

- 2.) Labor market success is another important outcome, and we believe that the methodology described by the Department is generally sound. Again, we believe that while the raw numbers should not be adjusted, the benchmark against which institutions will be rated should take into account the location and characteristics of each institution. Graduates from the University of Mississippi go on to have excellent and exciting careers, but the earnings of our graduates will be influenced by the fact that many choose to stay in the state of Mississippi, where wages and salaries are lower than the rest of the country. Any evaluation of the labor market success of our graduates needs to take this fact into account.

- 3.) Also, we appreciate that part of the goal of this frame work is to spur colleges and universities to make improvements based on performance data. In order to make good decisions that will lead to improvement, institutions need to have access to the data in ways that allow for meaningful and custom internal analysis. We ask that the institutions that are included in the Department's framework be given access to as much detailed data as possible from the Department's sources. The most critical example of this need relates to labor market success. It is notoriously difficult for institutions to collect reliable data about employment outcomes. If this data is used for evaluation, then we request that we be given access to the data at a level that allows for meaningful analysis and that respects student privacy.

Thank you again for the invitation to provide feedback. We look forward to learning more about this proposal as it develops.

O'Bergh, Jon

From: Jeff Johnson <Jeffrey.Johnson@uvu.edu>
Sent: Tuesday, February 17, 2015 6:29 PM
To: College Feedback
Cc: Linda Makin
Subject: PIRS Comments from Utah Valley University
Attachments: PIRS Response Final.pdf

To Whom It May Concern:

UVU appreciates the Department of Education's consideration and efforts to involve the public in developing the proposed PIRS framework announced in December. Attached are comments from Utah Valley University regarding the proposal.

Sincerely,
Jeffrey Alan Johnson, Ph.D.
Asst. Dir., Institutional Effectiveness & Planning, Utah Valley Univ.



UTAH VALLEY UNIVERSITY

OFFICE OF THE PRESIDENT

February 17, 2015

The Hon. Arne Duncan
Secretary of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

via email: collegefeedback@ed.gov

Dear Mr. Secretary:

Utah Valley University has received, with great interest, the U.S. Department of Education's Postsecondary Institution Ratings System (PIRS) framework proposed on December 19, 2014. Utah Valley University (UVU) is a regional university offering certificates, diplomas, associate, bachelor, and master's awards and degrees. We are a public, open admissions institution with the largest undergraduate enrollment in Utah, and the largest public, dual-mission institution in the United States, providing both community college and university programs side-by-side. We are deeply concerned that both ratings systems in general, and the PIRS proposal in particular, are not suited to regional state universities like ourselves, which educate the majority of American undergraduates.

As was made clear in our response to the Request for Information of December 2013, UVU believes that ratings systems, whether managed by the federal government, the states, or private-sector entities, may often do more harm than good to the health of higher education in the United States. Beyond the methodological challenges of which the Department is well aware, such a system puts institutions in unnecessary competition with each other rather than supporting cooperation to create an effective higher education system, leads institutions to target improvements in ratings rather than improvements in mission fulfillment, and assumes a degree of choice in institutions that is not present for most students. The result is that ratings are likely to reinforce the role that higher education increasingly plays in the stratification of American society rather than restoring its place as an engine of economic and social opportunity. Our culture of accountability and transparency ensures that the constituencies we serve are provided with a broad range of information to evaluate the success of the institution. We believe that this commitment to transparency, not a ratings system, is a more effective means of promoting accountability and providing consumer information.

UVU nonetheless recognizes President Obama's intention to move forward with a ratings system. After extensive analysis of the ratings proposal by UVU's faculty and staff, we are concerned that the PIRS framework as proposed is overly focused on evaluating how well traditional institutions serve traditional students and is unsuited to meet the needs of the majority of contemporary students and the institutions, particularly dual-mission institutions, that serve them.

Our recommendations are based on the premise that any rating system should:

1. Faithfully reflect each institution and its students rather than an institution's conformity to an idealized higher education model and student. Data that is unrepresentative of the student body and measures that are inappropriate to or undermined by institutions' missions do a great disservice to students, institutions, and policymakers. Especially important to this is recognition of the growth of dual-mission institutions like UVU, which currently teach more than 1.4 million students.
2. Fairly compare institutions' success in meeting their specific educational missions rather than rewarding institutional prestige. Many existing ratings are notorious for reinforcing widely held notions that the best institutions are the most prestigious. Since outcomes are tied in no small part to the prestige of the institution rather than its actual performance, any rating system built around outcomes has great potential to punish institutions simply for lacking prestige or for attempting to serve the kinds of students whose needs are not met by elite institutions.

3. Be rooted in a clear methodology and publically available data. Ratings that are not transparent will appear arbitrary to both students and institutions. Accountability, especially, is enhanced by transparent methods that support institutions' efforts to validate and understand their rating and to respond to ratings with innovative actions that improve access, affordability, and outcomes.

In light of these principles, UVU offers the following recommendations for the final rating system:

1. Defer implementation of any rating system until reliable and valid data that has been evaluated by institutions and the public is available to drive the proposed metrics. As the Department has recognized, the data sources proposed by the Department will exclude very large numbers of students from the metrics due to the limitations of the IPEDS Graduation Rate Survey cohort and NSLDS. The weaknesses of the proposed data sources are such that it is difficult to see how any system based on them would not be regarded as arbitrary and capricious, especially if the system is tied to Title IV eligibility at some point in the future.
2. Adopt separate ratings for each of the three metrics that can be aggregated into a single overall metric for simplicity and accountability purposes. The Department's targeting of access, affordability, and outcomes are a classic case of a value triad in which any two goals are achievable but all three can be achieved only with an exceptionally rare combination of effort, skill, resources, and luck. Both institutions and families will likely prioritize two of these goals while satisficing on the third. Few, then, will be helped by an overall rating that does not also provide specific information about each metric.
3. Categorize institutions in two dimensions with three categories each: Mission (two-year, dual-mission, four-year) and selectivity (non-selective, selective, highly selective for four-year institutions only). The proposed methodology, first and foremost, creates significant data anomalies for dual-mission institutions, whose categorization may vacillate between categories or be inconsistent with their IPEDS categorization or their missions. It is, more importantly, unfair to both traditional two-year institutions and dual-mission institutions to compare their outcomes.

Perhaps the single most important factor influencing institutional performance is its selectivity. Comparing highly selective and non-selective institutions is neither fair for institutions nor informative for students. Moreover, failing to distinguish institutions on the basis of selectivity incentivize restrictiveness rather than access.

4. Control for student characteristics by rating institutions within categories that include selectivity as a dimension. Controlling outcomes measures for student characteristics reduces the information value for students. Students are likely interested in absolute outcomes rather than outcomes relative to expectations. Measures controlled for student characteristics promote accountability but only at the expense of consumer information.
5. Include as measures of access: selectivity; non-traditional student percentage; racial or ethnic minority student percentage; gender percentage; and percentage of students who are enrolled in distance education, night, and satellite location classes. The proposed access measures, with exception of first-generation student percentage, assume that access is primarily a financial issue. Like many institutions, UVU has found that access is multifaceted: academic preparation, geography, family status, and demographics limit access independent of whether students have income sufficient to pay for their education.
6. Measure affordability using net price for all students rather than only those receiving federal financial aid. Net price is a useful measure of how much such students pay. But it does not measure how affordable the institution is for students who do not receive aid. An effective affordability measure should recognize both institutions with low net prices and those with low published tuition and fees.

7. Measure completion using the IPEDS Eight-year Outcomes Measure that will be collected beginning in 2015-16. A six-year deadline is not relevant to the now-majority of non-traditional students. For these students, "on time" graduation is meaningless; continuing progress is their aim. But that continued progress brings results: UVU's graduation rate for first-time, full-time, baccalaureate degree-seeking students doubles between the sixth and tenth years.
8. Apply standards for transfer from two-year to four-year institutions to students who transfer from two-year to four-year programs within an institution as well. Measures for completion should not be counterproductive for the higher education system as a whole. Approximately half of all students are now believed to transfer at least once. We encourage the Department to extend the proposal to count two-year transfer as completion to transfers from two-year programs to four-year programs within dual-mission institutions.
9. Measure labor market success based on having secured substantial employment within three years of graduating or three years plus half the program time from beginning a program. Labor market success, especially at the highest levels, is shaped by many factors beyond institutions' control. Threshold metrics would limit the extent to which institutions are rewarded or punished for the ways that higher education in the United States has historically reproduced social divisions. In many cases companies recruit students for good jobs well before they complete their degrees. On balance, that is a positive outcome, and would be rewarded by measures of labor market success that do not assume completion.

Further information, including detailed analysis and rationales for these recommendations, is available in our full report at <http://www.uvu.edu/insteffect/docs/pirsresponse.pdf>, a copy of which is included with this letter.

Please let me express my appreciation for the Department's efforts in developing the proposal and for providing the opportunity for comment on it. UVU respects that the challenges in devising a rating system are tremendous and appreciates the openness the Department has exhibited in developing the proposal. We believe that the Department shares our concern that a poorly designed ratings system is very likely to hurt many students by limiting access, reducing affordability, and producing fewer graduates, especially among non-traditional students and institutions. Changes based on these recommendations would go far toward ensuring a system that is fair and effective for all students and institutions.

Sincerely,

(b)(6)

Matthew S. Holland, Ph.D.
President

Postsecondary Institution Ratings System (PIRS) Evaluation



*Institutional Research & Information
February 17, 2015*

The U.S. Department of Education released a draft framework for the Postsecondary Institution Rating System (PIRS) on December 19, 2014. The draft included discussion of the PIRS framework mechanics and possible metrics. The draft is intended to guide the development of a final, operational ratings system that is intended to be available by the beginning of the 2015-16 academic year.

SUMMARY

The proposal was extensively analyzed by UVU's faculty and staff. The analysis has concluded that the PIRS framework as proposed is overly focused on evaluating how well traditional institutions serve traditional students, and is unsuited to meet the needs of the majority of contemporary students and the institutions, particularly dual-mission institutions, that serve them.

The analysis is based on the premises that any rating system should:

1. Faithfully reflect each institution and its students rather than institutions' conformity to an idealized higher education model and student. Data that is unrepresentative of the student body and measures that are inappropriate to or undermined by institutions' missions do a great disservice to students, institutions, and policymakers. Especially important to this is recognition the growth of dual-mission institutions, which currently teach more than 1.4 million students.
2. Fairly compare institutions' success in meeting their specific educational missions rather than rewarding institutional prestige. Many existing ratings are notorious for reinforcing widely held notions that the best institutions are the most prestigious. Since outcomes are tied in no small part to the prestige of the institution rather than its actual performance, any rating system built around outcomes has great potential to punish institutions simply for lacking prestige or for attempting to serve the kinds of students whose needs are not met by elite institutions.
3. Be rooted in a clear methodology and publically available data. Ratings that are not transparent will appear arbitrary to both students and institutions. Accountability, especially, is enhanced by transparent methods that support institutions' efforts to validate and understand their rating, and to respond to ratings with innovative actions that improve access, affordability, and outcomes.

In light of these principles, UVU offers the following recommendations for the final rating system:

1. Defer implementation of any rating system until reliable and valid data is available to drive the proposed metrics. As the Department has recognized, the data sources proposed by the Department will exclude very large numbers of students from the metrics due to the limitations of the IPEDS Graduation Rate Survey cohort and NSLDS. The weaknesses of the proposed data sources are such that it is difficult to see how any system based on them would not be regarded as arbitrary and capricious, especially if the system is tied to Title IV eligibility at some point in the future.
2. Adopt separate ratings for each of the three metrics that can be aggregated into a single overall metric for simplicity and accountability purposes. The Department's targeting of access,

affordability, and outcomes are a classic case of a value triad in which any two goals are achievable but all three can be achieved only with an exceptionally rare combination of effort, skill, resources, and luck. Both institutions and families will likely prioritize two of these goals while satisficing on the third. Few, then, will be helped by an overall rating that does not also provide specific information about each metric.

3. Categorize institutions in two dimensions with three categories each: Mission (two-year, dual-mission, four-year) and selectivity (non-selective, selective, highly selective for four-year institutions only). The proposed methodology, first and foremost, creates significant data anomalies for dual-mission institutions, whose categorization may vacillate between categories or be inconsistent with their IPEDS categorization or their missions. It is, more importantly, unfair to both traditional two-year institutions and dual-mission institutions to compare their outcomes.

Perhaps the single most important factor influencing institutional performance is its selectivity. Comparing highly selective and non-selective institutions is neither fair for institutions nor informative for students. Moreover, failing to distinguish institutions on the basis of selectivity incentivize restrictiveness rather than access.

4. Control for student characteristics by rating institutions within categories that include selectivity as a dimension. Controlling outcomes measures for student characteristics reduces the information value for students. Students are likely interested in absolute outcomes rather than outcomes relative to expectations. Measures controlled for student characteristics promote accountability but only at the expense of consumer information.
5. Include as measures of access selectivity; non-traditional student percentage; racial or ethnic minority student percentage; gender percentage; and percentage of students who are enrolled in distance education, night, and satellite location classes. The proposed access measures, with exception of first-generation student percentage, assume that access is primarily a financial issue. Like many institutions, UVU has found that access is multifaceted: academic preparation, geography, family status, and demographics limit access independent of whether students have income sufficient to pay for their education.
6. Measure affordability using net price for all students rather than only those receiving federal financial aid. Net price is a useful measure of how much such students pay. But it does not measure how affordable the institution is for students who do not receive aid. An effective affordability measure should recognize both institutions with low net prices and those with low standard tuition and fees.
7. Measure completion using the IPEDS Eight-year Outcomes Measure that will be collected beginning in 2015-16. A six-year deadline is not relevant to the now-majority of non-traditional students. For these students, "on time" graduation is meaningless; continuing progress is their aim. But that continued progress brings results: UVU's graduation rate for first-time, full-time, baccalaureate degree-seeking students doubles between the sixth and tenth years.
8. Apply standards for transfer from two-year to four-year institutions to students who transfer from two-year to four-year programs within an institution as well. Measures for completion should not be counterproductive for the higher education system as a whole. Approximately half of all students are now believed to transfer at least once. We encourage the Department to extend the proposal to count two-year transfer as completion to transfers from two-year programs to four-year programs within dual-mission institutions.

9. Measure labor market success based on having secured substantial employment within three years of graduating or three years plus half the program time from beginning a program. Labor market success, especially at the highest levels, is shaped by many factors beyond institutions' control. Threshold metrics would limit the extent to which institutions are rewarded or punished for the ways that higher education in the United States has historically reproduced social divisions. In many cases companies recruit students for good jobs well before they complete their degrees. On balance, that is a positive outcome, and would be rewarded by measures of labor market success that do not assume completion.

UVU respects that the challenges in devising a rating system are tremendous and appreciates the openness the Department has exhibited in developing the proposal. We believe that the Department shares our concern that a poorly designed ratings system is very likely to hurt many students by limiting access, reducing affordability, and producing fewer graduates, especially among non-traditional students and institutions. The recommendations offered herein will go far toward ensuring a system that is fair and effective for all students and institutions.

KEY PRINCIPLES FOR RATINGS

UVU believes that a ratings system for higher education institutions must reflect three key principles: it must be transparent, faithful to individual institutions, and fair to all institutions. A system that fails on these three principles will neither provide useful information to students and their families nor promote institutional accountability to policymakers. UVU's recommendations regarding the Department's proposal are based on these principles.

Fidelity to Each Institution

Any ratings system must evaluate institutions in ways that faithfully reflect that institution and its students. Data that is unrepresentative of the student body and measures that are inappropriate to or undermined by institutions' missions do a great disservice to students, institutions, and policymakers. A ratings system that is not faithful to institutions risks imposing substantive changes on institutions that are inconsistent with the independence and diversity that is a hallmark of American higher education, incentivizing a single model of higher education that suits only a narrow, idealized subset of students and outcomes.

Especially important to this is recognition the growth of dual-mission institutions, which maintain a significant commitment to both community college and university educational program. More than 1,400 institutions—over one-third of all US institutions with physical campuses and first-time students—awarded both bachelor's and associate's degrees in 2013. Between 2004 and 2013, the number of institutions where both associate's and bachelor's degrees made up at least 20% each of the graduating class grew by 56%. Such institutions currently teach more than 1.4 million students. UVU is a leader in this segment, the largest institution in the nation—public, non-profit, or for-profit—to have maintained a dual-mission for more than 10 years. Dual-missions are a cornerstone of higher education in Utah, where only the University of Utah does not offer associate's degrees, and only Salt Lake Community College does not offer bachelor's degrees. Every indication is that more institutions will adopt a dual-mission approach, which suits both the needs institutions and states have for cost savings and nontraditional students' desire for flexibility and continuity. A system that does not recognize the needs of dual-mission institutions risks either its own irrelevance or the devastation of one of the most important areas of innovation in higher education.

Fairness to All Institutions

The ratings system must be built on a fair comparison of success consistent with institutions' purposes rather than rewarding institutional prestige. Many existing ratings are notorious for reinforcing widely held notions that the best institutions are the most prestigious: Harvard, Yale, and Princeton lead the *U.S. News* rankings nearly every year. If they are not among the highest rated institutions in the Department's ratings, the rating system will likely face a challenge to its legitimacy similar to that of the 1999 *U.S. News*

rankings. Since outcomes are tied in no small part to the prestige of the institution (in the form of stronger applicants and well-placed alumni networks) rather than its actual performance, any rating system built around outcomes has great potential to punish institutions simply for lacking prestige or for attempting to serve the kinds of students whose needs are not met by elite institutions.

Transparency for All Users

Ratings that are not rooted in a clear methodology and publically available data will appear arbitrary to both students and institutions. Accountability, especially, is enhanced by transparent methods that support institutions' efforts to validate and understand their rating, and to respond to ratings with innovative actions that improve access, affordability, and outcomes. Individual institutions should be able to reconstruct any measure used in their own rating from data available to them, and should be able to access the measures incorporating in the ratings for all institutions (much as is true for IPEDS data). Students and their families should be able to compare not only institutions' overall ratings but the component measures of greatest interest to them, which will require not only access to the data but appropriate guidance in its use.

RATINGS PROCESS

UVU believes that the ratings process is problematic for institutions that are not oriented toward traditional students. We support including both overall ratings and ratings for each component metric. We are concerned, however, that the proposed data sources are not representative and that the proposed comparison groups are insufficiently specific for the diversity of institutions being rated, especially given the development of higher education away from full-time residential study by recent high school graduates.

Data Sources

As the Department has recognized, the data sources proposed by the Department will exclude very large numbers of students from the metrics due to the limitations of the IPEDS Graduation Rate Survey cohort and NSLDS. UVU applauds the Department for its recognition that "there are many institutions at which first-time, full-time students are a minority, sometimes a tiny minority, of students in attendance." Nonetheless, that the Department persists in using this data suggests that it underestimates the extent of the problem. In fall 2013, 73% of UVU's degree-seeking students were not in an IPEDS cohort. None of our high school concurrent enrollment students—like those of any other institution offering such programs—are included, excluding *en masse* a critical part of our access mission. Part of that is due to factors that will be addressed in the Outcomes Measures beginning in 2015-16. Even with the Outcomes Measures, we expect that more than one-third of UVU students will still be excluded because they entered in the spring or after the fall census date, or because our high rates of missionary service result in large numbers of exclusions.

That the IPEDS GRS is severely unrepresentative is not simply a unique characteristic of UVU but a norm of contemporary higher education. On average, 52.7% of entering classes are included in the GRS cohort; that falls to 44.6% for public institutions and 42.1% for two-year institutions. The proposal to supplement IPEDS data with NSLDS data presents serious problems with comparability, and is subject to the same problem: 41% of UVU degree-seeking students do not submit a FAFSA. Unlike IPEDS, institutional NSLDS data is not publically available, undermining the transparency of any metrics based on it. We thus do not consider it an adequate supplement or alternative to IPEDS data.

The weaknesses of the proposed data sources are such that it is difficult to see how any system based on them would not be regarded as arbitrary and capricious, especially if the system is tied to Title IV eligibility at some point in the future. Ultimately, we believe that the only truly representative data source will be a student unit record system. However, we also acknowledge concerns such systems present regarding workload for institutions, duplication of effort with state longitudinal data systems, and student privacy that preclude us from taking a position on a federal student unit record data system more generally.

- **Recommendation 1:** Defer implementation of any rating system until reliable and valid data that has been evaluated by institutions and the public is available to drive the proposed metrics.

Distinct Measures for Access, Affordability, and Outcomes

UVU encourages the Department to adopt separate ratings for each of the three metrics that can be aggregated into a single overall metric for simplicity and accountability purposes. The Department's targeting of access, affordability, and outcomes are a classic case of a value triad in which any two goals are achievable but all three can be achieved only with an exceptionally rare combination of effort, skill, resources, and luck. Both institutions and families will likely prioritize two of these goals while satisficing on the third. Community colleges pursue access and affordability, but admit many students who lack the academic, social, or economic advantages to graduate in traditional timeframes. Small liberal arts colleges with aggressive minority recruitment programs achieve strong outcomes while providing access to children of promise but without the necessary means for a higher education, but are among the least affordable institutions in the nation. The service academies achieve near universal graduation and employment at no cost to the few students who succeed in the most selective admissions processes in the country. That institutions have these priorities suggests that there are constituencies for each set of priorities among prospective students. Few, then, will be helped by an overall rating that does not also provide specific information about each metric.

- **Recommendation 2:** Adopt separate ratings for each of the three metrics that can be aggregated into a single overall metric for simplicity and accountability purposes.

Comparison among Similar Institutions

The proposed categorization of institutions is wholly inadequate to represent dual-mission institutions. The methodology, first and foremost, creates significant data anomalies for such institutions. The standard referenced in the proposal framework is not entirely clear whether institutions will be categorized according to the majority of degrees awarded without counting certificates or the plurality of completions including certificates. Mathematically these standards should have identical results, but the confusion may complicate the execution in some cases. In either case, UVU would be categorized as a four-year institution currently, with 60.3% of completions at the bachelor's degree level. In 2008, however, 52.4% of completions were at the associate's degree level, which would have the institution categorized as a two-year institution.

This presents several problems. The change itself is problematic, as it represents an increment along a long-term trend rather than a moment of significant change for the institution, as would a change based on the IPEDS standard. Moreover, UVU's classification prior to 2009 would have been inconsistent with its IPEDS classification, a point of significant confusion for policymakers and, since the IPEDS classification is likely more consistent with the public's understanding of institutions, for students and their families as well. Most importantly, it is unfair to both traditional two-year institutions and dual-mission institutions to compare dual-mission institutions to single mission ones. The large percentage of bachelor's degrees awarded by UVU in 2008 would give it a significant advantage in labor market outcomes over an exclusively two-year institution. After 2009, UVU's large percentage of associate's degrees put it at a disadvantage in comparison to exclusively four-year institutions.

UVU is typical of dual-mission institutions in all of these respects. Six hundred eight institutions would have changed PIRS classifications at least once between 2004 and 2013; 133 would have more than once. Nine hundred eighty-nine institutions would have PIRS classifications that conflict with IPEDS classifications at least once in the last decade, and 381 would have had such conflicts every year. Such volatility and inconsistency with source data sources will severely hamper PIRS value for both consumer information and accountability. A dual-mission classification similar to the Carnegie Classification of Baccalaureate/Associate's Colleges but including institutions that awarded a substantial minority of associate's degrees would mitigate these effects.

Perhaps the single most important factor influencing institutional performance is its selectivity. Students with better academic preparation are more likely to graduate and more likely to attend institutions whose prestige is an asset in the labor market. Comparing highly selective and non-selective institutions is neither fair for institutions nor informative for students, punishing institutions for providing important second (or third, fourth, fifth, etc.) chances for academically weak students while sending the message that the only path to success is an elite institution. Moreover, failing to distinguish institutions on the basis of selectivity incentivize restrictiveness rather than access: Many institutional leaders have made clear that they believe that the quickest way to improving outcomes is to be more selective and thus less accessible. More than half of the institutions in the United States are non-selective, including nearly all two-year and dual-mission institutions.

- **Recommendation 3:** Categorize institutions in two dimensions with three categories each: Mission (two-year, dual-mission, four-year) and selectivity (non-selective, selective, highly selective for four-year institutions only).

Outcomes Adjustment

Much research suggests that institutional efforts, as important as they can be in individual cases, are secondary to student characteristics in student success. As a principle for accountability, then, the proposal to adjust outcomes measures to student characteristics is valuable, rewarding institutions for doing more for the students they have rather than for finding better students. Unquestionably the most important characteristic is academic preparation. Direct measures of academic preparation are not consistently available in the data sources that the Department suggests using, but selectivity measured by admissions rate would be a useful approximation. This would also mitigate incentives to artificially inflate selectivity by encouraging unqualified applicants to apply for admission; such inflated figures would increase expected outcomes without increasing the quality of incoming students. Family socio-economic status and educational background are useful control measures as well, but are only available through FAFSA and NSLDS data.

However, controlling outcomes measures for student characteristics reduces the information value for students. Students are likely interested in absolute outcomes rather than outcomes relative to expectations: they are more likely to ask, "Among the institutions that I can attend, which is most likely to get me a degree and a job?" than "What institution provides the most gains for the kinds of students they admit (who may be very different from me)?" The latter question is the question of accountability, while the former is the question of student information. Measures controlled for student characteristics achieve the former, but only at the expense of the latter.

- **Recommendation 4:** Control for student characteristics by rating institutions within categories that include selectivity as a dimension.

MEASURES

Access and affordability

The proposed measures for access and affordability are problematic both in themselves and together. The proposed access measures, with exception of first-generation student percentage, assume that access is primarily a financial issue. Like many institutions, UVU has found that access is multifaceted: academic preparation, geography, family status, and demographics limit access independent of whether students have income sufficient to pay for their education.

UVU has been aggressive in meeting many of these concerns. We created a structured enrollment program that allows students with poor academic preparation to enroll while ensuring they receive the support the need to succeed. We expanded distance education, satellite locations, and schedule flexibility to support students who cannot easily travel to the main campus when it happens to be convenient for the university. We expanded our on-campus child care center to increase the educational attainment of women, thanks in large part to a \$2 million donation from the Barbara Barrington Jones Foundation. The

proposed measures for access will not capture efforts that institutions make to overcome these kinds of barriers.

Pell eligibility is not exclusively a measure of socio-economic status; the number of children is a factor as well. While UVU's low FAFSA submission rate excludes many students who would be Pell-eligible, the culture of large families in the region likely makes Pell eligibility an inflated estimate of the socio-economic status of those who do seek aid. EFC gap is difficult even for higher education professionals to understand intuitively, likely of no use to students and families, and not transparent.

- **Recommendation 5:** Include as measures of access selectivity; non-traditional student percentage; racial or ethnic minority student percentage; gender percentage; and percentage of students who are enrolled in distance education, night, and satellite location classes.

All of these will need clear definitions for submission within the IPEDS framework.

Similarly, the affordability measures are all based on cost to students after financial aid programs—programs designed to promote access—have been applied. Net price is a useful measure of how much such students pay. But it does not measure how affordable the institution is for students who are not targeted by these broadest federal access policies. At UVU, 41% of students pay the standard tuition and fees. An effective affordability measure should recognize both institutions with low net prices and those with low standard tuition and fees. This could be achieved by calculating the net price for all students rather than only those receiving financial aid.

However, we do note that there is great difficulty in generating meaningfully comparable cost of attendance data beyond tuition and fees in the absence of a standard methodology for data collection. This undermines the transparency of all net price measures. Where cost of attendance is largely cost of living, net price comparisons may be of little use to students who are not able to relocate.

- **Recommendation 6:** Measure affordability using net price for all students rather than only those receiving financial aid, which can be calculated based on existing data collected through IPEDS.

Completion

The proposed outcomes measures are the measures most plagued by the lack of representativeness in existing data sources, a problem that will be only minimally remedied by the IPEDS Outcomes Measure. While UVU expects, based on the principles so far discussed, that inclusion of part-time and transfer cohorts will increase GRS participation to approximately two-thirds of students, the allowable exclusions and spring cohorts will still exclude a large number of students who are distinctly different academically than those included in the GRS cohort.

The proposed use of the 150% timeframe for completion is not appropriate for institutions that include large numbers of part-time or non-traditional students. Many UVU students, as is increasingly true nationally, begin as full-time students but, as work and family obligations mount, shift to part-time enrollment in order to balance education with these other obligations. They will be included in the GRS cohort, having been enrolled full-time as first-time students, despite having had no expectation that they would complete in four or even six years. For these students, "on time" graduation is meaningless; continuing progress is their aim. But that continued progress brings results. On average, UVU's overall graduation rate for first-time, full-time, baccalaureate degree-seeking students grows by 42% between 150% and 200% of program time and doubles between the sixth and tenth years. A six-year deadline is simply not relevant to the now-majority of non-traditional students.

- **Recommendation 7:** Measure completion using the IPEDS GRS200 rate for the first-time/full-time, part-time, and transfer cohorts that are expected to be available in 2017.

Transfer Students

UVU strongly supports a rating system that recognizes the ability to transfer between institutions as a virtue of American higher education. Approximately half of all students are now believed to transfer at least once. Measures for completion should not be counterproductive for the higher education system as a whole, which must support student mobility as the reality of the landscape. We are especially supportive of considering transfer students as a completion for two-year institutions; students who intend to transfer should be able to do so when it suits their needs rather than only doing so upon completing a degree. We encourage the Department to consider doing so for transfers from two-year programs to four-year programs within dual-mission institutions as well, especially since the simplest solution to articulation of two and four-year degrees is stackable credentials within an institution.

- **Recommendation 8:** Apply standards for transfer from two-year to four-year institutions to students who transfer from two-year to four-year programs within an institution as well.

Unfortunately, data on transferring students is limited especially if the Department lacks access to National Student Clearinghouse data, so there is no clear or transparent solution for specific measures that support transfer students.

Labor Market Success

UVU strongly supports the use of substantial employment and program entry principles for measuring labor market outcomes. Labor market success, especially at the highest levels, is shaped by many factors beyond institutions' control, such as family social positions. Histories of institutional exclusion of a range of social groups and of the (all too often ill-gotten) wealth of founders contribute to institutions' current positions in the prestige hierarchy of higher education, which is perhaps the most significant determinant of labor market success across institutions. Threshold metrics would limit the extent to which institutions are rewarded or punished for the ways that higher education in the United States has historically reproduced social divisions, and continues to do so today. It would also mitigate the effects of the institutional classification anomaly described above.

Measuring success from program entry for non-graduates would be exceptionally valuable for community colleges and dual-mission institutions, where many students might need specific skills from a few courses rather than a completed degree to gain employment or improve their position in their workplace. In many cases companies recruit students for good jobs well before they complete their degrees. On balance, that is a positive outcome, arguably better than graduating without a good job and certainly better than never starting the degree and never getting a good job.

UVU's surveys of alumni show that graduates may not be immediately successful in the labor market but do become so over the long-term. New graduates, of course, take time to complement their education with experience. The unemployment rate for our graduates falls from 7.6% one year after graduation to 7.1% after three years and 6.8% after five years. Median salary grows by 17% in the first three years after graduation and 36% in the first five. This supports the Department's suggestion that employment should be measured well after completing a program.

However, the proposed changes will not address the unrepresentativeness of NSLDS data, which will necessarily be the primary source for measures of labor market success. It seems reasonable to expect that students who graduate without receiving federal aid, whether because their socio-economic position gives them the resources to do so or because their own abilities allow them to work their ways through, are more likely to be successful in the labor market. This is a perverse incentive for institutions to pursue a high-cost, high-discount model rather than keeping tuition and fees low. We thus suspect that effective labor market outcomes data may prove illusory without access to Social Security earnings data—and, thus, without a student unit record database to which Social Security data can be matched.

- **Recommendation 9:** Measure labor market success based on having secured substantial employment within three years of graduating or three years plus half the program time from beginning a program.

O'Bergh, Jon

From: Karen Strickland <Kstrickland@aftwa.org>
Sent: Tuesday, February 17, 2015 6:36 PM
To: College Feedback
Subject: College Ratings feedback

Dear Secretary Duncan,

I am writing on behalf of 4,500 higher education members of AFT Washington in regard to the Department of Education's intention to create a college rating system. I have concerns about how meaningful and useful such a system can be considering the last several decades of disinvestment in higher education in most of the states in the United States. The impact of disinvestment was exacerbated by deeper cuts and sky-rocketing tuition during the Great Recession.

Rather than establishing a punitive system to evaluate quality, the Department of Education would serve students and communities more effectively by taking steps to ensure a reinvestment in our institutions of higher learning. We have the evidence telling us what is needed to ensure a high quality learning experience for students - a high full-time to part-time faculty ratio, adequate counselors and advisors, a relevant and diverse curriculum - to name just a few examples, but these are just the qualities that have been lost as a result of the states' defunding of higher education.

Furthermore, while I understand the DOE's interest in refraining from dictating the steps colleges and universities should take to achieve the desired outcomes, a focus solely on outcomes such as higher degree completion or lower cost ignores the reality that those measures can be the result of many things other than high quality. For example, a college may cost less because there are fewer support services or a high ratio of part-time to full-time faculty, both of which contribute to problems for the student.

An additional concern is the risk of a rating system becoming primarily punitive. When colleges are struggling, they generally need additional support rather than reductions. This leads back to my earlier point about disinvestment; institutions are trying to make up lost ground. Starting a rating system now is like ranking a runner who is getting back to racing after a serious injury.

Finally, as far as usefulness to students and families, while it may be helpful to know completion rates, far more useful would be to know the counselor to student ratio, the percentage of full-time faculty, the availability of tutoring services, and the diversity of course offerings.

On behalf of the higher education members of AFT Washington, I urge you to reconsider the DOE's approach to building up the higher education system in the U.S. It is time to double down on our country's commitment to vibrant, well-funded public colleges and universities.

Thank you for this opportunity to communicate the perspective of AFT Washington.

Sincerely,

Karen Strickland, President
AFT Washington, AFL-CIO
625 Andover Park West, Ste 111
Tukwila, WA 98188
Tel: 206-432-8080
Fax: 206.242.3131
E-mail: kstrickland@aftwa.org
Web: <http://wa.aft.org/>
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opeiu8/afl-cio

O'Bergh, Jon

From: Justin Draeger <draegerj@nasfaa.org>
Sent: Tuesday, February 17, 2015 6:45 PM
To: College Feedback
Cc: Megan McClean; Karen McCarthy
Subject: NASFAA PIRS Framework Comments
Attachments: NASFAA PIRS Comments.pdf

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), we submit the attached comments on the Postsecondary Institution Ratings System framework. Please let me know if you have any questions.

Best regards,

Justin

Justin Draeger
NASFAA President & CEO
draegerj@nasfaa.org



NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

★ FROM THE OFFICE OF THE PRESIDENT ★

February 17, 2015

To Whom It May Concern:

Thank you for the opportunity to provide comments on the framework that will further guide the development of the proposed Postsecondary Institution Ratings Systems (PIRS). The National Association of Student Financial Aid Administrators (NASFAA) is a nonprofit membership organization that represents nearly 20,000 financial aid professionals at approximately 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of 10 undergraduates in the U.S. Our members work with students and institutional financial aid and enrollment data on a daily basis and are well positioned to provide feedback on this proposal.

We appreciate the Administration's long-standing commitment to improve college access, affordability and transparency for students and families and we agree that consumer information should be helpful, relevant, and easy to understand. As the Administration moves forward with ratings system, we share the following comments related to:

- Limitations of possible metrics
- Importance of quality data
- Input-adjustment of metrics
- Peer groups
- Importance of consumer testing

Given the lack of specificity in the draft PIRS framework and the number of outstanding questions related to ED's plans for finalization of the system, we strongly recommend another public comment period when the detailed plan is available and before publishing any ratings. Specifically, before publication we request the ability to review and offer public comment on the planned formula for rating institutions and any weights that will be applied; the precise types and sources of information to be included; and detailed information about the peer groups that will serve as the basis for institutional comparisons.

We are troubled by the seemingly arbitrary way in which the ratings system has been developed and we recommend that ED develop a systemized review process that is consensus focused to create or make changes to the system in the future. To the extent that this Administration – or any future Administration – can cobble together such disparate data sources in an attempt to rate institutions based on the values of that Administration should be troubling to students and parents. While ED has made significant efforts to reach out to the higher education community, there is no formalized process for review, challenge, consensus, or discussion on future changes.

Thank you for considering our comments and suggestions.

Sincerely,

(b)(6)



Justin Draeger
President & CEO

Limitations of Possible Metrics and Importance of Quality Data

The discussion of the dozen or so metrics being considered by the Department in the PIRS framework draws attention to the overall lack of comprehensive data on postsecondary education. Given the patchwork of available data, we urge the Department to implement a process whereby institutions have the opportunity to not only review their reported data, but also challenge it, similar to the processes already in place for cohort default rate calculations and certain gainful employment metrics. Also, since the ratings system is a new endeavor, it is crucial that there be a formal evaluation and review process that allows future changes to go through a formal vetting process.

Of the metrics under discussion, only one, the percentage of enrolled students who are Pell Grant recipients, is easy to understand, includes all enrolled students, and has no significant limitations. The rest of the proposed metrics each have significant limitations that render them inaccurate, incomplete, misleading, and/or difficult to understand from a consumer standpoint.

For example, the framework includes two separate metrics regarding completion, each with distinct disadvantages. The first would use data from IPEDS, which has the well-known limitation of including only the fall cohort of first-time, full-time students, which now represent a minority of enrolled students. The second completion metric would be newly-created using institution-reported administrative enrollment data to NSLDS. The latter would have the advantage of capturing outcomes among part-time students and transfers, but would still be incomplete since NSLDS only contains data for Title IV recipients.

Cobbling together various datasets, as they currently exist, is riddled with problems and inappropriate for both consumer information and accountability purposes. The issues surrounding data limitations have also re-opened conversations about the potential need for a student unit record data system. Prior to the release of a ratings system would be the most appropriate time to revisit this issue. While many have argued that a ratings system imposed by the federal government will be inherently flawed, it is certainly unacceptable to publish without complete and thorough data.

Input-Adjustment of Metrics

In NASFAA's earlier public [comments](#) on the proposed ratings system, we urged ED to consider taking into account unique institutional and student characteristics, which would allow institutions to be judged primarily on the education and services it provides, rather than on the students they serve or the programs they offer. We are encouraged that ED is considering adjusting outcomes for important differences among institutions based on student and/or institutional characteristics to diminish their influence on the ratings. We agree that ratings on outcomes that take into account the student bodies of institutions would be informative to prospective students, and would be a fair way of assessing institutional quality. Input-adjusted metrics also avoid disincentives for institutions to serve disadvantaged students and/or offer academic programs that lead to high-need occupations that are not financially lucrative.

Peer Groups

Grouping of institutions is a critical component of the framework of the ratings system. In earlier PIRS comments, NASFAA and others pointed out differences in institutional characteristics and mission, and how those differences might be taken into account when rating institutions. We appreciate that ED is exploring several strategies for grouping institutions together for comparison purposes, but are disappointed that the released framework only includes ED's plan to group predominantly two-year institutions separately from predominantly four-year institutions.

Missions vary greatly among institutions, even within sector, and we encourage ED to explore a way to incorporate institutional mission into the ratings, an admittedly challenging task. Furthermore, we urge ED to remember that the missions, goals, and objectives of institutions can be intangible and sometimes unquantifiable. While mission may ultimately be one factor used to compare institutions, it will be critical for the PIRS to establish several controls to group institutions to provide apples-to-apples comparisons. We support ED's data analysis efforts to determine what, if any, more granular groupings might be appropriate.

Importance of Consumer Testing

We are pleased to see that ED will be doing consumer testing in order to ensure the ratings can be easily understood by prospective students and other users. Any new proposal for consumer information will be an exercise in futility without statistically sound, quantitative and qualitative data that shows what information students and families really require to make informed choices. We encourage ED to involve students and families early on to ensure that information is relevant and useful.

Concluding Remarks

Finally, a review of the draft PIRS framework forces us to consider the broader question of whether developing an institutional ratings system is the appropriate role of the federal government. From a philosophical standpoint, we are concerned that the ratings system will erode and commoditize the diversity of America's higher education system--the facet that makes it so unique and valuable. From a practical view, given that the majority of first-year students apply to only one institution, there are better avenues to provide helpful consumer information than through a ratings system structured around institutional comparisons.

Again, we are pleased to provide these comments for consideration. We look forward to continuing to work with the Administration toward the laudable goals of enhanced access to accurate, timely and actionable consumer information and strengthened institutional accountability for the receipt of public funds.

O'Bergh, Jon

From: Palacios, Barbara P. <barbara.palacios@ugf.edu>
Sent: Tuesday, February 17, 2015 6:46 PM
To: College Feedback
Subject: Comments for New System of College Ratings
Attachments: College Feedback.pdf

Good Afternoon,

Attached please find the comments and feedback from President Eugene McAllister from the University of Great Falls.

Sincerely,

Barbara Palacios

Special Assistant to the President | Director of Special Projects
University of Great Falls | 1301 20th Street South | Great Falls, MT 59405
Office:406.791.5300 | Fax:406.791.5391 | Barbara.Palacios@ugf.edu



University of Great Falls

A private, Catholic, liberal arts university

OFFICE OF THE PRESIDENT

February 17, 2015

To Whom It May Concern,

I am writing to offer a comment from a small private faith-based liberal arts university from Montana. The recent request for comment introduced two important topics: (a) improvement over time; and (b) the idea of including transfer students in the calculation of graduation rate.

We at the University of Great Falls strongly endorse both of these ideas. We believe they add a perspective that more accurately portrays our University. In addition, they hold out the prospect of enabling us to continue in our efforts to serve especially Pell grant recipients and first generation students.

Very briefly, the University of Great Falls has been engaged in a very significant transformation over the past 12 years. We have moved from a very local institution that served mostly part-time and older students to a liberal arts institution, emphasizing our faith-based mission, and serving more traditional age students in a residential environment. As you might imagine, this journey has been challenging, with much learning, adaptation and improvement throughout. We continue to serve older and part-time students, but have a thriving undergraduate community that is growing increasingly diverse, to our delight, and serving many low income students and first generation students. Nearly 50% of our first-time students are Pell grant recipients and 55% of our students are first generation to attend college.

However, our graduation reflects the University as it was 6 or 7 seven years ago. That is a lifetime for us. It fails to capture the improvements we have made over the past 12 years, but especially the past 5 years.

The concept of improvement over time is very important. One way of capturing that improvement might be to consider additional factors, such as retention rates. There is a strong correlation between retention and graduation, with retention having the virtue of reflecting the improvement over time cited in the request for comments. I have attached two charts. The first displays the 6 year graduation rate, the second the relationship between retention and graduation at the University of Great Falls. We can anticipate with certainty significantly higher graduation rates over the coming years. We would hope the scorecard system might reflect our efforts and successes in a way that a strict calculation based on the graduation rates would not.

The University of Great Falls also recommends including transfer students in the calculation of the graduation rate. Again, for us that is data that more accurately reflects the state of the University in the past 3 years, rather than the 7 year look that is offered from the graduation rate of freshmen only. We have introduced an RN to BSN program that earned a 5 year accreditation from the Commission on Collegiate Nursing Education (CCNE) with no reservations during our initial accreditation review. We believe graduates of that program should be included in the graduation rate calculation for purposes of the scorecard. That graduation rate offers a much superior view of the University of Great Falls than the traditional freshmen only calculation.

Thank you very much for the opportunity to bring these two concerns to your attention.

Sincerely, *E*

(b)(6)

Eugene J. McAllister, Ph.D.
President

O'Bergh, Jon

From: Clark, Pamela - Staff <pamelaclark@delta.edu> <pamelaclark@delta.edu>
Sent: Tuesday, February 17, 2015 6:56 PM
To: College Feedback
Subject: Comments on the new system of college ratings
Attachments: Delta College letter from Dr. Jean Goodnow.pdf; Delta College letter from Mike Rowley.pdf

I have been asked to forward to Secretary Arne Duncan the attached two letters of comment regarding the U.S. Department of Education's Postsecondary Institution Rating System. We ask that you give the thoughts and opinions careful consideration as you move forward in development of the national college rating system. And, please contact us if you have any further questions.

Pam Clark

Exec. Director of Institutional Advancement/Foundation
Delta College - Office #B-156
1961 Delta Road; University Center, MI 48710
Office: 989-686-9225
Cell: (b)(6)
Email: pamelaclark@delta.edu



Office of the President

February 17, 2015

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

Dear Secretary Duncan:

I am writing to express my strong opposition to the quick implementation of the U.S. Department of Education's Postsecondary Institution Ratings System. As the President of Delta College here in Michigan – and a member and past Board member of the American Association of Community Colleges (AACC) – I know how vital the federal funding that flows through your department is to our institution.

However, there are what I believe to be some very serious flaws in the proposed measurements, as defined on your website, and I want to let you know how those will impact our students. A full 65 percent of Delta College's students attend part time and therefore are not included in the proposed full-time, FTIAC (First Time in Any College) method of measurement. Although I understand your desire to utilize data that already exists, utilizing the Integrated Postsecondary Education Data System (IPEDS) limits the accuracy of the outputs, since it measures full-time, first-time students who start in the fall and complete their program within 150 percent of the "normal time" at that institution.

Since a majority of Delta College's – and most other community colleges' students - are not first-time students or do not first enroll in the fall, they are excluded from consideration. And, a substantial percentage of students take more than 150 percent of the "normal time" to complete their programs because they are working adults, yet there is no denying that they are successes in every respect.

There must be a method included for how to measure a student's overall persistence or retention from one term to the next, or from one year to the next. And, the 150 percent 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 Voluntary Framework for Accountability (VFA) is completion within 6 years. This is the reality for most of our students who are working either part-time or full-time and attending classes.

I also urge the department to calculate its completion rate by including all transfers-out, rather than just those subsequently enrolling in 4-year institutions. The proposal is woefully inaccurate in today's "swirling" higher education system. This is perhaps best reflected in the fact that, according to the National Student Clearinghouse, 52 percent of all transfers-out from 4-year public colleges next enroll in 2-year public institutions. We welcome those who are returning to their "home" community college and we serve them well as they continue to pursue their higher educational goals.

Secretary Arne Duncan – page 2
February 17, 2015

Students choose to attend Delta College because we are local, and for reasons of cost, proximity or convenience. Our mission is to respond to the training needs of our local employers and to meet the goals of our students. Each of those targeted responses aren't necessarily tied to the completion of a certificate or degree within a three year time period.

Although I applaud your efforts to be able to apply accountability measures to higher education institutions across the country, I feel your current proposed metrics are flawed in their ability to adequately represent the work of community colleges. And as Delta College's President, I want to express my concerns with the premature launch of a flawed system of data collection in the U.S. Department of Education's Postsecondary Institution Ratings System.

I am asking that you delay implementation of the rating system to allow time to work with all stakeholders to fix some major problems. You need to refine the data collection elements to be able to develop a more comprehensive and accurate picture of all institutions, especially our valued community colleges. One idea may be to pilot the ratings within a region that has a statewide educational system in place, such as Florida or Washington state. Due to their structure, they are more able to respond to questions of workplace hiring and wages for student graduates, whereas Michigan, with its 28 separately elected Boards of Trustees, does not have an integrated system of data collection or access.

As a Board member with the Michigan Community College Association (MCCA), I have worked on the statewide effort by all of the community colleges to adopt the Voluntary Framework of Accountability. We are not against accountability, but understand the need to gather and report data on our students in a more representative fashion. I believe the VFA reporting system would incorporate the most representative data that Michigan has available.

Delay of the implementation would allow us to find measures that are relevant and accurate. The Department of Education should spend the time it needs to identify a solution that more fairly represents the good work of our community colleges across the country. Or, it should spend the dollars necessary to make the IPEDS system more representative of the part-time nature of the students served by community colleges.

Again, I ask that you delay implementation of the Postsecondary Institution Ratings System until such time as a broader set of data can be gathered from all of the parties involved.

Sincerely,

(b)(6)

Jean Goodnow, PhD
President
989-686-9200
jeangoodnow@delta.edu



1351 Delta Plaza • Unity Center, #148710
936-686-9000 • www.delta.edu

February 17, 2015

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

Dear Secretary Duncan:

As the Chair of Delta College's Board of Trustees, I want to express my concerns with the impending implementation of the U.S. Department of Education's Postsecondary Institution Ratings System. Although I applaud your efforts to be able to apply accountability measures to higher education institutions across the country, I feel your current proposed metrics are flawed in their ability to adequately represent the work of community colleges.

Once ratings are developed nationally, it's just a small hop to be made to turn them into a ranking system, pitting colleague institutions against each other. And, the value of comparing community colleges from around the country seems very flawed. The very reasons a student comes to Delta College – or any community college – is because it is their local community college, and therefore a known and trusted entity. They choose to attend locally for reasons of cost, proximity or convenience, so comparing to other community colleges around the country seems pointless.

Delta College responds to the needs of our community in ways very different from typical four-year institutions. The majority of our students are part-time attendees focused on gaining the skills needed to move directly into employment. That is a goal I wholeheartedly endorse.

As a local business leader, I do believe in the value of accountability when it comes to the use of federal funding dollars. But as a leader of Delta College, I know how effectively and efficiently this is currently being accomplished.

So, I am writing to ask for a delay in the implementation of the rating system, to allow time to fix two major flaws as I see them. First, there are no adequate measures of community college success that will be captured in the proposed system. Focusing on data gained through the Integrated Postsecondary Education Data System (IPEDS) measures full-time, first-time students who start in the fall and complete their program within 150% of the "normal time" at that institution. A full 65 percent of Delta College's 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 students take more than 150% of the "normal time" to complete their programs because they are working adults, yet there is no denying that they are successes in every respect.

Secretary Arne Duncan – page 2
February 17, 2015

Second, Michigan is not a statewide system, with access to data with ease as may be the case in other states such as the Florida or Washington state systems. We each have an independently elected Board, which works to represent our local needs and values. These facts, which have been so important to Michigan voters, would now seem to work against our local community college's ability to report and comply with your rules.

As a Board member, I value the information continually brought forward by the staff to help us assess our success. And, I've been supportive of Michigan's statewide effort by all of the community colleges to adopt the "Voluntary Framework of Accountability" as a way to gather and report data on our students. I believe this system would incorporate the most representative data that Michigan has available.

The proposed Department of Education system seems to be attempting to measure educational institutions that award federal financial aid to students. But, I believe implementation should be delayed, allowing us to find a solution that more fairly represents the good work of our community colleges across the country. Imposing a federal reporting system that is limited in its accuracy, does not seem wise.

I believe wholeheartedly in accountability, especially when it relates to the use of federal funding. But, delay of the implementation would allow us to find measures that are relevant and accurate. The Department of Education should spend the time it needs to identify a solution that more fairly represents the good work of our community colleges across the country. Or, it should spend the dollars necessary to make the IPEDS system more representative of the part-time nature of the students served by community colleges.

Imposing a federal reporting system that is not only onerous, but also limiting in its accuracy, does not seem wise. For these reasons, I ask that you delay implementation of the Postsecondary Institution Ratings System until such time as a broader set of data can be gathered from all of the parties involved.

Sincerely,

(b)(6)

Mr. Mike Rowley
Chair, Delta College Board of Trustees
michaelrowley@delta.edu

O'Bergh, Jon

From: Taylor, Cameron P <CPTAYLO@emory.edu>
Sent: Tuesday, February 17, 2015 6:59 PM
To: College Feedback
Cc: Mugg, Heather; Leach, John B.; Hauk, Gary S; Zimmerman, Lynn J; Harman, Charlie; Taylor, Cameron P
Subject: Comments on the Department of Education's Proposed Ratings System
Attachments: Ltr_Rawlings to Dept of Ed Chair_PIRS.pdf; Postsecondary Institutional Rating System-Emory's comments.docx

Good afternoon.

Emory University endorses the attached letter submitted by the Association of American Universities regarding the Department of Education's proposed Postsecondary Institutional Rating System. In addition, you will find attached a list of issues that are of significant concern to Emory.

Thank you for the opportunity to comment. We appreciate your consideration of Emory's views on this important topic.

Sincerely, Cameron

Cameron Taylor
Director of Federal Affairs
Office of Government and Community Affairs
Emory University
202-441-0058



ASSOCIATION OF AMERICAN UNIVERSITIES

February 3, 2015

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

Dear Secretary Duncan:

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

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

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

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

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

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

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

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

Comments on the rating system

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

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

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

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

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

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

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

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

Comments on data and metrics

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

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

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

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

Below we include comments about specific metrics under consideration:

Percent Pell

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

EFC (Expected Family Contribution) gap and Family income quartiles

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

First-generation college status

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

Average net price and Net price by quintile

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

Completion and transfer rates

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

Labor market success

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

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

Graduate school attendance

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

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

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

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

Sincerely,

(b)(6)

Hunter R. Rawlings III
President
Association of American Universities

⁴ <http://www.utsystem.edu/seekut/>

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

Postsecondary Institutional Rating System (PIRS)

Challenges for Emory University

Emory University fully supports the letter submitted by Hunter Rawlings III, President of the AAU. In addition, we offer the following challenges that have the potential to negatively impact Emory:

1. Single System of Accountability for Multiple Types of Institutions

Emory has concerns about the unintended consequences of this rating system both as a consumer information tool and as a federal accountability system. Consumers have access to so much data online that perhaps the most difficult component is discerning that which is valuable. Adding to this information may only add to the abundance of information, leaving much to interpretation. Given the unique nature of higher education, we fear that the proposed rating system fails to consider the unintended consequences of a consistent metric for so many different types of institutions. Institutional mission drives institutional priorities. Given the large number and type of institutions, how can a single system of accountability adequately measure institutional effectiveness? Therefore, relying on a single system of accountability may measure the effectiveness of the industry, not of each institution and further serve to mislead prospective students. A lofty goal, a single system of accountability neglects to consider the individual and distinctive missions of each institution.

2. Data Concerns

Various systems to extract data to support these accountability measures have been discussed; however, each system often falls short in providing a comprehensive perspective of student information. While Pell seems like an obvious consideration to demonstrate institutional support of access, it neglects to acknowledge the generosity of institutional aid Emory provides to “needy” students that may not be Pell eligible. The same could be said for measuring net price. Emory’s institutional aid policies, including Emory Advantage provides generous awards for our students, yet in this accountability measure may be lost if Pell is the only factor.

3. Labor Market/Potential Earnings

Emory College and Oxford College strengths in the Liberal Arts could easily be lost in measures that only consider placement in fields outside of the Liberal Arts. Differences between disciplines remain critical and should not be underestimated. In addition, many Emory students enter their undergraduate programs with the full intention of attending graduate or professional school. This could negatively impact Emory if the rating places a high value only on job placement.

O'Bergh, Jon

From: Tom Allison <tom.allison@younginvincibles.org>
Sent: Tuesday, February 17, 2015 8:03 PM
To: College Feedback
Cc: Jennifer Wang
Subject: Comments on Proposed Ratings Framework
Attachments: YI PIRS Comments Final.pdf

To whom it may concern:

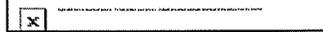
Please see the attached comments, submitted on behalf on Young Invincibles, to the Department on their proposed college ratings framework.

Thank you for your time and consideration,

Tom Allison

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Tom Allison
Policy and Research Manager



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January 31, 2014

U.S. Department of Education
Attention: National Center for Education Statistics
1990 K Street NW, 8th Floor
Washington, DC 20006

Re: Request for Information To Gather Technical Expertise Pertaining to Data Elements, Metrics, Data Collection, Weighting, Scoring, and Presentation of a Postsecondary Institution Ratings System

Dear Sir or Madam:

Last fall, Young Invincibles convened a group of Portland Community College students to discuss the need for better information about college choices. Ebony, a nineteen year-old, first generation student told us that she wished she had known more about how her schools' graduates performed in nursing school as well as the workforce. Currently, no one can tell Ebony what proportion of Portland Community College Students successfully transferred and graduated from any institution, not to mention success rates in nursing school or workforce outcomes in the industry. With so much at stake, we must do more to help students like Ebony make informed decisions about their future.

For this reason, we appreciate the Department's effort to equip students with better information through a Postsecondary Institutional Ratings System (PIRS). Done well, we believe that such a system can help students make informed choices and receive more value from their post-secondary investments.

However, the Department faces a daunting task on several fronts. First, the Department expects PIRS to assist consumers and hold institutions accountable. These two goals are very different and likely require different systems. Second, basing aid on ratings could unintentionally harm low-income students who face barriers to successful outcomes. Third, the Department currently lacks the necessary data to make PIRS successful. Using the wrong data could render the system useless, or worse, counter productive. Fourth, the Department has set a very fast timeline for PIRS, giving it few opportunities to address the above challenges.

Finally, we feel it is important to note that information and incentives alone will not solve the problem of college affordability. States cut per-student higher education expenditures by an average of 28 percent between fiscal years 2007 and 2012, and in response, institutions hiked tuition an average of 27 percent.¹ Any comprehensive solution for college affordability must address state disinvestment.

¹ Phil Oliff, Vincent Palacios, Ingrid Johnson, Michael Leachman, "Recent Deep State Higher Education Cuts May Harm Students and the Economy for Years to Come," Center for Budget and Policy Priorities, March 19, 2013, <http://www.cbpp.org/cms/?fa=view&id=3927>

We hope the following comments from the student perspective will constructively contribute to your efforts. Specifically, we ask the Department for the following:

- 1. Incorporate data that students care most about: affordability, job placement rates, and the ability to pay back their loans.**
- 2. Present information to students in a clear and understandable format.**
- 3. Engage the public through an outreach campaign about the ratings system.**
- 4. Distinguish between using PIRS for consumer information and institutional accountability.**
- 5. Use the ratings to set a minimum performance bar for institutions to receive aid and reward institutions who successfully serve low-income students.**
- 6. Establish privacy protections for student level data.**

1. Incorporate the data students care most about: affordability, job placement rates, and the ability to pay back their loans.

A primary goal of PIRS is to provide students with the information they need to make more informed college decisions. Consumers place a high priority on affordability, employment rates, and the ability of graduates to pay back their loans. Additionally, the Department should incorporate pre-enrollment, in-school, transfer, and post-enrollment data. Congress will need to take action to implement many of these changes. Finally, consumer's interface with the ratings system should be straightforward and accessible.

A. What the Students Want to Know

Students and families are very concerned with the return on their investment in higher education.² In a recent poll, Gallup found that the most important factor in choosing a college or university was the percentage of graduates who were able to get a good job.³ The same poll found that the second most important concern was cost, and the third was the graduation rate.⁴ However, this poll also found that information about job placement

² Valerie Calderon and Preety Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

³ Valerie Calderon and Preety Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

⁴ Valerie Calderon and Preety Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

rates was difficult for respondents to find.⁵ The poll recommended that more consumer information is needed so that students and families currently weighing their options and trying to decide on a college are able to choose the strongest return on investment for themselves.⁶

Focus groups conducted by Young Invincibles found similar results: employment prospects were very important to respondents, as was graduates' ability to repay their debt.⁷ Students consistently ranked these two outcomes as most valuable to their decision.⁸ Furthermore, in a survey of student leaders, we similarly found that 81 percent of respondents prioritized a school's job placement rate as the most important information, an overwhelming show of support for this metric.⁹ Students ranked some of the more commonly cited reasons for picking a school, such as academic prestige and the program's US News and World Report Ranking, far lower.¹⁰

College offers a variety of benefits and experiences, though students prioritize it as an investment in economic opportunity and mobility. They consistently cite the cost, employment rate, and loan repayment ability as the core pieces of information they need to make informed choices. PIRS should reflect these priorities.

B. Additional Data for Institutional Metrics

Apart from collecting and reporting what students need to make decisions, the rating system will require additional data, particularly for implementing institutional accountability metrics. These should include four areas generally:

Pre-enrollment data – Information relating to a students' socio-economic background, ethnicity and race, geographic origin, veteran status, first-time student status, Pell recipient status, and first in the family to go to college are important descriptors of students. Students have unique challenges when it comes to post-secondary success, and PIRS should have the ability to evaluate an institution's performance in serving different populations.

⁵ Valerie Calderon and Preeti Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

⁶ Valerie Calderon and Preeti Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

⁷ Young Invincibles, "Will College Be Worth It?" December 12, 2013, <http://younginvincibles.org/2013/12/will-college-be-worth-it/>.

⁸ Young Invincibles, "Will College Be Worth It?" December 12, 2013, <http://younginvincibles.org/2013/12/will-college-be-worth-it/>.

⁹ Rory O'Sullivan, Jen Mishory, "The Student Perspective on Federal Financial Aid Reform," *Young Invincibles*, November 19, 2012, <http://younginvincibles.org/wp-content/uploads/2012/11/Student-Perspective-on-Federal-Financial-Aid-Reform.pdf>.

¹⁰ Rory O'Sullivan, Jen Mishory, "The Student Perspective on Federal Financial Aid Reform," *Young Invincibles*, November 19, 2012, <http://younginvincibles.org/wp-content/uploads/2012/11/Student-Perspective-on-Federal-Financial-Aid-Reform.pdf>.

During School – There are also metrics while a student is enrolled in an institution that should be included in PIRS. Progress benchmarks such as credit completion would be useful to evaluate an institution’s performance at progressing students. Area of study is also significant, as students who are confident in a specific area of study, such as biology, will be more interested in performance of biology students at that institution, and less interested in other areas.

Transfer Students: – We also currently lack information on transfer students. After all, a third of all students transfer institutions before earning a degree.¹¹ To accurately evaluate institutions that prepare students for their next school, PIRS should develop mechanisms to evaluate transfer student outcomes.

Post-Graduation – Outcomes after leaving school are the most significant category of metrics. As mentioned above, students we spoke with ranked job placement and ability to repay loans as top priorities from their college experience.

C. Congress Must Act to Provide the Data Necessary for a Success PIRS

As the Department is undoubtedly aware, there are several limitations to the amount of post-secondary data currently available. This lack of information is impeding efforts to design the PIRS system. For instance, the Department’s website currently lists “transfer rates, earnings of graduates, and completion of advanced degrees” as outcomes to be incorporated into the ratings system. This data is not currently tracked and will take considerable time and effort, including working with Congress to obtain the necessary information.

2. Present information to students in a clear and understandable format.

As the Department prepares to make additional information available to students, it should bear in mind that not all information is good information. Thanks to the Internet, our generation already has access to near infinite amounts of data. Rather than “more”, consumers need the “right” information about higher education. Further, they need it presented in an accessible way.

Take default rates. The Department uses them as a metric for whether schools are eligible for federal loans. From a policymaker’s perspective, this appears to make sense. Putting aside the debate over whether default rates are the best metric, we should not invest in institutions where large numbers of students are unable to pay back their loans and default. Many people would presume that students value default rates as a way to

¹¹ Andrew Flagel, “Special Report on the Transfer Admission Process,” National Association of College Admission Counseling,” April 2010, <http://www.nacacnet.org/research/research-data/Pages/TransferAdmissionProcess.aspx>.

evaluate institutions. It turns out that many are unsure what default rates mean.¹² An 18-year-old who is about to take out a student loan for the first time may have little concept of what defaulting on a loan entails.

There are two takeaways from this. First, we need to educate students about the risks of student debt. Second, and importantly for PIRS, default rates are not an intuitive metric to incoming students regardless of how much education we do. The Department should look for metrics that they can explain in a straightforward manner.

As noted above, job placement and employment rates appear to be a metric that works. Students want to know whether they will have opportunities for employment after graduation. Moreover, they want to know if they will be able to afford their debt. Given this, loan repayment rates may seem like a helpful statistic, but the method for calculating them is quite complex. We urge the Department to find an accessible way to communicate that graduates from a particular institution are routinely able to pay down their debt.

A rating system has an advantage in this area as it presumably can boil down complex information like default rates and repayment rates to give schools a “grade.” On the other hand, a single grade or score risks oversimplifying these concepts. To avoid this, we recommend that the Department consumer test the rating system to ensure students adequately understand the information conveyed and can make decisions based on the ratings. Early input from actual families and students on the College Scorecard proved essential to its design and we expect the same strategy would benefit the PIRS process.¹³

3. Engage the public through an outreach campaign about the ratings system.

An accessible website will not be enough, however, to benefit consumers looking for better information on college choices. Students and families already have a number of tools available to assist in their college search and financial aid process, and the Department has been instrumental in producing many of them. They include the College Scorecard, the Shopping Sheet, College Board’s Big Future, U.S. News and World Report, to name a few.

Unfortunately, many students are not aware of these tools, and the small portions of students who do use them do not take advantage of the information they provide.¹⁴ Our own experience during student roundtables on the issue of college information confirms

¹² Healey C. Whitsett and Rory O’Sullivan, “Lost Without a Map: A Survey about Students’ Experiences Navigating the Financial Aid Process,” NERA Economic Consulting, November 11, 2012, http://www.nera.com/nera-files/PUB_Student_Loan_Borrowers_1012.pdf.

¹³ Julie Margetta Morgan and Gadi Dechter, “Improving the College Scorecard: Using Student Feedback to Create an Effective Disclosure,” Center for American Progress, November 2, 2012, <http://www.americanprogress.org/wp-content/uploads/2012/11/CollegeScorecard-4.pdf>.

¹⁴ Libby Nelson, “No Magic Bullet,” *Inside Higher Ed*, June 12, 2013, <http://www.insidehighered.com/news/2013/06/12/first-year-shopping-sheet-doesnt-make-big-splash>.

the trend. Most students were not aware of the tools currently available, or had heard of them but had not used them. It is essential that the Department conduct a public outreach campaign to communicate the launch of the tool.

The campaign should explain the current transparency problem and demonstrate how the consumer-facing tool can help students and families navigate the confusing college search process. It should also reach students early in their high school careers. For example, the Department could provide information, instructions, and demonstrations to high school sophomores and juniors.

Furthermore, we have seen that in addition to social media, mobile device compatibility is essential to reach young people. In fact, most low-income adults use a mobile device as their primary way of connecting to the Internet.¹⁵ Using texting, apps, and social media (including targeted social media advertising where other methods fail) as a means of engagement and to grow participation will further engage young adults. This applies not only to messages sent to students about the ratings system, but to the user interface itself. A mobile compatible interface ratings system will increase the chances that young people will use the tool.

Finally, an essential component to encourage usability is advising and counseling. Students, particularly first-generation students and those from disadvantaged backgrounds, have a harder time accessing, understanding, and acting upon information about applying to and paying for college.¹⁶ For this reason, the Department must train high school teachers and counselors, parents, mentors, and other figures on how to use the ratings system.

4. Distinguish between using PIRS for consumer information and institutional accountability.

The challenge in presenting the ratings system to students in an accessible way highlights a tension at the heart of the PIRS project: the Department wants the ratings system to serve as a system of institutional accountability *and* consumer information. Trying to do both at the same time risks doing neither well. We recommend that the Department develop different ratings, or at a minimum, different interfaces for the two models.

As we note above, creating a rating system for consumers demands simplicity and accessibility. The Department should use metrics that consumers can understand, or explain ratings in a way that makes sense. For instance, rather than using an opaque

¹⁵ Amy Lin, Jennifer Mishory, "Young Adult Outreach and the ACA," Young Invincibles, November 11, 2012, <http://younginvincibles.org/wp-content/uploads/2012/08/Young-Adult-Outreach-and-the-ACA-nographics-8.10.12.pdf>.

¹⁶ Jennifer Engle, "Postsecondary Access and Success for First-Generation College Students," American Federation of Teachers: American Academic-Volume Three, January 2007, <http://dbweb01.aft.org/pdfs/highered/academic/january07/Engle.pdf>.

method to calculate repayment rates, the Department could give an “A” through “F” grade on how well a school’s graduates repay back their debt.

On the other hand, an effective institutional accountability method would prioritize other goals. For example, simplicity would be less important than proper targeting. As the Department acknowledges, punishing institutions for poor outcomes can have unintended consequences, because low-income students face greater barriers to post-secondary success. As a result, schools may respond to accountability metrics by limiting access to underrepresented students. To prevent this, the Department may need to include more targeted metrics such as completion rates or repayment rates of Pell grant eligible students to ensure that schools meet the needs of underrepresented groups. While more metrics may create a more effective accountability tool, the added complexity would make it much more difficult to explain to consumers.

The Department should bear this tension in mind when developing PIRS. Creating two separate ratings systems would avoid these challenges. At a minimum, the Department should create an accessible consumer-focused interface separate from one designed for policymakers and researchers focused on institutional accountability.

5. The ratings should set a minimum performance bar for institutions to receive aid and reward institutions that successfully serve low-income students.

Although consumers have different needs than policymakers, an institutional accountability rating system can benefit both taxpayers and students. In the case of the former, it protects federal investments in higher education by tying financial aid to school performance. For the latter, it creates a powerful incentive for students to avoid schools where they face limited financial aid options. However, developing an accountability framework that adequately compares small differences in institutional performance will prove impossible. Consequently, the Department should set a minimum performance floor for financial aid eligibility, and second, it should incentivize improvement by rewarding institutions that successfully serve low-income students.

A. Minimum Floor for Performance

In its discussion of PIRS, the Department rightly avoids developing a ranking system in favor of a ratings system. The scale and diversity of American higher education allows for incredible creativity in types of institutions and their missions. Consumers benefit from the variety because it increases the likelihood that they can find an institution that meets their individual needs. Were the Department to create a single ranking system for institutional performance and tie federal financial aid to that system, it would threaten that diversity by forcing all schools to measure themselves by a single set of metrics.

Similarly, the department should avoid tying different levels of aid too closely to different ratings. For example, if the Department chooses a ratings system based on letter grades, and allowed different levels of aid to institutions at each grade, it could begin to

mimic the consequences of a ranking system. We believe the Department should address the issue by setting a performance floor and eliminating eligibility for schools who perform below it. It will be easier to identify poor performers than identify differences between average performers. For example, schools with very low completion rates or repayment rates on student loans would face limited or no eligibility for federal grants and loans.

This should simultaneously protect students and families from spending time and resources on an education that is not projected to result in a positive return on their investment, as well as ensure that the government doesn't allocate valuable public tax dollars to institutions that don't provide their students with a valuable education.

B. The ratings should reward and incentivize institutions who are successfully serving low-income students.

As we note above, setting performance benchmarks risks unintended consequences for underserved populations without adequate safeguards. Potential unintended consequences include punishing institutions that serve students particularly difficult to reach, undervaluing professions that serve the public interest but don't produce high earnings, or over-emphasizing student success that could be attributed to factors outside the institution, such as quality of the K-12 education or other social indicators.

The Department should counteract these incentives by capturing institutions' performance in serving low-income students and reward top performers. Low-income students could be defined at the Department's discretion, but Pell eligibility would be a logical place to start. Rewards could include bonus points in overall ratings, inclusion in a highlighted list of top performers, larger portions of federal work study funds, consideration for special grants, or increases in the number and value of Pell grants awarded to that institution's students. Nearly all of the above changes would require legislative action by Congress.

6. Establish privacy protections for student level data.

To institute accountability metrics, the Department would need to compile a significant amount of data on individual students. Surveys demonstrate that young people have a healthy skepticism of how the government tracks personal data.¹⁷ Young Invincibles has heard similar concerns about civil liberties and privacy voiced in meetings with students. However, we have also seen a general consensus from students that they do feel as if they need more information to help them make better-informed decisions when choosing a school. We propose that the Department strive to balance these concerns, ensuring that students have the information that they need without compromising privacy.

¹⁷ Drew Desilver, "Young Americans and privacy: 'It's complicated,'" Pew Research Center, June 20, 2013, <http://www.pewresearch.org/fact-tank/2013/06/20/young-americans-and-privacy-its-complicated/>.

There are examples of the federal government successfully tracking unit level, personally sensitive information, that the Department could look to emulate. The Integrated Public Use Microdata Series (IPUMS) datasets provide individual level data for researchers to draw inferences from census data sets that wouldn't otherwise be available from aggregated data. IPUMS has effectively employed measures to assure confidentiality, such as suppressing names and other identifying information.¹⁸ The census collects similar data points as the proposed ratings system, such as income, education attainment, job status etc., and should be seen as a model of how to collect and protect unit level data that expands our knowledge of the world.

Conclusion

On a final note, it is worth returning to Ebony's story that introduced our comments. She expressed concern over her lack of knowledge about the success of graduates in her program. However, she also spoke movingly about another reason for pursuing education: to become a better citizen. She wanted to do this by learning more about the world and developing critical thinking and problem-solving skills. Ebony felt that these skills would allow her to better stand up for her friends, family, neighbors, fellow Oregonians and Americans.

Her story is instructive for the Department. Providing students with more information about the economic value of postsecondary credentials is a vital goal, but it is not the only outcome of our post-secondary system. Young people pursue education for a variety reasons. They may want to challenge themselves, to learn about the world, to build social networks for career success, or, like Ebony, to become better democratic citizens. These pursuits are worthy goals for individual and public investments. They are also extremely difficult to measure.

The Department should approach its task with humility over the proceeding months and years. It cannot measure every important thing about post-secondary education or create the definitive consumer rating system. Nor will more information solve the problem of college affordability. A simple tool meant to show students what schools lead to economic security and eliminate financial aid for schools that fail to do so would be a step forward for students.

We appreciate the opportunity to contribute to the Department's work in designing a college ratings system. We hope to act as a resource for the Department in the future and look forward to seeing how the program progresses. Please feel free to contact Tom Allison at tom.allison@younginvincibles.org with any questions.

¹⁸ "IPUMS Frequently Asked Questions," accessed January 23, 2014, <https://usa.ipums.org/usa-action/faq#ques25>.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, February 17, 2015 8:28 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: As President of Radford University, in July 2014, I joined 50 other presidents of Virginia's public and private institutions of higher education in expressing concern about the proposed higher education rating system. Of particular concern is the linkage of the rating system to the award of federal student aid. We believe there already exist adequate data that is currently available that provides our students and parents with the information that the new rating proposes to supply.

Our concerns are primarily:

- Institutions traditionally serving low income or non-traditional populations would be disadvantaged under the current proposal
- A rating system that places significant weight on graduate income is fundamentally flawed and counter to student choice in the American higher education system
- The U.S. Dept. of Education's current system of measuring graduation rates does not take into consideration students who transfer from the community college system or who transfer to another institution, which is a growing reality in today's higher education environment

Every institution currently provides a substantial amount of data through the IPEDS system. The recommendation is that the focus should be on clarifying and simplifying already available data. I urge the President and Congress to reevaluate this proposal and its linkage to the award of federal student aid.

Sincerely,
Penelope W. Kyle, J.D.
President, Radford University

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): president@radford.edu

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

O'Bergh, Jon

From: Tom Allison <tom.allison@younginvincibles.org>
Sent: Tuesday, February 17, 2015 9:40 PM
To: College Feedback
Cc: Jennifer Wang
Subject: Re: Comments on Proposed Ratings Framework
Attachments: PIRS comments Final.pdf

Apologies for attaching *last year's* comments on the ratings system. Please disregard.

Attached are our most recent comments on the proposed framework as published December 19, 2014.

On Tue, Feb 17, 2015 at 8:02 PM, Tom Allison <tom.allison@younginvincibles.org> wrote:
To whom it may concern:

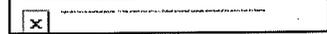
Please see the attached comments, submitted on behalf on Young Invincibles, to the Department on their proposed college ratings framework.

Thank you for your time and consideration,

Tom Allison

--

Tom Allison
Policy and Research Manager



1411 K Street, NW
Washington, DC 20009
(202) 734-6528
tom.allison@younginvincibles.org

--

Tom Allison
Policy and Research Manager



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February 17, 2015

U.S. Department of Education
Attention: National Center for Education Statistics
1990 K Street NW, 8th Floor
Washington, DC 20006

Re: For Public Feedback: A College Ratings Framework

Dear Sir or Madam:

Thank you for the opportunity to provide feedback on the College Ratings Framework as published on December 19, 2014. As a non-profit research and advocacy organization working toward expanding economic opportunity for young adults, we applaud the Department of Education's (hereafter "the Department") work to make institutions of higher learning more accountable to students and families, better able to improve, and more transparent for taxpayers.

We understand and appreciate the difficulty of achieving an ambitious project such as the one that the Department lays out in its framework. Systems within higher education are extremely complex, often to the detriment of students and families. How the Department will assign value to its activities and outcomes speaks to our values and priorities as a nation. We hope that our comments are beneficial to your work and will result in a usable system that benefits students and families, with an emphasis on students from underrepresented communities.

Young Invincibles recommends that the Department:

1. Develop a long-term strategy to overhaul how we collect and use education data
2. Enact the suggested ratings categories of minimum and maximum standards
3. Use institutional groupings to encourage enrollment and success of disadvantaged and underrepresented minority students rather than adjust ratings by expected outcomes of student demographics
4. Protect student data privacy
5. Incorporate metrics that focus on communities least likely to enroll and complete college

6. Incorporate best practices and principles of information design for the website and tool

As a non-partisan, non-profit research advocacy organization working to expand economic opportunity for young people, Young Invincibles is in a unique position to comment on the proposed ratings framework. We've amplified student priorities and perspectives at the Department's convenings, open forums, and previous requests for comments on the ratings system. We have also surveyed the student voice and submitted responses to the Administration to better quantify how complexity and lack of information leads to gaps in students' understanding of higher education systems, particularly federal financial aid.

Young Invincibles is an active member of and contributor to the Postsecondary Data Collaborative, a community of postsecondary data experts. Our work with the Collaborative has included conducting an in-depth literature review on cognitive information processing, gleaning principles of information provision and decision-making, as well as holding focus groups around the country to test current tools for usability and interface design. This comment contains portions of our research thus far, and we hope that our recommendations inform the design of the consumer-facing tool. As researchers and organizers, we are grateful for the opportunity to help inform the systems' form and function.

1. **Develop a long-term strategy to overhaul how we collect and use education data**

Throughout the proposed framework the Department recognizes the lack of current data to fully build the ratings system as outlined. We agree. The ratings system as proposed will fall short of its laudable aspirations because existing data are insufficient to satisfy the metrics outlined in the framework. For the Department to accomplish its goals, it must fundamentally overhaul its postsecondary data infrastructure.

For instance, information from the National Student Loan Database System, a consistently cited source of data in the framework, only contains information on student loan borrowers. According to an estimate by the Institute of Higher Education Policy,

this accounts for only 57 percent of students.¹ It is also unclear how the Department will capture employment and earnings data, especially from students who do not borrow to attend school. These labor outcomes are also likely impossible to measure under the student unit record ban,² which the Department must specifically work with Congress to lift if they intend to wholly deliver on its promises with their ratings system.

As the Department is of course aware, IPEDS, the other primary source of data for the ratings system, is submitted by institutions already aggregated. The Department therefore cannot use IPEDS for many of the metrics it has expressed an interest in, such as completion rates by selected demographics, transfer activities, and information about non-full time and non-first time students. These are all metrics that Young Invincibles believes must be in a ratings system.

The Department also recently acknowledged that the Pell graduation rate, a metric that YI supports and that the Department has proposed incorporating, cannot be gleaned from NSLDS.³ The Department must find a way to capture Pell graduation rate, because it is one of the best ways for consumers and researchers alike to determine whether institutions are successfully supporting low- and middle-income students.

Therefore, we urge the Department to commit to follow through on their proposed ratings system with the proposed metrics above. To do so, we recognize that the Department must take a long-term approach to find solutions, some of which must be legislative, to its current lack of data. This calls for a comprehensive strategy, working with Congress and, more than likely, laying a foundation beyond this Administration, to fundamentally overhaul the way we collect and use postsecondary data. Department officials must work with Congress to incorporate new data collection and provision

¹ IHEP analysis of NPSAS:12 data using PowerStats

² McCann and Laitinen, *College Blackout: How the Education Lobby Fought to Keep Students in the Dark* (Washington DC: New America Foundation, 2014), 3, accessed February 10, 2015, <http://newamerica.net/sites/newamerica.net/files/policydocs/CollegeBlackoutFINAL.pdf>.

³ Carrie Warrick, "The Elusive Pell Grant Recipient Graduation Rates" (Washington, DC: National College Access Network, 2015), accessed February 10, 2015, <http://www.collegeaccess.org/BlogItem?dg=30cb87831a18419bad2f3d6ed7e0ce0b>.

mechanisms. Young Invincibles has crafted a framework for this overhaul, should the law eventually allow it, below.

The ratings system is an opportunity to call attention to the need for a new paradigm of data collection and use. While many details remain to be carved out, a new data system could look as follows:

- Replace IPEDS institutional reporting with an automatic reporting system at the student unit level. This system would report data on student demographics, area of study, part-time status, and other information that every institution currently tracks but does not disclose. Instead of burdening institutions with reporting requirements like aggregating and calculating observations, institutions could automatically transmit information to the Department from secure terminals. Information like Pell and loan status would not yet be incorporated at this stage.
- The Department could link incoming student data from institutions with loan information via NSLDS and labor outcomes from the Internal Revenue Service or Social Security Administration, with personal identifiable information such as social security number as the joining field. The resulting database would be a student unit record system with the ability to answer our most pressing questions around equity, access, affordability, success, and outcomes, but without the federal government tracking students directly.
- The Department would house the database with strict protocols keeping the three sources of data (institutions, NSLDS, and employment) separate. The database would then truly inform the three objectives as laid out in the proposed framework: provide information to consumers, bolster institutional accountability, and help institutions improve.

2. Enact the suggested ratings categories of minimum and maximum standards

In Young Invincibles' previous comments, we requested that the Department outline a minimum and maximum threshold to identify institutions serving students the best and worst. We agree with the Department's proposal to categorize institutions into three groups: high performing, low performing, and a middle category. This makes sense

both for both institutional accountability and consumer information. We believe that consumers will understand categorical thresholds and that institutions will strive to improve how they serve students based on these categories. As such, we agree with this proposed framework and recommend that the Department implement ratings categories using minimum and maximum standards.

3. Use institutional groupings to encourage enrollment and success of disadvantaged and underrepresented minority students rather than adjust ratings by expected outcomes of student demographics

Young Invincibles, together with the Postsecondary Data Collaborative, recommend that the Department disaggregate measures of student success and access for underrepresented minorities. Because substantial gaps remain in enrollment and graduation rates --- and vary by institution⁴—incorporating disaggregated data into a rating system is essential to improve these outcomes.

We see value in students and families' ability to search and compare institutions that might reflect the student demographics that they are interested in. As the framework itself acknowledges: "Students want to know and compare institutions based on whether they will be able to complete their degree, find work, or go on to pursue graduate education; whether they will be able to repay the financial obligations they assumed to pursue their education; and whether they are likely to be able to earn a living and support their families." This is exactly what we hear from our conversations with students and young people. For many students, whether they believe an institution will successfully serve them depends on whether the institution successfully serves students like them.

To that aim, we recommend that the rating system include the following measures of success and access for underrepresented minority students:

⁴ Joseph Yeado. *Intentionally Successful: Improving Minority Student College Graduation Rates*. The Education Trust. July 2013. Retrieved from: http://edtrust.org/wp-content/uploads/2013/10/Intentionally_Successful.pdf.

- **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.
- **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.

However, we must emphasize that the Department should *not* rate institutions based on the characteristics of the students they serve and their expected outcomes, particularly via socioeconomic and racial breakdowns. This would result in perverse incentives and a free pass for institutions that do not properly serve students from underrepresented communities.

Young Invincibles previously criticized the consulting firm the Parthenon Group's analysis of the Department's proposed gainful employment rule. In their analysis, The Parthenon Group claimed student characteristics, not institutional performance, drive educational outcomes. Our response criticized this analysis because enrolling low-income and minority students does not free institutions from accountability. Our viewpoint on this stands, and is relevant here.⁵

4. **Protect student data privacy**

We are encouraged by and agree with the Department's emphasis on protecting student privacy. Contrary to impressions of young people over sharing private information on social media platforms, surveys demonstrate students are concerned about the abuse and misuse of information about them.⁶ In our direct work with young adults, Young Invincibles has heard stories and concerns about civil liberties and privacy. Other than personal health records, data and information about an individual's education and employment can be some of the most sensitive details of one's life.

⁵ Young Invincibles, *Faulty Foundation: Parthenon's Analysis of GE Rule Structurally Unsound*, (Washington DC: Young Invincibles, 2015), <http://younginvincibles.org/wp-content/uploads/2014/09/2014.04.14-Faulty-Foundations-Brief-Final.pdf>.

⁶ Drew Desilver, "Young Americans and privacy: 'It's complicated,'" Pew Research Center, June 20, 2013, <http://www.pewresearch.org/fact-tank/2013/06/20/young-americans-and-privacy-its-complicated/>.

However, we have also seen a general consensus from students that they feel as if they need more information in the right format to help them make better-informed decisions when choosing a school. We propose that the Department strive to balance these concerns, ensuring that students have the information that they need without compromising privacy.

We are currently developing a comprehensive position on student data privacy, drawing from statistical best practices inside and outside the education community as well as surveys and focus groups from our student partners. At this time we feel that there are many current protections and laws, such as those codified by FERPA, and those regulating the use of census data,⁷ that the government can turn to for guidance as the Department works to protect student privacy.

5. Incorporate metrics that focus on communities least likely to enroll and complete college

We applaud the Department's suggested metrics and their emphasis on access, affordability, and outcomes, in general. However, in order to achieve the amount of postsecondary degrees necessary for a competitive future economy,⁸ we recommend that the Department develop a ratings system that will be useful to communities least likely to enroll and complete college.⁹

We also applaud the Department for considering labor market outcomes in the ratings system. Students and families are very concerned with the return on their investment in higher education. 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.¹⁰ Similarly, Gallup found that the most important factor in choosing a college or

⁷ "IPUMS Frequently Asked Questions," accessed January 23, 2014, <https://usa.ipums.org/usa-action/faq#ques25>.

⁸ Anthony Carnevale, Nicole Smith, and Jeff Strohl, *Recovery: Job Growth and Education Requirements Through 2020*, (Washington, DC: Georgetown Center for Education and the Workforce, 2013), accessed May 27, 2014, https://cew.georgetown.edu/wp-content/uploads/2014/11/Recovery2020.FR_Web_.pdf.

⁹ Rory O'Sullivan, Konrad Mugglestone, and Tom Allison, *Closing the Race Gap: Alleviating Young African American Unemployment Through Education*, (Washington, DC: Young Invincibles, June 2014), 7-8, https://d3n8a8pro7vhmx.cloudfront.net/yicare/pages/141/attachments/original/1403804069/Closing_the_Race_Gap_Ntnl_6.25.14.pdf?1403804069.

¹⁰ Kevin Eagan, et. al. *The American Freshman: National Norms Fall 2014*. (Los Angeles: Higher Education Research Institute, UCLA, 2014) <http://heri.ucla.edu/monographs/TheAmericanFreshman2014.pdf>.

university was the percentage of graduates who were able to get a good job.¹¹ Young Invincibles also conducted our own focus groups conducted and found similar results: employment prospects were very important to respondents, as was graduates' ability to repay their student debt.¹²

However, we are again urge the Department to begin to solve the fundamental problem of lack of data for key metrics, including those listed here. Metrics like net-price by quintile, EFC gap, and first-generation college status are all examples of metrics the Department is considering for its rating system. However, none can be currently calculated for students via NSLDS. As it stands, the system would omit significant amounts of students and their outcomes.

We are also concerned that the system would lack sufficient data about transfer students. A full understanding of transfers between institutions and completion rates disaggregated by race and ethnicity could be possible with reforms to IPEDS, but even this would fall short of truly capturing a students' progress through multiple institutions, largely because the way IPEDS captures only first-time, full-time students.

With little change of capturing the aforementioned metrics, we again urge the Department to take a long-term approach to solve gaps in data, such as the student unit record system as outlined above. The ratings system must take the full spectrum of consumer and accountability needs into account. While we recognize that the student unit record ban is a roadblock to these aims,¹³ the need for the Department's commitment to working on lifting the ban is now more important than ever.

6. Incorporate best practices and principles of information design for the website and tool

¹¹ Valerie Calderon and Preeti Sidhu, "Americans Say Graduates' Job Status Key to College Choice, March 30, 2014, <http://www.gallup.com/poll/163268/americans-say-graduates-jobs-status-key-college-choice.aspx>.

¹² Young Invincibles, "Will College Be Worth It?" December 12, 2013, <http://younginvincibles.org/will-college-be-worth-it/>.

¹³ McCann and Laitinen, *College Blackout: How the Education Lobby Fought to Keep Students in the Dark* (Washington DC: New America Foundation, 2014), accessed February 10, 2015, <http://newamerica.net/sites/newamerica.net/files/policydocs/CollegeBlackoutFINAL.pdf>.

We are also encouraged by the Department's commitment to incorporating consumer feedback about the design of the college ratings website and transparency tools. Even in an ideal situation, with all the metrics and data about student characteristics, institutional performance, and post-collegiate outcomes, this project will still fall short if students and families do not take advantage of these resources.

Young Invincibles is in a unique position to contribute in this area. Rooted in a comprehensive literature review of academic studies, reports, and experiments on cognitive information processing, Young Invincibles has been exploring best practices and principles of good design that lead to desired use and outcomes. In addition to the literature review, Young Invincibles has conducted over a dozen focus groups, with more scheduled, testing the awareness and use of current college search tools, identifying models of website and mobile app design inside and outside of the education sphere, and gleaning valuable lessons from the student experience navigating online interfaces and tools.

We preview some of these initial findings below:

- The website and tools should present information in a parsimonious manner. Information processing is difficult for people when they are overloaded with information. More is not always better.
- Information should be unambiguous; otherwise people are prone to give the information little weight in their decision-making.
- The characteristics of the options presented should be "alienable", or similar, so that individuals can make direct comparisons between them.
- Numbers should be presented in a way that is straightforward to interpret. Certain numbers, like percentage interest rates, are more difficult for people to process than the same figures expressed in dollar terms.
- The information should be directly relevant to what individuals perceive as salient factors in their decision-making process. In our focus groups, we've seen information about programs of study, student demographics, and expected outcomes as key drivers of their decisions.

- Special attention should be paid to the context in which the information is presented, as even subtle contextual factors can have a large impact on information take-up. In one study researchers manipulated conditions to determine an impact on loan uptake. To provide just one example, the researchers placed a “suggestive” phone call to a subset of borrowers asking them whether or not they intended to take out a cash loan in the following months. The mere suggestion of taking out a loan increased the loan uptake for this subset of consumers by a statistically significant margin.¹⁴

As student-friendly as the design may be, it will do no good unless students and their families are seeking out the information that the system contains. This is particularly true for low-income and less-educated populations. The Department therefore must take steps to ensure that all students and families, particularly those from underrepresented backgrounds, are not only engaged in active information search, but that the relevant information is easily accessible to them.

Notably the literature has shown time and time again that low-income and less-educated populations have a considerably more difficult time with information search and processing than do their better-off peers. For instance, low-income populations consult fewer sources and spend less time searching for information. Lower-income populations also more often make financial decisions against their best interest.

These facts must not be misconstrued to “blame the victim” and create lower expectations for these groups. Low incomes are often correlated with lower education, disenfranchisement from financial and public institutions, and a more tumultuous household life, making navigating financial and higher education systems more difficult. These facts call for special efforts from the Department to tailor the rating system specifically to the needs of these populations. One potential strategy is to include targeted counseling of how to best benefit from the system’s resources. The Department must ensure that the ratings system is a tool for promoting equal access to affordable, quality postsecondary education.

¹⁴ Bertrand, Karlan, Mullainathan, Shafir, Zinman, *What’s Psychology Worth? A field experiment in the Consumer Credit Market*, (New Haven, CT: Yale University, 2005), 20, http://www.econ.yale.edu/growth_pdf/cdp918.pdf.