national nonprofit that develops and advocates for policies that improve the lives of low-income people and works to increase the number of low-income adults and youth who earn postsecondary credentials—has made a number of recommendations related to the ratings system over the last year. These include written comments, testimony, a briefing paper on implementing a system that empowers students while avoiding unintended consequences, and a briefing paper on the importance of presenting workforce outcomes. We are pleased to see some of our recommendations addressed in the draft framework.

First and foremost, we commend the careful attention paid to the potential unintended consequences of a ratings system on low-income and underprepared students. While the framework does not have all the answers on this account, it is asking the right questions. Second, we are gratified that the Department plans to include measures of labor market success among its metrics. Students, especially low-income students, go to school to improve their earnings potential – so a postsecondary education ratings system without workforce outcomes would be sorely insufficient. Last, we appreciate the attention to creating fair comparison groups of institutions that take into account differences in institutional characteristics and missions. The strategy of grouping colleges and universities by predominantly two- and four-year institutions is a good start, and the framework rightly identifies additional characteristics for consideration like program mix and admissions selectivity. Determining how to take institutional and student characteristics into account using peer groups will be a challenging but critically important task.

We are concerned, however, that the framework fails to respond to the call from CLASP and many other organizations to make a distinction between uses of data for transparency as opposed to accountability. It is very important to distinguish the data elements and presentation most appropriate for each purpose. While considering transparency separately from accountability may potentially more time consuming, a single system that is intended to serve multiple purposes may either increase the chances of unintended consequences for low-income and underprepared students, or provide little useful information to students, and possibly both. For these reasons we recommend that the primary purpose of the ratings system should be to provide consumer information.

In the following comments, we address selected issues in the framework in more detail, in the order in which they are found in the framework, focusing on the topics of: 1) institutional groupings, 2) labor market success measures, 3) separate or aggregate metrics, 4) adjusting outcomes for student and institutional characteristics, and 5) consumer customization. Finally, we offer recommendations for two additions to the draft framework: program-of-study level data and voluntary data reporting.

Institutional Groupings

We support the framework's intent to create peer comparison groups so that only broadly similar institutions are being compared. This is important to reduce disincentives to serve low-income and underprepared students. At a minimum, the plan to group predominantly two-year institutions separately from predominantly four-year institutions, due to difference in missions, is a good start. As the Department considers accounting for additional characteristics, CLASP recommends grouping institutions along key institutional differences that have strong predictive power for the outcome metrics. These dimensions are discussed in detail below in our comments on Adjusting Outcomes for Students and Institutional Characteristics. Using robust comparison groups is better than adjusting outcomes for student outcomes and institutional characteristics. The concepts are highly related, and the Department should think about them together, as we pair them below.

Labor Market Success

CLASP is very pleased to see measures of labor market success included in the draft framework. Workforce results matter to students, who consistently report that their prospects for employment and improved earnings are very important to them as they enter college.¹ According to a newly released survey from the Higher Education Research Institute at UCLA, three of the top four reasons that 2014 freshman cited as "very important" in deciding to go to college are related to labor market success: getting a job (86.1%), training for a career (77.1%), and making more money (72.8%).²

While including measures of labor market success is important, great care must be taken to avoid unintended consequences related to access for low-income and under-prepared students. If measures are too stringent, then institutions may become more selective, leaving behind those in most need.

From a cursory scan of nine state websites that measure postsecondary education students' employment and earnings outcomes, we noted 14 unique measures of labor market success, including full-time employment, employment paying at least minimum wage, mean and median first year earnings, and earnings two, three, five, and ten years out of school, among others. While mean first year earnings is the most commonly used measure across the sites, the breadth of measures shows that there is clearly no commonly held measure of choice.

Any discussion of the "best" earnings or employment measures will depend on the overarching policy objectives, as well as the specific context within which each measure will be used. For instance, uses of workforce outcomes measures may include:

- Consumer information
- Performance measurement for continuous improvement
- Performance measurement for accountability
- Performance-based funding

It appears that the Department is trying to find measures that can meet multiple policy objectives used in multiple contexts. CLASP supports separating measures used for transparency

from those used for accountability. However, if measures must meet the purposes of both transparency and accountability, to minimize unintended consequences for low-income and under-prepared students, certain considerations should be taken:

- Earnings levels for accountability purposes should not be set so high as to discourage the use of career pathway programs that may have lower earnings levels for initial credentials, but the potential of higher earnings later (e.g., nursing assistant).
- Earnings results should be presented in a labor market context if possible. For example, median earnings results could be supplemented with information on the percent of a state or regional median wage that the earnings result represents.
- Earnings results should always be presented for particular programs of study, rather than for an entire institution (see Consumer Customization, below).

Employment measure

“Substantial employment” as described in the draft framework would indicate whether or not former students achieve a certain level of earnings, for example 200 percent of the poverty level for a family of one. This construct makes sense for a metric to support accountability, since it could be used to identify a minimal level of acceptable annual earnings. Using such a level is better than counting an individual as employed if they have any earnings in the time period under consideration, which is how the workforce development performance measures generally work, because it would set too low a bar.

Earnings measure

The longer-term earnings metric described in the draft framework would measure mean or median earnings of former students ten or more years after entering the institution. This could be an appropriate metric for consumer information purposes, but we believe ten years is too long. Five years would be a more reasonable amount of time for prospective students to use in decision making. If this metric were used for accountability purposes, while ten years might better reflect the lifetime earnings of a former student, five years may correlate just as well.

Measurement timing

The draft framework states that labor market success metrics would have to be measured either some number of years after entrance or some smaller number of years after graduation. We understand that the data on graduation rates is often not timely or accurate, but using NSLDS program-level data may be feasible as the graduation data improves in this database. A third option would be to measure some number of years after exit, meaning graduation or leaving school without a credential. Many students upgrade their skills and obtain employment well before obtaining a credential, and a graduation-based earnings metric may exclude these students. For instance, the new common indicators of performance under the Workforce Innovation and Opportunity Act (WIOA) are measured a number of quarters after exit. Such an approach would work only if good data were available for when individuals exited school.

The most feasible option may be to measure some number of years after entrance, which, while it has pitfalls, may be the only option with reliable data. If the earnings metric is based on a time period following enrollment, rather than graduation, it should include different time periods for different program durations, in order to capture post-program earnings that are more comparable.

Separate or Aggregated Metrics

In addition to asking for input on metrics themselves, the Department has also asked for comments on how metrics should be presented, and, specifically, if it would be helpful for consumers or policymakers to have a single overall metric that takes into account all of the individual metrics. CLASP opposes the creation of a single composite rating. Because not all metrics are equally important to different consumers, individuals should be able to view the individual metrics most important to them. The federal government should focus on data, metrics, and groupings, and on making data available to outside entities with expertise in providing consumer information to students.

From an accountability perspective, a composite rating may be difficult to understand and difficult to use for program or institutional improvement. Treating institutions fairly would require that any disqualification thresholds be based on clear criteria. These criteria should be designed to remove those institutions that fail to meet minimal standards of performance over time. Setting thresholds based on a single criterion can create strong incentives to game results or distort institutional missions and may also have other undesired results. No institution should ever be confused about the minimal threshold or metric(s) they must improve to retain Title IV eligibility.

Adjusting Outcomes for Student and Institutional Characteristics

Consistent with our recommendation that the primary focus of the ratings system should be on consumer information, rather than accountability, we do not recommend adjusting actual outcomes to account for differences in the types of students who are enrolled or for institutional characteristics. For consumer information purposes, we think that only unadjusted information should be provided to students and stakeholders. Consumers should always be able to see what the actual institutional result was for each of the metrics used in the rating system. However, consumers should be able to use selection criteria to compare institutions based on location and other factors, as we have discussed above, and they should be able to compare the results for each metric with the results of other peer institutions. These peer groupings should be comprised of institutions that are similar in terms of the types of students enrolled, the institutional mission, and other characteristics that strongly affect their results. In our view, the most appropriate function for statistical analysis in support of the rating system will be the formation of these peer groups.

Selecting the student and institutional characteristics that will be used in forming peer groupings will be a very challenging task. There are student characteristics that may be highly relevant (e.g., level or preparation for college work) but for which data are not generally available. There are characteristics that may be essential for disaggregating results (e.g.,

race/ethnicity, gender) but that should probably not be used to form comparison groups, to avoid setting lower expectations for student results based on membership in one of these groups. Finally, there are institutional characteristics that are highly relevant for determining results (e.g., level of selectivity in admissions), but that may be difficult to measure

Given all of these considerations, CLASP recommends the following student and institutional characteristics be explored for creating peer groupings for comparison of results:

Student characteristics:

- Pell recipient, or recipient of other need-based aid;
- Low-income based on FAFSA data;
- First-generation college status; and
- For earnings results, program of study.

Institutional characteristics:

- Level of selectivity (e.g. percent of applicants admitted);
- Primary types of credentials granted (awards, certificates; associates, bachelors, advanced); and
- Percent of students attending other than full-time.

If the system will be used for accountability beyond setting minimum thresholds of performance for certain metrics that all institutions are expected to meet, then it must have some process for setting institutional expectations that takes into account the differences in critical institutional and student characteristics. Without incorporating such protections for institutions that enroll low-income students and help them succeed, an accountability system will create perverse incentives to enroll and focus resources on the most prepared students and those most likely to succeed in postsecondary education and the job market – thus harming the most disadvantaged and underprepared students. Until the Department can determine how to take institutional and student characteristics into account using peer groups, we strongly recommend that the ratings system not be used for accountability purposes.

Regression-based adjustment models have been used for years by the U.S. Department of Labor (USDOL) in setting expected outcomes for workforce programs (JTPA, WIA, now WIOA), but the context for these programs is very different than what pertains to a college ratings system. USDOL sets expected outcomes that are meant to reflect a realistic goal for actual performance, as well as promoting improvement over time, rather than a minimal threshold intended to eliminate the poorest performers. Furthermore, the consequences for failing these goals are significant, especially for local program administering entities, so there is tremendous pressure to meet whatever expectation is set. This is almost certainly not the context for the ratings system in the foreseeable future. We urge the Department to continue its dialogue with the community, including workforce programs at the federal and state levels, to further its understanding of the most appropriate uses of these statistical methods for setting expectations.

Consumer Customization

According to the draft framework, the Department will be incorporating into the ratings tool the ability for users to customize their own college ratings to reflect what is important to them. Consumers would want to see data on a measure disaggregated by specific subgroups. This is in keeping with CLASP's recommendation that students be able to view results for students like themselves. We recommend the following subgroups:

- Program of study: This would be helpful for each of the metrics, but is of particular important for labor market success measures, which are most useful when presented in the context of a program of study.
- Pell Grant recipients: Does the institution obtain good results for both Pell recipients and non-Pell recipients?
- Full-time/part-time/mixed status: Students' ability to attend full time heavily affects their prospects for graduation. It is a disservice to students not to make this reality clear. Further, students should be aware that some schools are more successful than others with part-time students.
- Gender: Showing institutional results for students by gender, particularly in settings where they will be underrepresented, is an important part of the context.
- Race/ethnicity: The ability of the institution to minimize the achievement gaps for minority students is an important element for comparison.

Suggested additions to the framework: Program of Study-Level Data and Voluntary Data Submission

While CLASP appreciates the incorporation of some elements of our past recommendations in the draft framework, we were disappointed that the Department has not included disaggregation of data by program of study. Program of study-level data are useful for all of the metrics, but are especially important for measures of labor market success. Prospective students should be able to see how students in various programs of study fared in the labor market, to help inform their choice of program. Non-traditional and low-income students, in particular, need data by program of study, because they are often place-bound due to family or work constraints. They are unlikely to choose to leave home to pursue their postsecondary education; however, they can choose among the many options of programs of study at a local university, community college, or other conveniently-located institution.

We understand that the National Student Loan Data System (NSLDS) has recently begun collecting students' program of study, but that the data may not be ready to use because of quality control. CLASP recommends that the Department use the program of study data it has as soon as practical. If a ratings system started to use the NSLDS program of study data, it would create a strong incentive for institutions to improve the quality of this information.

A second recommended addition is to allow institutions to voluntarily report data on students who are not required to be in the NSLDS. As students who did not qualify for aid, these students are likely to be better prepared and will probably have higher outcomes than students

currently in NSLDS. If these students have better outcome measures, it would be in institutions' best interest to voluntarily report the data. NSLDS may not be currently configured to allow such voluntary reporting, but movement in that direction could address the concern about only having data on students who receive federal financial aid.

Thank you for the opportunity to provide comments. If you have any questions, please contact Anna Cielinski at 202-906-8019 or acielinski@clasp.org.

¹ Tim Harmon, Neil Ridley, and Rachel Zinn, *Workforce Results Matter: The Critical Role of Employment Outcome Data in Improving Transparency of Postsecondary Education and Training*, Center for Law and Social Policy, 2014, <http://www.clasp.org/resources-and-publications/files/2014-04-29-CLASP-Workforce-Results-Paper.pdf>

² Kevin Eagan, Ellen Bara Stolzenberg, Joseph J. Ramirez, et al., *The American Freshman: National Norms Fall 2013*, Higher Education Research Institute at UCLA, 2015, <http://www.heri.ucla.edu/monographs/TheAmericanFreshman2014.pdf>

O'Bergh, Jon

From: Julie Schumacher Cohen <julie.cohen@scranton.edu>
Sent: Tuesday, February 17, 2015 1:08 PM
To: College Feedback
Subject: Comment on Federal Rating System from The University of Scranton
Attachments: U-of-S-Federal-Rating-System-Comment.pdf

Dear Secretary Duncan,

Please find attached a letter from the President of The University of Scranton, Kevin P. Quinn, S.J., sharing his concerns regarding the proposed federal rating system. We appreciate your allowing us to submit our comments and appreciate your consideration of this feedback.

Sincerely,

Julie Schumacher Cohen
Director of Community & Government Relations
The University of Scranton
570-941-5529 (office)
email: julie.cohen@scranton.edu
scranton.edu/community
facebook.com/uscrantoncommunityrelations

THE UNIVERSITY OF
SCRANTON
A JESUIT UNIVERSITY

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 join with colleagues at other private colleges and universities, including through the National Association for Independent Colleges and Universities (NAICU) and sister Jesuit colleges and universities through the Association of Jesuit Colleges and Universities (AJCU), to express my concern about the proposed federal rating system.

At The University of Scranton, we are committed to the core principles you have expressed through your proposal: access, affordability and transparency. To this end, we feature the Net Price Calculator prominently on our website, and have assembled information about student outcomes, student financial assistance, health and safety, intercollegiate athletics and other campus information on our Consumer Information website as part of our response to the Summary of the Higher Education Opportunity Act (HEOA) reauthorized in 2008. Moreover, we participate in the consumer search tool, University and College Accountability Network (U-CAN), to further help students and parents make an informed choice about whether The University of Scranton is right for them.

We are also making every effort to meet the financial needs of students and to reduce expenses to keep college affordable, as we respond to market pressures and, most importantly, to concerns expressed by students and families about college cost. Specifically, we have kept our tuition increases at the lowest levels since the 1970's. Last year we increased our financial aid by more than \$1 million, awarding more than \$60 million in student aid. Financial aid represents 30% of our budget. In just the last year, we reduced our budget by more than \$4 million. The University of Scranton is not unique among colleges and universities to exercise fiscal restraint in this pressured environment, a process that I believe will bear fruit as higher education is increasingly challenged to provide value by those most important judges and critics: prospective students and their families.

What particularly troubles me about the proposed rating system is its inability to capture what makes colleges and universities unique and especially well suited for particular students. For example, the rating will not be able to communicate adequately how The University of Scranton, a Catholic and Jesuit university, seeks to provide our students

with a transformational educational experience that is faith-based and grounded in the liberal arts, while preparing them for immediate employment or graduate studies. It will not be able to show sufficiently how many of our students combine career-focused majors, such as pre-med, nursing or education, with studies in philosophy, theology and literature in ways that will help them encounter future ethical and moral dilemmas with depth and nuance. It will not be able to encompass our deep commitment to service and community engagement that combines our students' academic study with experiences that prepare them to become "men and women with and for others" in a broken world. It will not describe our attention to "cura personalis" – care of each person in his or her own uniqueness – which empowers our faculty and staff to help each student achieve her or his God-given potential. In sum, it will not communicate what is special about Scranton or about the many other colleges and universities that have helped young men and women open their minds, search their souls, and become thoughtful, caring and compassionate citizens. Indeed, as our colleagues at NAICU have stated,

The values that the federal government has an interest in, and their relative worth, may not be the same as those for a student who is searching for a school that best fits his or her needs. For example, that a college is related to a particular church or faith may be the most important factor to a particular student, but not a highly-rated value by the federal government.

At Scranton, we remain committed to providing transparency to our consumers and to maintaining affordability in an increasingly competitive environment. The federal government can encourage and support this process in a variety of ways. I do not believe the rating system to be your most effective tool. In this regard, I agree with a bipartisan group of members of Congress in their conclusion that the current "oversimplified federal rating system will lead to less choice, diversity, and innovation and should be rejected."

Increases to Pell grants to help serve those students most in need are an important federal effort that I applaud. Moreover, a reinvestment in campus-based aid programs would help us at Scranton better serve our low-income students.

As I have stated here, we share many of the same goals. Moreover, like many other presidents of independent colleges and universities, I firmly believe I am addressing important concerns related to the future of higher education through concerted and committed efforts – efforts that must be undertaken not as mere adherence to regulation, but as fundamental to the survival and success of our institutions, and that of our students and graduates.

Thank you for providing this opportunity to share with you my feedback and I appreciate your consideration of these concerns.

Sincerely,

(b)(6)

Kevin P. Quinn, S.J.
President

O'Bergh, Jon

From: Shirley Hoogstra <SHoogstra@cccu.org>
Sent: Tuesday, February 17, 2015 1:11 PM
To: College Feedback
Cc: Shapri LoMaglio; Shirley Hoogstra
Subject: CCCU feedback on Ratings System
Attachments: Ratings System Comments 2172015.pdf

Thank you for your willingness to read and integrate our comments.
We have many similar goals. The mechanism is not just right, yet.

Shirley V. Hoogstra, J.D.

President

Council for Christian Colleges & Universities

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February 17, 2015

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

Dear Mr. Secretary:

On behalf of the 144 U.S. member and affiliate institutions of the Council for Christian Colleges & Universities (CCCU), I write to affirm the comments of the American Council on Education, the National Association of Independent Colleges & Universities, as well as many of our member campuses that have written you directly, expressing concern regarding the proposal by the Department of Education to institute a Postsecondary Institution Ratings System. Likewise, our organization is concerned that the system proposed thus far would have many unintended consequences harmful to colleges and universities and the students and families they serve.

Our colleges and universities share the President's commitment to access, affordability, and transparency for higher education. CCCU institutions are proud of their graduation rates, low default rates, and lower than average student debt. We believe, however, that a single ratings metric generated by the government would actually be harmful to the president's important goals listed above.

Access: The proposed ratings system, would hurt the most vulnerable students. Colleges would be disincentivized from accepting low-income, first-generation students who statistically have lower than average graduation rates because it could harm their "rating." We believe this is bad for institutions who serve those types of students, and thus is ultimately bad for the students themselves.

Additionally, the president has rightly acknowledge that not all students are the same, and he has encouraged education for all, regardless of whether a person is seeking to be a mechanic or a professor, or is seeking job re-retraining for a second or third career path. Nor do all students possess the same aspirations upon graduation. Consistent with the president's goal of encouraging more Americans to



serve others, many CCCU graduates aspire to work in fields' of service upon graduation. Many serve as teachers in low-income school districts or in third-world countries; others feed the needy in the U.S. or help develop sources of clean water in the developing world. As the President has championed, all students should have access to higher education regardless of their background or their aspirations. We believe that proposed measures such as graduation rates, post-graduation salary, and could create disincentives for institutions to support access for the students that need it the most.

Affordability: Colleges and universities offer different programs, based on different missions, with different state funding levels, that reach different types of students. Thus, any sort of attempt to create a single system of rating based on affordability could cause some colleges and universities to try and diffuse this measure through imposing "service fees" or reducing vital services such as counseling services in order to improve their rating. Obviously, this would actually work against the President's desire for each student to be able to find the institution that best meets their needs and to have all of the information they need in advance of enrolling. As your Department well knows, affordability is a very amorphous measure that a simple dollar amount cannot, and should not, attempt to capture.

In addition, the President's support for and expansion of the income-based repayment program recognizes that the important work that we need willing citizens to perform is not always the most lucrative,. Statistics do show that while humanities and social science majors make less than their pre-professional and engineering peers upon graduation, by the end of their careers their incomes are higher. Over-elevating the "cost" of a degree discourages students from considering which degree will best prepare them to do the work they wish to do, surround them with the networks they wish to have to reach their professional goals, and give them a degree based on a diverse knowledge base that will allow them to seamlessly transition through multiple careers in a life-time. To be clear, any attempt to link this ratings system to federal funding will only further reduce affordability for students.

Transparency: Currently, students do not face a shortage of information. The internet is replete with information about colleges of all types. College Navigator, the White House College Scorecard, the Financial Aid Shopping Sheet, the College Affordability and Transparency Center, UCAN, and others all make the type of information the ratings system proposes to gather available. **Rather than create yet another new system, we believe that a more useful approach would be to work**



in partnership with the higher education community in an effort to consolidate some of the above approaches to achieve the Presidents goals. Each additional system creates further confusion for students and families about which information system is the best, and costs institutional resources that it could otherwise be spending on student services.

Finally, on the issue of transparency, we strongly believe this system should not go forward based on the current level of information that the higher education community has been given as of today. This organization, along with many other higher education stakeholders wrote this department in January of 2014 expressing much of the same concern expressed here, and the draft proposed in December of 2014 remains too vague as to address these concerns and many unanswered questions remain:

- How will the DOE gather the data for which there is currently no mechanism for collecting? (This applies to one-half of the proposed categories.)
- How does this system interface with accreditation and the process of peer-reviewed accountability?
- What sorts of “accountability” do they intend will occur between the federal government and 4000 plus higher education institutions? How will they adapt the particular areas of accountability in light of each institutions respective mission? How will these new measures of accountability interact with current measures of accountability the Department already holds?
- What disproportionate effects would this system have on faith-based institutions of higher education? (The December draft provided no additional information on institutional groupings.)
- How can this ratings system possibly be finalized quickly enough to go into effect by the DOE’s goal of the 2015-2016 school year? In addition to the significant burden that would create for institutions, that rush seems to only increase the significant prospect for errors.
- In the event that there is a data error, how will the Department respond? Will there be an appeal mechanism? Will the Department send out a notice informing all stakeholders that an institution was rated in error?



The reality is that a ratings system will inevitably become a ranking system. This system will cause students and parents will look at one institution as "better" than another because it is higher on the list, rather than helping students and families learn how to ask the right questions about what they should look for in a college and to help them find the college that is best for that *respective student*.

Students of different ages, from different backgrounds, who aspire to different things are all served by our vast and diverse higher education system. There is no possibility for a single ratings system to capture that complexity. **The stakes are too high in an increasingly knowledge based economy to get this wrong at this time.** Therefore, we strongly encourage the Department to forego the ratings system and to instead partner with higher education to develop a system that would be simpler, more reliable, and thus could better help students and institutions alike achieve their potential.

Sincerely,

(b)(6)

Shirley V. Hoogstra

President

O'Bergh, Jon

From: Halleran, Michael R <halleran@wm.edu>
Sent: Tuesday, February 17, 2015 1:12 PM
To: College Feedback
Subject: feedback

I write to express support for APLU's College Transparency and Accountability Plan. It addresses the administration's core principles of transparency and accountability without the problems of turning data into rankings, which effort, by introducing subjective evaluations, undermines the goals behind the administration's laudable efforts. I hope you will embrace the principles of this alternative plan.

Michael R. Halleran
Provost
The College of William & Mary
Williamsburg, VA 23187
757-221-1993
halleran@wm.edu

O'Bergh, Jon

From: Cummings, Nandi <nandi.cummings@yale.edu>
Sent: Tuesday, February 17, 2015 1:14 PM
To: College Feedback
Subject: Yale University Comment - College Ratings - February 17, 2015
Attachments: YaleUniversityComment-CollegeRatings-2-17-15.pdf

Please find attached, Yale University's comment letter regarding College Ratings.
Kindly advise if there are any concerns regarding this letter.
Thank you for the opportunity to comment
Nandi Cummings

Nandi Cummings
Yale University
Office of Federal Relations
203-436-2893 – main
203-436-4879 - direct



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February 17, 2015

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

Dear Mr. Secretary,

I write on behalf of Yale University to comment on the U.S. Department of Education's draft framework for a college ratings system, entitled "A New System of College Ratings – Invitation to Comment." We applaud the Administration's focus on ensuring that all Americans have the opportunity to enroll and succeed in college. As you well know, Yale was honored to participate in two White House Summits this past year, where we were pleased to do more to make our brand of education affordable for working and middle class families. On the occasion of both gatherings, we announced new initiatives to build on Yale's long-standing commitment to access, opportunity, and affordability.

We strongly support the President's goal of providing clear, accurate information about colleges and universities to prospective students and their families. The college search process can be a formidable task of sifting through enormous amounts of information, and the stakes for students and families are high. Ranking and rating systems have an obvious appeal: they seem to simplify complicated and confusing information and help shape early perceptions of college quality and selectivity. If thoughtfully constructed, better consumer information, provided by the federal government, could be a useful tool for prospective students and their families in the college selection process. Given the potential benefit of the federal effort, we are deeply concerned that the ratings proposal is being rushed to completion without adequately addressing a number of important data limitations and concerns about methodology and interpretation.

As currently drafted, many criteria in the proposed framework are not yet defined and critical questions remain unanswered, including how sub-factors will be weighted and whether they will be aggregated. We provide comments below in an effort to be constructive, but we strongly recommend that the Department reconsider its timeline for the release of the ratings system and provide the higher education community and the general public the opportunity to review and comment on the complete product before it

is made available to students and the families as a college choice tool. A federal ratings system could send strong signals to consumers; we urge you to not completely undo its positive benefits by releasing an incomplete product that will be widely criticized with many reasonable questions about its logic and validity.

Every ranking or rating system makes a subjective judgment about the criteria that represent quality in higher education to determine a particular institution's placement in that system. One problem inherent in these systems is that individual needs and preferences are diverse, as are the characteristics of higher education institutions, and no one system can be equally useful to all. Although the data that comprise the rankings or ratings are meaningful on their own, the metrics and their respective weights reflect one set of preferences that may be ill-suited for another consumer's particular interests and goals. It is important to acknowledge colleges and universities have strengths (and weaknesses) that might make any given choice of college the right choice for certain students. Absent the ability for individual consumers to customize the metrics and their weights – and a lack of consensus on the concept of quality – the Department must clearly define and contextualize its framework so that an individual might judge how it would serve his or her preferences and interests.

Under the proposed framework, the ratings system looks to serve three separate purposes: a) to help students and families make informed choices in the college selection process; b) to support an accountability structure for policymakers; and c) to help colleges and universities measure, benchmark and continuously improve their access, affordability and outcomes. As currently presented, this framework will disappoint as a consumer information tool. Colleges and universities will be divided into performance categories of high, middle and low with the vast majority of these institutions rated as middle. This will make comparisons across institutions nearly impossible. For the narrow band of (mostly affluent) students that employ numerical rankings as a tool in their college search process, typically as a way to identify the “best” colleges and universities, the proposed system would not provide value over the commercially available products that provide ordinal, if disputed, rankings of colleges and universities.

Additionally, with only three performance categories, the weightings unknown and the correlation among the variables undefined, it is very difficult to predict how much movement to a higher category could or should be expected of any institution. If the criteria used in the ratings can only be affected by actual changes in access, affordability and quality (and not sub-factors with a more dubious connection to those measures), the relative position for most institutions would likely be remarkably stable, absent a large, targeted infusion of funds. Since most institutions would fall in the middle – with no relative sense of their position – the incentive for institutions and governments to make needed investments may disappear and the system would frustrate all but the bluntest accountability measures targeted at the lowest performing institutions.

The effort to use the same ratings system both to offer consumer information and to drive accountability causes the current framework to fall short; prospective students and policymakers need different information from a rating system. We strongly recommend that the Department refocus its efforts on improving consumer information by providing needed transparency on college and university affordability; standardizing data and addressing the limitations of government databases; and helping prospective students, families, and the general public understand that an institution's overall categorical rating or numerical ranking is just one of the many criteria they should take into account in selecting a college or university.

In addition to a focus on providing greater standardization and clarity in consumer information, we also believe the Department is on target with its focus on affordability and helping to strengthen the resolve of colleges and universities to increase access for low-income students. Although we agree that the percentage of students who receive federal Pell grants is the most common and most readily available measure of access for low-income families, it is subject to an important limitation. As others have commented, the raw percentage of Pell recipients does not acknowledge that some students are not eligible for federal grant aid, regardless of their income status. As you know, Yale meets the full financial need for all admitted students, and is one of a handful of institutions that applies this same commitment to international and undocumented students. We are proud of this rich diversity, with international students coming from 100 countries around the world and comprising 10 percent of our undergraduate enrollment. Minimally, this commitment to access should not work against Yale or others that provide enabling aid packages to all students with financial need. To correct for this misrepresentation, the appropriate denominator to use in calculating the percent of Pell recipients is the total domestic (U.S. citizen and permanent resident) student body – not the overall student body.

Similarly, the Department proposes to use IPEDS as the database for the affordability metrics, but it is limited in that it only reports information on Title IV aided students. At Yale, 55 percent of undergraduates receive financial aid, most of it from Yale, and a much smaller fraction receive Title IV aid. Since students are not required to take loans as part of their financial aid package, 84 percent of the students who graduated in 2014 did so with zero student debt. Any metric of affordability, including net price, based only on students aided under Title IV would be biased because it would exclude the large number of students who benefit from institutional aid.

As you consider future data elements related to access, we encourage you to include the percentage and amount of institutional aid awarded on the basis of need vs. the percentage and amount of institutional aid awarded on the basis of merit. Better information on institutions' use of grants solely to affect the college choice of highly sought-after students would provide great insight into the type of access valued by a college or university. Such a disclosure also could create incentives for institutions to retain need-based aid programs and encourage greater efforts, including at the state and national levels, to meet greater levels of demonstrated need for admitted students.

Although the framework currently provides no opportunity to account positively for need-based institutional aid, it does propose adjusting outcome measures by institutional characteristics, including the endowment, through regression analysis. While we support the use of research in policymaking – and agree that we should seek to better understand the relationship between institutional characteristics and a variety of measures, including graduation and default rates – we oppose the use of regression analysis as a way to discount an institution’s commitment of its own resources to education. Our endowment makes possible our policies directly related to access, affordability and student success, with many gifts specifically restricted to supporting excellent faculty, low student-faculty ratios, our rich system of libraries and museums, and student scholarships. Inclusion of the endowment as an independent variable in regression models – and other factors that allow Yale to graduate a large percentage of students on time with relatively low levels of debt – creates serious problems with the information that will ultimately be made available to consumers, without any additional context or explanation. Given the limitations of data from FASFA, IPEDS and the National Student Loan Data System, using regression analysis to compare diverse institutions would be ill-advised, creating a false sense of precision for a system that is incomplete and flawed.

We appreciate the Department’s more nuanced views of labor market success based on the substantial threshold model, although, as others have noted, any such benchmark would need to be adjusted for geographic variation. Many have cautioned against the creation of perverse incentives for students that might otherwise lead to important but lower paying positions including those in public service, and we share in that concern. We also would add that such metrics should take care to ensure that students in competitive short-term positions with low compensation – prestigious scholarships and national fellowships, for example – should not be viewed as negative, as they are an excellent proxy for long-term career success. Families often take future earnings into account when deciding on a college, but there is a difference between asking whether a college education will lead to a reasonable standard of living and judging the quality of education in large part by the salaries of an institution’s graduates. To do so would be to narrow the purpose and the benefits of a higher education, which would be a disservice to families and to the nation. As you look to develop a more complete measure of outcomes, we hope you will consider the work by the National Association of Colleges and Employers (NACE) in its First Destination Survey. Their standards for collecting outcomes are more inclusive and comprehensive, covering private and public sector employment as well as military and volunteer service, and we think they better capture the many avenues available to our college graduates.

Finally, we agree that graduate school attendance is an important outcome, and we are pleased that many of our students choose to continue their education at the graduate level. At Yale, 17 percent of the Class of 2014 indicated that they would be attending graduate school the fall following graduation, and 82 percent stated their intention to enroll in a graduate program within the next five years. Although it is not clear how graduate school attendance would be used for accountability purposes, particularly if the goal is continuous improvement, we agree that this is important consumer information. That said, and as discussed in the framework, the best source for

this data is the National Student Clearinghouse, but the framework would rely on the National Student Loan Database System (NSLDS) for reasons not specified. As with IPEDS, the NSLDS only includes students who finance their education with federal aid. More than half of Yale College graduates who choose to continue their education will pursue a master's degree or Ph.D. immediately after graduation, with a good number of them enrolling in programs that provide both a tuition waiver and a stipend, making them invisible to the NSLDS. As discussed above, the NACE First Destination Survey may be a useful way to provide a more accurate picture of graduate school attendance.

Thank you for the consideration of our views. It is our hope that they are helpful to you as you reflect on the goals and the data in a federal rating system.

Sincerely,

(b)(6)

Cynthia Carr
Acting General Counsel

O'Bergh, Jon

From: Mike Lefler <mike.lefler@doane.edu>
Sent: Tuesday, February 17, 2015 1:16 PM
To: College Feedback
Subject: Federal Rating System Comments
Attachments: Federal Rating System Letter.docx

Please see the attached letter on behalf of Dr. Jacque Carter, President of Doane College. Thank you.
Mike

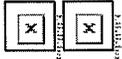
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Mike Lefler | Senior Director of Strategic Communications

Doane College 1014 Boswell Ave., Crete, NE 68333

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DOANE
COLLEGE

Office of the President

February 13, 2014

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

Dear Mr. Secretary,

In 143 years of successfully educating students, Doane College has shared in a belief of making the higher education experience accessible to all who wish to pursue post-secondary knowledge. It has been our goal to distribute accurate and relevant information to prospective students to give them the facts they would need to make educated conclusions in the matter of their higher education path.

While Doane College supports the President's commitment to making higher education more accessible and affordable, the establishment of a system to rate schools using imperfect criteria that cannot be accurately measured or equally applied would undermine the ability of a student to make a truly informed decision. A ratings system that puts particular emphasis on graduates' earnings will standardize higher education and suggest that lower-income occupations, such as teaching, military service and staying home to raise children are somehow less worthy.

On behalf of Doane College, I fully support House Resolution 26 and the comments previously shared with you from David Warren, President of NAICU, that express the concern that the federal ratings system would infringe on an individual's judgment about what is important and valuable in an education experience.

Sincerely,

(b)(6)

Dr. Jacque Carter
President, Doane College

O'Bergh, Jon

From: Rodicio, Lenore <lrodicio@mdc.edu>
Sent: Tuesday, February 17, 2015 1:26 PM
To: College Feedback
Subject: Response - Invitation to Comment, College Ratings System

At Miami Dade College (MDC) we recognize and understand that there is an increasing demand from various stakeholders for more accountability in postsecondary education. MDC is committed to transparency and accountability. However, any system that will be used to rate or rank institutions must be carefully thought-out in order to avoid unintended consequences. As such, we are grateful for the opportunity to provide feedback on the most recent overview of the college ratings system. Below are some observations and responses to some of the key questions posed by the Department:

- **Data Sources.** One overarching concern is that an effective ratings system should be based on reliable data. We understand the need for consistency in data, but are also concerned with some of the shortcomings of the current data systems. We are appreciative of the Department's consideration of alternative data systems to IPEDS and NSLDS, and hope to be involved in future conversations on this topic. One key characteristic that should be present in any future data source is a balance between capturing the most accurate institutional data possible, while at the same time not creating an additional reporting burden for the institutions. Ideally, a new system would replace existing reporting systems.
- **Rating Categories.** The current framework indicates that there will be three performance categories (high-, low- and middle-performing). As the department further considers how to report these rankings, we recommend that the institutions receive separate rankings for categories of metrics, rather than a single ranking. A single ranking can mask institutional strengths and/or weaknesses.
- **Improvements over time.** Implementing high-impact practices at postsecondary institutions is a process that takes time not only in enacting key strategies, but also in terms of observing results. As such, in response to the question of including metrics that are improvements over time, we recommend that the Department look at the metrics related to output measures (e.g., completion, transfer, labor market success) over a minimum period of 5 years.
- **Metrics.**
- Some of the proposed metrics are very related to one another. The Department might consider creating groupings of metrics that combined determine the rating category for the institution for the overarching metric. As an example, the proposed metrics of average net price and net price by quintile could contribute to an overarching metric of affordability. Similarly, completion rates, transfer, and labor market success could all contribute to a broader student success metric for each institution that would be reflective of the institutions' respective missions in terms of academic programs.
- The first four proposed metrics (percent Pell, EFC gap, family income quintiles and first generation college status) are all inputs, rather than outputs, and many are beyond the control of the institution. They are, however, critical in identifying the population of students served by the various institutions. A suggestion for the Department to consider is to use these characteristics not as metrics *per se*, but as multiplying factors for the output metrics that would place institutions serving the neediest of students on par with institutions serving more traditional college students.
- Although specific details on the calculation of the completion rate metric are not given in the current framework, we urge the Department to consider completion rates in 200% of the required time to account for part-time students, who are the majority at community colleges nation-wide.
- Although the Department is not currently considering the use of average loan debt as indicated in the framework, a potential metric listed is loan performance outcomes. Whether or not a student repays his/her loan is not something that is within an institution's realm of control. We would recommend that the Department not include loan measures. Affordability of a college degree would best be measured in the net price and net price by quintile measures.

- On the metric of transfer rates, we suggest that institutions receive credit for both lateral transfers, and well as transfers between 2- and 4-year institutions, and vice versa. Continuing one's education, despite the institution, should be rewarded.
- Regarding labor market success, we reiterate the concerns previously expressed by various constituencies that wages and earnings are highly variable measures that are dependent on career track and even geographic location. We support the Department's suggestion of expanding this metric to include substantial employment. In addition, we would like to reiterate our comment above, that the concerns regarding this metric could be mitigated by using it as a factor in a broader metric of student success.
- We are in favor of using metrics related to intermediate measures of success. In our work here at MDC around student success and completion, we track key outcomes such as remedial coursework completion, completion of second-language coursework, and achievement of 25%, 50% and 75% degree completion. These intermediate measures not only serve as accountability measures for external stakeholders, but are key metrics that we use in day-to-day decision-making to improve our services to students.
- **Transparency tools.** Currently, most of the widely available transparency tools do a poor job of representing metrics in light of the institution's mission and student demographic. As the Department begins to consider models for a transparency tool, we recommend a system that does not allow for institutional "ranking," but rather a search model that allows consumers to view institutions of their choice. The individual institution profiles should include a brief description of institution type and demographic served.

Once again, thank you for the opportunity to comment. If you should need any further information, please do not hesitate to contact me.

Sincerely,

LENORE P. RODICIO, PH.D.
PROVOST, ACADEMIC AND STUDENT AFFAIRS
Miami Dade College
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"It is the education which gives a man a clear conscious view of his own opinions and judgments, a truth in developing them, an eloquence in expressing them, and a force in urging them." ~Cardinal John Henry Newman, The Idea of a University (1858)

Please Note: Due to Florida's very broad public records law, most written communications to or from College employees regarding College business are public records, available to the public and media upon request. Therefore, this e-mail communication may be subject to public disclosure.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 17, 2015 1:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: On behalf of the California Teachers Association (CTA) and its 325,000 members, I submit the following comments on the Department of Education's proposed College Ratings Framework.

Our highest priority is to preserve access to opportunities for quality higher education for all of California's and the nation's students. Providing transparent information on colleges' and universities' success with students is an admirable goal, yet must take into account an institution's mission, the student body it seeks to serve, the programs offered, and the aspirations, preparation and intentions of the students who attend. We remain committed to expanding opportunities for all of our students, including those from racial, ethnic, and economic backgrounds that historically have had less access to higher education. This is especially relevant as we consider the sobering, recently released report that more than half of public school students in the U.S. are poor, knowing that low-income students have a lower college attending rate than more affluent peers. Metrics that assess institutions that seek to serve students with complex social, economic and educational needs, and succeed in doing so, should not result in a less-favorable rating in comparison to institutions that educate students with greater resources from families with extensive experience in navigating the culture of higher education.

Although the proposed framework includes selected student demographics in the rating framework, any final rating system must ensure that the criteria are sensitive enough to discriminate among the many and varied circumstances of students' lives that will influence the ultimate ratings achieved by institutions. For example, if completion rates remain a factor in the rating system, economic, personal and familial circumstances that influence the pace at which students complete their degree, certificate, or workforce preparation program must not be ignored. As NEA President Lily Eskelsen García remarked in commenting on the proposed rating framework, "A single mother working two jobs, caring for her family, and attending school at night who completes a degree in nine years is counted a failure, instead of being celebrated as a triumph."

The rating system must also safeguard that Minority Serving Institutions (MSI) are not disadvantaged by the new system. Of particular concern to CTA is California's three-tiered public higher education system. California's Community College system is the largest post-secondary education system in the nation and more than one-third of its campuses are considered Hispanic Serving Institutions (HSI). The majority of our California State University (CSU) campuses are also HSI. With over 53% of California's K-12 students identified as Hispanic and nearly 7% as African-American, we cannot disadvantage the institutions that serve students from our state's predominant ethnic and racial backgrounds.

While we support the administration's desire to avoid additional reporting burdens to institutions by using currently available public data, the idea of allowing institutional-selected or created metrics to be included in the system is one that may merit additional consideration after thorough discussions with the affected institutions. We also look forward to a more comprehensive explanation of how the rating system might include a measure of institutional growth and improvement rather than solely determining a status rating in one of the three bands (strong, middle, weak) proposed.

If you have further questions that I might answer, please contact me at DVogel@cta.org. Thank you.

Dean E. Vogel, President
California Teachers Association

Constituency: Other (specify below)

Other Constituency (if supplied): California Teachers Association

User E-mail (if supplied): DVogel@cta.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: Fitzgerald, Clare Froggatt <crffitz@bu.edu>
Sent: Tuesday, February 17, 2015 1:55 PM
To: College Feedback
Subject: Boston University ED Ratings Framework Letter
Attachments: Boston University ED Ratings Framework 2.17.25.pdf

Good Afternoon,

Attached is Boston University's Federal Ratings Framework Response Letter.

Best regards,
Clare

Clare Fitzgerald
Executive Assistant to the Vice President for Enrollment & Student Affairs

Boston University | ENSA
881 Commonwealth Avenue
Boston, MA 02215
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Boston University Enrollment & Student Affairs
Laurie A. Pohl, Ph.D., Vice President



881 Commonwealth Avenue
Boston, Massachusetts 02215
T 617-353-9814 F 617-353-7300

February 17, 2015

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

Via collegefeedback@ed.gov

Dear Secretary Duncan:

On behalf of Boston University, I am responding to the U.S. Department of Education's invitation to comment on a proposed federal college ratings framework. We endorse the comments submitted by the Association of American Universities, and wish to add our own. While we have reservations about a federal ratings system, we appreciate the Administration's continued focus on helping students make thoughtful college choices.

BU enrolls more than 16,000 undergraduates and provides over \$200 million in institutional financial aid each year. Our students choose BU for a variety of reasons, many of which could not be captured in a ratings system: academic rigor, urban location, diverse arts offerings, opportunities to be involved in research and scholarship with faculty, and myriad study abroad options, among others. Our views on the specific issues raised in the framework are as follows:

Ratings categories and institutional groupings

We recommend the Department consolidate its proposed three category rating system (high-performing, low-performing, and middle) into a single designation of "Department commendation." We understand the Department's efforts to highlight outstanding schools and bring focus to institutions that are lagging, but the current inconsistencies in the available data and the untested nature of a federal rating system make any greater distinction inadvisable. Such an endorsement will allow the Department to identify and work with struggling institutions while also reinforcing the perception that these efforts are a rating, not a ranking.

Data

We share the concerns many have raised about a ratings system based on federal data sources that are known to have numerous limitations. We urge the Department to have a process for institutions to review their reported data and ensure its accuracy. We also endorse the concept of "allowing institutions to provide alternative sources of data to supplement their information in the ratings system."

Metrics

Percent Pell: Pell grant eligibility and the percentage of a population receiving Pell Grants should not be used as a stand-alone measure of access, as it ignores families with significant financial need whose income just exceeds Pell eligibility.

First-Generation College Status: College access for first-generation students is important, but evidence suggests that students who complete the Free Application for Federal Student Aid (FAFSA) do not always report their first-generation status. This makes it an ineffective indicator.

Net Price by Quintile: Evaluating the net price by income bands using the actual family income and financial need the institution uses in determining financial aid eligibility would reduce the incentive for institutions to favor Pell recipients over other needy students, and would perhaps eliminate the need for net price calculators, as it would provide the consumer with more meaningful information.

Labor Market Success: We appreciate that the framework describes some of the challenges inherent in utilizing labor market success as a metric for a quality college experience. We are as proud of BU graduates who excel in public service and graduate school as we are of those who pursue lucrative careers. A federal ratings system should not conflate earnings – which are very difficult to quantify – with the value of college attendance.

Graduate School Attendance: While we are pleased the Department recognizes graduate school attendance as an important outcome for college graduates, the presence of graduate loans in the National Student Loan Data System for Students is not an accurate measure for this outcome, as the framework rightly points out. Many doctoral students do not utilize loans since their course of study is funded through other means, including, in the STEM fields, funding through research assistantships by other government agencies.

Ratings web site and transparency tools

In the spirit of simplification, we recommend consolidating the College Scorecard, Data Navigator, and federal college ratings into a streamlined source of information for students and families. Multiple tools may result in inconsistent information for families, which is detrimental to the Department's ongoing simplification efforts, students, and the institutions being rated.

We support the framework's assertion that the Department must implement consumer testing of the ratings web site and associated tools to ensure they are truly useful to students and parents.

Thank you for your consideration of our feedback on the ratings framework.

Sincerely,

(b)(6)

Laurie Pohl

Vice President, Enrollment and Student Affairs

cc: Robert A. Brown, President
Jean Morrison, University Provost and Chief Academic Officer
Jennifer Grodsky, Vice President of Federal Relations

O'Bergh, Jon

From: Pat McGuire <McGuireP@Trinitydc.edu>
Sent: Tuesday, February 17, 2015 2:04 PM
To: College Feedback
Subject: RE: Comment on College Ratings Framework - Corrected Date
Attachments: Trinity President McGuire to Secretary Duncan 2 15 2015.pdf

My comments attached with corrected date.

PS --- I tried to post an excerpt on the ed.gov blog at <http://www.ed.gov/blog/collegeratings/> but the comment box is not working

From: Pat McGuire
Sent: Saturday, February 14, 2015 2:13 PM
To: 'collegefeedback@ed.gov'
Subject: Comment on College Ratings Framework

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



Office of the President
Trinity Washington University
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v 202-884-9050 f 202-884-9056
president@trinitydc.edu www.trinitydc.edu

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: Steve Voytek <svoytek@careertech.org>
Sent: Tuesday, February 17, 2015 2:11 PM
To: College Feedback
Subject: Comments on New System of College Ratings-- NASDCTEc & ACTE
Attachments: College Ratings Framework Comments-- NASDCTEc-ACTE.pdf

To Whom It May Concern:

Below please find formal comments from the National Association of State Directors of Career Technical Education Consortium (NASDCTEc) and the Association of Career and Technical Education (ACTE) in response to this solicitation.

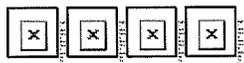
For your convenience, I have attached both a PDF version and a hyperlink to our organizations' input. Thank you for your consideration in this matter.

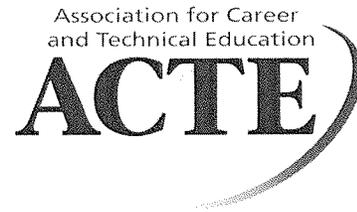
<http://careertech.org/sites/default/files/College%20Ratings%20Framework%20Comments--%20NASDCTEc-ACTE.pdf>

Best,

Steve Voytek

--
Steve Voytek
Government Relations Manager
National Association of State Directors
of Career Technical Education Consortium
8484 Georgia Avenue, Suite 320
Silver Spring, MD 20910
Phone: 240-398-5406
Fax: 301-588-9631





February 17, 2015

The Honorable Jamiene Studley
Deputy Under Secretary
Office of the Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Deputy Under Secretary Studley:

The National Association of State Directors of Career Technical Education Consortium (NASDCTEc) and the Association for Career and Technical Education (ACTE) would like to submit the following comments on the Administration's recent draft College Ratings Framework. Our organizations represent the broadest spectrum of the Career Technical Education (CTE) community with regards to secondary, postsecondary, and adult CTE throughout the country. We applaud the President's continued focus on college affordability, student access to postsecondary education and outcomes at a time when our nation's students and families are struggling with the rising costs of college, and with their employment prospects following the completion of a postsecondary education.

While we believe that the federal government has a vital role to play with regards to these three areas—particularly in providing accurate and transparent postsecondary performance data for public consumption—we do not believe the creation of a federal ratings system will ultimately accomplish the Administration's intended objectives. The current proposal's three broad "ratings" of high, medium, and low performing institutions carry with them inherent value judgments regarding the highly varied purposes and missions of postsecondary institutions and we are concerned regarding the Department's capacity to make this type of determination regarding an institution's value based on only a few data points.

However, we remain hopeful that future iterations of this ratings system will reflect the perspectives we've shared with you below as you continue to hone and improve this proposal in the coming years.

We have organized our comments around a selection of proposed metrics included in this most recent draft and have provided more general suggestions for ways to improve upon this proposal below.

Compare Programs, Not Institutions

The current draft ratings system seeks to compare a great variety of entities within our nation's postsecondary education system ranging from four-year baccalaureate degree granting institutions to two-year institutions awarding associate degrees and certificates. While we applaud the draft's effort to create separate groupings for these two broad institutional categories, we remain deeply skeptical that these groupings will fully take into account the diversity of these institutions in terms of size, student populations served, institutional mission, program offerings, and many other important factors. To build upon this aspect of the draft, we strongly encourage the Department to incorporate additional institutional characteristics such as program mix and institutional selectivity in order to account for the differences between institutions outlined above.

Many students seeking to enroll in postsecondary CTE have a limited set of institutions from which to choose and are oftentimes limited by geographic proximity. If the purpose of the draft ratings system is to provide more transparent information to students and families for the purposes of deciding between institutions, the choice will likely fall between two and four-year institutions rather than within one institutional grouping or the other. Alternatively, presenting information to students and families regarding the pros and cons of an institution's available programs would prove to be much more valuable for postsecondary education consumers. As a consequence, we strongly believe the focus of a ratings system should be on postsecondary *programs*, not institutions.

At the very least, making program-level information publicly and readily available would empower students to make more informed choices when selecting a pathway and also enable the Department to more accurately assess the employment and earnings outcomes of students in a more comparable and accurate fashion within the context of a ratings framework.

Develop and Implement Quality Data Systems

As with any endeavor of this type, a ratings framework for postsecondary institutions will only be as useful and effective as the underlying data and information that supports and informs it. In its current form, the draft framework proposes to measure the "labor market success" of an institution's students and possibly use earnings as a metric indicative of success. We remain concerned about any proposal that would use student earnings alone as a barometer of success. Factors such as local and regional labor market conditions, disruptions to the wider economy, and a host of other variables largely outside of an institution's control have an enormous impact on individuals' earnings.

As such, we believe that such a metric could unfairly penalize institutions if incorporated for evaluative purposes within this ratings framework. Instead, we urge you to include this as a public reporting requirement to increase public transparency and accountability, but do not support including an earnings metric as a way to “rate” a postsecondary institution.

As touched on earlier, the earnings associated with various degrees, programs and certifications can vary greatly even within a single institution. Using student earnings as a way to measure students’ and graduates’ labor market success would not take into consideration the important contributions relatively low-paying occupations, such as those in public service, would make to society more broadly. These types of contributions are critically important to take into consideration when “rating” postsecondary institutions as the framework proposes to do.

Those concerns aside, to implement this metric the Department would need to link Social Security or Unemployment Insurance (UI) wage data of individuals back to the institutions where they attended. However, even here challenges persist. Students will often attend more than a single college making the attribution of an individual’s earnings to one institution quite difficult. UI wage data in particular has several limitations including the exclusion of individuals who are self-employed, making this data incomplete at best.

The draft proposal also remains unclear as to whether students, graduates, or a combination of the two would be included in this measurement. With regards to this broad measurement, we would encourage the Department to only include an institution’s graduates, not all students who may have enrolled in a given academic year. This would more accurately assess the impact of a program or institution on student’s employment prospects. A combination of both short and long-term measures of labor market outcomes would also be needed to adequately capture student progress within the labor market. This would take more fully into account the many factors contributing to a student’s future earnings and employment prospects that are sometimes out of an institution or program’s control.

We also encourage the Department to take into consideration the characteristics of the students who are served. For instance, first-time or traditionally aged students (under the age of 24), typically have relatively little career experience when they enter into the labor market, which can have enormous consequences for earnings immediately following program completion. This further underscores the complexity of using earnings as a metric of success and the need for a combination of short and long-term measurements to truly capture a student’s later progress in the labor market over time.

The most effective way of calculating any measurement of student’s labor market success would be through the creation of a student unit record system — a proposal both of our organizations support within the context of the reauthorization of the Higher Education Act.

Until Congress and the Administration work toward the creation of such a system, we believe that attempting to measure the labor market outcomes of postsecondary students without the necessary data system infrastructure is ill-fated at best.

We therefore remain strongly concerned regarding the proposal to quantify something so complex within a three-tiered ratings framework which could be misinterpreted by the general public. While we acknowledge the utility in presenting this data to these audiences—particularly through a user-friendly online source—we encourage the Department to work with institutions to ensure they have the necessary resources to assist students in making informed choices regarding program selection and federal student financial aid.

We appreciate your consideration of these comments. We remain hopeful that as this ratings system continues to evolve, that much-needed improvements to the framework can be incorporated over the coming years. Should you have any remaining questions regarding the above comments, please contact NASDCTEC's Government Relations Manager, Steve Voytek (Svoytek@careertech.org) or ACTE's Legislative and Regulatory Affairs Manager, Mitch Coppes (mcoppes@acteonline.org) who would be happy to address any concerns.

Sincerely,

(b)(6)

Kimberly A. Green
Executive Director
NASDCTEC

Stephen DeWitt
Deputy Executive Director
ACTE

O'Bergh, Jon

From: Didier, Meredith <medidier@ davidson.edu>
Sent: Tuesday, February 17, 2015 2:14 PM
To: College Feedback
Cc: LeFauve, Linda; Quillen, Carol
Subject: Davidson College Comments on the Revised Proposed College Ratings...
Attachments: postsecondary ratings system response FINAL.docx

On behalf of Davidson College, attached please find our public comments on the revised proposed college ratings framework. Thank you for the opportunity to make this submission, and we appreciate your making this available as part of the public record. President Carol Quillen and Associate Vice President for Planning and Institutional Research Linda LeFauve would be happy to answer any questions from Department officials about these comments. Thank you again, Meredith Beaton Didier

Meredith Beaton Didier
Special Assistant to the President
Davidson College
Box 7145
Davidson, NC 28035
p. 704.894.2681
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DAVIDSON



Comments on the (Revised) Proposed College Ratings Framework

The revised ratings framework provides clear evidence that the Department of Education has listened to feedback from the higher education community, and that is positive. The new proposed metrics reflect a trend toward more clearly defined data elements and more useful information. It is especially heartening to see a recognition of the ways in which mission and special student populations may affect metrics such as graduation rate.

The Department of Education has also taken seriously the concerns expressed by many that the initially proposed ratings system implied a level of precision with respect to differences across individual institutions that was problematic. The decision to categorize institutions as high, mid-level, or low performing is one we applaud.

Overall, however, we remain concerned about the ratings system's reliance on the population of students receiving federal financial aid. Students attending colleges with generous institutional aid, low tuition, non-traditional or part-time populations, or state-subsidized tuition appear in that population at lower frequencies than students attending colleges where they can or must depend on federal programs to meet their tuition obligations. Although we understand that the Department of Education has a significant interest in the accountability of institutions drawing federal aid dollars, the implication that metrics based on these participants are representative of all higher education is misleading.

Comments on the Metrics

The revised ratings system raise some additional questions about metrics related to family income and educational attainment. We also remain concerned about the role of the Department of Education regarding college outcomes. Specifically, there are not sufficient outcome measures that apply across all sectors of higher education to warrant their inclusion here, nor is it clear that focusing on any subset is an appropriate role for the Department.

Pell Recipients

The ratings proposal makes this statement: "The percentage of a college's enrolled students who receive Pell grants is the most common measure of access and the most readily available." Although we agree that this percentage is among the most readily available, its common use is driven more by that availability than its appropriateness as a measure of access. Absent institutional commitment to a diverse economic profile—whether in the form of affordable tuition or institutional financial aid—Pell awards themselves do not preclude putting the financial burden of attendance on the students who receive them. Further, even with an institutional commitment to access for the lowest income students, the result of

focusing on Pell can easily result not in economic diversity but economic bifurcation. Davidson's financial aid program is able to provide access across income levels through its commitment to meeting 100% of need regardless of income band, but not all schools have such resources. A ratings system that rewards institutions for their Pell percentages exclusively discourages broader economic diversity.

EFC Gap

There is a great deal of confusion, on our own campus and among our peers, about what this metric means, how it is to be calculated, and who assigns the "gap" benchmark. "Some focal EFC" is not language with which any financial aid office we've spoken with is familiar yet it appears both its definition and calculation are the responsibility of individual campuses. The measurement and purpose of this metric are too unclear for us to comment.

First-Generation Students

As above with respect to Pell recipients, we agree that the percentage of first-generation students a college enrolls is a commonly used measure, in this case of "the extent to which institutions serve underrepresented populations." We disagree, however, that its use is due to its being "a simple categorical measure that is easily understood by families and the public." In fact, there is a good amount of disagreement about what constitutes "first generation." Among the definitions used:

- Neither parent attended a postsecondary institution. This is the definition the ratings system proposal seems to presume. Having neither attended nor graduated, there is the additional presumption that these parents are employed in lower income jobs and do not have the tools to help their sons and daughters navigate the college experience.
- At least one parent attended but did not graduate from a postsecondary institution. Here, again, the presumption is that the absence of a college degree means lower income, although the parents here would be able to discuss the college experience with their sons and daughters.

Even if there were agreement on whether the definition revolves around the degree itself, we have seen myriad differences among institutions regarding what qualifies as "college." Some schools consider only parents with four-year college degrees when making the determination that a student is first generation. Sons and daughters of parents with associate degrees or who are graduates of workforce development programs are considered first generation even if those degrees were obtained in what is otherwise a traditional college campus. Considering students at community colleges, especially, to be first generation when their parents have associate degrees is clearly contradictory. Are there to be different definitions of "first generation" depending on higher education sector? We have even seen examples of students considered first generation because neither parent had a four-year degree even though grandparents on both sides did.

Regardless of definition, the proposed source of this information is the FAFSA. Only students applying for financial aid would contribute to this metric, which is the same problem that complicates the research noted in the proposal regarding the links between first-generation status and income or degree completion.

However defined and however collected, the Department of Education should clarify the intent of this metric. Is it a barometer of family income and therefore evidence of a college's commitment to economic diversity? If so, would family income itself (as demonstrated through net price) not be a more direct measure? Is it a response to suppositions that first-generation students will have less professional or life success without a degree than their non-first-generation peers? If so, enrolling them is philosophical or programmatic, and not a measure appropriate to the proposed ratings system.

Net Price/Net Price by Quintile

We recognize that there are some issues related to the use of net price and these are acknowledged in the proposed ratings system. However, we agree that these measures, particularly net price by income quintile, provide families with more practical detail than offered elsewhere. We support their use in the proposed ratings system.

Average Loan Debt

We agree that inclusion of this metric would be misleading and support its exclusion from the revised proposal.

Completions/Transfers

The revised proposal recognizes that graduation rates may not be the best measure of student outcomes. Part-time students may be making excellent progress toward a degree yet be missing from the "150% of average" timeframe used for completion. Students who feel academically prepared for transfer from a two-year to four-year program prior to finishing their two-year degree may be evidence of a particularly effective program. However, relying on the NSLDS as the source of data for their eventual completion of a degree suffers from its own set of problems. Part-time students may be attending part time for the very purpose of avoiding loans; transfer students may have started as commuter students at their local community college in order to avoid loans. Neither group will appear in NSLDS database. Unless part-time and transfer students represent a disproportionate percentage of an institution's enrollment—in which case that institution will have had to determine other measures of success (see below), we believe it is best to focus on graduation rates as defined in IPEDS data.

Outcome Measures

The impulse to measure what has been called a "return on investment" may be understandable, but it is the very reliance on language better suited to business propositions that clouds and complicates an assessment of the value of higher education. "Labor market success," in particular, is vague, nearly impossible to measure, and, ultimately, not a metric appropriate to the Department of Education. Since we understand that the Department has given considerable thought to outcome measures, and since some form of outcome measurement is a critical component of institutional effectiveness, we are providing a more detailed critique of this section of the proposal. We then suggest a more appropriate and realistic of addressing outcomes.

The proposal refers to one finding of *The American Freshman*, an annual survey completed by entering students at many colleges: "Most students state that an important reason to go to college is 'to be able to get a better job.'" It is true that this is the most frequently cited reason most years. What this statement

fails to take into account, however, is that students may choose more than one response and, in fact, six additional reasons are also cited by a majority of respondents. Of those, nearly as many choose 'to learn more about things that interest me' as choose 'to be able to get a better job.'

The proposal also equates "better job" with "higher earnings," a connection not supported by data in *The American Freshman*. In fact, significantly fewer select 'to be able to make more money' even though that is also offered as a possible response. Even if job placements and earnings were considered appropriate measures for some types of institutions, the fact remains that there are no credible, thorough, or representative sources of such data.

So are educational outcomes to be ignored and the reasonableness of assessing the degree to which an institution achieves its mission dismissed? No; in fact, there are already processes in place—and in which the Department of Education already participates—that places the responsibility for demonstrating outcomes where it belongs. Further, it does so in the context of institutional mission.

Accreditation is the accepted practice through which institutions document not only their stability and sustainability but the means by which mission is realized. Outcomes must be rigorously defined and measured, and the case made for their achievement must be compelling. As a system of peer review, accreditation relies on the judgment of other higher education professionals who know and understand the complexities and expectations of the sector in which they function.

It is exactly that complexity that should preclude the inclusion of post-graduation outcomes in the Department of Education's proposed ratings. Even at its most streamlined, consider:

Workforce development institutions. Many of these are in the for-profit sector and many have missions that speak directly to job preparation. There, recruitment of students based on promises of job placement puts those placement rates squarely in the jurisdiction of their accrediting agencies. To be fair, some of the problems associated with for-profit schools came under congressional scrutiny as early as 1992, with the result that these schools could no longer compensate admission staff based on the number of students they enrolled. However, it was the Department of Education that, in 2002, created a series of loopholes that enabled these schools to again compensate according to enrollment. As of 2011, these loopholes have been removed.

Does the shifting nature of this scrutiny mean that the Department of Education has a mandate to define appropriate outcomes for all sectors of higher education? No; the Department of Education has reason to closely monitor the sector that has engaged in misleading practices, and recent regulations have done exactly that. Importantly, these regulations are specific to workforce development institutions.

Community colleges. Caught in the middle, in some ways, is the nation's community college system. Part workforce development, part transfer college, there is almost no measure by which they can demonstrate success. If subjected to job placement metrics, the students who transfer to four-year institutions create a ratio divorced from its denominator. Students sufficiently prepared to transfer to four-year institutions even prior to completing an associate degree dampen both graduation statistics and job placement statistics even as those students are the very definition of a successful outcome.

Accreditation reviews take these entire institutions and their multifaceted missions into account. Outcomes and achievement can be demonstrated in context.

Four-year colleges and universities. Although graduates of four-year colleges and universities accrue higher career earnings and are the most likely to attain additional education, there is no easy or obvious way to capturing predictive data at graduation. Nor is there a pressing need: No higher education sector has been studied as frequently or as deeply as the non-profit four-year college sector. As a sector, if success is to be defined, as the proposed ratings system suggests, by career and compensation, it has been admirably demonstrated.

That does not mean that these institutions are content either to wait for longitudinal data or to depend only on data aggregated across the sector via various studies. It is, in fact, the complexity of their position as the foundation for lifelong achievement that has created the need for these schools to articulate signposts of achievement reflective of their missions. Again, only the accrediting agencies have the resources and time to examine this information at the individual college level to ascertain success.

Relying on the accreditation of individual institutions as a litmus test of student outcome achievement does seem to beg the question of how prospective students and their families are to compare across institutions. Yet it is rare for students to compare across sectors. Students interested in workforce development institutions will have access to placement statistics because that is mandated practice. Students interested in degrees that provide a foundation for a the myriad opportunities presented to four-year college graduates will find, through the schools themselves, the specific information they seek.

The primary flaw in the proposed ratings system is that metrics exist that apply equally well to all versions of higher education and to all student expectations. Particularly with respect to outcome measures, almost any form of compromised common ground will become just so much white noise.

O'Bergh, Jon

From: Nelen, Carla <cnelen@mtaloy.edu>
Sent: Tuesday, February 17, 2015 2:39 PM
To: College Feedback
Subject: Comments from President Foley--Mount Aloysius College
Attachments: Mount Aloysius College-Ratings Comments.pdf

Please see the attached PDF for the "comments" submission for Mount Aloysius College on the latest framework for the college ratings proposal.

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Comments on College Ratings Framework of December 2014

I want to thank the Department for all its efforts to review and respond to the comments that were officially submitted to you on the White House College Ratings framework announced December 2014. I had a chance to review many of the 53 submissions to the first set of guidelines and the newest guidelines. It is clear to me that you listened and that great effort has been made—especially to deal with the situation of institutions who are, in fact, already serving high proportions of low-income and first-generation students. It is also clear to me that it is not your intention to misrepresent or discourage in any way the efforts of these high Pell Grant-serving institutions through implementation of a White House Ratings System.

I also appreciated Deputy Under Secretary Jamiene Studley's remarks at the recent National Association of Independent Colleges and Universities meeting. She emphasized the phrase (and intent to) "do no harm" and the remainder of my comments are offered with that admonition in mind.

Mount Aloysius is a mission-focused institution that serves almost 60% "first-generation to college" students and almost 50% Pell grant recipients, and where fully 41% of our students come from families that live within 150% of the federal poverty level for a family of four. 82% of our students work at least a part-time job, 60% of our students commute, and mature students represent fully 35% of our student body. With that context in mind, please allow me to add three additional comments to my earlier testimony.

First, the current approach to the ratings calculations may have the unintended consequence of penalizing institutions that both (1) serve high proportions of college Pell recipients and (2) offer dual enrollment to high school students to lower eventual college costs. (See Attachment 1 for a detailed point-for-point presentation on this paradox). Current IPEDS calculations instruct higher education institutions to include dual enrollment students in their total headcount figure. The instructions that are provided with the total headcount number are pretty clear about including all students who are in any way enrolled on the campus and calculating that headcount number. And although I polled 12 colleges and found that 11 of them do not include dual enrollment in their calculations for this figure (on the grounds that it just doesn't make sense, for various reasons), both our Institutional Researcher and another from one of the 12 colleges polled agreed that the regulations are unambiguous—instructing institutions to include all students achieving college credits. (See Attachment 2 for highlights of those instructions).

Let me explain why this is a problem. Dual enrollment, as you know, is an effort to lower total college costs for families by offering college-level courses at the high school level. That is accomplished by high schools soliciting curricula that are developed and approved by college departments/curriculum committees and offering those courses to their students. At Mount Aloysius, in the heart of one of the lowest income regions in Pennsylvania (the Southern Allegheny Mountains), this represents an important initiative to address college affordability issues.

In the last five years, we have almost quintupled the number of students (from under 200 to almost 1,000) who now achieve dual enrollment credits while in high school from Mount Aloysius College. That has been a deliberate attempt, enabled by our hiring a former high school principal with excellent connections in multiple school districts. He has grown the program successfully and it is now active in 64 different school districts in Pennsylvania. When I met with him recently to discuss the program he gave me an example of his own grandchildren who accumulated 28 and 29 credits respectively, each saving their parents an entire year of college tuition.

It's important to emphasize that dual enrollment is not a money-making proposition at the higher education level—at least not for a school like ours. We charge a minimal amount to the high schools and though we don't lose any money on the proposition, we certainly don't make any. It is a serious attempt at this mission-focused Mercy institution to address—in a practical way—real affordability issues, especially for first-generation and low-income families.

It would be very easy to fix this inequity in reporting by simply ensuring that the denominator in all cases where we are calculating the percentage of Pell or lower-income students at a school does not include dual-enrolled students (again, see the analysis in Attachment 1). I would also encourage you not to include any but full-time enrolled students, since so many part-time, continuing education students these days are not enrolled to acquire a degree but simply to improve their skills in a given area. But ***at the very least, the Department needs to make it clear that dual enrollment should not be included in the calculation of total headcount at these institutions.***

The second concern that I have with the proposed new calculations is the Department's indication that it will classify colleges into only two categories: two-year institutions and four-year institutions. We are a hybrid institution. Mount Aloysius began as an academy for young girls when, 161 years ago, seven Irish-born nuns realized that no one was educating young *girls* (K-12) in this region of the Southern Allegheny Mountains. In 1939, they expanded that educational offering and founded the very first junior college in Pennsylvania to give these now young *women* (and later, men) a further advantage in higher education. We became a four-year institution in 1991, again expressly because the mission of the college was to provide

the kind of education that was necessary in the region and it was determined that four-year degrees needed to be added to the program of existing two-year offerings.

It's important to understand that offering two-year degrees is one of two key tools in our effort to attract first-generation and low-income students to Mount Aloysius. For many first-generation to college and lower-income families the financial commitment to four years of college is simply too unrealistic for them to even consider. Encouraging them to begin with a career-directed, two-year program (our two-year curricula focus on the health sciences—nursing, radiology, surgical technology, etc.—but require liberal arts and critical thinking courses) makes the proposition more affordable and therefore more palatable. It is an important part of our arsenal in serving this population in our part of Pennsylvania.

Another key element of the attraction is that these programs of study are in fields which have extremely high job placement rates in this region (100% placement rate for our two- and four-year nursing programs, over 90% placement rate for our two-year health science degrees) and are, therefore, acceptable to these "new-to-college" families. We use the two-year curriculum to prepare them for a career but also as an opportunity to infuse critical thinking through the required liberal arts courses (our Mount Aloysius *Compact* is designed to produce students who are "job-ready, technology-ready and community-ready"). We also encourage these two-year degree students to complete the four-year degree as well and more than a third of them do. To compare us solely to two-year or, alternatively, only to four-year institutions would not be appropriate. We are neither. *This is also a problem that is easily fixed—simply keep the current Carnegie Classification System which separately categorizes institutions that offer both two- and four-year curricula.*

In fact, if we were to become overly concerned with scores in this rating system, the exclusively two- *or* four-year model envisioned in the latest iteration of the White House Ratings System would encourage institutions like Mount Aloysius to move away from the two- *and* four-year model, which, in our experience, is a proven way to encourage first-generation and lower-income students to move into higher education. So, I would encourage you strongly to employ a category in the ratings that reflects the current Carnegie Classification System and includes schools that offer two-year degrees, four-year degrees and both two-year and four-year degrees.

Third, for there to be any chance for this Ratings System to be successful, it is essential that the US Department of Education assume full ownership of the data. Small adjustments in definitions across states and ratings systems can result in significant variances in overall "scores." There are already a myriad of entities which solicit data from a variety of state, federal, for-profit and non-profit sources to create their very own "scores"—on everything from graduation and retention rates, to campus safety and security, to job placement and even such amorphous concepts as "likability, "atmosphere," etc.

It would not be prudent—as some have suggested—to merge data from multiple states and data systems. As a former state cabinet level official charged with supervising enormous data

systems for a population of 11 million citizens, I can assure you that the definitional disparities alone would be daunting. It would be far wiser to emphasize key data points over which you have complete confidence and control.

In your effort to create a kind of “student acuity index” (similar to the “patient acuity index” currently employed in the health care system)—it would be better to use multiple data points from data sets for which you have complete confidence, rather than to merge data from multiple sources including ones in which you have less confidence. For example, while you intend to include a measure for the overall percentage of Pell recipients among full-time students, you may have difficulty finding reliable measures for some of the other 11 indicators you suggest as part of what I am referring to as a “student acuity index.” You could simply refer back to the data set in which you do have confidence (Pell recipient rates) and ***add another measure from that data—for the percentage of students who receive the highest Pell grant (who are often the hardest to serve). While the former (total percentage Pell) shows commitment; the latter (percentage highest Pell) shows real determination.***

Thank you for this opportunity to comment. All the best,

(b)(6)

Thomas P. Foley
President

Attachment 1: Memo on IPEDS and Dual Enrollment—Key Issues

Attachment 2: Highlighted IPEDS Dual Enrollment Reporting Instructions

{Submitted: February 17, 2015}



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MEMORANDUM

To: Secretary Arne Duncan

From: Tom Foley, President, Mount Aloysius College

(b)(6)

Date: 2/13/2015

RE: High School Dual Enrollment and Non-Degree Seeking Student Reporting to IPEDS

The White House Scorecard, as currently envisioned, may discourage affordability initiatives such as dual enrollment. Let me explain with direct reference to IPEDs data submission requirements:

- 1. IPEDs requirements are clear:** In order to follow federal guidelines for IPEDS reporting, we currently report High School Dual Enrollment students and other non-degree seeking students in several sections of the surveys, including Fall Enrollment and Student Financial Aid. The instructions in the IPEDS surveys are clear in that we should count High School Dual Enrollment students as non-degree seeking students (see the highlighted portions of pages 2, 6, and 17 of the attached instructions for Fall Enrollment and page 5 of the Student Financial Aid instructions).
- 2. The denominator is key:** This current reporting method does and will continue to have a significant negative impact on the calculated percent of students receiving Pell grants in the Student Financial Aid section of IPEDS. Currently in the Student Financial Aid section our percent Pell is calculated by using all undergraduate students as the denominator (which in fall 2014 includes 230 non-degree Dual Enrollment students who are not eligible for Pell Grants and in Spring 2014 included almost 1,000 Dual enrollment students). This also is the same denominator used to calculate the percent receiving: (1) Grant or scholarship aid from the federal government, state/local government, the institution, and other sources known to the institution; and (2) Federal Student Loans.
- 3. Essential unfairness:** Using high school dual enrollment and other non-degree seeking students in calculating the percentage of our students who are Pell students unfairly lowers the percentage since non-degree seeking students are not eligible to receive any type of federal, state or institutional financial aid (grants, scholarships and loans). This may not be an issue for many institutions but due to our high proportion (13% of the total) of non-degree seeking students, it is for us.

4. **Paradox with Dual Enrollment:** The irony with this current method is that by providing a cost savings initiative like Dual Enrollment (which helps middle to lower-income students), we could be lowering our White House Scorecard rating because none of these student are eligible to receive Pell grants. If this method of calculation is used in such a rating, it will potentially discourage institutions from having Dual Enrollment programs which provide little profit or other benefits to the institution but saves the families millions in college costs down the road.
5. **Multiplier effect:** In addition, anyone (including non- and for-profit entities that issue their own scorecards) can go to IPEDS and access the percentage calculated by the current method and report it elsewhere without providing the method of calculation and the problems with it.
6. **There is an easy fix to this problem:** Based on how student enrollment data are currently reported to IPEDS, it should be relatively easy for any federal calculations to factor out non-degree seeking students because they are reported as a separate group from degree seeking students. Simply switching out “all undergraduate students” as the denominator and replacing it with “degree seeking undergraduates” would resolve the problem.

For institutions operating on an "other academic calendar," a calendar that differs by program, or enrolls students on a continuous basis (referred to as program reporters), fall enrollment is reported for students enrolled any time during the period August 1 and October 31.

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Context Boxes

Context boxes are provided to allow institutions to provide more information regarding survey component items. Note that some context boxes are posted on the [College Navigator Website](#), which is the college search tool offered by NCES. NCES will review entries in these context boxes for applicability and appropriateness before posting them on the [College Navigator Website](#); institutions should check grammar and spelling of their entries.

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Coverage

Who to Include

Include all students **enrolled for credit** (courses or programs that can be applied towards the requirements for a postsecondary degree, diploma, certificate, or other formal award), regardless of whether or not they are seeking a degree or certificate. This includes:

- Students enrolled for credit in off-campus centers
- High school students taking regular college courses for credit
- Students taking remedial courses if the student is degree-seeking for the purpose of student financial aid determination
- Students from overseas enrolled in U.S. courses for credit (e.g., online students)
- Graduate students enrolled for thesis credits, even when zero credits are awarded, as these students are still enrolled and seeking their degree

Who to Exclude

Exclude students who are **not** enrolled for credit. For example, exclude:

- Students enrolled exclusively in courses that cannot be applied towards a formal award
- Students enrolled exclusively in Continuing Education Units (CEUs)
- Students exclusively auditing classes
- Residents or interns in doctor's - professional practice programs, since they have already received their doctor's degree

In addition, the following students should be excluded:

- Any student studying abroad (e.g., at a foreign university) if their enrollment at the 'home' institution serves as an administrative record
- Students in any branch campus located in a foreign country

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Where to Get Help with Reporting

IPEDS Help Desk
Phone: 1-877-225-2568
Email: ipedshelp@rti.org

Web Tutorials

You can also consult the [IPEDS website](#) which contains several tutorials on IPEDS data collection, a self-paced overview of IPEDS tools, and other valuable resources.

IPEDS Resource Page

In column 5, report the total number of full-time non-degree/certificate-seeking undergraduates. These students are enrolled for credit but not with the intention of earning a formal award. **Note:** High school students enrolled in creditable courses prior to high school graduation are considered non-degree/certificate-seeking students.

Once you save the data by clicking the 'Verify and Save' button, the 'Total full-time degree/certificate-seeking undergraduates' (column 4) and 'Total, full-time undergraduate students' (column 6) will be calculated by the system and display on the survey screen.

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Part A: Part-time Undergraduate Students

Report part-time students using the same definitions and instructions provided for full-time undergraduate students.

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Part A: Graduate Students by Race/Ethnicity and Gender

Report all students enrolled for credit at the graduate level as either full-time (column 1) or part-time (column 2). Include graduate students enrolled for thesis credits, even when zero credits are awarded, as these students are still enrolled and seeking their degree.

Graduate Student Reporting Reminder: Institutions are required to report using the new postbaccalaureate classifications. Report all postbaccalaureate degree and certificate students as graduate students, including doctor's-professional practice students (formerly first-professional).

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Part A: Enrollment by Selected Fields of Study

Report students in the selected fields using the same definitions and instructions provided for Part A: Enrollment by Race/Ethnicity screens.

Students at your institution that have not declared a major field of study or their major field of study is not one of the selected fields should be reported on the Part A Enrollment by Race/Ethnicity. The enrollment reporting by the selected fields of study is most likely only a subset of the total students enrolled in your institution.

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Part A: Enrollment by Distance Education Status

On this screen, report all students reported on previous Part A screens who are:

Enrolled exclusively in distance education courses offered at your institution:

Students who are enrolled only in courses that are considered distance education courses.

Enrolled in some but not all distance education courses offered at your institution:

Students who are enrolled in at least one course that is considered a distance education course, but are not enrolled exclusively in distance education courses.

Not enrolled in any distance education courses offered at your institution: Students who are not enrolled in any distance education courses.

Note: Requirements for coming to campus for orientation, testing, or academic support services do not exclude a course from being classified as exclusively distance education. Similarly, if a student is taking instructional portions of their program entirely online, but are then required to complete a practicum, residency, or internship, the student can still be considered enrolled in entirely education courses.

These students should be reported as first-time undergraduates. The definition of "first-time" allows for students to still be classified as first-time if the college credit they have previously earned occurred in the summer immediately prior to enrollment.

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4) How do I report a student who earned college credit while in high school (a dual enrolled student) and has now graduated high school and enrolled in my institution in the Fall?

If the college credit was earned prior to the student graduating high school, then this student would be considered a first-time student in the Fall. The definition of "first-time" allows for students to still be classified as first-time if the college credit they have previously earned was prior to their high school graduation.

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5) How do I treat new students who transferred into the institution the prior summer term and take courses in the fall?

For the Fall Enrollment survey, count the student as a "transfer-in," even if the student transferred into the institution during the prior summer term and is not entering the institution for the first time in the fall.

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6) Does "continuing/returning student" include those students who have stopped out and re-entered the same institution?

Yes, "continuing/returning student" is meant to capture students who are not first-time or transfer-in. This includes students who have been continuously enrolled in the institution and those who have stopped out and re-enrolled, without having transferred to another institution.

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7) How do I report a student who took courses as a non-degree-seeking student and re-enrolls as a degree-seeking student at the same reporting institution?

As of the fall reporting date, students with credit received for courses taken as a non-degree-seeking student at the same institution, without having transferred to another institution, should be reported as continuing/returning students. Students without credit received for courses taken as non-degree-seeking student at the same institution and without any other prior postsecondary experience should be reported as first-time.

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8) If a student enrolled for credit has not indicated whether they intend to earn a degree or certificate, how do I determine whether they are degree/certificate-seeking?

If the student has not indicated any intent but is applying for Title IV federal financial aid, assume the student to be degree/certificate-seeking.

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9) Where do I report students who are seeking a second baccalaureate degree?

Report these students in the column labeled "Continuing" degree/certificate-seeking students (column 3). This column is intended to capture all degree/certificate-seeking undergraduate students who are not first-time and did not transfer-in to the institution in that Fall.

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10) Where do I report a high school student who is enrolled for credit at my institution (a dual enrolled student)?

This student would be reported as non-degree/certificate-seeking. Prior to graduating high school, a student is non-degree/certificate-seeking. Once the student graduates high school they can be classified as degree/certificate-seeking, if appropriate.

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11) My institution has students for which gender is unknown. Since there is no place to report "gender unknown" on the IPEDS data collection screens, how should we report these individuals?

These individuals are still to be reported to IPEDS, even though their gender is unknown. It is up to the institution to decide how best to handle reporting individuals whose gender is unknown. However, a common method used is to allocate students with gender unknown based on the known proportion of men to women.

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12) How do I report foreign students living outside the U.S. who are enrolled in my institution?

There has been no change to how these students should be reported. Foreign students living outside the U.S., such as a foreign student living outside the U.S. who is enrolled in distance education at your institution, should be classified in the Race/Ethnicity Unknown category. Only U.S. citizens are to be categorized in the specific Race/Ethnicity categories. The non-resident alien category is reserved specifically for students that are in the U.S. under that specific legal status.

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Fall Enrollment in Selected Fields (Part A, 4-year institutions only)

1) What do I do if my institution does not offer any of the program areas listed on the CIP selection screen?

O'Bergh, Jon

From: Smith, Amy Budner <amy.smith@squirepb.com>
Sent: Tuesday, February 17, 2015 3:12 PM
To: College Feedback
Cc: Jordan, Stephen (smjordan@msudenver.edu)
Subject: Metropolitan State University of Denver comments re: ratings framework
Attachments: MSU Denver - Comments on the College Ratings System Framework - February 2015.pdf

Good afternoon,

On behalf of Dr. Stephen Jordan, President of Metropolitan State University of Denver, I have attached the University's feedback on the approaches and specific questions outlined by the Department on the proposed ratings system framework and metrics. We hope you find this information useful and we are happy to answer any questions you may have.

Sincerely,
Amy



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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

Dear Secretary Duncan:

On behalf of Metropolitan State University of Denver (MSU Denver), I respectfully submit these comments on the College Ratings Framework that the Department of Education released in December 2014. We greatly appreciate the opportunity to comment on the framework for the college ratings system and provide feedback on the data elements, metrics, methods of data collection, methods of weighting or scoring, and presentation frameworks for assessing the performance of institutions of higher education and advancing institutional accountability while also enhancing consumer access to useful information.

MSU Denver would like to commend the Department on its efforts to better inform students and their families of the choices they have in higher education and to improve institutional and student performance while also helping to meet President Obama's 2020 college completion goal. MSU Denver also strives to meet these objectives, while serving the unique population of our student body. MSU Denver, however, has serious reservations with the Department's proposed framework for the college ratings system because of the flaws associated with the data sources the Department has indicated it will rely on for the 1.0 version. Further, given the Department's reliance on these data sources and the intent to attach a rating to most of the metrics proposed, we are concerned that the ratings system will not necessarily present accurate information to prospective students and their families. We also are concerned that MSU Denver and other institutions will be held accountable for metrics that may not truly reflect the value we offer students. For these reasons, we are worried that there will not be an opportunity to share feedback on the actual system (before ratings are incorporated), given the Department's intent to have a system established by the 2015-2016 academic year, which is only a few months away. At this point in time, there is no clear formula laid out, tested, and available for review.

We have been in support of many of the Department's efforts and continue to be, but in the interest of informing our prospective students and their families properly and ensuring that MSU Denver and other institutions of higher education are not subject to unintended consequences from the ratings system that could have a serious, detrimental impact, we respectfully ask that the Department reconsider its implementation timeline for the ratings system.

ABOUT US

MSU Denver is Colorado's urban land-grant university, offering individualized, relevant bachelor's and select master's degrees to more undergraduate Coloradans than any other four-year university in the state. MSU Denver's student population mirrors the ethnic demographics of the state, making the University the leader in diverse enrollment among Colorado's four-year universities with nearly 35 percent students of color. Moreover, the average age of our student body is 26, and 80 percent of our students work full- or part-time. Over the last five years, we have seen a two-percent decrease in the number of students 24 and under, and a 17 percent increase in those students 25 and older. We serve a large number of first-generation and low-income students, with approximately 45 percent of the student body Pell-eligible. In addition, MSU Denver works diligently to serve the veteran population in Colorado. Recently, the *Military Times* named MSU Denver the best college in the state of Colorado for veterans and ranked our school 32nd best in the nation.

RATING INSTITUTIONS

- **Improvement Over Time.** MSU Denver recommends two metrics for the Department to consider identifying institutional trends, which we think should be over a 20-year period to allow for subtle changes that require years to compound. The first metric is the number of degrees/certificates issued per full-time equivalent student, which demonstrates effectiveness and includes all the transfers, re-admits, and long-term students. The second metric shows efficient use of tuition and public funds by taking the total budget divided by the number of degrees granted.
- **Institutional Groupings.** MSU Denver is concerned about the current structure that the Department has proposed for rating schools in the institutional groupings outlined in the framework. While we understand the need for classifying schools into categories for comparison, the current proposal does not fully capture various institutional characteristics as it only has two groups: two- or four-year institutions. This proposed grouping fails to account for other measures such as size, diversity of student body, economic status of student body, similarity of academic offerings, level of state support, tuition per student, and university mission (outside of two- or four-year degree granted).

MSU Denver has a very unique mission in comparison to the other institutions located in the state of Colorado, thus a comparison of our institution to other four-year institutions in the state is often irrelevant given the type of students that we serve. Additionally, 97 percent of our student body is made up of in-state students from Colorado. As such, a simple comparison to four-year institutions outside of the state also is not as helpful as it could be if we were compared to schools based on other metrics besides the two-year or four-year designation.

DATA SOURCES

- **Integrated Postsecondary Education Data System (IPEDS)**. Again, while MSU Denver supports any efforts to advance institutional accountability and assist students in making well-informed decisions about higher education, we are concerned that the data that the Department is using to hold institutions accountable and determine the ratings, as defined in the framework, is inaccurate and often unavailable. Many of the metrics that the Department says it will use to measure colleges and universities are not currently collected as part of the Integrated Postsecondary Education Data System (IPEDS). For example, of the eleven metrics that the framework proposes to use, only one metric – the percentage of Pell Grant recipients – is currently accurate and available to the Department. Although MSU Denver commends the Department for seeking to hold institutions accountable and increase transparency, we believe that it is important for the Department to focus on fixing the current IPEDS system.
- **National Student Loan Data System (NSLDS)**. MSU Denver is not in favor of the Department using NSLDS as a data source because it covers only students who receive federal student aid and also is flawed. This limited scope does not and cannot accurately depict how an institution fulfills its mission through support and service to its entire student body.
- **Alternative Data Sources**. MSU Denver fully supports efforts to have the Department adopt metrics from the Voluntary System for Accountability (VSA), which was developed in 2007 by university leaders and is sponsored by the Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AACU). MSU Denver was an early adopter of the initiative, which seeks to supply clear, accessible, and comparable information on the undergraduate student experience through a common web report. We believe so strongly in this initiative that as President of MSU Denver, I agreed to the VSA Oversight Board chairmanship in 2014.

MSU Denver encourages the Department to continue to have constructive conversations with education associations about the adoption of some of VSA's metrics and we welcome the opportunity to be a part of these conversations. With nearly 280 institutions of higher education participating in the VSA initiative, the Administration should not reinvent the wheel but should find ways to build off of the good work already done here.

METRICS

- **Percent Pell**. MSU Denver believes this access metric should not be included in the college ratings system unless the Department includes it as a substitute for college readiness and such a metric is viewed as a baseline factor in determining the expected performance/value-add of an institution.

As for the Department's concern that including this metric will incentivize institutions to enroll Pell-eligible students over those students who are just over the income-eligibility threshold, we think no such incentive will exist. Predictive analysis shows that Pell-eligible students have lower success rates, thus, should the Department proceed with a college ratings system that does incorporate this metric into a baseline to determine expected performance, then there is an incentive for institutions to enroll non-eligible Pell students in order to have higher ratings on performance outcomes (e.g., completion rates).

- **First-Generation College Status.** MSU Denver supports the Department including a first-generation college status metric because there is a significant correlation between degree attainment between generations.
- **Average Net Price.** MSU Denver strongly encourages the Department to include an average net price metric because it is a true cost indicator. For example, under this metric, the cost of attending MSU Denver is more accurately reflected because it accounts for combined federal, state, institution, and donor funding provided through grants to our students, which averages about 50% of all tuition and fee charges.
- **Net Price by Quintile.** MSU Denver recommends including this affordability metric in the college ratings system and having it serve as a complement to the average net price. MSU Denver does not recommend that the Department replace the average net price metric with the net price quintile metric.
- **Average Loan Debt.** MSU Denver agrees with the Department's decision in the framework to not use the average federal loan debt accrued by students for the reasons the Department outlined.
- **Completion Rates.** MSU Denver is most concerned about the way the Department calculates its completion rates and how this metric will be used to rate institutions under the college ratings system. Currently, IPEDS data only counts the success of a very limited college-going population and does not acknowledge the "new majority" of post traditional higher education students – that is students who are largely transfer students, have family or work obligations that inhibit their ability to be full-time students, and, as a result, graduate on an eight-to-ten year plan versus the IPEDS four-to-six year plan. By using a completion rate metric based on how many first-time, full-time freshman graduate from the institution, the data that is collected is completely misleading in characterizing schools like MSU Denver, especially since only 17 percent of our student population is a first-time, full-time student.

Further, MSU Denver encourages the Department to include re-admits in the calculation of completion rates. For example, it is commonly understood among our peer-institutions that part-time students rarely attend every semester. In fact, sometimes after not attending for one or two semesters, they are required to readmit. In the case of MSU Denver, this is a large number of our students.

- **Transfer Rates.** MSU Denver recommends that the Department adopt the VSA metric on transfer rates because its data is more comprehensive and reflects more accurately the credit institutions should receive. Should the Department not adopt the VSA metric, then we believe the Department should give credit to institutions for transfers between two-year and four-year institutions in addition to allowing community colleges and four-year institutions to share credit. In doing so, MSU Denver believes a pro-rated quotient seems fairest (e.g., if a student spends 70 hours enrolled at our institution, and 50 hours enrolled at another institution, MSU Denver would receive 7/12 of the credit), though we do recognize some of the challenges involved with this record keeping.

- **Labor Market Success.** MSU Denver strongly urges the Department not to include a metric to measure labor market success – if there are additional financial burdens placed on institutions. The cost to hire the number of full-time employees required to find information post-graduation would be considerably high for institutions that are not part of an educational system or located in a state that takes the lead on collecting information on employment and earned income. Further, most institutions would likely divert funds allocated to students or raise tuition in order to support the additional staff necessary to collect such information.

More importantly, MSU Denver is extremely concerned about the inherent messaging this metric would send if included in the college ratings system – that salary level is the only important post-graduation metric that students should measure and institutions like MSU Denver are primarily responsible for such salary levels.

- **Graduate School Attendance.** MSU Denver recommends that the Department not include this outcome measure in the college ratings system. We are concerned with including this metric because there is limited data available, as the Department acknowledged in the framework, and the metric signals that graduate school is a desirable outcome for all students. For universities like MSU Denver and our peer-institutions, there is strong emphasis placed on having our students enter and navigate a competitive workforce after graduating.
- **Loan Performance Outcomes.** MSU Denver does not believe this metric should be included in the college ratings system as it is not an indicator of institutional performance. The metric does not distinguish between the debt students amass at each institution before transferring. Thus, a prospective student who is reviewing the college ratings may easily assume that the debt accrued by a student who transferred twice before graduating from MSU Denver, for example, was all accrued at our institution, which is inaccurate and misleading.

If the Department decides to use this metric, it may want to consider using the metric only in ratio to the cost of attendance, as well as only allow the debt accumulated at an individual institution to be counted.

- **Performance Over Multiple Years.** MSU Denver recommends that to safeguard against volatility in ratings due to anomalous, one-time shocks that the Department use a rolling average over five to seven years to incorporate multiple years of data for each metric. We believe that three years is too short of a time frame, as it takes a student an average of nearly five years to graduate.

RATINGS STRUCTURE

- **How It Fits Together.** MSU Denver suggests that the Department consider using an ACT-type score for each grouping of institutions with an overall index score then broken down into no more than four components.

Once again, MSU Denver thanks the Department for providing us with the opportunity to submit comments. If you have questions about our comments or would like to discuss them further, do not hesitate to contact me.

Sincerely,

(b)(6)

Stephen Jordan
President

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 17, 2015 3:14 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: February 17, 2015

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

Dear Mr. Secretary:

I write to offer my thoughts on the proposed Postsecondary Institution Ratings System (PRIS). Like other leaders in higher education, we, at Fairfield are committed to the President Obama's agenda of broadening access and affordability, along with transparency of information for prospective students and their families. We also appreciate the opportunity to work with the Administration to address these areas.

We are in agreement that individuals should be able to easily access the information they need to choose a college that meets their needs and aspirations. While we are supportive of having the federal government identify the appropriate information and put in place the means to make this information as accessible as possible, we also believe that weighting and assigning a value to that information should rest in the hands of the those who are using the information to select the institutions which are of interest to them and will meet their individual needs.

The federal government, with its access to millions of college aspirants, and its credibility as an unbiased, statistical resource is in a unique position to help families sort through myriad college options available. The current consumer search tool, the University and College Accountability Network (U-Can) was developed for just such a purpose and has the active participation of more than 600 independent colleges and universities, and has had nearly four million institutional profiles researched and viewed since its introduction.

While there is mutual concern by government and educational institutions about transparency in college choice, when the announcement of PIRS was made, there was concern among higher education leaders because of the lack of clarity about the components and intended uses of the proposed rating system.

The National Association of Independent Colleges and Universities (NAICU) has outlined in great detail and provided to you and others numerous issues related to PIRS that are of concern, and I will not reiterate them in this communication. However, NAICU member presidents and others involved in administering the college admission process are in agreement that a useful college rating system, whether done by private entities or by the government is not possible. Such a system of numbers without context is not a valuable tool. Determining the worth of certain factors is an individual process, and one that is relative to the circumstances of an individual student and their family. In addition, it is important to note that traditional age college students are being joined, more and more, in their classrooms by part-time, older students who are returning to complete a degree or starting for their first time and their selection factors may be quite different that the 18 to 22 ye! ar olds.

In closing, I believe that is an appropriate role that the Administration can play in helping prospective students make informed choices when selecting an institution at which to pursue their educational goals. Providing information that would go beyond commercial ratings and rankings would be of great service and is an initiative in which we, in higher education, are happy to participate. However, we cannot support any effort that would create a government-imposed rating system.

Sincerely,

The Rev. Jeffrey P. von Arx, S.J.
President
Fairfield University

Constituency: Other (specify below)

Other Constituency (if supplied): University President

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: Jim Kolesar <jkolesar@williams.edu>
Sent: Tuesday, February 17, 2015 3:15 PM
To: College Feedback
Subject: comments on college rating framework
Attachments: SKMBT_C28015021715210.pdf

WILLIAMS COLLEGE WILLIAMSTOWN, MASSACHUSETTS 01267

February 17, 2015

JAMES G. KOLESAR
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James.G.Kolesar@williams.edu

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

Dear Secretary Duncan,

Williams College appreciates the opportunity to comment on the document "A New System of College Ratings." The observations here complement those provided by Williams President Adam Falk on January 30, 2014.

In that letter he applauded the Department of Education's efforts to better help vulnerable families navigate the financial aid process and to better ensure that federal aid is spent in ways that maximize its benefit to students and society. He also expressed concerns about possible unintended negative consequences of a federal rating system, and it is those concerns that lead to the comments contained here.

I would start with pointing out how misleading it would be for many families if the rating calculation were to ignore the very considerable institution-based grant aid that those families would benefit from at many colleges. This misinformation would seem likely to increase the kind of under-matching that the department is rightly eager to address.

Similarly, the inclusion of full-fee payers in the calculation of average net price would so skew the results as to make them misleading to the many families of low and middle income who would qualify for federal and institutional aid.

At the same time, the exclusion of average debt from the rating calculation would hide from families the dramatic differences that exist in loan expectations among institutions. This, too, would run counter to the department's laudable efforts to decrease families' reliance on education debt.

Among the many challenges of collecting useful and reliable data on the experience of students after they have left college, the measure of how many graduates of a college attend, or have attended, graduate school would be skewed by counting only those who used federal loan programs to do so. This also would mislead families.

We understand the great complexities of devising a single rating system that could well serve families and the federal government. At a minimum, such a system should do no harm, as it appears some of the components currently under consideration would actually do.

As a result, we ask you to proceed with all due caution.

Sincerely,

(b)(6)

James G. Kolesar

JGK/alw

O'Bergh, Jon

From: Marc Scheessele <mscheess@slu.edu>
Sent: Tuesday, February 17, 2015 3:18 PM
To: College Feedback
Subject: PIRS Framework Comments
Attachments: Draft Framework Comments.pdf; January 2014 PIRS Comment Letter.pdf

Attached, please find written comments from Saint Louis University's President, Dr. Fred Pestello, regarding the Department's initiative to establish a Postsecondary Institution Rating System and the draft framework that was released for public comment on December 19, 2014.

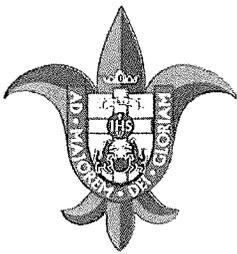
Should you have any questions, please feel free to contact me directly at 314-977-4132 or mscheess@slu.edu.

Sincerely,

Marc Scheessele

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Marc Scheessele
Director of Government Relations
Saint Louis University
314-977-4132



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SAINT LOUIS
UNIVERSITY

Office of the President

February 17, 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 Saint Louis University to provide written comments on the Department of Education's (Department) initiative to establish a Postsecondary Institution Rating System (PIRS) and the draft framework that was released for public comment on December 19, 2014.

Founded in 1818, Saint Louis University has long been committed to providing a top-quality education to students from differing backgrounds and all walks of life. As a Catholic, Jesuit institution our mission calls us to ensure that educational opportunities are extended to groups currently underrepresented in the higher education community. Therefore, we applaud the Department's continued efforts to increase access, ensure affordability and improve student outcomes.

Throughout the process of the Department's efforts to create a PIRS, the University has appreciated your willingness to engage in a dialogue with the higher education community and is grateful for this opportunity to again provide feedback. I'd like to begin by calling attention to the letter dated January 31, 2014, (attached) as the concerns described in our previous public comment remain the same, especially those related to the collection of data, along with provisions for data corrections when necessary, and concerns about the inclusion of non-degree seeking students in the rating system metrics. I also hope any scorecard or rating system would recognize the percent of undergraduate students that graduate with no student loans.

After reviewing the draft framework, I continue to be concerned that it will be nearly impossible to design the new PIRS in a fashion that would factor in a number of variables that are often difficult to quantify. Through the Department's own admission in the framework document: "Many of the outcomes of postsecondary education are intangible, are not amendable to simple and readily comparable quantitative measures, and are not the subject of existing data sources that could be used across all institutions." To continue to move forward in designing a rating system that has no way of including hard to quantify elements will be a disservice to many families that might rely on the Department's ratings without the benefit of allowing them the opportunity to make their own value judgments about what is important when evaluating a school.