

The Honorable Arne Duncan

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February 17, 2015

Additionally, as the draft framework acknowledged throughout the document, nearly all of the proposed metrics have flaws, or their inclusion might produce unintended incentives that would negatively impact certain student populations. Statements in the framework that a certain metric under consideration “might give institutions undesirable incentives to enroll students who are at the upper end of the income distribution within each income quintile” and that inclusion of a different metric “could have a chilling effect on the willingness of institutions to enroll low-income students” are clear evidence that while well intended, some possible outcomes of creating this rating system may be detrimental to the very students needing assistance the most.

Further, in a number of instances the framework points to the difficulty in designing the rating system due to the limited data currently available to the Department. Ensuring that a clear and accurate measuring device is included in a tool the federal government is designing to empower consumers is paramount. If a rating system moves forward without reliable data in place, it is almost certain that an incomplete and potentially inaccurate representation of a school will be presented to students and parents.

As you continue to have discussions with key stakeholders on this issue, I am hopeful you will come to the conclusion that establishing a rating system for colleges and universities is not a task the federal government should be involved in. For complex institutions serving a wide diversity of students, like Saint Louis University, the proposed system has the potential to do more damage, through misinformation, than good.

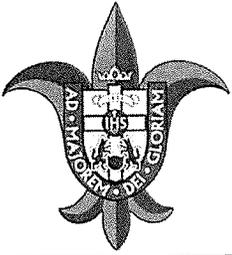
I am asking you to strongly reconsider moving forward with the proposed PIRS program.

Sincerely,

(b)(6)

Fred P. Pestello, Ph.D.
President

cc: Fr. Mike Sheeran of AJCU
David Warren of NAICU E
Rich Eckmann of CIC
Michael Galligan-Stierle of ACCU



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SAINT LOUIS
UNIVERSITY

Office of the President

January 31, 2014

Richard Reeves
National Center for Education Statistics
1990 K Street, NW
Room 8113A
Washington, DC 20006

Re: Docket ID ED-2013-IES-0151 "Postsecondary Institution Ratings System Response"

Dear Mr. Reeves:

On behalf of Saint Louis University, I am writing in response to the Department of Education's (Department) Request for Information regarding the development of a Postsecondary Institution Rating System (PIRS), which was published in the Federal Register on December 17, 2013.

Saint Louis University, founded in 1818, is proud of its long and ongoing efforts to provide top quality educational opportunities for all types of students, especially those underrepresented in the higher education community. We support the Department's ongoing focus on improving access for low-income and first-generation college students, maintaining affordability and reasonable debt levels and its support for entrepreneurial efforts to create educational opportunities for high school and non-traditional students.

As the Department begins to craft the new rating system, we would ask you to keep in mind that many institutions of higher education, including Saint Louis University, have unique missions to serve these differing student populations. We are concerned that if the new PIRS is not designed to factor in a number of variables that are often difficult to quantify, an incomplete and potentially inaccurate representation of a school may be the result.

In addition, recent troubling experiences with the data collection and interpretation processes used for the Department's College Scorecard initiative caused us apprehension regarding the formation of a new rating system. Specifically, Saint Louis University is uneasy about the potential analysis of institutional data into over-simplified results in combination with the Department's current data correction practices. Our recommended rating principles and concerns are as follows:

1. **Average salary levels should be gauged by graduates' degree field, career goals and home geographic location.** An over-emphasis on salary levels could adversely position institutions that promote careers in community and public service or whose graduates find work in lower paying regions of the country.
2. **Enrollments in high school advanced college credit programs, as well as students completing courses for non-degree continuing education, should not be combined with degree seeking student cohorts to determine institutional student success and financial support levels.** Colleges and universities could receive negative ratings for utilizing dual-enrollment and innovative adult learner outreach activities.
3. **Student persistence and graduation rates should be gauged to accurately represent adult learners, under-prepared students, transfer students and students enrolling in multiple institutions.** The proposed financial aid penalties could discourage schools from serving student populations less likely to graduate on a traditional time schedule and participating in dual-degree or transfer articulation programs.
4. **Provisions for data corrections and prompt rating report updates should be established prior to the initial system launch.** The ability to correct and update information on web-based reports will limit the distribution of misleading information to students and the potential to damage an institution's public standing.
5. **Precise data definitions should be provided prior to initial data collection.** Without clear guidance on how to calculate each data element of the rating system, schools may provide differing statistics, making any subsequent comparison of institutions inaccurate and confusing.

As a private, not-for-profit, Catholic, Jesuit Institution, Saint Louis University has long sought to educate our students in a way that ensures their future success in the workplace while encouraging them to contribute to the good of society as a whole. As a result, many of our graduates show an interest in pursuing an occupation with a focus on community or public service. While these jobs are very fulfilling and lead to a satisfying professional career, they often provide lower salaries. To include average salary in a PIRS, without taking into account other measures that might determine success after graduation would penalize schools that educate students in disciplines that provide great value to our communities, yet offer somewhat smaller paychecks to those happily employed in these fields. In addition, average salary figures need to be adjusted for graduates living in lower cost communities, like the Midwestern states, where average salaries are generally lower.

In encouraging entrepreneurial efforts to support diverse student populations, the Department will need to review and potentially revise its current definitions and processes in order to accommodate these innovative initiatives. As a specific example, the Administration has publicly called on institutions of higher education to offer accelerated learning opportunities and promote the expansion of dual-enrollment opportunities for high school students to earn credit hours before enrolling in college. We, at Saint Louis University, also believe dual-enrollment programs are a great asset to students and for well over three decades have served as one of the nation's leaders in providing significantly discounted college credit courses to high school students throughout our region. However, the University is currently being penalized for

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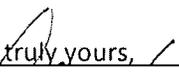
these efforts through a reporting requirement that factors these high school students into the definition that determines the total percent of overall students receiving aid, even though they are not eligible for government financial aid funds. In the past year alone, the percent of all Saint Louis University undergraduate students receiving aid as reported on the Department's College Navigator was deceptively low and calculated to be 53 percent, giving prospective students the false impression that only half of the University's students receive financial aid support. However, if the non-aid eligible high school students were omitted from the equation, a more accurate representation of 89 percent would have been displayed. We are hopeful steps will be taken to ensure that items being required to be reported to the Department paint the most accurate representation of each school as possible.

Further, as institutions like Saint Louis University are increasing the enrollment of adult learners it will be important to recognize these students often progress towards degree completion at a different rate than traditional undergraduates. While some adult learners' education advancement mirrors that of a traditional age student, many are part-time students or require longer to complete their degree due to other life circumstances that prevent them from remaining enrolled on a continuing basis. Schools enrolling a larger number of these students may need to be evaluated taking into account the different accommodations some adult learners require to successfully complete a degree.

Accuracy of data and information is paramount in any ratings system. The complexity of the data collection endeavor and the likelihood that incorrect data may unintentionally be included will be an ongoing concern. We hope the Department will develop clear processes for correcting mistakes and promptly post the accurate information in the ratings websites and publications so that universities are not detrimentally affected by inaccurate information. For example, it is alarming that without a mechanism for correcting data errors; the Department has allowed misinformation about Saint Louis University's six-year graduation rate to remain on the College Scorecard for almost a year after being notified that incorrect data was being displayed.

Finally, in the development of any PIRS, or other comparative data system designed to help prospective students and their families make meaningful comparisons between institutions, we would ask the Department to provide as much clarity and specific guidance as possible regarding how each matrix should be compiled. If schools are expected to be rated and subsequently compared to one another by information being collected by the federal government, it is imperative that clear definitions for calculating costs and other data elements are established to ensure that all institutions are providing similar statistics and consistency is being applied throughout the process.

Thank you for this opportunity to provide comments. Should you have any questions or require additional information, please let me know.

Very truly yours, 

(b)(6)

William R. Kauffman
Interim President
Saint Louis University

00027838-1

January 31, 2014
Page | 4

cc: J. Joseph Adorjan

O'Bergh, Jon

From: Moon, Jennifer <jennifermoon@augustana.edu>
Sent: Tuesday, February 17, 2015 3:21 PM
To: College Feedback
Subject: Augustana_Bahls_Response
Attachments: doc00262420150217141204.pdf

Please review the attached letter.

Thank you,

Jennifer L. Moon

Executive Assistant to the President
Office Manager - Communication and Marketing
Augustana College
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jennifermoon@augustana.edu

----- Forwarded message -----
From: <jennifermoon@augustana.edu>
Date: Tue, Feb 17, 2015 at 2:12 PM
Subject: Scanned from Founders111
To: jennifermoon@augustana.edu

Please do not respond directly to this e-mail as this account is not monitored. Please respond directly to your contact at Augustana College.

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Office of the President

February 17, 2015

College Ratings Comments
collegefeedback@cd.gov

Thank you for the opportunity to comment on the proposed college rating framework. We thank those at the Department of Education for their transparency and efforts to consider public comments.

At the outset, I should mention that I believe Augustana College in Rock Island, Illinois, the college which I have the privilege of serving as president, will do quite well under the proposed framework. Robert Morse of U.S. News and World Report has named the college as one of the three most efficient liberal arts colleges (comparing cost of attendance with outputs), and we have made great strides in increasing the number of Pell-eligible students, boosting strong graduation rates for all students.

Therefore, I am concerned about the proposed framework not for its impact on Augustana College, but for its impact on prospective students, particularly first generation students.

I am concerned that the proposed framework will cause unintended harm, specifically:

- 1. The proposed framework will disadvantage students, particularly first-generation students, by providing an overly simplistic metric that will divert needed attention from more important questions about college choice.**

The college selection process should be a highly individualized process for each student. These questions are the most important:

- Does the mission of the college fit the needs of the student and is the mission well-delivered?
- Is the academic program, and what it has to offer, a good match with the student's needs and abilities?
- Will the student find a fit at the college, taking advantage of the many experiences to grow in mind, spirit and body?
- Is the college a good value for students, both in terms of financial investment and time invested?

The proposed framework, purportedly designed "to provide better information about college value to students and families" in their college searches, obscures the important considerations set forth above by tempting families to shortcut the hard work of selecting a college by relying on a simplistic numeric rating. This particularly disadvantages first-generation students, whose parents have not have the college experience themselves and may be misled, notwithstanding the Department's cautions, to shortcut the deeper analysis necessary to find the right match.

- 2. Underlying the framework is the inappropriate assumption that the purpose of college is “labor market success.” Implementing this framework will further perpetuate this mistaken assumption.**

The purpose of Augustana for the past 155 years has been to prepare students for “rewarding lives of leadership and service” though growth in mind, body and spirit. Higher education is not, as the proposed ratings framework suggests, primarily an economic transaction. And it is noisome to church-related, liberal arts colleges to suggest that we should be rated by “long-term median earnings.” Is a college that prepares teachers and clergy less worthy than a college that prepares investment bankers? Why should a college that prepares students to enter human services profession be ranked lower than a college that primarily prepares business men and women?

I agree that job placement is important and college should prepare students for their first and last jobs. And I agree that it is difficult to lead a fulfilling life of service without gainful employment. But jobs are only one part of “leading lives of service” and, arguably, not the most important part. And in my experience, there is little correlation between a job’s earnings and its inherent value to society.

- 3. The proposed framework, like the U.S. News rankings, will lead to gaming of systems, cooking of numbers, and will drive harmful resource allocation.**

Prior to serving as President of Augustana College, I served as dean of Capital University Law School in Columbus, Ohio, for nine years. As law school dean I watched national rankings of law schools cause many unintended consequences. Information used by the rankings was inaccurate. Schools “cooked the books” on such things as placement rates. And law schools made resource allocation decisions not to improve student learning but to advance their rankings of influential publications. That will clearly happen here.

In the interest of supporting positive dialogue, I would suggest there are ways for the Department to address issue of accountability and public information which are much healthier and more effective than the proposed framework. Among them:

- 1. Require colleges and universities to prominently disclose key information about costs and outcomes on websites and in recruiting materials.**

The Department of Education should consider requiring prominent disclosure of information about costs and outcomes on its website and in its recruiting materials, as a matter of consumer protection. The American Bar Association (ABA) in Standard 509 of its Statements for Approval of Law Schools requires law schools to disclose, publish and distribute, in the form prescribed by the ABA, key consumer information. The information must be “complete, accurate and not misleading to a reasonable law school student or applicant.” The Department should consider doing the same thing in lieu of the currently proposed overly-simplistic rating frame work. The factors that the department might initially require disclosing could be those listed in the framework.

Disclosure of these factors leads to transparency and better consumer information, without the unintended consequence of encouraging students to put too much emphasis on the Department’s proposal to simplistically and artificially blend these factors into a rating. At the same time, the Department might disclose uniform factors with respect to each college and university on its website and provide the opportunities for students and their

families to receive a report about those factors for specific colleges and thereby compare and contrast them. Such reports have the potential to be much more information-rich and meaningful to families.

2. If the Department cannot be persuaded of the folly of its proposed rating system, the rating system should be based on student loan default rates.

Perhaps the most sound justification for the federal government to insert itself in the ranking of schools is the third purpose it identifies for rating – to ensure accountability and “wise and effective use” of the \$150 billion dollar investment in federal financial aid. The most direct way to do this is by rating colleges based on default rates related to federal loans. In addition, it would not be inappropriate to add program-completion rates for those receiving federal grants-in-aid.

Thank you for the opportunity to comment. Please challenge yourselves to step back from the current framework and consider the damage it will do by making the college choice process overly simplified and based on bad information. And please do not justify the current proposals as acceptable, as I have heard it justified, because these might be “better the least bad alternative” I, like many of my colleagues, are willing to do anything we can to work with you to develop a better framework for transparency and accountability.

Very truly yours,

(b)(6)

Steven C. Bahls
President

O'Bergh, Jon

From: Gelb, Jim <jgelb@calstate.edu>
Sent: Tuesday, February 17, 2015 3:39 PM
To: College Feedback
Subject: Comments on Draft Framework
Attachments: TPW - Duncan ltr 2-17-15 Framework College Ratings.pdf

Please find attached the California State University's comments on the Department of Education's Draft Framework for a New System of College Ratings.

James M. Gelb
Assistant Vice Chancellor for Federal Relations
The California State University
444 North Capitol Street NW, Suite 207
Washington, DC 20001
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 (cell)
jgelb@calstate.edu



THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

February 17, 2015

CHANNEL ISLANDS

CHICO

DOMINGUEZ HILLS

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LOS ANGELES

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POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS

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

Dear Secretary Duncan:

The California State University appreciates the Department of Education's invitation to comment on its draft framework of December 19, 2014 for a new system of college ratings.

We embrace the administration's purpose in proposing this framework: expanding college opportunity by recognizing institutions that excel at enrolling students from all backgrounds, focus on maintaining affordability, and succeed at helping students graduate. And we embrace the goals of promoting better informed family decisions, data-supported public policymaking, and "learning" opportunities for institutions that may be derived through comparative results from the ratings system efforts.

The nation's comprehensive undergraduate and graduate universities will play a pivotal role in the administration's success in reaching these goals. Their accessibility and scale creates opportunities for high quality affordable education that leads to success for students and society *writ large*. However, it is important that the administration's efforts do not unintentionally cause harm to or incentivize a change of mission in this important sector of educating America.

The California State University (CSU) serves unprecedented numbers of students targeted by federal programs, and has long provided an exceptional return on these investments. With 23 campuses and more than 460,000 students, of which nearly 400,000 are undergraduates, the CSU is the largest and most diverse bachelor and graduate degree university in the world. Roughly a third of our students are in the first generation in their family to attend college. Sixty percent of CSU students are students of color, and we provide more than half of all undergraduate degrees earned by California's Latino, African-American, and Native American students. Every year, over 50,000 students transfer from community colleges into the CSU. In 2013-14, CSU students earned over 103,000 undergraduate and graduate degrees; nearly half of the more than 85,000 undergraduate degrees were earned by Pell Grant recipients. Our graduates go on to be key contributors to the nation's workforce. An average

annual tuition and campus fees of \$6,759 helps make CSU campuses among the most affordable investments in the nation, and CSU students who incur debt graduate with significantly less of it than the national average.

Moreover, I am pleased to share with you that the CSU is leaning forward with substantial new commitments to increase student success. Our recently announced Graduation Initiative 2025 aims to boost CSU bachelor's degrees earned by over 100,000 over the next decade relative to current graduation rates. The initiative sets specific goals for improved completion rates for first-time freshmen, transfer students, and historically underrepresented and low-income students. Productive use of data and metrics and meaningful accountability processes are key to our strategy for meeting our goals in all of these areas.

We feel that the proposed ratings system holds good promise to align with ongoing CSU efforts to provide students and their families information that will allow them to make prudent decisions as they consider their higher education aspirations, as well as promote transparency, accountability and equity in higher education. Our efforts to date include participation in the Voluntary System of Accountability (VSA) College Portrait project since its inception in late 2007. Further, the CSU amplified on the required VSA elements through its Contributions to the Public Good pages, which pioneered providing information on costs, student loan indebtedness and mid-career salaries of bachelor's recipients for the system and each of our campuses. Our campuses also participate in the Student Achievement Measures (SAM), a promising new endeavor to identify and share useful information about access, affordability and outcomes as it includes transfer and part-time students and paints a much more realistic picture of today's student body than IPEDS/NSLDS data.

We are mindful of the difficulties inherent in identifying ratings categories and metrics that will meet the administration's objectives. And we appreciate your sensitivity to ensuring that any ratings system carrying the imprimatur of the U.S. Department of Education not have unintended negative consequences. In this spirit, we remain particularly interested in further work in three areas:

1. Reducing the draft framework's reliance on NSLDS data, as it disregards about half of the students in the CSU;
2. Reducing the reliance on post-graduate income levels and focusing more on employment rates (including participation in post-graduate education, military or Peace Corps service, etc.);
3. Improving clarity on the basis for rankings of "high-performing," "low-performing" and in the "middle" – we seek these outcomes to be normalized to the level of preparation and characteristics of incoming students and against like-institutions.

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In order to facilitate next steps, please find technical comments in the attached appendix.

I reaffirm our support for the core principles the administration is pursuing, and offer, as always, the CSU as a resource and partner as you work with institutions of higher education to tackle the critical issues facing our nation.

Sincerely,

(b)(6)

Timothy P. White
Chancellor

Attachment

c: Ted Mitchell, Under Secretary of Education
Jamiene S. Studley, Deputy Under Secretary of Education
Cecilia Muñoz, Assistant to the President and Director of the Domestic Policy Council
James Kvaal, Deputy Director of the Domestic Policy Council
Jim Gelb, Assistant Vice Chancellor of Federal Relations, California State University

The California State University (CSU) is pleased to provide this technical issue response to the Department's invitation to comment on its draft framework for a new system of college ratings. For questions about the comments and recommendations made below, please contact Dr. Ed Sullivan, Assistant Vice Chancellor for Academic Research and Resources, at (562) 951-4767 or esullivan@calstate.edu.

CSU Areas of Particular Interest

Sources of data - IPEDS and NSLDS: These primary data sources are retrospective. The resulting ratings will reflect lagged data. The NSLDS source will disregard approximately half of our students. Rating categorization after the first rating cycle is likely to remain the institution's ongoing rating in future ratings cycles.

Labor Market Success – Substantial Employment: We have concerns over how regional differences, data availability, and family/caretaking decisions will affect the proposed variable dichotomy. State mandates make provision of this data for those remaining in the institution's state possible for public institutions. A similar source for private institutions remains elusive. We prefer a metric based on employment rate (including participation in post-graduate education, service in the military or Peace Corps, etc.). The metric should allow for reasonable exclusions.

Rating Shown to Consumers and Institutional Accountability/Improvement Based on Metrics: Nuances of the three ratings levels will be complex for the average consumer to interpret. The three proposed rating levels (High, Middle, Low) will undoubtedly be equated to/interpreted as grades of A, C, or F. Most institutions will find themselves in the middle range of the distributions (grade of C). For these institutions it is unlikely the ratings will provide enough meaningful/actionable data to enact change efforts that they were not already considering. There will be little urgency for institutions to act upon the metrics to improve their ratings unless they are in the lowest rating category. It will be important to clarify ratings by institution sector (public/private), size, and academic mission (very high/high research institutions differ greatly from campuses with limited or no doctoral programs) along with other institutional characteristics revealed in the student body.

Additional Areas for Consideration

Improvement over time: We recommend that trend data over a rolling five-year period be considered. The five year trend allows strategic campus efforts to be reflected in the outcome metrics. Shorter time spans are subject to data turbulence. We recommend the following as potential change over time measures:

- One- and two-year persistence as a prospective improvement measure related to student outcomes (4- and 6-year graduation rates).
- Change in tuition and fees considered in real dollars as a reflection of changed financial burden to students. Percentage changes tend to be misleading, showing large changes in percentage when low-tuition institutions make modest changes in tuition/fee policy.
- Campus resources use/funding priorities may reflect a change in campus vision over time. These sorts of measures should be considered in a trend data collection.
- Consider use of measures like CLA, NSSE, the Purdue alumni survey, et al. as proxies of quality of the student experience.

Absence of data reflecting the Success of Community College Transfers at Four-Year Colleges and Universities: We see service, commitment, and magnitude of effort/impact by four-year colleges on the successful bachelor's degree completion of students transferring from two-year colleges as an area where data collection, additional rating consideration, and potential ratings augments are appropriate.

O'Bergh, Jon

From: Barry H. Corey <barry.corey@biola.edu>
Sent: Tuesday, February 17, 2015 4:00 PM
To: College Feedback
Cc: Shirley Hoogstra; David Warren
Subject: College Ratings Feedback
Attachments: 2-17L DOE Ratings Input.pdf

Attached is Biola University's feedback on the proposed college ratings system.

Barry H. Corey
President
Biola University
www.biola.edu
(562) 903-4701

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BARRY H. COREY



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 Biola University, I want to commend the DOE for its efforts to strengthen the performance of colleges and universities in promoting access, ensuring affordability and improving student outcomes through the design of the college rating system. As a member of the Council for Christian Colleges and Universities, Biola University is deeply invested in this rating system initiative and its subsequent outcomes. Having reviewed the document, "A New System of College rating - Invitation to Comment," we would like to register our constructive input for each of the three initiative domains: access, affordability and outcomes.

Accessibility is tremendously important to us at Biola University and is an area we have been focusing on for years. Since 1908 our university has primarily served Caucasian students from middle-income families. But in the last seven years non-white enrollment has increased significantly and Caucasian students now make up only 48% of Biola's enrollment.

We have made that shift by focusing on the Latino, Asian and African-American population. More importantly we have sought out the individual interests, educational and vocational pursuits of each prospective student to see if Biola would be a good fit for them. And that's where we struggle with the proposed rating system.

The rating system oversimplifies a more complex decision-making process by categorically labeling a university as a high-, low- or middle of the road performing institution. A prospective student could quickly withdraw consideration for a school that could best serve their interests simply by looking at a rating. We do not see this approach as superior to the individual-based "what's in the best interest of a student" approach Biola has been using. Therefore Biola University is not in favor of the proposed DOE rating system. If the DOE is determined to implement this rating system, we would advocate for an individual rating for each of the primary metrics instead of one rating per university. That would, at a minimum, provide a more comprehensive assessment of performance.

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Similar to accessibility, affordability is one of our primary aspirations and a core component in our 2012-2022 University Plan. Three years ago Biola launched a campaign to raise \$85 million in additional scholarship funds before January 1, 2017, of which \$66 million has been raised to date. Furthermore, we have increased our discount rate $\frac{1}{2}\%$ in each of the three prior fiscal years.

Our concern with the rating system is that it will require increased staff and operational expenses to track and report on the individual rating metrics. This runs counter to our affordability initiative and only hurts our ability to provide a Biola University education at the lowest affordable cost.

Finally, as we think about student outcomes, we believe it is important to register that graduate earnings, one of the identified rating metrics, is not a good measure of success.

We believe the DOE's interest should not be in how much money people make, but rather on whether they are able to pay back their loans. In Biola's case, our graduates have one of the lowest loan default rates in the nation (2.8%) despite the fact many of our graduates enter into service-oriented positions that do not historically pay high salaries. Ministry positions, roles in non-profit organizations and other service-oriented occupations are of keen interest to our graduates. Basing our rating on graduate salaries would penalize the large number of Biola graduates impacting their communities in significant ways.

We want to thank you for the opportunity to provide input on the proposed rating system and trust our feedback will help shape this important effort. We look forward to following the DOE's progress and if we can be of further assistance, please don't hesitate to contact me directly at barry.corey@biola.edu.

Respectfully submitted,

(b)(6)

Barry H. Corey
President
Biola University

O'Bergh, Jon

From: Jacobowitz, Mrs. Chani <cjacobowitz@bmg.edu>
Sent: Tuesday, February 17, 2015 4:01 PM
To: College Feedback
Subject: Response to Invitation to Comment on Postsecondary Institution Rating System
Attachments: Response to Invitation to Comment - PIRS - From Beth Medrash Govoha 2 17 2015.pdf

To Whom This May Concern,

Attached please find comments in response to the Department's Invitation to Comment on the framework for a college rating system.

We would appreciate if you could please acknowledge receipt, if possible.

Thank you!

Chanie Jacobowitz, M.S.W.
Director of Government Affairs
Beth Medrash Govoha
617 Sixth Street
Lakewood, NJ 08701
(732) 367-1060, Ext. 4219



February 16, 2015

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

Dear Mr. Secretary,

We appreciate the invitation extended by the President for the higher education community to work together with the Administration on our common goals of ensuring access, affordability and transparency in higher education. Thank you for providing a chance to comment as the Administration moves forward on the President's initiative to establish a Postsecondary Institution Ratings System (PIRS).

I am writing on behalf of Beth Medrash Govoha (BMG), which is a licensed and accredited Jewish-affiliated college located in Lakewood, N.J., with an enrollment of more than 6,700 undergraduate and graduate students. As the largest and most prominent institution focused on Talmudic Studies programs in the United States, BMG often advocates for the common concerns of some 80 institutions in our sector, which collectively enroll 20,000 students across the nation.

As a non-profit, independent college, BMG is a long-standing member of the National Association of Independent Colleges and Universities, which has forwarded comments to your attention on behalf of the NAICU membership in a letter from President David Warren dated January 30, 2015. We hope the important concerns raised by NAICU will be addressed as this process progresses.

NAICU has already explained the general concerns involved in developing a Federal Ratings System, and the related concern that tying aid to such ratings would decrease access for low-income and other disadvantaged students, thereby hurting the very population that the PIRS

initiative seeks to assist. We concur that developing a meaningful, standardized college-ratings system would be a difficult, if not impossible task, given the diversity of students and institutions and the difficulty of zeroing in on any one measure or factor without considering the data in the broader context of student demographics and institutional characteristics.

Even if a method can be devised to fairly and meaningfully present the data in context, the data set underpinning the various measures discussed does not yet exist in a form that is sufficiently accurate and comprehensive to capture some of the key proposed metrics. The Department lists the Integrated Postsecondary Education Data System (IPEDS) and the National Student Loan Data System (NSLDS) as the two primary data sources for PIRS. Taken together, these sources do not provide a sufficiently comprehensive data set to arrive at an accurate picture of a college that lends itself to an overall "rating."

As noted in the Invitation to Comment, NSLDS data only covers students who receive financial aid. Using this data will result in a skewed and incomplete picture of the outcomes of an institution's students. This is of particular concern to institutions which make a concerted effort to ensure that students have sufficient institutional aid to cover their tuition costs, so that they do not have to borrow. This limits the student data in NSLDS to just the Pell eligible students, who are a relatively smaller sample that may not be representative of the full student population.

Due to the recent changes to the Enrollment Reporting guidelines, the process has become more detailed - and prone to errors creeping in - during this transition to the new Enrollment Reporting requirements. We therefore respectfully urge the Department to postpone pulling data from NSLDS to inform a rating system until such time as the accuracy of the data can be improved and assured.

In regards to using IPEDS as a primary data source, we see several concerns. One large deficiency in IPEDS as a data source for ratings is that, for many surveys, IPEDS only captures data on first-time, full-time freshmen and their eventual outcomes. As noted in the Department's Invitation to Comment, "There are many institutions at which first-time, full-time students are a minority, sometimes a tiny minority, of students in attendance. Similarly, many institutions, particularly two-year institutions, have large numbers of students transfer to other institutions before graduating." Thus a significant percentage of students, perhaps even the majority at this point, are not accounted for at all by many of the IPEDS data sets.

Even for the population that is included in the IPEDS cohorts, there are limitations on the outcomes information that is captured. The limitations in how graduation/completion rate

data is captured are of particular concern, as the Department has identified completion rates as a key metric under consideration for inclusion in PIRS. We appreciate that the Department has acknowledged the limitations in the current IPEDS Graduation Rate surveys, and is considering using data from the Outcome Measures Component, which will capture data on part-time students; transfer-in students; and students who subsequently enroll at other institutions – data which is not currently captured by the IPEDS Graduation Rate surveys. However, there are still gaps and drawbacks in the new Outcomes Survey that would need to be addressed before the Graduation Rate data can capture all outcomes needed in order to “rate” a college based on its completions.

The new Outcomes Measures survey has columns to capture students who received awards as well as those who are still enrolled at their original college or a different institution. While it is important that these successful transfers are acknowledged, there needs to be a mechanism for the original college to get “credit” for the success of students who have transferred out and ultimately achieved degrees elsewhere, in part due to the preparation and credits they achieved at their original institution. According to the National Student Clearinghouse, more than a third of today’s college students attend multiple institutions before completing a degree. This is now a normal path to successful completion, and any ratings system needs to reflect this with respect to a college’s success in regards to student completion.

There are also limitations in the time frames for data collection for the IPEDS Outcomes Survey, which have been set at six years and eight years after initial enrollment. While this is 150% and 200% of normal time respectively for a four-year program, it does not acknowledge the normal time frames for completion at a five-year program. For example, a part-time student in a five-year program will take ten years to complete. Such a student will be listed as “still in school” at eight years, but the institution will never be able to claim “credit” for that student’s successful completion, because the school will not be able to report on that student’s cohort at ten years after enrollment. We therefore respectfully suggest that the IPEDS surveys be revised to accommodate time frames that are appropriately inclusive of five-year programs (i.e. 200% of completion = ten years), or to allow for alternate reporting time frames for five-year programs.

As noted in the Invitation to Comment, data based on the new Outcome Measures survey will not be available until 2017. We respectfully request the Department refrain from incorporating graduation rate data into PIRS until the above identified gaps in the new Outcomes Measures survey are remedied and accurate data from a revised Outcomes Measures survey is available.

In addition to the primary concerns and recommendations discussed above, we have additional comments on several different areas mentioned in the Invitation to Comment, as follows:

The Department asked for comment on the following question:

Over how many years should the Department look to identify institutional trends over time (Improvement Over Time II.A)?

It would seem that several years of data, at a minimum, would be necessary to track improvement over time. However, there are metrics, such as Graduation/Completion rates, where data collection methods need to be changed and expanded in order to attain a sufficient data set to support a rating system. In the case of such metrics, it is important that any "look-back" period to show progress over time only begin from such time as data was collected in the revised and expanded format necessary to support fair and meaningful conclusions. As such, longitudinal data to illustrate trends would only become available several years down the road, when a history has been established for the updated data collection.

We also wish to comment on several of the other metrics proposed by the Department, as follows:

Family Income Quintiles

The Department is exploring the use of family income quintiles to measure enrollment of low-to-moderate income students. While family income seems to be a straightforward indicator of socio-economic status, income alone does not demonstrate whether a family has adequate resources to support a child's college education. To understand the true extent of a family's income situation, it is necessary to take family size into account. An income of \$40,000 may support a middle-class standard of living for a family of two, but it is below the poverty level for a family of eight. In many ethnic communities and religious faiths, including the Orthodox Jewish community, large family size is common, with families of 6-10 children the norm. If the Department will be looking at family income, we respectfully suggest that the income brackets be tied to percentage of poverty level, which takes family size into account to ensure that the approach is fair to these communities throughout the U.S. as they seek to access assistance for higher education.

Transfer Rates

We appreciate that the Department recognizes that successful transfer to another college represents a successful outcome, and that when a student attains a degree at the second institution, the original college should also get "credit" for having contributed to that success. However, the Department limits the discussion of collecting data on such outcomes-after-transfer to students who attend a two-year school and then transfer to a four-year school.

There are significant numbers of undergraduates who transfer from one four-year college to another using credits and experiences gained at their original college to help them ultimately complete their degree at a second, four-year college. We would therefore respectfully urge the Department to give weight to successful transfers between four-year colleges in a manner that is equivalent to how transfers from two-year to four-year colleges are treated. In other words, institutions should receive credit for lateral transfers between two-year institutions and for lateral transfers between four-year institutions. When a student transfers and subsequently graduates, the successful outcome should be credited both to the original institution and to the institution in which the student completed the degree.

Labor Market Success

We agree with the many commenters who have noted the dangers of overemphasizing earnings in college ratings, particularly in regards to the concern that institutions that have programs that offer the most social benefit – teaching, social work, etc. – will end up with lower ratings due to the lower-wage nature of these jobs. The Administration has taken several laudable steps, such as income-based repayment of student loans, which seek to help students whose career choice may result in limited or modest salaries. It seems contradictory, therefore, to propose a ratings system that sends messages to institutions – and students – that future salary is a key consideration to be taken into account when emphasizing programs, majors, or the choice of institution itself.

While we appreciate the Department's effort to address the concerns expressed, if short and/or long-term indicators of substantial employment or earnings are to be used, it is crucial to look at earnings at a point in time that follows program completion, as opposed to program enrollment. The Department has suggested looking at earnings at six years and then ten years after a cohort's initial enrollment. Since students who enroll together ultimately complete each at their own pace, at any subsequent point in time, some of those in the cohort will be newly-graduated, while others will already have been in the workforce for several years. It will thus be impossible – or extremely unlikely - to obtain earnings data at one point that is broadly demonstrative of the achievement level of the cohort, as the data will vary according to the work experience of various people in the cohort, making it impossible to attribute the specific variations to a particular college's educational program.

There is another issue that casts doubt on the utility of taking a "point in time" measure, even one that is done within a set time frame of completion/graduation. Students who went on to graduate school may be just at the beginning of their careers two or three years out, while other students who went straight into the workforce already have several years of employment behind them. While the Department correctly notes that graduate school enrollment is a

positive outcome that ultimately often results in higher-income attainment over the long run, by looking at income statistics two years after undergraduate graduation, the Department may well end up including students who have just finished graduate school but have not established themselves in the labor market. Likewise, six years after completion of the undergraduate degree would not be a "long-term" outlook for students who then continued on to several years of graduate school, but would rather represent the short-term outlook.

Loan Performance Outcomes

The Department notes that it is considering adding rates of loan deferment to the current cohort default rate metrics. This would be counterproductive to discouraging the positive outcome of Graduate School Attendance. Students who are still in school or in graduate school will be in deferment, which should not count negatively against the institution's rating. We recommend that the Department continue to exclude any student with an in-school deferment from the loan performance rate.

We also respectfully request that the Department include students who are in the Income Based Reimbursement program in an institution's loan "repayment rate," even if the graduate is currently not paying down principal on their loans because they qualify for a reduced payment. To count such graduates against the institution in regards to repayment would mean penalizing institutions that offer programs to train those who contribute to society and the public good as teachers, social service workers, government employees, and other such fields.

In closing, we again express our thanks for the opportunity to provide comment on the unfolding development of PIRS. We have commented on the specific issues that may inform development of such a system, in order to help the Department examine the various issues surrounding development of a rating system. However, we strongly agree with the overall concern expressed by NAICU regarding the concept of a federal rating system in general, and we appreciate your giving this reasoning all due consideration. Thank you.

Sincerely,

(b)(6)

Rabbi Aaron Kotler

President

Beth Medrash Govoha

O'Bergh, Jon

From: Chad Merrill <chadm@blueridge.edu>
Sent: Tuesday, February 17, 2015 4:04 PM
To: College Feedback
Subject: draft college ratings system

Following is the response from Blue Ridge Community College, Flat Rock, North Carolina, regarding the draft college ratings system, as proposed by the U.S. Department of Education.

The leadership of Blue Ridge Community College (BRCC) agrees with the comments offered by the American Association of Community Colleges (AACC) and offers the following comments in support of AACC.

Blue Ridge Community College strongly opposes the college ratings system, as proposed by the U.S. Department of Education. A federal college ratings system does not seem appropriate for community colleges, especially those in North Carolina. The North Carolina Community College System (NCCCS) includes 58 community colleges across the state, each with its own designated multi-county service area. To meet the need of residents, many community colleges have satellite campuses. Subsequently, every North Carolina resident lives within a 30-minute drive from a community college. The mission of each community college is to serve its residents and provide education and training opportunities. At the same time, the colleges must develop academic and training programs that address the economic and workforce needs of the community. The uniqueness of each community college and the specific way in which each delivers products and services to its respective service area precludes it from being rated fairly and equitably across a national forum.

As the AACC suggests, a national rating framework would not provide much assistance to prospective students primarily because community college students, by their very nature, are "place-bound" and choose to attend a community college because of its affordability, reputation within the community, and close proximity to home and work. A student would not typically use a national rating to determine which community college to attend. Additionally, comparing community colleges as an institution would not be as helpful to prospective students as comparing by programs of study. Again, community colleges are unique to their specific service area and programs may vary by geographic region, thus comparison would not be "apples to apples."

The proposed rating categories also pose a problem in that "high-performing," "low-performing," and those falling in the middle would not give an accurate representation of the community college's performance. This broad brush approach could mislead consumers as to the actual performance of a community college on specific attributes that the public would like know. As AACC suggests, categories this general would be of "no meaningful benefit." The same could be said about the ED's suggestion to recognize improvement over time. It is not clear how to measure an institution's improvement over time and such a metric could be confusing to the public.

Developing a system of ratings by institutional groups, 4-year and 2-year institutions, sounds logical in theory but would not make sense to the consumer to compare community colleges on a national level. It would seem more appropriate to continue highlighting attributes and performance of community colleges on a state-wide level, like the system used in North Carolina; students, the community, employers, and even legislators can all relate to the same standards.

Some of the challenges seen in a national ratings system are the same as those facing the local community college systems. Using federal data collections such as Integrated Postsecondary Education

Data System (IPEDS) and the National Student Loan Data System (NSLDS) has major limitations. AACC suggests using multiple measures of affordability instead of a single net price measure. Tuition should stand alone as an important piece of data. Completion rates are also limiting. More and more, community college leaders are seeing the value of using persistence measures rather than graduation rates. Transfer rates are a valuable measure both transferring to 4-year institutions and those transferring from 4-year institutions to the community college. Additionally, data related to employment outcomes are becoming highly valuable to the public and to legislators. Finally, graduate school attendance would not be meaningful to community college performance.

In summary, Blue Ridge Community College agrees with the comments of the AACC in that it does not support linking college ratings with institutional federal student aid eligibility. There is simply not a logical way to measure 4-year and 2-year institutions with a national ratings system. The nature and mission of the community college is to serve locally and therefore the measurement to establish their performance should be focused on local criteria not federal.

--

R. Chad Merrill, Ed.D.
Vice President for Technology & Development

Blue Ridge Community College
180 West Campus Drive
Flat Rock, NC 28731-4728

Phone: (828) 694-1704

www.blueridge.edu

Our mission is to provide quality education and training opportunities that support student learning, enhance student advancement and success, and meet the workforce needs of our community.

E-mail correspondence to and from this address is subject to the North Carolina Public Records Law.
(NCGS.Ch.132)

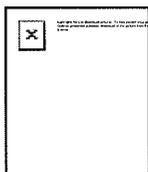
O'Bergh, Jon

From: nvanderberg@ncf.edu on behalf of Provost Office <provost@ncf.edu>
Sent: Tuesday, February 17, 2015 4:06 PM
To: College Feedback
Cc: Stephen Miles; Julie Morris
Subject: System of College Ratings – Invitation to Comment: NEW COLLEGE OF FL
Attachments: NCF Comment on Federal College Rating System.pdf

Kindly find attached comments on behalf of New College of Florida in regard to the System of College Ratings. Thank you for this opportunity.

Regards,

Stephen Miles



The Office of the Provost

Stephen Miles, Provost
Robert Zamsky, Dean of Studies
Julie Morris, Assistant VP of Academic Affairs
Nicole Vanderberg, Executive Assistant



New College

THE HONORS COLLEGE of Florida

Office of the Provost and Vice President for Academic Affairs

February 17, 2015

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

Re: System of College Ratings – Invitation to Comment

Dear Secretary Duncan,

On behalf of New College of Florida, I am providing comments on the proposed federal system of college ratings.

New College is a public liberal arts college, the designated Honors College for the Liberal Arts within the Florida State University System. Our enrollment is between 800-850 students, and our student to faculty ratio is 10:1. We provide a personal and collaborative learning environment where faculty and students engage in in-depth exploration of ideas and subject matter and students have agency to chart their academic course of study. Princeton Review, US News and World Report, and Washington Monthly consistently rank New College of Florida among the top ten best value colleges in the nation.

We offer the following specific comments on the characteristics and purposes of the proposed rating system.

Rating system vs Ranking system

- New College of Florida supports a rating system that highlights areas of success and weakness and does not attempt to rank institutions and avoids false precision.

Institutional Groupings

- New College of Florida supports grouping institutions for comparison purposes. Grouping by Carnegie Classification would be straightforward and useful.

Percentage of Students Receiving Pell

- The percentage of students receiving Pell grants is a simple measure of higher education access for low income students. However, the percentage receiving Pell is an imperfect measure access: a number of Pell eligible students choose not to apply for Pell; and, due to their mission, liberal arts colleges, as a group, attract fewer Pell eligible applicants.

The graduation rates of Pell-eligible students would be an important measure of the academic success of low income students. There are drawbacks to providing incentives to *enroll* low income students without yoking those to incentives for *graduating* low income students. We recommend using the graduation completion rate of Pell eligible students instead of the enrollment percentage of students receiving Pell in the rating system.

First Generation Status

- We are concerned about the reliability of data on first generation status. The definition of first generation in college is not fixed; the proposed source of this data is self-reported information on the FAFSA; colleges with a low percentage of first generation students will have only a small number of students as the basis for this measure.

Average Net Price

- New College of Florida supports a rating measure for affordability based on average net price. This information is currently reported to IPEDS and indicates what students actually pay to attend an institution. There is no additional reporting burden on institutions to provide data for this measure.

Net Price by Quintile

- New College of Florida supports an affordability measure that reports net price by quintile. We've noted that students from families in the quintile just above Pell eligibility face financial challenges that reduce their academic success, and net price by quintile would highlight the affordability challenges of these students. We already report net tuition and fees by quintile to the Florida State University System, but do not include room and board in this reporting.

Completion Rates

- New College of Florida supports continued use of IPEDS completion rates as a measure of student outcomes. IPEDS completion rates are being enhanced by including completion rates for students who transfer and continue to completion at another institution.

Transfer Rates

- New College of Florida supports a measure that would give institutions credit for transfers between four-year institutions, treating these lateral transfers as a positive outcome for students.

Labor Market Success

- New College of Florida echoes many of the concerns raised by others. We are a public liberal arts college with full-time students and no pre-professional degree programs. Our students graduate with low average debt, and a significant number take one or two gap years at relatively low pay before attending graduate school. Data from our CIRP freshman survey consistently indicate that 90% of our students plan to attend graduate or professional school. Our students are not focused on maximizing their earning power. According to our most recent alumni survey, our graduates choose positions in education, professional services, health, and public service professions.

The Florida Performance Funding System for Higher Education currently measures employment and average full time wages for graduates within 12 months of graduation, which is a poor measure of our graduates' outcomes. Long term capacity to earn a solid living is better measured

ten years after graduation, a proposed measure for the federal rating system that New College strongly supports.

This metric requires reliable, verifiable, transparent data on labor market success, which is currently difficult to generate. If the metric is included in the rating system, we strongly urge that the system allow individual institutions to review and validate the data that federal and state governments collect. In addition, the system should also allow institutions to report graduates who work abroad.

Graduate School Attendance

- New College of Florida supports including graduate school attendance within ten years as a measure of student outcomes. The National Student Clearinghouse is currently the best source of this data, and an acceptable basis for this measure. Graduate students in the physical sciences typically do not take out loans, and the alternative measure being considered (NSLDS and Federal Stafford loans) would miss these students.

Performance Over Multiple Years

- New College supports basing the proposed measures on a rolling average of 3-5 years. Institutions with small enrollments will have greater variability year to year and a rolling 3-5 year average will provide a more stable indication of performance.

How it Fits Together

- New College of Florida recommends against a single overall rating and supports disaggregated ratings. Consumers likely have priority interest in a subset of rating measures. Access may be most important to some consumers while completion rates are most important to others. Collapsing all measures into a single rating hides specific information that consumers may be searching for.

Student and Institutional Characteristics

- New College of Florida supports providing an opportunity for institutions to showcase an additional measure that highlights the characteristics of their students and institution. We do not support development of a complicated regression model to adjust outcomes for student characteristics. A regression model will be difficult for consumers to understand, and determining which characteristics to include and exclude in the regression model will be fraught.

We appreciate the opportunity to provide comments on the new system for college rating being developed by the Department of Education. Please contact me with any needed questions or clarifications.

(b)(6)

Steven Miles
Provost
New College of Florida

O'Bergh, Jon

From: Cheryl Smith <Cheryl.Smith@uncf.org>
Sent: Tuesday, February 17, 2015 4:22 PM
To: College Feedback
Subject: UNCF Comments on College Ratings Framework
Attachments: UNCF Letter on College Ratings Framework 2.11.2015.pdf

Please find attached comments from UNCF (United Negro College Fund) on the College Ratings Framework, released in December 2014.

Thank you for the opportunity to share our views.

Best,
Cheryl

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Senior Vice President
Public Policy & Government Affairs
UNCF
Direct: 202.810.0334
Cell: (b)(6)
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1805 7th Street, NW, Washington, DC 20001





United Negro College Fund, Inc.
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Dr. Michael L. Lomax
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Chair, Board of Directors

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Founder

COLLEGES & UNIVERSITIES

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Columbia, SC

Benedict College
Columbia, SC

Bennett College
Greensboro, NC

Bethune-Cookman University
Daytona Beach, FL

Clarin University
Orangeburg, SC

Clark Atlanta University
Atlanta, GA

Dillard University
New Orleans, LA

Edward Waters College
Jacksonville, FL

Fisk University
Nashville, TN

Florida Memorial University
Miami, FL

Huston-Tillotson University
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Atlanta, GA

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Tuskegee, AL

Virginia Union University
Richmond, VA

Voorhees College
Denmark, SC

Wilberforce University
Wilberforce, OH

Wiley College
Marshall, TX

Xavier University
New Orleans, LA

February 11, 2015

The Honorable Ted Mitchell
Under Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Under Secretary Mitchell:

Thank you for the opportunity to submit comments on the U.S. Department of Education's College Ratings Framework, released on December 19, 2014. We appreciate the additional time that you and Deputy Under Secretary Studley are taking to consider the many complex issues raised by the federal college ratings proposal and your consideration of the views expressed last year by UNCF and many of our member presidents at the Department's public hearings and roundtables.

As you know, UNCF is a leading nonprofit organization that invests in better futures for African-American students through higher education. UNCF began 71 years ago as a fundraising collaborative for the 37 private Historically Black Colleges and Universities (HBCUs) that are our members, and we have intensified our focus over the years to help low-income, African-American students at all types of institutions progress to and through college by means of scholarship and programmatic support. In executing this important mission, we have raised more than \$4 billion to help over 400,000 students receive college degrees.

Because we deeply believe that "a mind is a terrible thing to waste,"[®] UNCF and its member institutions continue to question whether a federal college ratings system can deliver on its stated goals, including whether it will accurately and usefully portray the real value that institutions of higher education, especially HBCUs, provide to their students. Additionally, basing federal student aid allocations on institutional ratings would likely create a perverse incentive for some institutions to enroll fewer at-risk students, undermining college opportunity for the very students on which the ratings system seems focused. Equally troubling, attaching federal financial assistance to ratings would introduce additional complexity and uncertainty into our federal student aid system, the current complexity of which is already a barrier to entry for too many low-income students. These aspects of the President's proposal turn the ratings program into a high-stakes proposition for both institutions and students.

Overall, UNCF-member institutions support the concept of ensuring that students and the public are aware of the value that our institutions provide. We also agree that

institutions should be accountable for delivering a quality education. Presently, that accountability exists through the governing boards of our institutions, the accreditation process required under Title IV of the Higher Education Act (HEA), state oversight, and the many federal statutory and regulatory requirements under Titles I and IV of HEA. These requirements, taken as a whole, already produce a wide range of data that are available for students, families, and the public to judge the quality and performance of our institutions. This information also is used by accreditors and the U.S. Department of Education for quality assurance.

While we believe there is a need for continued accountability and public reporting for higher education, we also believe that it is not possible for the federal government to develop a ratings system that is accurate and fair, without unintended and potentially negative consequences, given the approximately 7,000 diverse colleges and universities in America. The diversity of institutions runs the spectrum from extremely selective four-year and graduate institutions with few if any need-based aid recipients, to open access two-year and four-year institutions where almost all students rely on student aid, to for-profit schools and other types of institutions.

Even across the 105 institutions in the HBCU network, this diversity is prevalent. HBCUs are represented within six Carnegie Classifications: research universities, master's universities, baccalaureate universities, medical schools, seminaries, and associate's institutions.¹ They include two- and four-year institutions, all male and all female colleges, and land-grant universities. Many UNCF member institutions are open enrollment, but some are more selective in their admissions policies. For example, in the 2012-2013 academic year, Virginia Union University admitted 93 percent and Florida Memorial University admitted 90 percent of their applicants. In contrast, Spelman College and Claflin University admitted just 38 percent and 39 percent, respectively, of their applicants in that same year. Mislabeling institutions based on a system of metrics that does not take into account this diversity could only lead to diminished access to education for at-risk students who need it the most.

We appreciate the Department's frank discussion in the framework about potential metrics and the data that would be used to calculate these metrics. As the Department acknowledges in its framework, the biggest challenge with any ratings system is the accuracy of the data that it uses. In order to achieve buy-in from institutions and the public, a ratings system with a federal imprimatur must meet the highest standards in order to produce correct and credible ratings. However, the Department's framework only serves to heighten our concern about large limitations in the federal data resources that the Department is considering for the ratings' metrics; for example:

- No data sources include all students in our postsecondary education system;

¹ John Michael Lee, Jr. and Samaad Wes Keys. (2013). *Repositioning HBCUs for the Future: Access, Success & Innovation*. Association of Public and Land-Grant Universities.

- Some data sources include only full-time, first-time students who comprise the minority of all college students;
- Some data sources include only federal student aid applicants or recipients;
- Some key data is not reported by all institutions;
- Some key data is not collected by the federal government;
- Some data is out of date;
- Some data is self-reported; and
- Most data is not audited or independently verified to assure accuracy.

These are not insignificant problems for what is intended to be a high-stakes accountability system that would both publicly label institutions and allocate billions in federal student assistance to thousands of colleges and universities in America – the consequences of incorrect or false data are potentially great. Simply seeking to combine these data sources or have one data source augment the other will not remedy the shortcomings in their use.

Additionally, some of the contemplated metrics – such as earnings data – rely on information that is not accessible to colleges and universities in order to review and correct it. Institutions would not be able to independently evaluate earnings information to ensure its accuracy, and the public would have no way to verify to accuracy of this data. A fundamental issue of fairness in any federal ratings system should be the ability to review, challenge, and appeal the data upon which the ratings system is based, before its public release. It is simply common sense to provide schools with due process to review this data, especially for a ratings system with the high stakes of impacting federal aid awards to students. Unfortunately, the system being contemplated does not seem able to provide this much-needed protection.

In addition to picking which metrics to use, the Department will have to decide whether to produce a composite rating based on the totality of all metrics or provide a rating on each individual metric. We believe there are major shortcomings to the method of assigning a single, composite number, grade, or label to an institution based on a combination of metric scores. Such a composite score would not be sufficiently nuanced and would create a system that allows gains on some metrics in order to mask lower performance on others. A single composite score would have limited utility for prospective students and their families, who vary widely in the factors that they consider important in selecting a college or university. Most troubling is that a composite score would require the federal government to assign weights to individual metrics, supplanting the values and interests of students and their families with those of the federal government.

The bottom line is that we continue to believe that a federal ratings system is a distraction from the real work that is needed to achieve the President's goal that America regain world prominence in college attainment, including ensuring that more underrepresented students earn college degrees. 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 and programs that are a barrier to low-income student enrollment, more support services to students in middle and high school and continuing through freshman year, and additional federal financial assistance.

SPECIFIC COMMENTS ON PROPOSED INDIVIDUAL METRICS

While we do not support the Department moving forward with a federal college ratings system, we feel compelled to point out the challenges, shortcomings, and modifications that need to be addressed in regard to the proposed ratings' metrics. Below you will find specific thoughts on the proposed metrics.

Access Metrics - Percent Pell, Family Income Quintile, and First-Generation Status

The metrics associated with college access have the potential to measure accurately the extent to which students with limited financial resources are able to access and enroll in an institution of higher education. The percentage of Pell Grant enrollment in an institution's overall student body as a metric to measure access would provide an accurate, readily accessible, and useful starting point. We believe that additional granularity by disaggregating Pell Grant enrollment by expected family contribution (EFC) would provide additional insight into the extent to which institutions provide access to the neediest students. A student whose family has no financial resources to contribute to their education (zero EFC) will be in a significantly different financial situation than a student whose EFC allows for the minimum award.

Family income quintiles would report the full range of students with incomes across the spectrum. However, displaying family income by quintile is unlikely to provide additional clarity in determining what percentage of a student body is truly needy, compared to an examination of the percentage of enrollment receiving Pell at an institution. Further disaggregation of the Pell metric would largely make a metric measuring the quintiles of family income moot.

First-generation status could also have some value in that it indicates the extent to which an institution's outreach efforts focus on reaching a key and underrepresented student population. However, this data is self-reported, is not comprehensive across all institutions, and is not easily validated. The use of this particular metric as part of a federal college ratings system would be problematic if its accuracy cannot be assured.

Affordability Metrics – Average Net Price and Average Net Price by Quintile

Average net price and average net price by quintile – which are a function of an institution's cost of attendance and net grant aid – can provide some information about the affordability of a college and the actual prices that students pay. However, the use of these metrics points to the challenges of constructing a ratings system for both

informational and accountability purposes. If used as an accountability mechanism, ratings must fairly account for not only differences among institutions, but also the significant factors that contribute to those differences.

The cost of attendance at an institution – one part of the net price equation – is heavily influenced by the extent to which public institutions receive state and local subsidies that lower the actual tuition and fees that students pay. Private institutions largely do not receive these public subsidies. Net grant aid – the second part of the net price equation – is significantly impacted by whether an institution has the ability to discount tuition due to an endowment or other financial resources. For example, consider Edward Waters College in Florida, which reported a \$1.7 million endowment for the 2011-2012 academic year, and Livingstone College in North Carolina, which reported a \$1.3 million endowment for the same year.² These institutions have little financial means to discount tuition or adjust average net price. In contrast, both major public and private institutions of higher education, such as the University of Virginia (\$5.3 billion for the 2013-2014 academic year³), or Harvard University (\$32.7 billion at the end of fiscal year 2013⁴) have endowments that allow these institutions the flexibility to respond to individual student financial need. Wealthier institutions benefit from having endowments while under-resourced institutions are largely reliant on tuition and fees to cover the costs of educating their student body.

Institutional outcomes, including affordability, should be considered fairly. By its very nature, a ratings system relying on net price metrics will necessarily favor well-resourced institutions and penalize institutions with the least resources – the very same campuses that tend disproportionately to enroll low-income, academically under-prepared students. If the college ratings system is intended to identify institutions that assist these students, the net price metric could have an inadvertent, negative impact on those campuses.

Performance Metrics – Completion Rates, Short and Long-Term Earnings, Graduate School Attendance, and Loan Payment Outcomes

Under this category, the Department is proposing the use of several metrics related to the performance of an institution's graduates. All of these metrics reflect the measures of student success that HBCUs are routinely focused on achieving. However, their inclusion in a federal ratings system, without some acknowledgement of the degree of difficulty that HBCUs face in educating economically and educationally disadvantaged students, will only create a skewed system that creates an inaccurate picture of the success of HBCUs. Thus, we are pleased that the Department recognizes that using raw outcome measures,

² Richards, D.A.R. (2014). *UNCF Statistical Report, 2014*. Washington, DC: Frederick D. Patterson Research Institute, UNCF.

³ University of Virginia 2014-2015 Budget,
http://www.virginia.edu/Facts/Glance_FinanceEndowment.html.

⁴ *U.S. News and World Report*, 10 Universities with the Largest Endowments,
<http://www.usnews.com/education/best-colleges/the-short-list-college/articles/2015/01/13/10-universities-with-the-largest-financial-endowments>.

such as graduation rates, will paint an unfair and potentially unflattering picture of institutions that serve high proportions of at-risk students.

HBCUs routinely outperform other institutions when the academic preparedness and income status of their student bodies are taken into consideration. When the UNCF Frederick D. Patterson Research Institute conducted a regression analysis to control for SAT reading and math scores and Pell recipients across nearly 2,000 institutions, the statistical model predicted that HBCUs would graduate African American students at a rate 14 percentage points higher than at non-HBCUs. This controlled comparison suggests that HBCUs are in fact outperforming their peer institutions.⁵

In order to accurately account for the performance of HBCUs in achieving these outcomes, we strongly believe that performance metrics must be risk adjusted through a predictive model or other statistical adjustments validated by the National Center for Education Statistics. Specifically, these metrics should be adjusted for the level of academic preparedness and income status of the student population, whether the institution is selective in its enrollment (and how selective), and financial resources per full-time equivalent (FTE) student.

Risk-adjusted performance metrics should focus on key metrics that fairly reflect the value added and effectiveness of the institution: student progress such as developmental course completion, retention rates, and graduation rates over at least a six-year, and preferably longer timeframe, to account for the fact that low-income students must often stop in and out of school due to financial challenges. Without these adjustments, a ratings system would create an inaccurate picture of institutional impact, penalizing institutions that serve a high proportion of at-risk students.

We would be remiss if we did not point out that the use of transfer and graduate school attendance rates are especially problematic if included in a federal ratings program. As the Department documents in its proposed framework, significant data issues exist in accurately capturing transfer rates among colleges and universities due to the limitations of the Integrated Postsecondary Education Data System (IPEDS). In addition, transfers from two-year institutions to four-year institutions speak to the impact that the two-year institution had on the student rather than any contribution made by the four-year institution receiving the student.

Likewise, whether a four-year institution's students go on to graduate school may have more to do with the type of instructional programs offered at the institution and the goals of its students. Further, graduate school is expensive and its cost of attendance is growing. Given that the decision to attend graduate school may be impacted by the high cost of graduate education and the significant amount of debt students with limited means incur prior to graduate school, it is hard to understand why this metric would be used to judge the quality of any undergraduate institution.

⁵ Richards, D.A.R., & Awokoya, J.T. (2012). *Understanding HBCU Retention and Completion*. Fairfax, VA: Frederick D. Patterson Research Institute, UNCF.

Lastly, earnings, employment, and student loan repayment/default rates must not be used as metrics in a federal ratings system. Many external factors impact the earnings, employment, and loan repayment behavior of students once they leave an institution. Regional and local economic shortcomings along with labor market discrimination based on race and gender all have an impact on levels of employment and earnings. Whether a student is able to secure and maintain employment that pays a salary needed to repay student loans also largely depends on these factors. African-American college graduates are twice as likely to be unemployed as white college graduates.⁶ Median wages for African-American women in the Southern states where most HBCUs and their students are located range from 49 percent to 68 percent of those for white men.⁷ Institutions with high proportions of African-American students such as all HBCUs, and women's colleges such as UNCF-member Spelman College and Bennett College, would be disadvantaged by the use of employment, earnings, and loan repayment metrics.

Linking College Ratings to Federal Student Financial Aid

Finally, we would like to specifically address the plans the Department has announced to determine how much grant aid a student may receive, or the terms and conditions of their student loan, based on the federal rating their institution would receive. First, we believe that it would be irresponsible to attach financial awards to a ratings system that is (and will be for the foreseeable future) based on incomplete and flawed data. The current federal data infrastructure is simply not robust enough to support the linkage of ratings to the allocation of student aid.

Further, such a linkage is extremely troubling for other reasons because it would most certainly undermine access, equity, and choice in higher education. From an equity standpoint, this could lead to students at similar institutions receiving different amounts of federal assistance. Reduced grant aid or higher interest rates on student loans could lead some students to drop out or not enroll in higher education at all. This would be especially troubling for low-income students who, based on where they reside, may not have a wide choice of institutions to attend.

We urge you to take a step back from the proposed system where the federal government would compile value ratings. While this proposal is well intentioned, it has a myriad of problems that must be resolved. Accordingly, we strongly urge that the Department provide additional details for public comment before publishing any ratings. A federal college ratings system – if it is based on flawed data and metrics and fails to take into account the degree of difficulty that HBCUs face in educating at-risk students – will have limited value to consumers and crippling consequences for colleges.

⁶ Center for Economic and Policy Research. (2014). *A College Degree is No Guarantee*.

⁷ National Partnership for Women & Families. (2014). *FACT SHEET: African American Woman and the Wage Gap*.

Thank you for your consideration of our views.

Sincerely,

(b)(6)

Michael L. Lomax, Ph.D.
President and CEO
UNCF

cc: Jamiene S. Studley, Deputy Under Secretary

O'Bergh, Jon

From: Weekes, Dana <dana.weekes@squirepb.com>
Sent: Tuesday, February 17, 2015 4:22 PM
To: College Feedback
Cc: Owen, Janet D (jowen@unf.edu) (jowen@unf.edu); smjordan@msudenver.edu; skreid11@msudenver.edu; O'Neill, Kevin; Smith, Amy Budner; Martin, Samantha; Boyd, Roxana
Subject: College Ratings Framework - Urban Publics Coalition's Comments
Attachments: UP Coaliton - College Ratings - Comments [FINAL - 02-17-2015].pdf

Good Afternoon –

On behalf of the Urban Publics (UP) Coalition, I have attached its comments on the Department of Education's "College Ratings Framework" released on December 19, 2014. The UP Coalition truly thanks the Department for giving stakeholders the opportunity to share their feedback on the framework.

The Urban Publics Coalition is a new and growing coalition started by a diverse group of institutions from Colorado, Florida, and Oklahoma in 2015. The UP Coalition focuses on ensuring that the unique interests of public urban and metropolitan institutions of higher education are protected and advanced, including in the policy areas of financial aid funding, workforce and economic development, and the proposed college ratings system. Together these institutions enroll over a combined 100,000 students, grant over five types of degrees, and serve a more diverse group of students, with minority student populations accounting for 35% to 60% of their student populations, as well as first-generation, Pell-eligible, and veteran and servicemember students. The UP Coalition works collaboratively with other organizations representing institutions of similar backgrounds as well as a diverse range of public and private stakeholders to bring public urban and metropolitan universities' interests to the forefront of these important policy discussions.

As a newly formed coalition, the UP Coalition looks forward to serving as a resource to the Department to discuss the unique interests and perspectives of public urban and metropolitan universities across the nation as the Department continues to implement efforts to achieve President Obama's 2020 goal. Along these lines, the UP Coalition requests a meeting with the Department to discuss its recommendations in further detail and to identify opportunities where the UP Coalition can partner with the Department going forward.

Thank you for considering the UP Coalition's comments.

Best,
Dana



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URBAN PUBLICS COALITION

February 17, 2015

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

Dear Secretary Duncan:

The Urban Publics (UP) Coalition thanks the Department of Education for providing us and other education stakeholders with the opportunity to submit comments on its “College Ratings Framework” (referred to as “framework” or “proposal”) released on December 19, 2014.

The UP Coalition recognizes the Department of Education’s role in helping prospective students and their families make well-informed decisions in pursuing their educational endeavors, as well as ensuring that all institutions of higher education are successfully working to meet President Obama’s 2020 goal. As such, the UP Coalition supports the many efforts of the Administration to achieve President Obama’s goal; however, we have some serious reservations with the Department’s proposal on the college ratings system which we discuss in our comments below. Overall, the UP Coalition supports efforts from diverse stakeholders, including the Department, to collect and report better data and broaden the sources from which the Department collects data. This includes looking beyond federal sources to alternative data sources like the Voluntary System of Accountability (VSA) and the Student Achievement Measure (SAM). For the college ratings system to be successful, comprehensive and accurate data is the foundation to educating consumers and holding institutions accountable.

In addition to prospective students and their families, the Department also has a responsibility to institutions of higher education in presenting accurate information about our institutional characteristics and value, especially as the purpose of transparency and consumer education is to help inform a prospective student’s decision on what school to attend. Thus, in being transparent and educating consumers about institutions of higher education, there immediately exists a direct reputational, financial, and regulatory impact on our institutions that is contingent on how data is collected and presented to the public. Therefore, much of our comments focus on how the Department can structure the ratings system and include metrics to better inform prospective students and their families about schools, as opposed to metrics that are designed to measure performance which may have unintended consequences because they would not be effective at doing so.

A. ABOUT THE UP COALITION

The Urban Publics Coalition is a new and growing coalition started by a diverse group of institutions from Colorado, Florida, and Oklahoma in 2015. The UP Coalition focuses on ensuring that the unique interests of public urban and metropolitan institutions of higher education are protected and advanced, including in the policy areas of financial aid funding, workforce and economic development, and the proposed college ratings system. Together these institutions enroll over a combined 100,000 students, grant over five types of degrees, and serve a more diverse group of students, with minority student populations accounting for 35% to 60% of their student populations, as well as first-generation, Pell-eligible, and veteran and servicemember students. The UP Coalition works collaboratively with other organizations representing institutions of similar backgrounds as well as a diverse range of public and private stakeholders to bring public urban and metropolitan universities' interests to the forefront of these important policy discussions.

B. DATA SOURCES

The UP Coalition strongly urges the Department to not proceed with establishing a college ratings system solely based on IPEDS data until the Department follows through on its commitment to address commonly acknowledged flaws with IPEDS by the education community.

Should the Department move forward with creating a 1.0 version that relies solely on federal sources, then the ratings system will be sharing information with prospective students and families that can mischaracterize institutions and even mislead prospective students and families about the value an institution can offer. We are very concerned that these unintended consequences will disproportionately affect public urban and metropolitan universities. Thus, creating a 1.0 version that relies only on IPEDS data that is not comprehensive can penalize high-value institutions. For this reason, among others, we also request that all data used to construct the ratings system should be shared with institutions prior to being released to the public, as the Department has stated in its framework that it plans to release all data used to construct the ratings to facilitate transparency.

We also recommend that the Department not use NSLDS data by itself or in conjunction with IPEDS data because NSLDS only collects data from students who receive financial aid. Given the limited scope of NSLDS and the commonly-known flaws with IPEDS, using such data together or separately – without substantial changes – may undermine the Administration's objectives of better educating the consumer as it will be viewed as a "data patchwork" ratings system.

Should the Department move forward with its 1.0 version that solely relies on current federal data sources, we ask that the Department state in plain language what limitations are associated with the data presented and explain how these limitations may not accurately reflect institutions' outcomes (e.g., those related to transfers) when publishing information through the college ratings system. This would help to provide a better context for prospective students to assess an institution's value and ensure that information shared with consumers is accurate.

Additionally, we strongly encourage the Department to consider using value-added approaches, as we've discussed throughout our comments, and further engage education associations and the UP Coalition to decide on adopting metrics from SAM and VSA for both the 1.0 and 2.0 versions of the ratings system. We welcome the opportunity to engage with the Department.

C. RATING INSTITUTIONS

As stated previously, the UP Coalition is concerned with the Department using IPEDS or NSLDS as the sole data source for the college ratings system, particularly as it looks at how to identify trends over time, as well as institutional groupings. Should the Department decide to move forward with a college ratings system, we think the Department should consider a ratings system that is based on a value-added approach, which we discuss in greater detail below along with our other recommendations.

- **Rating Categories.** The UP Coalition recommends that the Department adopt a value-added model based on predictive analysis starting with its 1.0 version of the ratings system, instead of including performance categories such as high-performing, low-performing, and those falling in the middle. A value-added approach would indicate what the value of the outcome metric(s) is expected to be based on institutions' inputs and composition of their student body. In other words, the expectation of performance for institutions would be more so determined on its own baseline of factors as opposed to various factors that may not even be applicable to certain institutions.

Further, the value-added methodology would alleviate concerns about arbitrariness relating to the cutoff points for slating institutions into the three categories. It would also readily identify schools that are above or below par on particular outcomes, as well as show how far an institution is above or below par without having seemingly arbitrary performance categories. This would provide more accurate and helpful information to prospective students and their families.

- **Improvement Over Time.** The UP Coalition recommends that the Department first conduct a gap analysis of how data is collected for specific metrics before considering what metrics should be used to identify institutional trends over time. For example, in the case of public urban and metropolitan universities, we have serious concerns with what our schools are credited for when it comes to transfer rates (see "Transfer Rates" section of our comments). We thank the Department for starting to take steps to address the limitations associated with data collection for this metric and ask that the Department make a similar concerted effort to improve data collection across the board for other metrics.

Additionally, the UP Coalition requests that the Department identify and implement a methodology for providing accurate trend comparisons for institutions that may merge or separate over time, or experienced significant structural changes that cannot be accounted or corrected for in IPEDS. Further, the Department should hold these types of institutions harmless until baseline data has been reestablished.

In terms of specific metrics for the Department to include under this category, we recommend that the Department look at the number of degrees and certificates issued per full-time equivalent student. This metric demonstrates effectiveness and includes all the transfers, readmits, and long-term students. Additionally, we also ask the Department to include a metric that shows the total budget of an institution divided by the number of degrees granted. This will

show the efficiency in use of tuition and public funds and should be based on 20-year trends which can best account for subtle changes that take years to compound.

Lastly, we think it is critically important for the Department to consider the use of other metrics included in the VSA. In fact, we encourage the Department to continue to have constructive conversations with education associations about the adoption of some of VSA's metrics in order to best identify institutional trends over time. We welcome the opportunity to be a part of these conversations.

- **Institutional Grouping.** The UP Coalition appreciates learning that the Department is currently conducting data analyses to determine what, if any, more granular groups might be used. As the Department considers how to account for differences in institutional characteristics, the UP Coalition strongly encourages the Department to differentiate between the missions of various universities. For public urban and metropolitan universities, many of us are open enrollment/access institutions or have higher acceptance rates in comparison to other four-year institutions. Additionally, the Department should also consider factors distinguishing between public and private institutions, other metrics/indicators that best capture the academic preparation of newly enrolled students at that institution (e.g., first-generation students, Pell percentage, veterans and servicemember students), and a redefined transfer rate (as outlined in our comments).

Once again, we strongly encourage the Department to only use IPEDS as the data source for these metrics once it has addressed the commonly known flaws associated with these metrics, as stated previously. Otherwise, we recommend that the Department use alternative data sources like VSA and SAM for more comprehensive information.

D. METRICS

The UP Coalition maintains its recommendation that the Department not move forward with establishing a college ratings system solely based on IPEDS data until the Department addresses the challenges associated with IPEDS. Should the Department proceed, however, the UP Coalition has answered directly some of the questions and statements the Department presented in its framework. Overall, the UP Coalition believes the Department, at times, must treat the same metric differently as it relates to educating the consumer versus holding an institution accountable. For example, as it relates to the purpose of consumer education, the UP Coalition recommends that the "access" metrics should not have a rating attached to them, but serve as baseline factors to be included in a value-added approach.

Below are our recommendations in greater detail:

- **Percent Pell.** Overall, we recommend that the Department not include a percent Pell metric in the college ratings system. Although the Department is concerned that including a percent Pell metric would incentivize institutions to enroll students who qualify for Pell grants over students who do not, the UP Coalition does not actually believe this to be the case. If institutions were to enroll an extremely high number of students who receive Pell and not balance out the numbers with other qualified students who do not receive such funding, including those just over the

income-eligibility threshold, then such institutions may be more concerned with resulting rising costs. Thus, there is somewhat of a financial incentive to finding a balance between enrolling students who Pell-eligible versus those who are not. Additionally, some institutions may not be incentivized to enroll a very high number of Pell-eligible students because they may be concerned about their performance outcomes, given the lower success rates typically associated with Pell-eligible students.

Should the Department decide to include the percent Pell metric, then we strongly encourage the Department to carefully consider how the percent Pell metric is used. If the Department's intention is to use percent Pell as a metric for prospective students and their families to best understand the demographics of the student population it serves, then the Department should not attach a rating (e.g., high performance) to the metric.

If the Department decides to attach a rating to the metric, then we recommend that the Department include the percent Pell as one of the baseline factors through predictive analytics as part of a value-added approach to best determine how an institution is performing.

- **First-Generation College Status.** The UP Coalition believes that this metric is a critical factor for determining institutional groupings and as a baseline factor in a value-added approach. Studies have found that this student population has lower college persistence and attainment rates than do their continuing-generation peers. Using this metric in such a manner provides a better context for understanding an institution's actual value offered to its students.
- **Average Net Price.** The UP Coalition strongly recommends that the Department include this affordability metric because it is the only honest indicator of cost to a student for public urban and metropolitan universities. Quite often, our institutions receive criticism for price increases when they are calculated as percentages. For example, if students pay \$10,000 to attend an institution each year, and costs then increase to \$12,000, that totals a 20 percent increase. However, if another institution costs \$35,000 a year and costs do not increase, criticism is frequently directed towards the first school because the percentage increase is higher while overall costs are substantially lower.

Further, we recommend that the Department use this metric to determine institutional groups, as well as include as a baseline factor in a value-added approach.

- **Net Price Quintile.** The UP Coalition requests the Department to include this metric as a compliment to the net price metric, but should not replace it. This metric, in some ways, can replace the Scorecard's cost calculator because students understand what they will likely pay and allows prospective students and families to compare the costs on the quintile scale to determine if it is reasonable to them.
- **Average Loan Debt.** The UP Coalition strongly recommends that the Department not include the average loan debt metric in the college ratings system. Including this metric will mislead prospective students and their families because it does not distinguish what debt is incurred directly from the institution in which a student enrolls. Under this metric, institutions of higher education are held accountable for the debt transfer students bring when they enroll at a new institution and graduate from it.

- **Completion Rates.** The UP Coalition thanks the Department for making a substantial change in how completion rates data is collected starting with the current collection cycle. The UP Coalition thinks this is a considerable step in the right direction. First-time, full-time IPEDS data is completely misleading in characterizing public metropolitan and urban institutions, which have higher enrollments of part-time and returning students. Should this metric be included in the college ratings system, then the Department needs to determine which institution gets credit when a student starts at one institution and graduates from another institution. At public urban and metropolitan institutions, it is common for students who graduate to carry two to three transcripts when they enroll. Given this circumstance that our institutions deal with more frequently than other four-year institutions, there needs to be equitable rules on first, indicating that such students have graduated, and, second, determining which institution is recognized for such students graduating.

The UP Coalition does not support the Department using NSLDS data to measure outcomes among part-time students and transfers, given that such data only covers those students who receive financial aid.

- **Transfer Rates.** The UP Coalition strongly recommends that the Department adopt the VSA metric on transfer rates as it addresses many of the concerns institutions of higher education have with the existing measure based on IPEDS data. We also think the Department has started to understand and address our concerns by looking to give credit to institutions for lateral transfers and receive credit for transfers between four-year institutions. Additionally, the UP Coalition supports action that would allow community colleges and other public urban and metropolitan institutions to share credit given that many university systems require or heavily encourage students to move among and between institutions, as they go from a two-year to four-year institution, for example. Otherwise, these institutions would be penalized or their value mischaracterized.
- **Labor Market Success.** The UP Coalition believes that this metric should only be included in the ratings system for those institutions that are a part of an educational system or are located in states that take the lead on collecting information on employment and earning outcomes. Otherwise, the cost to each institution to hire the number of full-time employees required to find information post-graduation is burdensome and adds no value to existing students. In fact, funds would more likely be diverted away from helping students succeed to support additional administrative salaries.
- **Graduate School Attendance.** The Department should not include a graduate school attendance metric because of the limited data available. Further, by including this metric, there will be an inherent assumption that graduate school is a desirable outcome for all students, when, in fact, the focus of some universities is having the students enter the workforce upon graduation. It also creates an expectation that universities are the sole contributors/influencers of whether a student goes to graduate school, when this is not always the case. For example, employers are also contributors as many students entering graduate school are partially or fully subsidized by their employers.

- **Loan Performance Outcomes.** The UP Coalition recommends that this metric not be included in the ratings system because it does not measure an institution's success, because the current measure is attributed to the graduating school, even if all or most of the debt was incurred at a previous school. Additionally, the current metric creates an inherent assumption that institutions of higher education are *solely* responsible for how students repay their loans after graduating, instead of other contributors/factors like financial institutions, employment retention, and the students themselves. Should the Department decide to include this metric in the ratings system, it should consider using it in ratio to the cost of attendance, which may help to level the playing field, and count only the debt accumulated at an individual institution.
- **Performance Over Multiple Years.** The UP Coalition recommends a rolling average over five to seven years to avoid volatility in ratings. This range also covers the length of a recession, which usually forces universities to face financial burdens, including tuition issues. Further, we recommend that the Department not adopt a three-year average, as this timeframe is too short, given that the average graduating student in the U.S. has closer to five-years in school rather than four.

Once again, the UP Coalition appreciates the opportunity to submit its recommendations on the Department's college ratings framework. As a newly formed coalition, we look forward to serving as a resource to the Department to discuss the unique interests and perspectives of public urban and metropolitan universities across the nation as the Department continues to implement efforts to achieve President Obama's 2020 goal. Along these lines, we request a meeting with the Department to discuss our recommendations in further detail and to identify opportunities where we can partner with each other going forward.

If you would like to discuss our comments further or accept our invitation to meet, please contact Dana Weekes at 202.457.6307 or dana.weekes@squirepb.com.

Signed,

Urban Publics Coalition

Florida International University
Metropolitan State University of Denver
University of Central Oklahoma
University of North Florida

O'Bergh, Jon

From: Rob Mccarron <rob.mccarron@aicum.org>
Sent: Tuesday, February 17, 2015 4:26 PM
To: College Feedback
Subject: Written Comments to President's College Ratings Draft Framework from the Association of Independent Colleges & Universities of Massachusetts
Attachments: AICUM Written Comments to President's College Ratings Draft Framework.pdf

Dear Secretary Duncan,

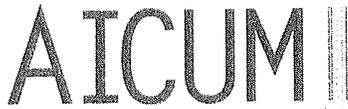
Attached please find written comments from the *Association of Independent Colleges and Universities in Massachusetts* in response to the Department's December 19, 2014 invitation to comment on the proposed College Ratings Draft Framework.

We are pleased to answer any question that you or your staff may have regarding our comments.

Thank you.

Robert J. McCarron

Robert J. McCarron
Vice President for Government Relations/General Counsel
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Association of Independent
Colleges and Universities
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Amherst College
Anna Maria College
Assumption College
Babson College
Bay Path University
Becker College
Bentley University
Berklee College of Music
Boston Architectural College
Boston Baptist College
Boston College
Boston University
Brandeis University
Cambridge College
Clark University
College of the Holy Cross
Curry College
Dean College
Eastern Nazarene College
Elms College
Emerson College
Emmanuel College
Endicott College
Fisher College
Gordon College
Hampshire College
Harvard University
Laboure College
Lasell College
Lesley University
Marian Court College
Massachusetts Institute of Technology
Massachusetts School of Professional Psychology
MCPLIS University
Merrimack College
MGH Institute of Health Professions
Mount Holyoke College
Mount Ida College
New England College of Optometry
Newbury College
Nichols College
Northeastern University
Olin College of Engineering
Pine Manor College
Regis College
Simmons College
Smith College
Springfield College
Stonchill College
Suffolk University
Tufts University
Urban College of Boston
Wellesley College
Wentworth Institute of Technology
Western New England University
Wheaton College
Wheelock College
Williams College
Worcester Polytechnic Institute

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,

Thank you for the opportunity to provide written comment as feedback to the President's "College Ratings Draft Framework" released on December 19, 2014. (*A New System of College Ratings— Invitation to Comment*).

I would also like to acknowledge the Department of Education's efforts over the last year to elicit feedback and concerns as to how the proposed framework and metrics may well have unintended consequences for students seeking access to higher education. However, despite these efforts, it does not seem that the significant concerns raised by college presidents, faculty, students and families in many different forums with our Presidents and others over the past twelve months have been assuaged by the proposed Framework released on December 19th.

The Association of Independent Colleges & Universities in Massachusetts (AICUM) is a nonprofit association comprised of 59 diverse colleges and universities located throughout the Commonwealth of Massachusetts – institutions which educate 275,000 students each year and employ more than 84,000 people. Our member colleges include large nationally renowned research universities, smaller, highly regarded liberal arts colleges, religiously affiliated institutions, and colleges with special missions focused on business or music or allied health services. Massachusetts is truly unique in that we are the only state in the country that educates more students at private institutions than at public institutions.

Massachusetts is home to many of the top colleges and universities in the world, and we take great pride in the high quality of education that our students receive. Massachusetts' private colleges and universities lead the nation in 4-year graduation rates; we educate 55% of the PELL recipients educated at the Commonwealth's 4-year colleges/universities; and this year we awarded more than \$2.8 billion in institutional need-based financial aid to our students and their families.

The private colleges and universities in Massachusetts welcome and support the President's commitment to ensuring that all Americans have the ability to avail themselves of a higher education that is accessible, affordable and transparent.

Indeed, our colleges and universities invest significant institutional resources to serve their core mission – graduating students on time, with as little debt as possible, and equipped with the lifelong skills needed to compete in a global, knowledge-based economy.

We continue to have significant concerns that the Draft Framework seeks to address a number of complex issues with untested measures, limited and arbitrary metrics, and faulty data. Trying to impose such a Framework on a higher education system in which no two states and no two colleges are alike simply cannot provide an accurate picture of an institution to students and their families. Rather, it is a proposal fraught with unintended consequences.

One need only look at the wide range of colleges and universities found in Massachusetts to understand the inherent deficiencies of the Draft Framework. From large research universities to small liberal arts colleges to institutions dedicated to engineering, entrepreneurship, or optometry, AICUM's member institutions have radically different profiles that cannot adequately be measured by a simple metric. The Framework will present a limited picture of such institutions and, rather than promoting access, it could serve as a disincentive to institutions to enroll more at-risk students in order to avoid new federal penalties.

Our fundamental concerns with the Draft Framework include:

- The reliance on flawed and arbitrary metrics that can be very misleading when trying to compare “peer” institutions. For example, the Draft Framework will rely primarily on IPEDS, but there is no definitive explanation as to how the ratings will account for transfer students when calculating completion rates. The data to be used to calculate transfer or completion rates would not capture students who do not receive federal aid, so it will not provide an accurate profile of a college. And colleges that serve a predominately older population of part-time students still face the risk of having grossly underreported graduation rates, which are currently calculated based on first-time, full-time students.
- The inability to adequately capture the long-term value that higher education provides to individual students and to society as a whole is a glaring deficiency. The true value of a college degree cannot be – nor should it be - measured solely by “labor market success” or employment outcomes. The hallmarks of a college education – the ability to think critically and holistically, to write and communicate effectively, to be more civically engaged and have a greater understanding of one’s place in the world – are nowhere to be found in the Framework. This does an incredible disservice to the many excellent liberal arts colleges in Massachusetts and the nation, whose graduates should be encouraged to pursue the career of their choice, whether it be a lower-paying career in public service or in the non-profit sector or a higher-paying career in finance or the sciences.
- We view the grouping of institutions into 2-year and 4-year categories for purposes of trying to make comparisons to be overly simplistic. This approach inevitably will fail to take into consideration the nuances that provide real distinctions between colleges and universities that have wildly different resources, missions, geographic advantages and disadvantages, alumni support, and opportunities to partner with local businesses. If the Framework eventually adopts a single rating for each college and university, it is hard to imagine how students and families will be able to use that information in a meaningful way. The only certainty is that an institution that gets a low rating will be penalized if its

particular mission and target student characteristics does not match up well against a few arbitrary metrics. It is dangerous for the federal government to effectively be picking winners and losers using such flawed and narrowly selected data.

- The fact that many of the metrics to be used by the Framework remain very much a work in progress is also problematic. So this leaves open the real possibility that the Framework will do little to actually move the needle in a meaningful way in helping assist students and families to navigate the college decision-making process more efficiently.
- We are also disappointed in the lack of inclusion of the proprietary higher education sector in the early phases of this endeavor. This industry has long been a source of concern to lawmakers and consumers alike for its misrepresentation of academic offerings to prospective students, failure to graduate students in a reasonable timeframe and often leaving students with high levels of debt. It is curious that the Framework will not provide students and families with information about the one sector in higher education which has come under the greatest degree of consumer and public policy scrutiny.

Unfortunately, the true purpose of the Ratings Framework remains unclear. The higher education system in Massachusetts – and the entire country – is a much too important part of our educational, cultural and economic livelihood to roll out a Ratings Framework and then take a “wait and see” approach to better understand its impact on colleges, universities, students and families. The Framework seems like a quixotic effort to provide apples to apples comparative information to students and their families while ignoring the reality of the strength of our nation’s diverse higher education sector featuring thousands of colleges and universities with fundamentally different missions and institutional profiles.

AICUM and its member colleges and universities would urge President Obama and the Department of Education to reconsider whether the Draft Framework will help or hurt students and families make better choices when deciding which college to attend. Making better use of the substantial amounts of information that is already compiled by numerous organizations, including the Department of Education, would further the goals of access, affordability and transparency without running the risk of having the federal government’s rating supplant a student’s decision about which institution or course of study best serves her educational talents, learning styles and personal interests.

AICUM would like to take this opportunity to incorporate by reference and reinforce written comments which the National Association of Independent Colleges and Universities (NAICU) submitted to the Department of Education on January 30, 2015.

Thank you for your attention to these comments, and to the written comments submitted by NAICU and the many institutions of higher education that call Massachusetts home.

Sincerely yours,

(b)(6)

Richard Doherty
President, AICUM

O'Bergh, Jon

From: David Crook <David.Crook@cuny.edu>
Sent: Tuesday, February 17, 2015 4:41 PM
To: College Feedback
Cc: JBM; Doris Suarez; Jay Hershenson; Ricardo.Fernandez@lehman.cuny.edu; Barbara Sutton (bsutton@cassidy.com)
Subject: FW: A New System of College Ratings — Comments by the City University of New York on Framework Released December 19, 2014

A New System of College Ratings — Comments by the City University of New York

Released through the Office of Chancellor James B. Milliken of the City University of New York

The framework released by the U.S. Department of Education (DOE) in December 2014 announces some tentative decisions about how the President's College Rating System will be implemented and invites additional comment regarding a large number of unresolved questions. The DOE gathered extensive feedback over many months, and the framework document shows that the Department carefully weighed this testimony in its deliberations. The draft framework fully describes the many challenges of constructing such a rating system and offers a nuanced assessment of the alternatives for measuring institutional performance.

The City University of New York (CUNY) finds much to commend in the draft. The proposed rating system remains faithful to the President's original intent to measure institutional performance with respect to his three overarching priorities: access to higher education for low-income families, affordability and excellent outcomes. It is clear that all three of these goals retain their salience in the proposed ratings. Further, we endorse the Department's proposal to avoid the "false precision" of fine-grained rankings in favor of a three-category rating designed to highlight high- and low-performing institutions. The limitations of the currently available data are so great as to preclude rating scales with a larger number of marker points. The proposed ratings will incentivize institutional improvement by publicizing both good and sub-standard performance and expanding the information available to consumers. We note and support the DOE's intent to defer the difficult problem of how to link valid institutional ratings to financial aid funding in a fair manner. Finally, CUNY also supports the Department's intention to provide a rich array of indicators and information for consumers. Much of the proposed information has not been readily available to prospective students and their parents in the past, and they can only benefit.

We believe that the DOE has taken the right approach in its thinking about which institutions to rate and how many institutional groupings to create. Data are not sufficient to support ratings of graduate and non-degree institutions at this time, so it makes sense to postpone the rating of these types of institutions until better information is available. And because the missions of two- and four-year colleges differ from one another so greatly, their performance should be measured with separate sets of metrics.

Under the heading "How It Fits Together" (p. 13), the DOE requests comment on a set of questions about how to combine the metrics in a manner most useful to consumers. As it did in its response to the Department's Request to Gather Technical Expertise, CUNY continues to recommend that the Department develop a single index in which performance on all three of the President's objectives would be weighted equally. Such an index would have the benefit of steering consumers to institutions demonstrating excellence in access, affordability and outcomes simultaneously. We also recommend that the DOE develop separate ratings and

indicators for each of the three components and allow institutions to provide contextual information including most importantly the Student Achievement Measure (SAM) rates, together with a limited amount of narrative. We also believe that the Department should develop a set of filters that would allow prospective students to select institutions on the basis of geographic location, net cost, size, control, and degrees offered. The approach described above would maximize the utility of the ratings to consumers and thereby create the greatest incentives for institutional improvement.

The draft framework goes a long way to advance the twin goals of greater data transparency for the public and support for institutions of higher education to improve the quality of their data. The DOE intends to make available all of the data underlying the ratings both by publishing it and by creating an electronic linkage for developers who wish to reformat the information in creative new presentations. This approach to sharing the data would not only aid understanding of how the ratings have been constructed but also would add valuable new information to the education marketplace. However, the value of greater transparency is limited if the information that the public sees is incomplete. We appreciate the DOE's intent to allow institutions to review and correct the data that will be incorporated into the ratings. However, many institutions do not report complete information to IPEDS. (An example is transfer-out rates.) CUNY would welcome stronger measures by the Department to improve the quality of the data submitted in the federal collections.

Although CUNY endorses the general direction that the Department has set for further development of the ratings, we have some concerns, which are detailed below.

Technical Issues

The Department proposes to draw the data for the ratings primarily from two sources. The first is institutional-level data reported by the institutions to the federal IPEDS system, and the second is data about individual students that are stored in the National Student Loan Data System (NSLDS). For the purpose of constructing a common yardstick to measure the performance of all institutions subject to the ratings, the DOE is constrained to using widely reported data. As the DOE points out repeatedly, the NSLDS data are limited by the fact they are restricted to applicants for financial aid or aid recipients, thereby excluding upper-income, non-citizen, and undocumented students. Although these exclusions do produce a selective picture of many institutions, CUNY fully supports the use of the NSLDS for the ratings despite these limitations. IPEDS data are reported for all students, and therefore provide some balance. Moreover the public is particularly interested in how well higher education serves low-income students. The NSLDS provides especially valuable data on outcomes for this population of students.

Measuring Access. The Department proposes several alternative measurements of access for low-income students, including the percentage of the undergraduate body receiving Pell awards, an EFC gap, family income quintiles and first-generation college status. The first measure is reported for institutions as a whole and available from IPEDS, while the latter three would be derived from student-level data reported to the NSLDS and subject to the limitations described above. We believe that the percentage receiving Pell is the best measure of access because of its simplicity. The public will understand this measure, and it can easily be incorporated into a general index that measures access, affordability and outcomes simultaneously. CUNY also endorses the reporting of income quintiles and first-generation college status to provide additional context for consumers. We do not endorse use of an indicator of EFC gap (average difference between an arbitrary EFC level and each student's EFC). This is not an intuitive metric, and we discount the danger that it is designed to address: the possibility that colleges will change their admission practices to favor acceptance of applicants who are close to the income limit for Pell eligibility.

Measuring Affordability. We agree that average net price is a far more useful measure of affordability than sticker price, though net price is reported to IPEDS only for full-time in-state freshmen who receive some sort of financial aid. The Department should expand the IPEDS collection to gather cost data for part-time, out-of-state, and continuing students. The Department also proposes reporting net price by family income quintile. Although this measure is not so easily incorporated into indexes, we believe it should be reported for context, alongside the number of each college's students who fall into each income quintile. We also recommend that the Department report for context the percentage of students who take out federal loans while attending the institution. This indicator is an alternative to average loan debt, which the Department wisely is not considering.

Measuring Outcomes. As the Department notes, IPEDS and NLSDS data provide only a narrow window on degree completion and transfer. Completion rates will not be available from IPEDS for transfer-in and part-time cohorts until 2017, and while NLSDS data may allow for the tracking of these cohorts sooner, they do not provide data on the degree being pursued by transfer-out students at their new institution. We await the results of DOE's analyses of NLSDS data to gauge the validity of completion data for the incoming transfers and part-timers. Hopefully the department can develop composite rates for incoming freshmen, transfers and part-time students based on a combination of IPEDS and NLSDS data until we have better information. The limitations of the currently available data underscore the importance of allowing institutions to report their SAM rates, which are far more comprehensive.

The Department has asked for suggestions for intermediate measures of academic outcomes, given the long lag period associated with graduation rates. We suggest that the DOE consider one-year fall-to-fall retention rates for this purpose. These rates are available from IPEDS.

CUNY advocates that community colleges be given full credit for students who transfer vertically from an associate to a bachelor's program, whether or not the student completes a degree at the second institution, but that lateral transfers from one two-year institution to another not be counted as a success. Preparation for transfer from associate to bachelor's degrees is central to the mission of many programs offered at community colleges. Lateral transfer before degree completion, however, can too easily be attributed to inadequate student support at the first college, although we recognize that students transfer for many reasons. The receiving college should receive credit for completion by all incoming transfer students, whether their transfer route was vertical or lateral.

Clearly students and their parents are concerned about the kind of job that will be attainable as a result of their investment in higher education. However, post-graduate outcomes are very difficult to measure fairly for the many reasons mentioned in the draft framework. CUNY favors the Department's recommendation to report earnings from the NLSDS, even though these data would not be available for students who did not receive federal aid (e.g., students from wealthy families). We feel that the DOE's proposal to include a measure of substantial employment set at a low income threshold offsets the bias in the NLSDS data. We do have several concerns with other aspects of the proposed framework. Earnings should be measured only after the graduate has had ample time to become established in the labor force. This interval should be measured from the point of degree completion rather than first enrollment at the institution. Many low-income students require longer than 150% or even 200% of "normal" completion time because they attend part-time or stop out for one or more semesters. Furthermore, loan performance outcomes should be structured in such a way that institutions whose students borrow relatively little are acknowledged. Default rates and repayment rates can be misleading if they are calculated on a comparatively small number of students. Consumers should have access to the borrowing rate as well as data on the performance of borrowers.

Our other concern is the inability of the Department to give full credit for continuing study at the graduate level. This outcome should be valued just as highly as entry to the labor market. Unfortunately the only available indicator is the disbursement of loans for graduate-level education, from NLSDS. Because many graduate students do not take out loans, this is far from a perfect measure. We encourage the Department to allow institutions to report on graduate study by their bachelor's students, just as the DOE is considering the reporting of SAM rates. Data on graduate study are available to institutions from the National Student Clearinghouse.

Adjusting for Mission. Some of the most difficult methodological problems have to do with how to adjust outcome measures such as completion and earnings to the mission of the institution, as reflected in characteristics of the students that a college enrolls and of the institution itself. One approach is to sort institutions into categories finer than two- and four-year based on correlates of performance such as socioeconomic status (e.g., percentage of student body receiving Pell grants or percentage first-generation college goers). We believe that such an approach would be confusing to data consumers. In a worst-case scenario, they might have to choose from among a multiplicity of institutional categories in order to find the best fit. Instead, we encourage the Department to retain the two basic institutional categories that it has already proposed (two-year and four-year institutions) and continue its experimentation with regression models to adjust one or two outcome measures such as graduation rates on the basis of student characteristics. Of course, the most important predictor of academic success is academic preparation, but no data are available to the department to adjust for the academic profile of institutions nationally. In our experience enrollment intensity, gender, and family income are the student characteristics available to the Department that would be most useful in adjusting graduation rates to take into account the population of students served.

We continue to argue that an overarching index that equally weights access, affordability and outcomes is the most straightforward way to recognize institutions that advance the President's goals. Institutions that would reduce their enrollment of low-income students to improve outcomes would not be rewarded by such an index. Conversely, colleges that would increase their enrollment of disadvantaged students while maintaining outcomes would be rewarded.

In conclusion, we thank the Department for tackling the difficult task of developing a fair set of ratings and for the opportunity to comment on this framework. CUNY stands ready to lend its support for the further development of the ratings.

O'Bergh, Jon

From: Molly-Dodd Adams <Molly-Dodd.Adams@saintleo.edu>
Sent: Tuesday, February 17, 2015 4:50 PM
To: College Feedback
Cc: tim@naicu.edu
Subject: Feedback on the "College Ratings Draft Framework"

As a member institution of the National Association of Independent Colleges and Universities (NAICU), Saint Leo University fully endorses [NAICU's January 30, 2015, comments](#) on the "College Ratings Draft Framework" that was released on December 19, 2014. While the Department of Education has acknowledged many of the concerns raised by private, not-for-profit institutions like ours, the Draft Framework falls far short of what the current administration is trying to accomplish to increase access, affordability, and accountability. Of major concern is the proposition that student financial aid would be tied to an institutional rating based on an inadequate set of metrics, and may ultimately disenfranchise the very students the administration hopes to help. Saint Leo University reiterates NAICU President David Warren in saying "we cannot support any effort that would substitute a federal rating for an individual's judgment about what is important and valuable in an educational experience."

Respectfully,
Molly-Dodd Adams
Special Assistant to the President
Office of the President
Saint Leo University | University Campus
(352) 588-8291

O'Bergh, Jon

From: DAVID BAIME <dbaime@aacc.nche.edu>
Sent: Tuesday, February 17, 2015 4:52 PM
To: College Feedback
Cc: WALTER BUMPHUS; MATTHEW DEMBICKI; JAMES HERMES; JOLANTA JUSZKIEWICZ;
LAURIE QUARLES; ROXANNE FULCHER
Subject: Attached please find the comments of the American Association of Community Colleges
on the Draft College Ratings System. Thank you!
Attachments: AACC ED Draft Ratings System Comments Final.pdf

David Baime, AACC

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February 17, 2015

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

RE: Comments on Draft College Ratings Framework

Dear Secretary Duncan:

On behalf of the American Association of Community Colleges (AACC), I am writing to provide comments on the U.S. Department of Education's December 19 draft college ratings framework. AACC represents the largest sector in higher education, with more than 1,100 community colleges, and their students.

AACC opposes the proposed federal college ratings system. The system will inevitably carry with it implicit and explicit judgments about the appropriate goals, purposes, and functions of institutions of higher education, and the national government should not be undertaking this role. The federal scheme will of necessity use broad performance categories to rate institutions that will lead inevitably to them being misrepresented. The media's fascination with any sort of number or evaluation, no matter how superficial, is a given. Furthermore, the currently available data do not permit the system as outlined by the U.S. Department of Education (ED) to function effectively on its own terms, even if it were a sound proposition.

The utility of a ratings system to community college students is deeply compromised by the fact that most of them are place-bound and choose to attend their local community college simply because it is their local community college, and, as such, a known and trusted entity. If prospective community college students do in fact make choices between or among institutions, they are as, or more, likely to choose among colleges in their local area, not other community colleges.

The federal government does have an indispensable role in providing clear and relevant information both to consumers and policymakers. And, collectively, the Executive Branch and Congress have made progress in this area. However, it remains deeply disturbing that, for example, the Department of Education is not able to report to prospective students how likely they are to graduate from college when they enter a given institution, or what their earnings might be when they complete a particular program. Presenting this information to the public is a tremendously important role for ED to undertake, and one that it should accomplish before it contemplates establishing a ratings system. (For starters, it should refer to the report on its own Committee on Measures of Student Success, which focused on the shortcomings of current federal measures as applied to community colleges.)

Hopefully the development of a ratings system will spur the administration, working with Congress and the higher education community, to generate more accurate and relevant information. AACC has developed the Voluntary Framework of Accountability (VFA) to generate data on community colleges that is designed to foster ongoing efforts to increase student success. A theme of our comments is that

federal efforts to produce better data on American higher education should reflect the many months of deliberation that inform the VFA.

Generating and making public data on individual college programs will often provide a more helpful unit of comparison/analysis than one based on entire institutions. Although programmatic information may not be part of the ratings scheme, making this information available would clearly benefit prospective students, as AACC's suggestions elaborate.

Discussions of college ratings and data often overlook the fact that this information is only as useful as the role that it plays in actual decision making. There is increasing evidence that much of the college-related data, ratings, etc., that are currently available to prospective students are not penetrating the intended audience and when they do are often misinterpreted. Therefore, the administration and other policymakers need to focus on implementing mechanisms and tools that will provide the needed advising and counseling that will help future students make the optimal choice of college and program. A robust and user friendly website may be essential, but it is not generally sufficient for informed decision making. AACC supports the department's plan to have consumers test proposed website tools intended to support the ratings system. We strongly urge the federal government to ensure that students receive counseling from their institutions on various aspects of attending college, including student aid, while recognizing that additional resources are necessary to support such a mandate.

Specific Features of the Draft Ratings Framework

Below are specific comments on the ratings document. They are offered in the recognition that ED is likely to proceed with its plans to move forward with the system, despite AACC's opposition.

II. Overview of Ratings System

How the System Will Rate Institutions

Rating Categories:

The department is considering using three categories to rate various aspects of colleges: high-performing, low-performing, and those falling in the middle.

AACC Comment:

AACC takes issue with categorization of this nature, because the categories themselves will lead to simplistic interpretations by the media and other parties, and will be not be of benefit to students or institutions. At a lesser level of concern is the fact that small differences in performance, at the margins of the groupings, could result in institutions being placed in different ratings categories.

As stated, providing relevant data is a key role for the federal government, while evaluating levels of performance based on assumptions about the proper role of an institution is not.

Improvement over time:

The draft seeks input on whether the system should recognize improvement over time, and, if so, which metrics and over what time period should be incorporated.

AACC Comment:

This is a complicated issue, in part because of the multiple functions of the ratings system. While data about changes in an institution's performance (assuming the establishment of useful metrics) over time could be of benefit, there is only a small likelihood of enough of a change to occur in the short term so as to influence decisions about attendance or public support. Furthermore, multi-year data could prove confusing to the intended audience. That said, some past reference point about institutional performance, perhaps 5 years previous, might be a helpful benchmark.

Institutions that will be included in the ratings system:

The ratings system will first apply to two types of institutions: predominantly 4-year institutions that primarily award baccalaureate degrees and above and predominantly 2-year institutions that primarily award associate degrees and/or certificates. Graduate-only and non-degree granting institutions will not be subject to the first version of the ratings.

AACC Comment:

Grouping colleges by whether they are predominantly 2-year or 4-year alone represents only a modest start of the institutional sorting that any comparative scheme would require—as ED has acknowledged—but even this carries with it certain problematic aspects as discussed below.

Institutional Groups:

ED intends to group separately predominantly 4-year and 2-year institutions, due to differences in mission. Thereby, a community college will be usually rated against other predominantly 2-year institutions. ED is also considering taking into account institutional differences, such as program and degree mix and selectivity.

AACC Comment:

The implications of this issue go to the heart of why the ratings system is unsuitable for community colleges. Institutions clearly should be categorized by some major characteristics—including, but not limited to, those ED is considering, such as size, location, student population (including economic backgrounds and level of preparation), and resources, etc. This sorting would partially accommodate the tremendous diversity within the community college sector. However, because community college students are generally not inclined to enroll in institutions that are not immediately accessible, comparisons between similar institutions at disparate locations are likely to be of little interest to them.

While an argument can be made for grouping institutions along the lines suggested above to help policymakers and the public better evaluate institutions, the reality is that there are better means of

evaluating and/or presenting college performance and incentivizing change than the ratings system. This could occur through state level policies, accreditation, or, most importantly, institutionally driven efforts.

B. Data

The primary source of data that will be used for the first version of the college ratings system will be federal administrative data or existing federal data collections, including the Integrated Postsecondary Education Data System (IPEDS) and the National Student Loan Data System (NSLDS). In future versions of the ratings system, the ED may consider allowing institutions to use alternative data for certain measures, such as the Student Achievement Measure (SAM) completion/transfer rate.

AACC Comment:

The lack of comprehensiveness in the various datasets that ED has identified for use in the ratings system is a serious shortcoming. It stems from the lack of a national unit record data system. The NSLDS is, of course, limited to students who apply for and receive federal aid. This is particularly problematic for community colleges, since only about 60% of the students complete the Free Application for Federal Student Aid (FAFSA), which is the source of the NSLDS data, and, of those who do submit the form, only about 44% receive federal aid. The NSLDS is the planned data source for the student characteristics under consideration for the outcome adjusted measures, but these will not be available for most community college students.

The other major source of information, IPEDS, also has significant limitations. The official institutional completion rate is restricted to full-time, first-time students who start in the fall and complete their program within 150% of the "normal time" at that institution. Most community college students attend part time and therefore are not included in this measure. Other students are not first-time students or do not first enroll in the fall. Some community college students are not degree- or certificate-seeking, and many others seek to transfer to another institution to pursue their degree. Finally, a substantial percentage of community college students take more than 150% of the "normal time" to complete their programs, yet there are absolute successes. (AACC commends ED for planning to implement future additional graduation rate measures for part-time and transfer students.)

As mentioned, institutions should have the opportunity to submit other reliable completion-related data, whether institutional, public (such as from their state), or private, to be incorporated into the ratings framework. This would include the Voluntary Framework of Accountability as well as the Student Achievement Measure. While we acknowledge that this could create some problems for comparability, this does not outweigh the desirability of the system incorporating the most representative data available to a college or state.

The draft document does not cite a data source for earnings information. ED is using Social Security Administration (SSA) data for its earnings information under the gainful employment regulations, and this is very likely the best source for generating the needed data. AACC strongly supports using SSA data in this and related contexts.

C. Metrics

The draft ratings plan proposes potential metrics for access, affordability and outcomes. AACC comments accompany each these proposed metrics.

Access Metrics – Four access metrics are presented: (1) percentage of students receiving Pell; (2) expected family contribution (EFC) gap; (3) family income quintile; and (4) first-generation college status.

AACC Comment:

AACC supports measuring students' diversity, particularly in terms of socioeconomic characteristics and whether they are first-generation college students. However, ED should consider other important factors under the access rubric, including academic preparation; preparation has a powerful impact on students' path through college as well as nature of the education that the institution must provide. Preparation can be measured in a number of ways, including enrollment in developmental education or whether the student tested into developmental education. AACC's VFA measures developmental education progress and could be used as a model for this measure. EFC and first-generation status and other socioeconomic information is available from FAFSA, though, as mentioned earlier, the form is not completed by a large number of community college students.

Affordability Metrics – Two affordability measures are presented in the draft : (1) average net price and (2) net price quintile. A third, average loan repayment, is not being included in the college ratings system because "there are several drawbacks to the measure that make it ill-suited for college ratings."

AACC Comment:

AACC suggests using multiple measures of affordability, including tuition and fees, instead of a single net price measure. For community colleges, published tuition and fees is an important driver of enrollment decisions and should be presented discretely. Low tuition serves as a beacon of access for students and families.

Furthermore, community college students are predominantly independent and usually work, often to support families. Consequently, they have very different living expenses than students who are of traditional college age and pay room and board. Given this, assumptions about living expenses and student budgets based on net price can be misleading. Another shortcoming of net price is that it is greatly influenced by state student aid and appropriations, which institutions cannot control. Therefore, it remains important for tuition to stand alone as a highly relevant data item.

Outcomes Metrics – ED presents five specific outcomes measures and asks for comments about performance over multiple years and intermediate measures. The department also addresses outcomes that are not being considered for this version of the college rating system: (1) completion rates; (2) transfer rates; (3) labor market success; (4) graduate school attendance; and (5) loan performance outcomes.

AACC Comment:

The outcomes measures under consideration may be the most controversial college ratings metrics. These comments are specific to each outcomes metric:

Completion rates – While AACC supports ED’s plan, via IPEDS, to expand graduation rates to include part-time and transfer students, AACC urges ED to also consider using persistence measures for the rating. This is an important feature of AACC’s VFA. Possible persistence or progress measures include a given number or percent of credit hours earned, and retention from one term to the next or from one year to the next. Second, as outlined above, the 150% of normal time to complete a program is an unduly restrictive timeframe to measure community college students’ actual student success. A more appropriate measure and one used by the National Student Clearinghouse (NSC) and the VFA is completion within 6 years.

Transfer rates – AACC urges the department to calculate its completion rate by including all transfers-out, rather than just for those subsequently enrolling in 4-year institutions. In today’s “swirling” higher education system, the assumed hierarchy of institutions that informs the ED’s proposal is far off the mark. This is perhaps best reflected in the fact that, according to the National Student Clearinghouse, 52% of all transfers-out from 4-year public colleges next enroll in 2-year public institutions, and the corresponding figure at 4-year private colleges is 41%.

Labor market success, such as short-term “substantial employment” rates and long-term median earnings – AACC agrees that the economic or workforce benefits of postsecondary education is an important outcomes measure and commends ED for “exploring a variety of employment outcomes measures that can provide critical employment information that appreciate those differences (i.e., institutional missions, student bodies and costs) in ways that are sensitive to educational, career, work force, and other variables.” The actual data or measures that are being considered are not divulged, but, as stated, the source for earnings information should be the Social Security Administration, as for the gainful employment regulations.

AACC further thinks that:

- SSA data are preferred to individual state unemployment insurance data or other sources, primarily because of their comprehensiveness.
- Such information is most useful if reported at the program and not the institutional level.
- Local economic conditions should perhaps be taken into consideration when presenting these outcome measures. States and even municipalities have different minimum wages, unemployment and employment rates, occupation demand, etc. However, this is clearly data that would be far too nuanced to be used for any type of ratings system—this information should be provided primarily to inform student choice.
- The percentage of an institution’s (or individual program’s) credit population on which that data are based should be provided to give a proper context for the measures. This is particularly important for community colleges, given the fact that a relatively small percentage of students (when compared to other sectors) apply for and receive Title IV aid.

Graduate school attendance – “A measure of graduate school attendance rates of former students within a period, like ten years, from entry into a school’s undergraduate program.” This is not highly relevant to community colleges, although many former community college students ultimately receive advanced degrees. We note that it is inconceivable how data for calculating this measure would be available without a student unit record system. In fact, several of the other measures would only be possible or greatly enhanced if the data were obtained from a student unit record system.

Loan performance outcomes – According to ED, this would entail “relatively simple metrics like the percentage of students repaying their loans on time.”

At first blush, a repayment metric may appear preferable to a loan default rate as consumer-oriented information for assessing whether students “will be able to handle their financial obligations after attending a specific school.” The simplicity of these metrics may in fact be their shortcoming as well as their benefit. Without knowing what percent of students at an institution take out loans, neither of the rates—repayment or default—is particularly useful. Moreover, without knowing which loans are subject to repayment at a particular time period and what percent they constitute of all loans, again there would be no context for the prospective student to meaningfully interpret the data. These are extremely important as only a small minority—about 17%—of community college students take out federal loans.

Performance over multiple years – AACC welcomes ED’s openness to incorporating multiple years of data for each metric, which would address the volatility associated with differences in the student groups whose performance are being measured.

Intermediate measures – AACC agrees that intermediate outcomes measures are important as fewer students follow linear academic and career paths.

Outcomes not considered for metrics at this time – AACC has undertaken a major effort to create a framework for identifying and measuring post-collegiate outcomes, and agrees that the data to measure many outcomes, particularly non-economic, such as civic engagement and public service are not available and far from ready to be measured.

How It Fits Together:

ED is seeking feedback on whether performance ratings should be presented for individual metrics or whether the metrics should be aggregated into an institution’s performance measure. To help frame the comments, ED posed a number of questions:

- Would having a single overall institutional rating rather than ratings for each metric be less or more confusing to prospective students?
- Would either approach make it easier to assess the performance of institutions?
- Would a middle-ground approach, such as combining related metrics into a single rating dimension, be more useful, and, if the latter, what metrics would be useful to combine for the purpose of guiding consumer choice and institutional accountability?

AACC Comment:

The more the ratings framework departs from providing a single number that purports to evaluate colleges, the better. For that reason, we support the broadest possible disaggregation of metrics, data, etc. The most helpful outcome of the ratings system would be for ED to provide, in a clear format, data that are of interest to various stakeholders. In all contexts, the data provided should be displayed more prominently than any rating, whatever framework ED ultimately uses.

D. Adjusting Outcomes for Student and Institutional Characteristics

Acknowledging that outcomes measures may be influenced by student and institutional characteristics and other factors, ED has invited comments on adjusting outcomes for student and institutional characteristics. Specifically, ED is seeking comments on which student and institutional characteristics should be taken into consideration when rating various outcomes, and also on how they should be weighted.

AACC Comment:

Much helpful work has been done on identifying both institutional and student factors that, to some extent, explain disparities in institutional performance. Regression analyses have proven to be powerful tools in this context. We appreciate ED's efforts to try to ensure fairness in the ratings system by taking into account these factors. The department may want to support further research in this area.

However, the complexity of the undertaking suggests that these adjustments should not be undertaken at this time, as they would lend the ratings scheme an aura of precision that it could not actually possess given a variety of factors, including limits on currently available data and the complex nature of institutions, students, and programs. If the department is determined to proceed with a ratings system, it would be preferable to categorize institutions based on broad groupings of student and institutional characteristics, rather than to attempt to impose a complex regression-based measure with questionable validity and reliability issues.

E. College Ratings Websites and Transparency Tools

Existing models of consumer-friendly ratings tools:

AACC encourages the federal government to examine carefully the measures used by other extant models of accountability. This includes AACC's own Voluntary Framework of Accountability (VFA), which is intended to generate data to accurately reflect institutional performance and inform students and institutional leaders about community colleges. State performance-based funding plans, which are growing in sophistication and nuance (despite their ambiguous impact on student outcomes) should also be consulted.

Consumer customization

AACC concurs with the principle of consumer customization, given the complexity of the information being presented. Information that is not clearly understood is more harmful than if it were ignored.

For example, the disclosures accompanying the gainful employment regulations scheduled to take effect this July are well beyond the ability of prospective students to grasp their intended significance.

Additional information provided by institutions

In this section, ED seeks comments about the desirability of institutions presenting additional information on the same website as that captured by the ratings system. Specifically, ED asks whether this approach would be helpful to students and institutions and whether it would be helpful, in addition to open-ended information, to enumerate standard categories and if so, what categories should be included.

AACC supports having institutions provide comparable information, but disagrees with the department that some of it should be used in a ratings system.

III. Next Steps

AACC wishes to unequivocally state its strong opposition to linking college ratings with institutional federal student aid eligibility. This policy would simply compound the shortcomings of the ratings system. It could well limit access to postsecondary education and it is difficult to conceive how it could be implemented fairly. We urge the administration to rethink this proposal.

To reiterate, the ratings system is predicated on the assumption that students decide which college to attend based on a few pieces of data (however important those data may be in certain contexts), when, overwhelmingly, community college students choose to attend their local community college precisely because that's what it is: a conveniently located, affordable, accessible, flexible institution of higher education with a wide array of program offerings. Rating—and, by extension, ranking—two superficially similar community colleges in different regions, even in different parts of the same state, is highly unlikely to influence decisions about institutional choice. Distance education has altered this reality only to a limited degree. Furthermore, the ratings system is not designed to address individual programs offered by different institutions, which would be particularly relevant for distance education students.

Assuming it moves ahead with the ratings scheme, AACC further encourages ED to ensure that the ratings system does not incentivize institutions to educate fewer underserved students. To influence ratings, institutions without the open admission available at community colleges may implement more selective policies, thereby serving fewer students. In turn, community colleges may experience increases in their enrollments of underserved, less-prepared students and reductions in their successes and ratings. No one wants this outcome.

AACC also urges the department to redouble ongoing efforts to do what it can to ensure that students receive a robust counseling system composed of an array of entities such as high schools, institutions of higher education, public organizations, foundations and others.

Finally, although we do not think that a federal ratings system is a viable concept, we urge the department to delay its implementation until the many issues that the system presents are at least partially addressed. It is inconceivable that major conceptual and data-related issues can be satisfactorily resolved in just a few months.

Thank you for your consideration of AACC's comments. For more information, please contact David Baime, senior vice president for government relations and policy analysis, dbaime@acc.nche.edu, 202.416.4500.

Sincerely,

(b)(6)

Walter G. Bumphus
President and CEO

Cc: Theodore Mitchell
Jamiene Studley

O'Bergh, Jon

From: Bob Giannino <bob@uaspire.org>
Sent: Tuesday, February 17, 2015 5:11 PM
To: College Feedback
Subject: College Ratings Feedback & Input

Dear DOE Friends:

Thank you for the opportunity to provide input on the College Ratings System. I also want to thank the Administration's steadfast work to improve the information available to young people, families, counselors and college access & success professionals as they advise young people in making one of the most important decisions of their lives.

As the CEO of one of our Nation's leading college access and success organizations, I am proud to share a few key points of feedback and input for you and your colleagues to consider in your work to create a clear tool to support young Americans' pathways to a college degree. As an organization that focuses entirely on issues of affordability, my comments will be focused on how the Department can ensure that young people have the best FINANCIAL information to consider in order to find an affordable path to and through their post-secondary education.

First, we'd like to suggest that there be robust and comprehensive cost information. We recommend considering the following:

- Full cost including Tuition, Fees, and other, likely, expenses
- Net Cost (Total Cost minus Gift Aid, only – no loans, no work-study)
- Average Total Debt Incurred (if possible to include both public and private borrowing and PLUS loans) by graduates
- If admitted, Cost & Date of Deposit and whether it can be waived
- Average of last 5 years of Full Cost Increases

Secondly, We'd like to see to it that all financial information is reflected in total, by length of likely time to degree, instead of a single year in time. This makes it easier for students and families to understand what the total cost of a degree at each school would be. Too often, students and families do not understand that a single year's unmet need will be extrapolated out over an entire degree, thus they lose sight of total likely indebtedness and how much debt they will left to manage post-degree.

Finally, we'd recommend that as much data included in the Ratings System be disaggregated (to whatever degree possible) by socio-economic status. If it can be done by income grouping, great. If it can only be done by Pell Eligibility (Full/Partial/No Pell), even that will be better than the current state. This recommendation applies to all data – Enrollment Rates, Graduation rates, time to graduation, debt levels. Averages are not helpful for lower income young people and families – we need to give them a true apples-to-apples comparison when it comes to data.

My entire team and I are available to give further input, feedback or thoughts about how the Ratings System can provide more transparent and understandable information for young people and families.

Thank you for your work on this and for the opportunity to give you feedback.

Best,

Bob

Bob Giannino | *Chief Executive Officer*

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NEW ADDRESS: 31 Milk Street, Suite 900, Boston, MA 02109

OFFICE: 617.778.7204 | CELL: (b)(6)

EMAIL: bob@uaspire.org | www.uaspire.org

A COLLEGE DEGREE CAN CHANGE A LIFE. UASPIRE CAN MAKE IT AFFORDABLE.

uAspire is excited to share **Dollars for College**, a first of its kind, interactive resource we created in collaboration with America's Promise Alliance and The Citi Foundation. Please take a look!

O'Bergh, Jon

From: Voight, Mamie <mvoight@ihep.org>
Sent: Tuesday, February 17, 2015 5:21 PM
To: College Feedback
Cc: Cooper, Michelle; Mitchell, Ted; Studley, Jamie
Subject: Postsecondary Data Collaborative comments on college ratings
Attachments: Postsecondary Data Collaborative - College Ratings Comments.pdf

Dear Secretary Duncan,

Thank you for the opportunity to submit the attached comments on the Department of Education's college ratings framework. I write on behalf of members of the Postsecondary Data Collaborative, a coalition of organizations that advocates for the use of high-quality postsecondary data to inform policymaking, institutional improvement, and consumer choice - all to promote student success. To inform the ratings' development, the attached recommendations urge the Department to:

- Apply data differently to meet distinct purposes,
- Disaggregate measures of student success and access by race/ethnicity,
- Measure cumulative student debt and the share of students borrowing, and
- Incorporate labor market outcomes.

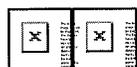
This letter is supported by the following members of the Postsecondary Data Collaborative:

Center for Law and Social Policy (CLASP)
Data Quality Campaign (DQC)
Georgetown Center on Education and the Workforce
Institute for Higher Education Policy (IHEP)
New America
State Higher Education Executive Officers Association (SHEEO)
The Institute for College Access and Success (TICAS)
Western Interstate Commission for Higher Education (WICHE)
Young Invincibles

We hope you find these recommendations useful and would be happy to serve as a resource as you continue these efforts. If you have any questions, please contact Mamie Voight, director of policy research at the Institute for Higher Education Policy (mvoight@ihep.org, 202-587-4967).

Sincerely,

Mamie Voight | Director of Policy Research | Institute for Higher Education Policy | 1825 K Street NW, Suite 720 | Washington, DC 20006 | 202 587 4967 | mvoight@ihep.org



www.ihep.org

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,

The undersigned organizations write as part of the Postsecondary Data (PostsecData) Collaborative to provide feedback on key portions of the Department of Education's college ratings framework. The PostsecData Collaborative is a coalition of organizations that advocates for the use of high-quality postsecondary data to inform policymaking, institutional improvement, and consumer choice—all to promote student success. Our group includes participants from a large swath of the higher education community, including experts and organizations that represent students, states, researchers, advocates, institutions and systems of higher education, and the business community. Through the Collaborative, we seek consensus among our diverse set of organizations on key postsecondary data issues, particularly those that impact students. This letter explains points of consensus supported by the organizations listed.

We have been encouraged by the Department's efforts to solicit feedback throughout the process of developing the ratings system and hope these comments will inform the next phase of the ratings development. Together as members of the PostsecData Collaborative, we urge the Department to:

1. **Apply data differently to meet distinct purposes:** We urge the Department to consider accountability, consumer information, and institutional benchmarking separately and either narrow the scope of the ratings to develop one tool to address one purpose or apply different rating system designs tailored to each purpose.
2. **Disaggregate measures of student success and access by race/ethnicity:** We recommend that the rating system include the following measures of success and access for underrepresented minority students:
 - a. SUCCESS: Graduation rates, disaggregated by race/ethnicity
 - b. ACCESS: Percent of students enrolled from each racial/ethnic group
3. **Measure cumulative student debt and the share of students borrowing:** We encourage the Department to incorporate measures of cumulative student loan debt, disaggregated by completion status and program level, into the rating system.
4. **Incorporate labor market outcomes:** We support the Department's efforts to incorporate labor market outcomes into the rating system in a thoughtful way that protects against unintended consequences.

This letter reflects significant consensus on several critical elements of the ratings among a diverse set of organizations within the higher education community. As such, we hope the Department will weigh these recommendations heavily when further designing and implementing the rating system. Many of our organizations also will submit their own detailed comments to inform other aspects of the college ratings system.

Apply data differently to meet distinct purposes

The Department of Education has been clear that “the college ratings system has multiple related purposes.”¹ The system is intended to inform institutional improvement, consumer choice, policymaking, and accountability. We agree that each of these purposes is important and requires high-quality data. However, we urge the Department to consider accountability, consumer information, and institutional benchmarking separately and either narrow the scope of the ratings to develop one system to address one purpose or design different rating systems that use common data while being tailored to each purpose. Data are powerful tools for informing stakeholder decisions but are not likely to be used if they are not presented in actionable formats tailored to specific stakeholder needs. High-quality public reporting presents information in a way that is easy for stakeholders to find, access, and understand.

While common and consistent data sources and data systems should contribute to all of the distinct purposes noted by the framework, one rating system design cannot adequately meet all of them simultaneously. Rather, an accountability-focused mechanism requires different design decisions than a consumer-oriented tool (like an improved College Scorecard or College Navigator), which requires different decisions than an institutional or system benchmarking instrument. Consider the following examples for how the mechanics of the system should vary depending on purpose:

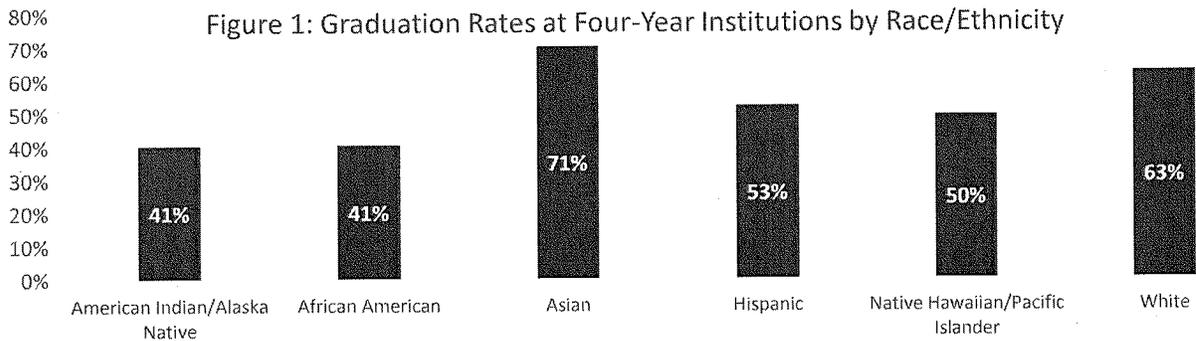
- The ratings framework suggests adjusting outcomes based on student and institutional characteristics. While debates continue about the appropriateness of such adjustments in an accountability or institutional improvement system, such adjustments should never be made in a consumer information system. Students need access to clear, unvarnished information, and adjusted outcomes would serve only to confuse at best and mislead at worst.
- To measure institutional affordability in a federal accountability system, it may make sense to account for variation in state investment in higher education. However, the funding factors (state, federal, and institutional) that influence price are less important for students and families, who simply need to know how much *they* will have to pay.
- Institutions or systems may find it useful to compare themselves with similar institutions or systems that share common characteristics. However, some of those institutional characteristics (e.g. sector, Carnegie classification, funding source, etc.) may be less important for students who may care more about location, price, and the chance of admission, all depending on their individual circumstances. Ratings should provide students with the flexibility to search using criteria like geography and majors offered, but an accountability system should not be weighted using such characteristics.
- Students may want consumer information about income levels of graduates and seek distinctions between low, mid, high, and very high paying careers. On the other hand, an accountability system may take a more targeted approach to incorporating wage data and only flag the programs or institutions with particularly poor labor market outcomes.
- The framework proposes calculating measures such as graduation and transfer rates for federally-aided students using the National Student Loan Data System (NSLDS). These data could be even more limiting than existing IPEDS data and possibly confusing if presented to students in a

¹ *A New System of College Ratings – Invitation to Comment*. U.S. Department of Education. 19 December 2014. Retrieved from: <http://www2.ed.gov/documents/college-affordability/framework-invitation-comment.pdf>

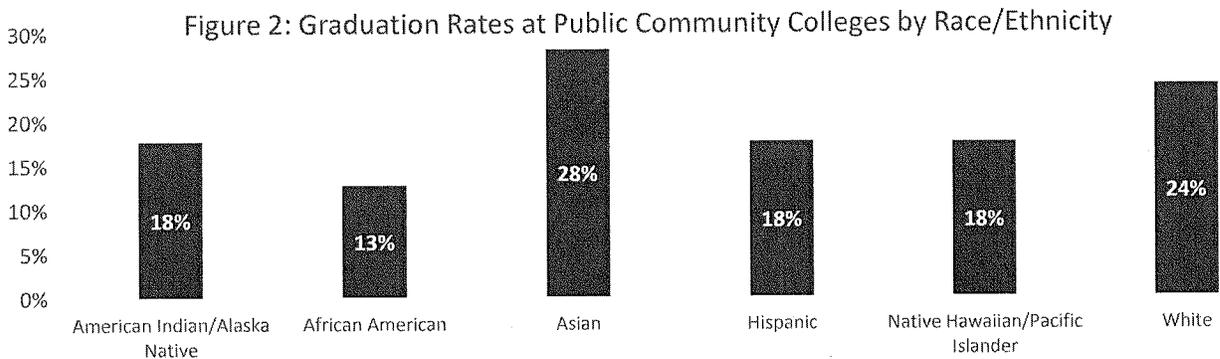
consumer information system because they represent only 57 percent of all college students and only 44 percent of community college students.² However, these data may be useful if the Department wanted to develop accountability mechanisms specifically for federal aid dollars.

Disaggregate measures of student success and access by race/ethnicity

As organizations committed to high-quality postsecondary opportunities for all students, we strongly recommend that the Department incorporate measures of success and access for underrepresented minority students into the rating system(s). The Department’s proposed framework suggests graduation rates for Pell Grant recipients and several measures of socioeconomic diversity, both of which are essential for promoting college opportunities for low-income students. However, omitting similar measures for racial/ethnic minorities overlooks critical populations that remain underserved by our postsecondary system. Graduation rates for white and Asian students still outpace those of African-American, Hispanic, American Indian, and Native Hawaiian/Pacific Islander students (Figures 1 and 2).



Source: Bachelor’s or equivalent degree-seekers at four-year institutions in *Graduation Rates for Selected Cohorts, 2005-10; and Student Financial Aid in Postsecondary Institutions, Academic Year 2012-13, First Look (Provisional Data)*. U.S. Department of Education.



Source: Degree/Certificate-seekers at public two-year institutions in *Graduation Rates for Selected Cohorts, 2005-10; and Student Financial Aid in Postsecondary Institutions, Academic Year 2012-13, First Look (Provisional Data)*. U.S. Department of Education.

² IHEP analysis of NPSAS:12 data using PowerStats.

Because these substantial gaps remain—and vary by institution³—incorporating disaggregated data into a rating system is essential. We recommend that the rating system include the following measures of success and access for underrepresented minority students:

- **SUCCESS:** Graduation rates, disaggregated by race/ethnicity – The rating system should measure and evaluate graduation rates for underrepresented minority students and/or graduation rate gaps between students of color and their classmates.
- **ACCESS:** Percent of students enrolled from each racial/ethnic group – Institutions with strong outcomes for underrepresented minority students should be especially acknowledged if they also enroll large shares of underrepresented minorities.

Data for these measures already are collected and readily available in the Integrated Postsecondary Education Data System (IPEDS). These measures could be incorporated into the ratings in similar ways as the percent Pell and Pell graduation rate measures proposed in the Department’s framework, or in ways that explicitly measure gaps between student groups. While we recommend including disaggregated results for these measures in the rating system, we do *not* suggest adjusting expected outcomes by race/ethnicity. Adjusted outcomes set different expectations for different students, which could reinforce existing attainment gaps and perpetuate stereotypes.

One of the most successful aspects of the No Child Left Behind Act of 2001 was its requirement to disaggregate data by race/ethnicity, economic disadvantage, disability, limited English proficiency, migrant status, and gender, and to provide this information to the public. Disaggregation by subgroups made it possible to have greater transparency and more accurate measures of academic performance in K-12 education than ever before. Similarly, the college rating system would benefit from the addition of data disaggregated by race and ethnicity.

Measure cumulative student debt and the share of students borrowing

With debt levels and public concern about student debt on the rise, students, policymakers, and institutions need clear information about how borrowing varies by institution. We are concerned by the framework’s suggestion that the ratings not incorporate debt as a measure of affordability and urge the Department to reconsider. Cumulative student debt accumulated at an individual institution and the percent of students borrowing at that institution, reported separately for completers and non-completers for each undergraduate program level (certificates, associate’s degrees, bachelor’s degrees), provide key information on college affordability. These data on borrowing would act as an essential supplement to net price data because debt measures affordability across the student’s entire time at an institution, rather than just in the first year. Also, debt metrics show *how* students are paying their college costs with a focus on financing that will continue for years into students’ lives after college. Aggregate debt at repayment for all borrowers should not be used, as it conflates time enrolled with debt incurred and can make colleges with low completion rates appear affordable simply because students drop out after relatively short periods of borrowing. Rather, debt data must be disaggregated by completion status to accurately reflect borrowing trends.

³ Joseph Yeado. *Intentionally Successful: Improving Minority Student College Graduation Rates*. The Education Trust. July 2013. Retrieved from: http://www.edtrust.org/sites/edtrust.org/files/Intentionally_Successful.pdf.

The Department has mandated the additional data elements necessary to calculate cumulative federal student loan debt at graduation through the National Student Loan Data System (NSLDS). We recommend using these data and continuing to evaluate them to ensure accurate and timely institutional reporting of student completion status and program level. To promote data quality, data can be cross-referenced with the best currently available data reported via the Common Data Set (CDS) surveys and the National Postsecondary Student Aid Study (NPSAS), as well as annual loan volume as reported through the Common Origination and Disbursement (COD) system and posted on the Federal Student Aid Data Center. In addition, we recommend collecting data on private, state, and institutional loans to students from colleges through the Integrated Postsecondary Education Data System (IPEDS), unless and until such loans are included in NSLDS or another equivalent data system.

Incorporate data on labor market outcomes

We support the Department's efforts to incorporate data on labor market outcomes into the ratings, given that career preparation is one of higher education's multiple purposes. At a time when the vast majority (86 percent) of college freshmen cite being "able to get a better job" as a very important reason for their decision to go to college,⁴ the Department should move forward with efforts to measure salient labor market outcomes in contextualized ways. Exhaustive evaluations of college quality would measure student learning and graduates' societal contributions as well as employment and earnings. However, we recognize the challenges associated with these other post-collegiate outcome measures, especially in a ratings context.

Earnings and employment are more quantifiable outcomes, especially using administrative data systems. The framework rightfully identifies several challenges, such as the need to avoid valuing financially lucrative careers over those that advance the social good, but also proposes a solution to this challenge by setting a minimum earnings standard. We agree that to inform decision-making for students, families, policymakers, and institutions, labor market data should be calculated and contextualized appropriately. For example, earnings and employment should be reported separately for completers and non-completers and students who re-enroll in college should be omitted from the calculations. With these considerations in mind, we recommend incorporating labor market data into the ratings to serve at least two purposes:

- **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 can be especially useful in educating students about their job and earnings prospects as they search for colleges, make borrowing decisions, and choose programs of study.
- **ACCOUNTABILITY FOR "SUBSTANTIAL EMPLOYMENT":** The ratings should identify programs or institutions that do not lead to labor market success, demonstrated by earnings below a bare minimum threshold, such as a multiplier of the federal poverty level or annualized minimum wage earnings. While students may seek more detailed information on employment outcomes, accountability standards for workforce outcomes may need to be limited to the poorest performers.

⁴ Eagan, Kevin, et. al. (2014). *The American Freshman: National Norms Fall 2014*. Los Angeles: Higher Education Research Institute, UCLA. Retrieved from: <http://heri.ucla.edu/monographs/TheAmericanFreshman2014.pdf>

Seek better data, but do not delay action now

As representatives of the higher education community, we support the Department's efforts to produce and provide better information about colleges and universities. Better data can and should be used to inform consumers, support institutional improvement, and drive policy and accountability decisions. In fact, many of our organizations have supported specific data improvements, such as changes to the IPEDS Outcome Measures specifications.

However, desires for higher quality data should not delay action now. Rather, the college rating efforts should advance with existing data, while also serving as an impetus for stronger data systems that will allow robust assessments of postsecondary institutions and systems. Many of our organizations submitted letters previously and still feel that those letters provide important recommendations taking into account the existing work and needs of our unique constituencies. This letter focuses on where all of our interests overlap and where we see the greatest need for improvement. We are encouraged by your efforts to think creatively about data sources and put postsecondary data to good use. We hope we can serve as a reliable resource for you as the Department continues these endeavors.

If you have any questions or would like additional information about the Postsecondary Data Collaborative, please contact Mamie Voight, director of policy research at the Institute for Higher Education Policy (mvoight@ihep.org, 202-587-4967). Thank you for your leadership and commitment to college access, success, and affordability.

Sincerely,

Postsecondary Data Collaborative, on behalf of:

- Center for Law and Social Policy (CLASP)
- Data Quality Campaign (DQC)
- Georgetown Center on Education and the Workforce
- Institute for Higher Education Policy (IHEP)
- New America
- State Higher Education Executive Officers Association (SHEEO)
- The Institute for College Access and Success (TICAS)
- Western Interstate Commission for Higher Education (WICHE)
- Young Invincibles

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

O'Bergh, Jon

From: David, Marcella <marcella.david@fam.u.edu>
Sent: Tuesday, February 17, 2015 5:29 PM
To: College Feedback
Cc: Mangum, Elmira; Miller, Jimmy
Subject: Comments from Florida A&M University on the proposed Rating System
Attachments: BOG rating system.pdf

Good evening

Attached to this email please find comments submitted on behalf of Florida A&M University.

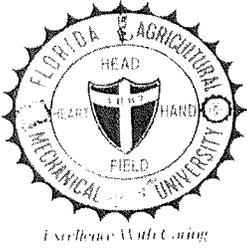
Please let me know if you have any problems with this submission and thank you for the opportunity to comment.

Sincerely,

M. David

Provost Marcella David
Florida A&M University
Lee Hall, Suite 300
Tallahassee, Florida 32307
ph: 850.599.3276 fax: 850.561.2551

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Florida Agricultural and Mechanical University

TALLAHASSEE, FLORIDA 32307-3100

OFFICE OF THE PROVOST AND
VICE PRESIDENT FOR ACADEMIC AFFAIRS

TELEPHONE: (850) 599-3565
FAX: (850) 599-3533

February 17, 2015

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

Dear Secretary Duncan:

Florida Agricultural and Mechanical University welcomes the opportunity to comment on the proposed U.S. Department of Education (USDOE) ratings system. While a response has been submitted by the State University System of Florida, as Florida's only public Historically Black University, Florida A&M University offers these comments to illuminate how the ratings system would impact our unique mission. In particular, this letter addresses the value of adopting a rating system, and which, if any, of the proposed metrics in the college rating framework appear to be acceptable and appropriate.

Florida A&M University (FAMU) supports and shares President Obama's and USDOE's interest in enhancing access, affordability, and accountability. However, we share the concern, expressed by others, that these three objectives cannot be met by a single college ratings system. Moreover, FAMU is opposed to any system that does not give adequate consideration to mission differentiation between schools based on the economic profile of a university's student body.

The merits of adopting a rating system

The approach of "rating" must be carefully considered and steps taken to ensure that it does not yield the unintended outcome of discouraging institutions from serving students with known risk factors, such as low income, in order to compete with each other on ratings. FAMU also has concerns about the availability and reliability of the data sought to be collected by the proposed rating system. Many of these concerns have been expressed by others, however a concern FAMU would like to emphasize is the cost to track, collect and report this data. This is especially significant for public colleges and universities that have faced reductions in funding; it would be an unfortunate and ironic outcome if the result of the ratings system is to divert limited resources away from programming that would otherwise support student success initiatives.

Even assuming no problems with the process of assembling the data, FAMU also has concerns about the inherent difficulties of rating a wide range of institutions with different missions. Performance must be judged in context: even acceptable and appropriate metrics may be misused in assessment absent sufficient recognition of mission differentiation. For colleges and universities that have a special mission of educating minority and underserved populations, it is crucial that any proposed measures are applied in a way that appreciates the importance of that mission, and recognizes the differentials in outcome measures that arises when a university accepts larger numbers of students who present preparedness challenges.

Comparing similar schools with a similar mission is a feature of the proposed system. The grouping of schools into a two-year or four-year group, however, falls far short of the type of categorization that is needed to account for the vast mission differentiation between colleges. We believe that it is ill-advised to develop any ratings system that measures a university's performance and that will be used to allocate precious resources prior to first developing a comprehensive method of categorizing institutions based on mission differentiation. The Department's commitment to looking at differences in institutional characteristics such as degree and program mix and selectivity is laudable, but still not adequate to account for mission differentiation. The University is also concerned about how the emphasis on community colleges as the entry point to higher education for most students may impact the metrics being proposed and the treatment of first time in college (FTIC) students in two-year and four year institutions.

These shortcomings notwithstanding, FAMU does find that the proposed federal ratings system does address some of the flaws inherent in ranking systems like the U.S. News & World Report ranking system in that it takes into consideration a number of metrics that focus on mission differentiation. Chief among these metrics is the extent to which institutions serve low-income first-generation students, such as percentage receiving Pell, family income quintiles, and first-generation college status. The percentages of Pell Grants and low-income first-generation students and income quintiles, should not only be used as evaluation criteria, but also to categorize institutions before they are rated.

The major determinant in any categorization of colleges for the purpose of evaluating performance should be the income profile of the student body. Study after study has shown that income is the best indicator of whether or not a student graduates. A New York Times Magazine expose entitled "Who gets to graduate?" states:

When you look at the national statistics on college graduation rates, there are two big trends that stand out right away. The first is that there are a whole lot of students who make it to college — who show up on campus and enroll in classes — but never get their degrees. More than 40 percent of American students who start at four-year colleges haven't earned a degree after six years. If you include community-college students in the tabulation, the dropout rate is more than half, worse than any other country except Hungary.

The second trend is that whether a student graduates or not seems to depend today almost entirely on just one factor — how much money his or her parents make. To put it in blunt terms: Rich kids graduate; poor and working-class kids don't. Or to put it more statistically: About a quarter of college freshmen born into the bottom half of the income distribution will manage to collect a bachelor's degree by age 24, while almost 90 percent of freshmen born into families in the top income quartile will go on to finish their degree.

Given that the income of a student's parent is by far the major statistical determinant of whether or not she or he graduates, no ratings systems can be complete unless it separates colleges into quintiles based on the incomes of the students' parents, as well as, first-generation college status according to mission.

Comments on the metrics

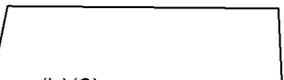
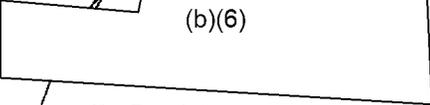
With these cautions, FAMU finds that the proposed Federal ratings system would collect important information not currently reflected in many higher education assessments.

Positive feature of the proposed ratings system would consider affordability to students and their families. While completion rates are identified as a metric, they would be strengthened by recognizing mission differentiation and rates of subgroups such as Pell grant recipients, and consideration of the selectivity of the institution in the academic preparation of the students they admit, both factors that have a significant impact on completion rates. FAMU also advocates for some recognition in the completion rates of the students who transfer to other institutions and complete their degree, through use of data in NSLDS or SAMS.

In terms of Labor Market Success, FAMU supports the consideration being given in the system to the notion of "substantial employment" as a short term measure, which would express the share of an institution's graduates who earned above a specific threshold. We find this preferable to focusing on the amount of wages since the latter varies by discipline, location and other factors, which may discourage students from serving in underserved communities and going into disciplines important to society but not lucrative, such as teacher education. We believe that it would be preferable to address employment alone, rather than a metric related to income.

Graduate school attendance could penalize universities that serve a high percentage of students from low-income households, since it takes them longer to graduate. Many of these students are also first-time college graduates in their families and would have to choose between supporting their families or going to graduate school.

Thank you for the opportunity to present these comments. We hope that they inform any further development of the Ratings System.

Sincerely, 
 (b)(6)

Marcella David
Provost and Vice President for Academic Affairs

Cc: President Elmira Mangum
Vice President Jimmy Miller

O'Bergh, Jon

From: Nadia Valliani <nadia@collegecampaign.org>
Sent: Tuesday, February 17, 2015 5:33 PM
To: College Feedback
Cc: 'Michele Siqueiros'; 'Audrey Dow'
Subject: Public Comment on College Rating System
Attachments: Campaign for College Opportunity - Rating comments 2-17-15.pdf

I would like to submit a comment from the Campaign for College Opportunity on the first draft of President Obama's college ratings system framework.

Thank you and please let us know if you have any questions or if we can be of assistance in any way.

Best wishes,
Nadia Valliani

Nadia Valliani
Research & Policy Analyst
The Campaign for College Opportunity
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Working to ensure all Californians have an equal opportunity to attend and succeed in college in order to build a vibrant workforce, economy and democracy.



The Campaign for
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Opportunity**

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February 17, 2015

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

RE: Public Comment on College Ratings Framework

Dear Secretary Duncan:

The Campaign for College Opportunity is a California-based higher education policy and advocacy organization committed to ensuring all Californians have an equal opportunity to go to college and graduate with a quality education. As you know, California is the country's most populous state with the largest GDP in the country. California is also among the most racially/ethnically diverse states in the country; in fact, one out of every two children under the age of 18 is Latino. That said, what happens in California affects our entire nation and we have an economic and moral imperative to ensure all of our residents have an equal chance at earning a higher education degree.

For this reason, we appreciate President Obama's and the Department of Education's (the Department) efforts to provide more and better information to students through a Postsecondary Institution Ratings System (PIRS) and the opportunity to comment on such a framework. We applaud the Department in its broader efforts to increase the rate of higher educational attainment for all Americans and to inform the public on institutional measures.

We believe that an effective college-rating system should be rooted in three guiding principles: (1) low-income and underrepresented minority students must be at the forefront of the access and success conversation; (2) institutions, not just students, should be held accountable for student success; and (3) tools and systems are helpful only if they are utilized and understood by the consumer for whom it is intended and by advocates and policy makers who can act upon the data effectively.

Based on these guiding principles, the Campaign for College Opportunity offers the following five recommendations to the

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Kent Wong *Director, UCLA Center for Labor Research & Education*

February 17, 2015

Department as it develops its Postsecondary Institution Ratings System.

- 1. Include race/ethnicity as part of metrics.**
- 2. Include level and quality of student support at institutions.**
- 3. Include data around student satisfaction.**
- 4. Develop an outreach plan so that students and their families understand and use the ratings system.**
- 5. Develop an outreach plan so that colleges and universities use the ratings plan effectively and as part of informed, strategic decision-making.**

1. Include race/ethnicity as part of metrics.

The Campaign supports the inclusion of income, first-generation status, and Pell grant recipient as part of the metrics in the rating system. However, a separate key equity measure is glaringly absent—that of race/ethnicity. Income and first-generation status certainly matter when discussing college enrollment and completion but they are not always proxies for race/ethnicity. Including race/ethnicity in PIRS also demonstrates to students and their families that diversity matters; that equity matters; that all students matter and will help ensure that more colleges and universities are paying attention to the racial/ethnic gaps that exist on their campus. The Department of Education should include race/ethnicity for all access, affordability, and success measures in its ratings system—this should not add extra burden to data reporters as such information is already collected. At the same time, we do not think that expected outcomes should be adjusted by race/ethnicity—doing so would indicate that separate standards or expectations exist for students depending on their skin color or background—a concept anathema to our ideals as a country.

2. Include level and quality of student support at institutions.

Nationally, only an average of 40 percent of students graduate from four-year universities within four years and 60 percent within six years. A large number of students have prepared and worked hard to access higher education but a large proportion are not graduating on time, if at all. Research has shown that college institutions play a large role in ensuring students' progress through college and graduate on time. One of the best ways colleges can ensure this progression and timely degree completion is by offering a wide array of services to support students every step of the way. These supports include, but are not limited to:

sufficient number of trained and passionate counselors to guide, advise, and track student progress along with clearly informing students that enrollment in less than 15 credits per term will result in delayed time to degree; the utilization of technology to track degree progress and schedule coursework by semester to fulfill academic requirements; tutoring and academic support centers to students who need extra help; mandatory orientation to new students so they are aware of the various ways colleges are committed to their success; and career centers to help students explore career options and prepare to enter the workforce to name a few. Some colleges excel at offering these supports while many fall short. It would be helpful to applicants to know which schools offer strong student services.

3. Include data around student satisfaction.

One of the concerns about PIRS is that a ratings system will not tap into the numerous intangible benefits a college education provides. We all know that a college education is more than just a pathway to a job and earned income. A college education inspires, opens minds, and ignites a passion for lifelong learning, all important yet intangible benefits. One way to make the intangible tangible is by measuring student satisfaction—are you satisfied with your college experience? This measure could speak volumes to potential students in ways that enrollment, completion, and jobs data might not.

4. Develop an outreach plan so that students and their families understand and use the ratings system.

A college ratings system will only help students if they are aware of such a tool and are able to use and understand it. We encourage the Department to prepare a comprehensive plan that addresses how the Department will publicize and market the ratings system and teach users how to utilize the tool to make an informed decision. Such a plan should acknowledge that the digital divide is reality for many low-income, first-generation, and underrepresented minority students—the very population that requires the most assistance and support in accessing higher education—and have a plan to access these marginalized groups. The Department should also recognize that English is not spoken at home for about 20 percent of the national population—in California that figure is 44 percent. It is critical to ensure that the ratings tool and any and all associated trainings, documents, webinars, are available in a variety of languages to ensure equal access and understanding.

5. Develop an outreach plan so that colleges and universities use the ratings plan effectively and as part of informed, strategic decision-making.

One of the goals of this new ratings system is so that institutions can benchmark their performance and compare it to similar institutions. The Department should provide a plan so that colleges understand the various ways in which they can use the information from the ratings system to set goals for improvement where necessary and to measure progress over time. A key component of this would be an opportunity or summit hosted by the Department of Education where colleges can discuss best practices and engage in conversations around making improvements, not only to the ratings system but also to their campus. Any efforts to support state policy makers to set forth clear goals and to fund and align accountability around them is

February 17, 2015

critical. As is any incentive and reward that the federal government can utilize to support colleges that are making progress, and closing critical gaps to improve outcomes for students.

We understand and appreciate the enormity of undertaking a ratings system of the thousands of colleges and universities that exist in the United States. We thank the President and his Administration for making college opportunity and affordability a key priority. Barriers to college access and success stifle the country's economic growth while widening the gap between the rich and poor and among students of different ethnic/racial backgrounds.

The Campaign for College Opportunity appreciates the opportunity to comment on the college ratings system framework. We hope to be a resource for the Department in the future and look forward to seeing how the program progresses. Please feel free to contact our Vice President of External Affairs and Operations, Audrey Dow, at audrey@collegecampaign.org with any questions.

Sincerely,

Michele Siqueiros
President
The Campaign for College Opportunity

O'Bergh, Jon

From: Brian Harlan <bharlan@calarts.edu>
Sent: Tuesday, February 17, 2015 5:43 PM
To: College Feedback
Cc: Tim@naicu.edu
Subject: College Ratings, NAICU Member Feedback
Attachments: CalArts PIRS Feedback_2-14-15.pdf

Steven Lavine
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24700 McBean Parkway
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Honorable Arne Duncan
Secretary
U. S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Secretary:

As a member of the National Association of Independent Colleges and Universities (NAICU), I am writing on behalf of California Institute of the Arts (CalArts) to endorse the association's position on the President's call to establish a postsecondary ratings system (PIRS). NAICU's statement focused on the potential consequences of an overreliance on data that is devoid of context to make decisions, both on the part of policy makers as well as consumers, and we would like to supplement this view from an institution's perspective. I want to express at the outset that CalArts is well aware of the importance and seriousness of the issues your administration is attempting to address with respect to access to higher education and student debt. We sincerely admire the work being undertaken and very much appreciate your efforts to engage subject-matter experts in the design of PIRS, and for taking the time to collect and consider feedback from the higher education community. It is clear that the DoE is cognizant of the potential impact that a federally-sanctioned rating system might bring to higher education, and is taking care to prevent any adverse ramifications.

In 2013 the President laid out his platform for improving the economic status of the middle class that highlighted education as the single most important investment we can make in order to meet this aim. CalArts could not agree more with this viewpoint, and I can speak for the institute in voicing our support for the basic premise of the plan. The overall approach, however, is potentially problematic and in some ways self-contradictory in its logic. If it has not already become clear to the DoE by the consensus among NAICU members as well as the overwhelming response from public colleges across the country, the PIRS project alone stands in the way of full support from the higher education community for this critical initiative. Furthermore, it is not the collection of data that has raised objection—nor even the public transparency of those data—but only the faulty notion that multi-year educational experiences can be

“ranked” in any meaningful and efficient manner. PIRS would link two items from the education plan; one under the heading of Promoting Innovation and Competition (“give consumers clear, transparent information on college performance”), and the other under Paying for Performance (“tie financial aid to college performance, starting with publishing new college ratings”). Not only is this competitive rhetoric troubling for us as a non-profit, as I will explain below, there are reasons to question whether the specific aims that have converged to engender PIRS are even compatible.

To begin, recent research conducted to examine the effectiveness of performance-based funding in higher education suggests that there is little to no effect. Barakat, Hillman, and Tandberg’s massive study of performance-based systems aimed at increasing graduation rates in nineteen states found that increased rates occurred in only four states, and that six states actually saw declining rates. More specifically, Jones’s paper entitled “The Myth of Performance-Based Funding” highlights the negative consequences of simplified metrics on historically black colleges because they are unable to account for differences of student background. Problems with this approach have also been pointed to by the Community College Research Center at Columbia University’s Teachers College, and they are no less controversial in primary and secondary education.

There are at least two primary reasons why the practice of performance-based funding is controversial in education. On one hand, simple metrics must be developed that reduce a complex array of factors such as student preparation and cognitive ability, teaching effectiveness, adequate facilities, geographical location and environmental fit, and so on—all of which are complicated by external life factors that occur across the months and years that any given educational experience is taking place. And on the other hand, these reductive metrics must be held constant across a diverse landscape of institution types that include not only size and location, but also differences in programmatic offerings, pedagogical philosophies, mode of delivery, and mission and values.

Even when carefully constructed to ensure reliability and validity rating systems are blunt tools at best, and are prone to misrepresentations. Most users will not take the time to understand their subtleties or their shortcomings. This will be especially true when the source of the rating is as authoritative as the federal government. US DoE ratings will likely go unchallenged by a large percentage of the population. Rating systems have also been seen to lead to gaming under pressure. Without mentioning institutions by name, there have been numerous examples recently of highly reputable institutions being caught reporting faulty numbers, and there are likely many more that have never been caught. The stakes are already high due to the many national and international rating systems that exist, and the competition for enrollment is already intense. It is likely that ratings tied to federal financial aid will only exacerbate the problem. Besides misreporting, this type of pressure can also alter standards. For instance, institutions could easily increase graduation rates merely by lowering graduation requirements. The concern here is not that institutions should never be put under pressure to provide a high-quality educational experience, but rather that being put under pressure can sometimes lead to bad data through inaccurate reporting, thereby compromise the entire system.

Rating systems can also have the unintended effect of stigmatizing under-funded institutions. It is certainly no mystery why the top-ranked schools in *US News*, for example, are also coincidentally among those that have the highest endowments. It has long been known that the best predictor of student graduation rates (a key

PIRS rating indicator) is simply high school GPA. Wealthy schools have the luxury of selecting the most academically prepared students, and thereby limiting their liability on outcomes. Well-endowed schools also have more flexibility to supplement federal financial aid with institutional financial aid, and they have more resources for academic support as well as high-impact programs that have been shown to increase student success such as study abroad and undergraduate research. Considering the correlation between graduation rates and endowment size, PIRS ratings could penalize schools for their lack of endowment and run the risk of disenfranchising those institutions and their alums. Concerns to avert such a situation could lead institutions to amend their admissions policies to better predict outcomes. A worst-case scenario would see American higher education lose the gains it has made toward democratizing access.

Finally, in higher education we have long held a presumption that the fit between students' needs, interests and preferences and their educational environment will impact satisfaction and success. Recent research by Bowman and Denson has provided statistical evidence that this intuitive notion can be relied upon. Through qualitative and contextual analysis the researchers calculated a "fit" index out of several interrelated dimensions of environmental fit for students. The results suggest not only a relationship between fit and general satisfaction, but also between fit and persistence. As one of less than a handful of small, private institutions that offer degrees in both visual and performing arts, at CalArts these findings confirm what we have experienced with our student body. We offer a highly-individualized educational experience that includes a low student/faculty ratio, and 24/7 access to private student studio spaces. We also have a mission that emphasizes risk taking and a set of stated values that enable us to live this mission. These unique aspects of our environment intentionally attract a unique student body. In fact, it is not an overstatement to claim that many students who graduate from CalArts do so because of their fit within our unique environment. Put differently, they might not have been able to make the same transformation to success at any other institution.

It is for the reasons, as well as the reasons stated by NAICU and other educational institutions and associations, that we urge you, Honorable Secretary Duncun, to reconsider the use of PIRS for institutional ratings. We also ask that the data not be used for financial aid disbursement, but this is a secondary concern. Of greater concern is any impact such a rating system might have on student choice. Federally-mandated data collection already exists through IPEDS, and it is already publically accessible to consumers through College Navigator. There is some sense in expanding the data summaries to include PIRS, but not to rank institutions without more context. One way to provide context would be to provide more education around regional accreditation standards, expand these standards as needed, require accreditors to present their findings in a more consumer-friendly way, and point the public to accreditors as the authorities on educational quality rather than the federal government.

I want to restate our admiration and support for the President's initiative to improve economic status and mobility within the United States through higher education. The current administration clearly understands the role and responsibility of education to enable a prosperous democratic society. We share this belief. Thank you again for reaching out to the higher education community to hear our concerns. Collectively we can reach the President's economic goals without impeding the overarching goals of American higher education.

Sincerely,
Steven Lavine, President

CaLARTS

Steven Lavine
President
California Institute of the Arts
24700 McBean Parkway
Valencia, CA 91355-2340

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

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In 2013 the President laid out his platform for improving the economic status of the middle class that highlighted education as the single most important investment we can make in order to meet this aim. CalArts could not agree more with this viewpoint, and I can speak for the institute in voicing our support for the basic premise of the plan. The overall approach, however, is potentially problematic and in some ways self-contradictory in its logic. If it has not already become clear to the DoE by the consensus among NAICU members as well as the overwhelming response from public colleges across the country, the PIRS project alone stands in the way of full support from the higher education community for this critical initiative.

Furthermore, it is not the collection of data that has raised objection—nor even the public transparency of those data—but only the faulty notion that multi-year educational experiences can be “ranked” in any meaningful and efficient manner. PIRS would link two items from the education plan; one under the heading of **Promoting Innovation and Competition** (“give consumers clear, transparent information on college performance”), and the other under **Paying for Performance** (“tie financial aid to college performance, starting with publishing new college ratings”). Not only is this competitive rhetoric troubling for us as a non-profit, as I will explain below, there are reasons to question whether the specific aims that have converged to engender PIRS are even compatible.

To begin, recent research conducted to examine the effectiveness of performance-based funding in higher education suggests that there is little to no effect. Barakat, Hillman, and Tandberg’s massive study of performance-based systems aimed at increasing graduation rates in nineteen states found that increased rates occurred in only four states, and that six states actually saw declining rates. More specifically, Jones’s paper entitled “The Myth of Performance-Based Funding” highlights the negative consequences of simplified metrics on historically black colleges because they are unable to account for differences of student background. Problems with this approach have also been pointed to by the Community College Research Center at Columbia University’s Teachers College, and they are no less controversial in primary and secondary education.

There are at least two primary reasons why the practice of performance-based funding is controversial in education. On one hand, simple metrics must be developed that reduce a complex array of factors such as student preparation and cognitive ability, teaching effectiveness, adequate facilities, geographical location and environmental fit, and so on—all of which are complicated by external life factors that occur across the months and years that any given educational experience is taking place. And on the other hand, these reductive metrics must be held constant across a diverse landscape of institution types that include not only size and location, but also differences in programmatic offerings, pedagogical philosophies, mode of delivery, and mission and values.

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examples recently of highly reputable institutions being caught reporting faulty numbers, and there are likely many more that have never been caught. The stakes are already high due to the many national and international rating systems that exist, and the competition for enrollment is already intense. It is likely that rankings tied to federal financial aid will only exacerbate the problem. Besides misreporting, this type of pressure can also alter standards. For instance, institutions could easily increase graduation rates merely by lowering graduation requirements. The concern here is not that institutions should never be put under pressure to provide a high-quality educational experience, but rather that being put under pressure can sometimes lead to bad data through inaccurate reporting, thereby compromise the entire system.

Rating systems can also have the unintended effect of stigmatizing under-funded institutions. It is certainly no mystery why the top-ranked schools in *US News*, for example, are also coincidentally among those that have the highest endowments. It has long been known that the best predictor of student graduation rates (a key PIRS rating indicator) is simply high school GPA. Wealthy schools have the luxury of selecting the most academically prepared students, and thereby limiting their liability on outcomes. Well-endowed schools also have more flexibility to supplement federal financial aid with institutional financial aid, and they have more resources for academic support as well as high-impact programs that have been shown to increase student success such as study abroad and undergraduate research. Considering the correlation between graduation rates and endowment size, PIRS ratings could penalize schools for their lack of endowment and run the risk of disenfranchising those institutions and their alums. Concerns to avert such a situation could lead institutions to amend their admissions policies to better predict outcomes. A worst-case scenario would see American higher education lose the gains it has made toward democratizing access.

Finally, in higher education we have long held a presumption that the fit between students' needs, interests and preferences and their educational environment will impact satisfaction and success. Recent research by Bowman and Denson has provided statistical evidence that this intuitive notion can be relied upon. Through qualitative and contextual analysis the researchers calculated a "fit" index out of several interrelated dimensions of environmental fit for students. The results suggest not only a relationship between fit and general satisfaction, but also between fit and persistence. As one of less than a handful of small, private institutions that offer degrees in both visual and performing arts, at CalArts these findings confirm what we have experienced with our student body. We offer a highly-individualized educational experience that includes a low student/faculty ratio, and 24/7 access to private student studio

spaces. We also have a mission that emphasizes risk taking and a set of stated values that enable us to live this mission. These unique aspects of our environment intentionally attract a unique student body. In fact, it is not an overstatement to claim that many students who graduate from CalArts do so because of their fit within our unique environment. Put differently, they might not have been able to make the same transformation to success at any other institution.

It is for the reasons, as well as the reasons stated by NAICU and other educational institutions and associations, that we urge you, Honorable Secretary Duncun, to reconsider the use of PIRS for institutional ratings. We also ask that the data not be used for financial aid disbursement, but this is a secondary concern. Of greater concern is any impact such a rating system might have on student choice. Federally-mandated data collection already exists through IPEDS, and it is already publically accessible to consumers through College Navigator. There is some sense in expanding the data summaries to include PIRS, but not to rank institutions without more context. One way to provide context would be to provide more education around regional accreditation standards, expand these standards as needed, require accreditors to present their findings in a more consumer-friendly way, and point the public to accreditors as the authorities on educational quality rather than the federal government.

I want to restate our admiration and support for the President's initiative to improve economic status and mobility within the United States through higher education. The current administration clearly understands the role and responsibility of education to enable a prosperous democratic society. We share this belief. Thank you again for reaching out to the higher education community to hear our concerns. Collectively we can reach the President's economic goals without impeding the overarching goals of American higher education.

Sincerely,

Steven Lavine

O'Bergh, Jon

From: Burkhart, Marian C <Marian.C.Burkhart@lonestar.edu>
Sent: Tuesday, February 17, 2015 5:45 PM
To: College Feedback
Subject: Comments on Postsecondary Information Rating System

Comments on Postsecondary Information Rating System

Marian Burkhart, Executive Director
Office of Analytics & Institutional Reporting
Lone Star College, Houston TX

Submitted: February 17, 2015

Lone Star College is the largest institution of higher education in the Houston area and one of the fastest growing community colleges in the nation. Dedicated to affordable access, student success and completion, we are:

- The college of choice for 95,000 students
- Providing 8000+ high school students with dual credit courses, earning simultaneous high school and college credit, to accelerate their college completion
- Enrolling 1 in 4, or 25%, of May graduates from area high schools in the fall term
- Graduating 84% of all emergency first responders and training 60% of all health care workers in our community
- Recognized nationally as a Top 10 Associate Degree Producer
- Leading the Texas Reverse Transfer Initiative, in collaboration with The University of Texas, a key strategy in Texas' goal of increasing higher education degree attainment
- Leading the Texas Completes effort statewide to dramatically increase college completion rates
- Fiscally-responsible as evidenced by our AAA Bond Rating by Standard & Poor's Rating Service, tax rate decreases 6 of the last 10 years, and one of the lowest administrative operating expenses (12%) in Texas
- A key driver and growing contributor to the local and regional economy with an annual economic impact of \$3.1 billion

Clearly, Lone Star College shares the President's goal of expanding opportunity for more students to enroll and succeed in college, especially low-income, underrepresented and first time in college students. However, after careful study and thoughtful consideration, we join thought leaders, educators, researchers and policymakers who oppose the Postsecondary Institutions Rating System on the basis of its poor design and methodology. Colleges don't object to being measured, but we want the tool to be grounded in reliable and valid data, presented in the appropriate context, and designed to provide what students and their families truly care about. We echo the conclusions made by scores of others in this comment process that current federal data on student outcomes is flawed and widespread legitimate disagreement exists about appropriate metrics and, as such, the rating system as designed will do more harm than good.

If the Administration proceeds with a rating system, we would respectfully request consideration of these and other changes to the proposed model:

- **Do not link federal student aid to the ratings** - it is fraught with problems not the least of which is to encourage unscrupulous institutions to manipulate data to ensure continued eligibility
- Expand data collected through IPEDS and strengthen and enforce compliance

- Avoid an ordinal ranking system because it improperly reduces and oversimplifies information needed by consumers to make informed decisions
- Draw from other efforts, like the AACC's Voluntary Framework of Accountability or the Student Achievement Measure initiative, when developing measures in order to properly contextualize the data points
- Adopt a Student Default Risk Index (SDRI)
- Look to the Higher Education Price Index (HEPI) rather than the Consumer Price Index (CPI) to measure college affordability
- Do not include graduate salaries in the rating system since data are incomplete and potentially misleading to students

Respectfully submitted,
ME

Marian Ervin Burkhart
Executive Director
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The Woodlands, TX. 77381
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O'Bergh, Jon

From: Studley, Jamie
Sent: Tuesday, February 17, 2015 5:49 PM
To: Voight, Mamie; College Feedback
Cc: Cooper, Michelle; Mitchell, Ted
Subject: RE: Postsecondary Data Collaborative comments on college ratings

Thank you for sending this, for IHEP's advice and leadership, and for bringing together this coalition to help us do this important work.

From: Voight, Mamie [mvoight@ihop.org]
Sent: Tuesday, February 17, 2015 5:21 PM
To: College Feedback
Cc: Cooper, Michelle; Mitchell, Ted; Studley, Jamie
Subject: Postsecondary Data Collaborative comments on college ratings

Dear Secretary Duncan,

Thank you for the opportunity to submit the attached comments on the Department of Education's college ratings framework. I write on behalf of members of the Postsecondary Data Collaborative, a coalition of organizations that advocates for the use of high-quality postsecondary data to inform policymaking, institutional improvement, and consumer choice - all to promote student success. To inform the ratings' development, the attached recommendations urge the Department to:

- * Apply data differently to meet distinct purposes,
- * Disaggregate measures of student success and access by race/ethnicity,
- * Measure cumulative student debt and the share of students borrowing, and
- * Incorporate labor market outcomes.

This letter is supported by the following members of the Postsecondary Data Collaborative:

Center for Law and Social Policy (CLASP)

Data Quality Campaign (DQC)

Georgetown Center on Education and the Workforce

Institute for Higher Education Policy (IHEP)

New America

State Higher Education Executive Officers Association (SHEEO)

The Institute for College Access and Success (TICAS)

Western Interstate Commission for Higher Education (WICHE)

Young Invincibles

We hope you find these recommendations useful and would be happy to serve as a resource as you continue these efforts. If you have any questions, please contact Mamie Voight, director of policy research at the Institute for Higher Education Policy (mvoight@ihep.org, 202-587-4967).

Sincerely,

Mamie Voight | Director of Policy Research | Institute for Higher Education Policy | 1825 K Street NW, Suite 720 | Washington, DC 20006 | 202 587 4967 | mvoight@ihep.org<<mailto:mvoight@ihep.org>>

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O'Bergh, Jon

From: ANN DAVIS WEBER <adweber@olemiss.edu>
Sent: Tuesday, February 17, 2015 6:29 PM
To: College Feedback
Cc: Maurice Eftink; Morris Stocks; Noel E. Wilkin; bhl; Susan Foust
Subject: Comments on the Federal College Ratings Framework from the University of Mississippi
Attachments: UM Reponse to Federal Framework 2 17 2015.pdf

To whom it may concern:

The Provost of the University of Mississippi, Dr. Morris Stocks, would like to submit the attached comments on the proposed Federal College Ratings Framework on behalf of the university. We look forward to learning more about the proposal as it develops.

Sincerely,

Annie Davis Weber, Ed.D.

Manager of Strategic Planning

The University of Mississippi

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THE UNIVERSITY OF
MISSISSIPPI

Interoffice Memorandum

PROVOST AND VICE CHANCELLOR FOR ACADEMIC AFFAIRS

University, MS 38677

Phone: (662) 915-5974 Fax: (662) 915-5280

TO: Secretary Arne Duncan, US Department of Education

FROM: Provost Morris H. Stocks, Vice Chancellor for Academic Affairs *MHS*

DATE: February 17, 2015

SUBJECT: Response to Federal College Ratings Framework

The leadership of the University of Mississippi is appreciative of the work that went into developing the federal College Ratings Framework. It contains ideas that stand to strengthen the American system of higher education. We especially appreciate the emphasis on the core areas of access, affordability, and outcomes, given our mission to serve as a public research university in the state of Mississippi. We also find that the proposed metrics and data collection strategies are reasonable and thoughtfully presented.

We do have some feedback or concerns that should be mentioned.

General Comments

- 1.) For each data element in the framework, we request that the Department make its expectations clear for what will constitute improvement. For some metrics, the answer is evident: higher completion rates represent an improvement. However, particularly for the Access metrics, it is less clear.

For example, will an institution be rewarded if the Expected Family Contribution (EFC) gap decreases or increases? A decline could be caused by some negative action by an institution, like changing recruitment or admissions practices to exclude students from lower socio-economic backgrounds. Or it could be caused by a growing economy, meaning the financial needs of students could decrease. Changes could also be driven by alterations to the federal financial aid system and the formula used to determine EFC. We ask for more information about how institutions are going to be evaluated on each metric.

- 2.) On the issue of single vs. multiple ratings, we support the idea of having both a single overall rating that is based on a careful weighting of the metrics, and disaggregated information about performance on each metric. As an example, some parents and students may care more about performance on Affordability metrics than they do about Access, and disaggregated information will allow them to form their own judgments.