

### **Additional Recommendations by the Postsecondary Data Collaborative**

In addition our individual comments, Young Invincibles is proud to be a collaborator and contributor to the comments submitted by the Postsecondary Data Collaborative. These comments represent consensus among higher education data experts and we believe reflect the best interests of students, institutions, and government entities. To summarize, those comments recommended that the ratings system: (1) apply data differently to meet distinct purposes; (2) disaggregate measures of student success and access by race/ethnicity; (3) measure cumulative student debt and the share of students borrowing; and (4) incorporate labor market outcomes.

Thank you for the opportunity to comment on the Department's proposed rating system. We hope that that the Department finds our input valuable and we look forward to continuing to work with you all. For more information, please contact Tom Allison, Policy and Research Manager for Young Invincibles, at [tom.allison@younginvincibles.org](mailto:tom.allison@younginvincibles.org).

**O'Bergh, Jon**

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**From:** Jennifer Tani <jtani@roosevelt.edu>  
**Sent:** Tuesday, February 17, 2015 3:36 PM  
**To:** College Feedback  
**Subject:** [Suspect Bulk Mail] PIRS Comments from Roosevelt University

Good afternoon,

On behalf of President Middleton at Roosevelt University, please find attached our comments regarding the draft framework of the Postsecondary Institution Rating System (PIRS).

Please feel free to contact us with any questions. Thank you in advance for your consideration.

Sincerely,

Jennifer

Jennifer Tani

Assistant Vice President, Community Engagement

Government Relations and University Outreach

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February 17, 2015

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

Dear Secretary Duncan:

Since President Obama's initial announcement of the proposed Postsecondary Institution Ratings System (PIRS) in August 2013, we have closely followed the Department of Education's announcements and engagement in developing the draft framework.

We contributed what we hoped would be meaningful and constructive feedback in the first opportunity to comment in January 2014. We would like to reiterate our point of view about the possible ramifications of PIRS and, importantly, more directly connect the Department to the students it purports to serve with PIRS.

After nearly a year and a half of time, effort and feedback, the Department's December 2014 draft plan framework demonstrates the continuing complexity entailed in developing a ratings system that is fair and meaningful without having made any substantial progress on a workable system. While being upfront about the challenges and limitations, the framework does nothing to effectively ameliorate the considerable constraints and potential damage created by PIRS.

The draft framework outlines a number of metrics and poses several questions, many of which we are certain are being shared with the Department. We will touch briefly on a few categories of concern and ask that the Department reflect honestly about the nature of these concerns.

While the Department has acknowledged the flawed nature of the currently available data, the Department has in no way sufficiently assessed the implications of using flawed data as the inputs for PIRS. With so many caveats on the data, we are deeply apprehensive

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about the effectiveness of the outputs—outputs which will generate a flawed and potentially inaccurate institutional snapshot. Additionally, these inputs—and “institutional” performance—are lagging indicators and may very well be significantly distant from an institution’s current operations by the time they are published and categorized.

The original announcement of PIRS suggested a plan that would compare institutions of similar mission. In the draft framework, the only certain delineation of institutional categorization is between two- and four-year colleges and universities which is far too simplistic to account for the considerable variation between institutions.

Certainly, degree and program mix, and selectivity and academic preparation do matter and can influence outcomes, and institutions have a broad range of characteristics that comprise the whole. Today’s college students have highly varying backgrounds, experiences and academic pathways. The proposal to develop a “student-level regression model that would adjust outcomes” is not only highly complex, but takes us down a dangerous pathway. We caution the Department about categorizing or lowering expectations for any particular groups of students while not unfairly penalizing students at institutions that may have served students with lower academic preparation or other barriers to traditional definitions of success. In this most especially we do not envy the Department its undertaking.

A tool that is in large part intended to be a resource for prospective students and families seems to be leaving out many elements that are critical to college choice. As students seem to be noticeably absent from this discussion, we want to take this opportunity to share just one of the many reflections of significant concern raised by one of our students. We sincerely hope you will consider her perspective.

*My name is LeeAnn and I am currently a full-time, undergraduate studying social justice and political science at Roosevelt University in Chicago. Prior to becoming a full-time student, I was a successful sales rep for a small business. I worked in that capacity for ten years and supported my children as a single mother. I had been attending classes on a part-time basis at the local community college, but I needed more advanced study than I could receive at a community college.*

*When my company closed in 2013, I realized that I now had an opportunity to enroll in school full-time to finish the degree that I had started 25 years prior. As a single mother to biracial children, a survivor of domestic violence and a product of the de-industrialization of the 1980s, I was drawn to build skills that would help facilitate policies and outcomes for people*

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*without the resources to advocate for themselves. I had personally benefitted from programs designed to help people help themselves and felt compelled to pay those investments forward.*

*Becoming unemployed changed everything and I was able to enroll at Roosevelt University—finding a program and culture that were exactly the right fit for me. I prioritized the connections and access that Roosevelt had to the civic/nonprofit community and knew that it would be beneficial to me in finding work or acceptance to a graduate school program after graduation. I looked at the faculty members and the work that they had done outside of academia. I researched the history of the school and how it was founded. I looked at the guest speakers who presented on campus and other events sponsored by the University. And, I looked at proximity and ease of transportation—of all the easily quantifiable concerns I had, this was the most salient for my decision-making. None of these things can be measured in a college ratings plan.*

*Since transferring to Roosevelt, I have remained on the Dean's List, have been awarded a highly selective fellowship and am part of the Honors Program. Through federal and state need-based financial aid, institutional aid, scholarships and fellowships, I will achieve my goal of graduating in December 2015 with a bachelor of arts in social justice with a minor in political science. I will be a proud alum but will go uncounted by PIRS as currently designed. How many other students are there like me?*

*According to the National Student Clearinghouse, one in three undergraduates transfers at least once and many transfer multiple times across multiple institutions. Nationally, a third of undergraduates are older than 25. Adult students are projected to have dramatic enrollment increases within the next decade: a 21 percent increase among students 25-34 years of age and a 16 percent increase in students 35 years of age and older. More than half of adults do not complete a bachelor's degree within six years. These diverse pathways to a college degree should not be discounted simply because they do not follow more "traditional" ones.*

*After an initial read of the goals and metrics that dominate the dialogue surrounding the college ratings plan, I can't help but notice there is a significant disconnect between the policy makers and the subjects of the intended policy. My current perspective presents me with a unique point of view. As a student of public policy (I plan to pursue a master's degree in public policy after graduation) and the Vice President of Thornton Fractional District 215 School Board, I commend the intentions of the administration in their efforts to improve post-secondary education outcomes. As a parent I share an additional point of view—one perhaps more significant than any data point PIRS could present: the conversation at my dining table is now forever changed since I enrolled at Roosevelt University and, along with it, the future that will await my children. They have seen and now desire for themselves all that learning*

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*can bring and the vitality of a future that higher education can provide. Sadly this was not something accessible to them or part of our family understanding prior, even when I attended community college.*

*Unfortunately, and not altogether uncommon, the gap between the perceptions of a problem and its solutions by policy makers and the realities experienced by the subjects of the policy is considerable. I have concerns about the significant amount of resources that are being dedicated to this project and what the return on this investment will be for students, parents and the American public in general.*

We support the Department's efforts to make college accessible and affordable to all students who seek it. Significant amounts of data are readily publically available already however it remains to be seen how this will be enhanced by the federal government rating these data. The now stated timeline of a fall 2015 roll out is overly aggressive given the significant concerns and the many open questions yet to be resolved. We strongly urge the Department not to move forward with PIRS or, at the very least, to delay until these myriad of serious issues can be reconciled.

If we want to focus as a nation on our competitiveness, and on educational opportunity for all students who seek it, there are many other ways we can invest in our students and institutions. A few examples that the federal government could support include investing in degree audit software that helps students map their academic pathways; year-round/summer Pell grants which can reduce time to degree and allow greater scheduling flexibility; and bridge programs that help with academic remediation and acclimation to the college environment. We would welcome the opportunity to share more of our thoughts on the best ways we've assessed at increasing access and attainment for some of the most vulnerable student populations.

Thank you for your thoughtful consideration of our feedback.

Cordially,

(b)(6)

Charles R. Middleton

CRM/jrt

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cc: The Honorable Dick Durbin  
The Honorable Mark Kirk  
The Honorable Bobby Rush  
The Honorable Robin Kelly  
The Honorable Daniel Lipinski  
The Honorable Luis Gutierrez  
The Honorable Mike Quigley  
The Honorable Peter Roskam  
The Honorable Danny Davis  
The Honorable Tammy Duckworth  
The Honorable Jan Schakowsky  
The Honorable Bob Dold  
The Honorable Bill Foster  
The Honorable Mike Bost  
The Honorable Rodney Davis  
The Honorable Randy Hultgren  
The Honorable John Shimkus  
The Honorable Adam Kinzinger  
The Honorable Cheri Bustos  
The Honorable Aaron Schock  
Douglas G. Knerr, Executive Vice President and University Provost  
Lesley D. Slavitt, Vice President, Government Relations and University Outreach

## O'Bergh, Jon

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**From:** George Hanbury <Hanbury@nova.edu>  
**Sent:** Sunday, February 15, 2015 2:30 PM  
**To:** College Feedback  
**Cc:** Donald Rudawsky; Ralph Rogers; Stephanie G. Brown; Jacqueline Travisano; Shirley Naidoo; George Hanbury; Dr. Thomas W. MacFarland; Richard D. Legon ; david@naicu.edu; Brad Williams  
**Subject:** [Suspect Bulk Mail] Postsecondary Institution Ratings System (PIRS)  
**Importance:** High

Ensuring that students, families, and policymakers have access to accurate and comparable data sources to inform their higher education decisions is a worthy goal that I support. However, I have several concerns with the proposed Postsecondary Institution Ratings System (PIRS).

The Net Price Calculator is a specific cost and financial tool that addresses affordability for students on an individual basis and is a better indicator of cost than any university wide measure. The College Navigator is an excellent tool enabling students and their families to compare multiple institutions on a wide variety of factors that are important to them, without the value judgments a ratings system would unnecessarily add. In addition to the issue of unnecessarily forcing a value judgment into a rating system, some elements of the PIRS are problematic due to the complexities and cost of data collection. **Consequently, I recommend expansion of the information shared within the College Navigator to include more of the types of measures proposed by the PIRS, versus the creation of any new rating system. One way to expand the College Navigator in line with the cost and outcome goals of the PIRS would be to add two-year student loan default rates.**

The draft framework, as we understand the proposal, defines metrics around access, affordability, and outcomes, and notes all student data will be presented only in aggregate. The proposal relies on IPEDS, NSLDS, and earnings information. As such, we understand that the Department is considering using the following indicators as part of the rating system:

- Percentage of students receiving Pell Grants
- Expected Family Contribution (EFC) gap
- Family income quintiles
- First-generation college status
- Average net price
- Net price by quintile
- Completion rates
- Transfer rates
- Labor market success, such as short-term “substantial employment” rates and long-term median earnings
- Graduate school attendance
- Loan performance outcomes

If institutions are required to expend additional resources to track all of these metrics, those are resources that are not being used to pursue the institution's educational mission. In addition, a rating system would indicate that there is some value in each of these metrics. I would ask, what leads to the highest rating with regard to family income quintiles? How will those types of decisions be made? I suggest that what is valued in that example would vary greatly from student to student and converting it to a rating or a component of a rating is counterproductive. If higher education is saddled with a ratings system, it will likely create new incentives for institutions to 'game the system' to achieve the highest rating, which may further detract from the academic mission unique to the institution.

The most problematic data element of set of data elements are in the area of labor market success. There is a fair degree of language in the PIRS about employment after enrollment, but there is little to no discussion on how institutions will reasonably obtain this data. Students cannot be required to report this information post-graduation. Survey efforts typically yield low response rates, and any self-reported salary information is likely to be fraught with misrepresentations. It may be possible to gather this type of information by connecting with state and federal data systems. However, there are some serious privacy concerns about sharing this type of information. In addition, this type of system would not include the many international students who either come to our campus or complete their studies online. **I cannot emphasize enough the additional cost to develop and report on labor market success, and the concerns I have with the accuracy of any institution's data in this category.**

We understand the interest in tracking labor market success in the context of the cost of higher education. However, **the PIRS ignores any measures of student learning outcomes. Student learning outcomes are much more controllable and measurable by the institution.**

The PIRS as currently described focuses primarily on first-time, full-time in college undergraduate students. Focusing on this group exclusively would greatly skew the rating of a university overall. Part-time, transfer, graduate, and professional students should also be considered. Additionally, with the emphasis on first-time, full-time undergraduates and the different success measures, some consideration of entering student academic preparation must be made.

The PIRS has laudable goals of providing potential students, their families, and policymakers with consistent, comparable, additional information to better inform their decisions. However, the PIRS will not achieve those goals through ratings. Data should be shared without judgment from a single perspective. Students must be able to weigh these factors on their own. In addition, the PIRS also has potential to generate tremendous additional costs in order to track and report the proposed metrics that are not currently part of reporting systems such as IPEDS.

Institutions of higher learning vary greatly in their missions. The creation of any ratings system will create a one-size fits-all view of higher education and any system that is selected is not likely to represent how well an institution meets its unique mission. The broad categories of

access, cost, and outcomes are important factors many students, families, and policymakers would like to consider when evaluating an institution, but individuals will weigh those and many other factors in different ways based on their own educational goals.

**I repeat, the existing Net Price Calculator with its expansion of the two year student loan default rates, is a specific cost and financial tool that addresses affordability for students and the ability of students to pay back their loans, on an individual basis and is a better indicator of cost than any university wide measure.**

Thank you for allowing me to express NSU's concerns to the Postsecondary Institution Ratings System proposal.

George L. Hanbury II, Ph.D.

President

Nova Southeastern University

**O'Bergh, Jon**

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**From:** baskesq@aol.com  
**Sent:** Tuesday, February 17, 2015 9:43 PM  
**To:** College Feedback  
**Subject:** NAFEO Responds to PIRS Framework  
**Attachments:** NAFEO Comments on PIRS Framework 2-17-15.pdf; HBCU\_PBI Community Comments to Request for Information Regarding Technical Ratings Factors 2DOEd BOD.doc

Dear Under Secretary Mitchell:

Please find attached, the NAFEO comments and feedback to the PIRS framework and specific questions posed relative to same. We are also attaching NAFEO's initial response to the request for comments regarding the proposed rating system. It will be helpful in augmenting, explaining, or providing background information for recommendations contained in the February 17, 2015 submission. The background document is incorporated by reference into the current document.

We thank you for affording us the opportunity to continue engaging in this important deliberation.

Sincerely,

Lezli Baskerville, Esquire  
President & CEO  
NAFEO  
(202) 439-4704



*If You Can Dream It, You Can Achieve It at an HBCU or PBI!*

February 17, 2015

The Honorable Ted Mitchell  
Under Secretary  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, D.C. 20202

Dear Under Secretary Mitchell:

The National Association for Equal Opportunity in Higher Education (NAFEO)<sup>1</sup> is pleased to submit the following comments and responses to some of the questions posed about the “framework” for the Department of Education’s Postsecondary Institution Rating System (PIRS) released on December 19, 2014. We appreciate the many and varied ways in which our members, the 105 HBCUs and 80 PBIs, and NAFEO as the advocacy association for the nation’s HBCUs and PBIs, and “*the voice for blacks in higher education,*” have been afforded opportunities for stakeholder input to date, in the shaping of PIRS. We look forward to a continuing engagement that we hope will yield a system of fully and fairly measuring and rewarding those institutions that are doing the lions share of educating disproportionate percentages of the growing student populations in high need disciplines, and in culturally competent, affirming, pluralistic, rigorous environments, while containing costs. When the academic preparedness of the students, socio-economic status, wealth and generation of family education are taken into consideration, as well as the wealth of the colleges and universities as evidenced by endowment size, total per pupil expenditure, and per pupil public support, HBCUs outperform other institutions. A fair and equitable PIRS system will reflect this.

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<sup>1</sup> The National Association for Equal Opportunity in Higher Education (NAFEO) is the only 501 (c) (3), not-for-profit membership association of the presidents and chancellors of the nation’s richly diverse 105 Historically Black Colleges and Universities (HBCUs) and approximately 50 Predominantly Black Institutions (PBIs). NAFEO members are CEOs of 2- and 4-year public, private, land-grant, sectarian and non-sectarian, undergraduate, graduate and professional schools in 35 states, the District of Columbia, and Virgin Islands. They represent 500,000 students, 53,000 faculty, and 5 million alumni worldwide. NAFEO member institutions educate disproportionate percentages of low-income students.

<sup>2</sup> In 1980, President Jimmy Carter signed Executive Order 12232, which established a federal program “... to overcome the effects of discriminatory treatment and to strengthen and expand the capacity of historically black colleges and universities to provide quality education.” In 1981, President Reagan, under Executive Order 12320, established the White House Initiative on Historically Black Colleges and Universities, which expanded the previous program and set into motion a government wide effort to strengthen our nation’s HBCUs. In 1989, President George Bush signed Executive Order 12677. This executive order established a Presidential Advisory Board on Historically Black Colleges and Universities to advise the president and the secretary of education on methods, programs, and strategies to strengthen

As we understand it, PIRS is to be designed to increase consumer information about and increase accountability of postsecondary institutions for improving access (by enrolling and sustaining especially students from the growing populations of the nation who are racial and ethnic minorities, low-income and first generation students, traditionally underrepresented in higher education), containing the costs of attaining a postsecondary degree, and moving students to certificate or degree completion in less time.

The HBCU and PBI communities eagerly anticipated the release of the PIRS “framework.” As you know, NAFEO seized the announcement of the establishment of PIRS as an opportunity to convene a nineteen member NAFEO Assessment Council that identified a number of data elements, metrics, methods of data collection, methods of weighing or scoring, and presentation frameworks for PIRS. This group of presidents and chancellors of diverse HBCS and PBIs, deans, and recognized leaders in the assessment and rating arenas, submitted their initial recommendations to requests for comment, Docket ID 2013-IES-0151-0001 in January 2014. We were pleased to see recognition of some of the recommendations and concerns raised in that document, in the PIRS “framework” you released on December 19, 2014.

Believing as we do, like Zig Ziglar did, that “repetition is the mother of learning, the father of action, which makes it the architect of accomplishment,” we are incorporating by reference the previous comments and attaching them hereto for ease of reference and in the hope that we will accomplish having a few more of our recommendations incorporated into the ultimate framework. The document also provides supporting information for some of the recommendations to specific questions posed in the December 19<sup>th</sup> framework.

We begin this submission as we did that of one year ago, recalling that which NCES concluded as early as 2006: *“The United States “does not have one metric, or even a handful of common metrics, that could paint a picture of the accomplishments of its more than 2,500 four-year and 1,600 two-year institutions.” We concur with Dwyer, Millet & Payne (2006), “... there is no commonly used metric to determine effectiveness – defined in terms of student learning – of higher education in the United States.”*

NAFEO’s below comments are in response to some of the specific questions posed by the Department regarding the PIRS “framework.” The comments should not be perceived as superseding the seven (7) key points NAFEO made in its January, 2014 comments that are attached hereto and incorporated by reference. The below comments augment the earlier submission or more narrowly tailor earlier points to align with the questions posed in the December 19, 2014 summary document:

(1) The Department requests guidance relative to **"peer groupings."** We believe that grouping institutions by mission alone will not be as helpful as the Department would like. For example, while it is logical that HBCUs might be a "peer grouping" because by federal definition HBCUs have similar missions, at least relative to the education of African Americans. While this is true, HBCUs are as richly diverse as the broader community of colleges. Among the 105 HBCUs we have public and private institutions,

land-grant institutions, 2- and 4-year institutions, urban and rural institutions, research universities, master's universities, baccalaureate universities, liberal arts colleges, seminaries, and professional schools. They span the gamut from selective to open admissions. While most HBCUs have endowments that are roughly one eighth the size of the average endowment of historically White colleges and universities, there are outliers that must be considered in determining appropriate "peer groupings." Some HBCUs are predominately black, several are nearly equally divided among African American students and "other race" students. Four are now predominantly "other race" institutions. The majority of HBCUs average in excess of 20% student diversity and 40% faculty diversity. In this regard, they are exemplars in diversity. While on average HBCUs enroll and graduate student bodies that are 73% Pell eligible, on the low end of the spectrum, a few HBCUs have student bodies that are in the mid 30%-40% range and on the high end, some have student bodies that are nearly 90% Pell eligible. A cohort of HBCUs has student bodies that are no longer majority first generation. Because of these important differences relative to the establishment of "peer groupings," we urge careful consideration of mission-based peer groupings that would automatically put all HBCUs into one "peer grouping."

We believe that the institutional **"peer groupings" should be determined based on institutional wealth as evidenced by the size of the institutional endowments, the total per pupil expenditure, and the per pupil public support.**

(2) Relative to the Department's stated goal of focusing on and rewarding colleges and universities that do well in **expanding access and affordability**, the Department has suggested that it will focus on the percentage of Pell grant students enrolled, among other things. The **percentage** of Pell grant eligible FTE students would provide a highly accurate and currently available metric that would suggest whether the institution truly reflects the growing majority of the high school students in the state, region, and/or nation. It would also indicate whether an institution has as a central part of its mission expanding access to and success of low-income students and students underrepresented in higher education. We believe that adding to this metric consideration of the percentage of FTE students who come from low-performing high schools, and who come from specific zip codes that are known to be zip codes in which families of least advantage reside, would provide three reliable, predictive, currently available metrics for determining the extent to which a college or university is faring well at enrolling students traditionally underrepresented and underserved.

Another factor that should be considered is the **extent to which the colleges are graduating the above identified students in growth and high need disciplines**, such as the sciences, technology, engineering, mathematics; in health professions, teaching professions, sustainability professions and the law (as an access and justice tool).

**Race and ethnicity are important criteria** for consideration in determining whether a university is expanding access. As long as it is the law of this land that race/ethnicity are valid college admissions criteria when considered among a range of other criteria,

race/ethnicity should be considered.

The extent to which a college or university is **advancing African Americans** in particular is an important metric for at least the following reason:

The President of the United States has established as a priority of the highest order the Educational Excellence of African Americans, because, “[n]early 60 years [after] ... the Brown v Board of Education decisions, African American students continue to lack equal access to a high quality education and still lag far behind their white peers in reading and math proficiency, high school rates, and college completion...;” and to “restore the country to its role as the global leader in education, to strengthen the nation by improving educational outcomes for African Americans of all ages, and to help ensure that all African Americans receive an education that properly prepares them for college, productive careers, and satisfying lives....”

There is support for **consideration of whether a college or university is an HBCU in determining whether a college or university is expanding access, affordability and accountability**. In signing Executive Order 13532, Promoting Excellence, Innovation, and Sustainability at Historically Black Colleges and Universities, President Obama prioritized HBCUs in rating the American higher education community of colleges, as had five previous Presidents of the United States before him, Democrats and Republicans.<sup>2</sup> Executive Order 13532 states in pertinent part:

“By the authority vested in me as President by the Constitution and the laws of the United States of America, in order to advance the development of the Nation's full human potential and to advance equal opportunity in higher education, strengthen the capacity of historically black colleges and universities to provide the highest quality education, increase opportunities for these institutions to participate in and benefit from Federal programs, and ensure that our Nation has the highest proportion of college graduates in the world by the year 2020, it is hereby ordered as follows:

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<sup>2</sup> In 1980, President Jimmy Carter signed Executive Order 12232, which established a federal program “... to overcome the effects of discriminatory treatment and to strengthen and expand the capacity of historically black colleges and universities to provide quality education.” In 1981, President Reagan, under Executive Order 12320, established the White House Initiative on Historically Black Colleges and Universities, which expanded the previous program and set into motion a government wide effort to strengthen our nation’s HBCUs. In 1989, President George Bush signed Executive Order 12677. This executive order established a Presidential Advisory Board on Historically Black Colleges and Universities to advise the president and the secretary of education on methods, programs, and strategies to strengthen these valued institutions. In 1993, President William Jefferson Clinton signed Executive Order 12876. This executive order required for a senior level executive in each agency have oversight in implementing the order, and that the Office of Management and Budget be involved in monitoring implementation of the order. On Feb. 12, 2002, President George W. Bush signed Executive Order 13256. This executive order transferred the White House Initiative on Historically Black Colleges and Universities to the Office of the Secretary within the U.S. Department of Education. Previously, the White House Initiative was housed in the Department’s Office of Postsecondary Education.”

“Section 1. Policy. Historically black colleges and universities (HBCUs) have made historic and ongoing contributions to the general welfare and prosperity of our country. Established by visionary leaders, America’s HBCUs, for over 150 years, have produced many of the Nation’s leaders in business, government, academia, and the military and have provided generations of American men and women with hope and educational opportunity. The Nation’s 105 HBCUs are located in 20 States, the District of Columbia, and the U.S. Virgin Islands and serve more than 300,000 undergraduate and graduate students. These institutions continue to be important engines of economic growth and community service, and they are proven ladders of intergenerational advancement for men and women of all ethnic, racial, and economic backgrounds, especially African Americans. These institutions also produce a high number of baccalaureate recipients who go on to assume leadership and service roles in their communities and who successfully complete graduate and professional degree programs.”

Similar language can be found in the preamble to congressional legislation **“Strengthening Historically Black Colleges and Universities,” Title IIIB** of the Higher Education Act of 1965. Title IIIB was first enacted by Congress as part of the Higher Education Act Amendments of 1986 (P.L. 99-498) as the Historically Black College and University Act, Title IIIB. It was the official federal legislative approach to recognizing this nation’s sorry history of invidious discrimination in higher education against the progeny of the American system of slavery; of the lingering impact of years of non-support of HBCUs; the continuing unequal support by states, funders, corporations and others for the nation’s original and premiere mission-based equal educational opportunity higher education institutions that we call HBCUs; and of the centrality of HBCUs for meeting the nation’s educational access and economic goals; moving the nation toward closing the achievement and attainment gaps, meeting human needs and human resources, and to global competitiveness.

In developing a rating system, consideration should be given to **race/ethnicity, advancing African American educational excellence, and HBCU status.**

(3) A consideration of **graduate earnings should not be a measure** of the quality of education. It would run counter to promoting and supporting public service and civic engagement, core American values. To use graduate earnings as a measure of the quality of education would also be inimical to the social contract between America and its colleges and universities in which postsecondary education is widely accepted as a public good playing a central role in addressing human needs and human services, neither of which likely yield the highest paying jobs. To measure graduate earnings in determining college quality also would be contrary to the national homeland security, the local community security, and justice interests of the nation.

Consideration of student **loan debt as an outcome measure** would run counter to the

access goal of the rating system. Such a consideration would deter enrollment and retention of low income, first-generation, and minority students, the fastest growing student populations in the nation. Using student loan debt as a criterion could be perceived as and might become a disincentive for low-income students to prepare for and aspire to attain a college certificate or degree. It would certainly lead colleges and universities to move away from educating the growing populations of this Nation, disproportionate numbers of whom are low-income, first generation.

(4) Relative to the Department's exploration of a **linkage between** the college rating system, a determination of how much **student grant aid** a student may receive, and the terms and conditions of student aid, we believe it would be regulatory overreach to link college ratings to federal student aid and may run counter to the constitutional tenet of academic freedom. It would certainly result in students with greatest financial need, dropping out, stopping out, or not enrolling in college at all. We oppose such an effort.

We hope the above comments, observations and recommendations when read in tandem with the previously submitted, incorporated by reference and attached background document, will prove useful to the Department in moving closer to shaping a rating system that will provide consumers with timely, useful, fair and accurate information, and incentivize and reward those institutions that are doing the lions share of educating disproportionate percentages of the growing student populations of the nation in high need disciplines, and in culturally competent, affirming, pluralistic, rigorous environments, while containing costs.

Please do not hesitate to call on NAFEO should you have questions or desire additional information. I may be reached at (202) 552-3300.

Thank you for your favorable consideration of these comments.

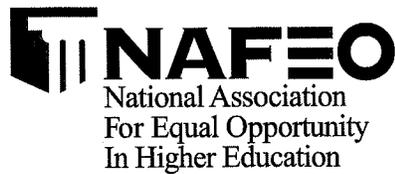
Sincerely,

*Lezli Baskerville*

Lezli Baskerville, Esquire

President & CEO

NAFEO



*If You Can Dream It, You Can Achieve It at an HBCU or PBI!*

**Postsecondary Institution Ratings Response  
DOCKET ID 2013-IES-0151-0001  
January 29, 2014**

**I. Introduction**

The National Association for Equal Opportunity in Higher Education (NAFEO) is pleased to submit the following response to the request of the National Center for Education Statistics (NCES) for information about data elements; metrics; methods of data collection; methods of weighing or scoring; and presentation frameworks for Postsecondary Institution Ratings Systems (PIRS) used to assess the performance of institutions of higher education (IHEs) and advance institutional accountability while also enhancing consumer access to useful information.

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A nineteen member NAFEO Assessment Council has identified a number of data elements, metrics, methods of data collection, methods of weighing or scoring, and presentation frameworks for PIRS for assessing the performance of their diverse students, disproportionate percentages of whom are low-income students, and measuring institutional performance. The most promising ones are discussed below.

We note at the outset that NCES concluded as early as 2006

*The United States “does **not** have one metric, or even a handful of common metrics, that could paint a picture of the accomplishments of its more than 2,500 four-year and 1,600 two-year institutions.” We concur with Dwyer, Millet & Payne (2006), “... there is no commonly used metric to determine effectiveness – defined in terms of student learning – of higher education in the United States.”*

The clarion call for accountability in higher education as exemplified in President Obama's plan for college affordability is reverberating throughout the nation's colleges and universities creating even more pressure to accomplish more with less. NAFEO member institutions know firsthand that the fierce competition for high-demand programs and students can rival a high-stakes football game on the gridiron. The defense on the field are HBCUs, PBIs, and some minority serving institutions competing against an offense of well-endowed institutions with the financial resources to lure students with state-

of-the-art sports facilities and high-end dorms featuring granite counter tops. It is within this hyper-competitive environment that NAFEO makes this submission of technical information that may be helpful in shaping President Obama’s proposed College Ratings System.

We believe that the right type of data gathering or the strategic organizing of currently collected data can assist institutions in better realizing their missions and can also assist in moving the nation to redoubling its effort in closing the achievement and attainment gaps and devising a comprehensive set of methodologies and performance metrics to level the education playing. The proposed **ratings system should** include risk-adjusted metrics; assess institutions on expansion of access and closing the achievement and attainment gaps; take into account the socio-economic make-up of students on a campus and the wealth of the institutions; include critical domains that align with employer priorities for college student success; incentivize and reward “affordability” and preparation of large percentages of low-income students for growth and high need disciplines; respect and align with regional accrediting standards; control for the vast differences between institutions, especially the mitigating and difficult barriers encountered by low-income, first generation students, and the fiscal challenges of the institutions that enroll disproportionate percentages of these students.

Studies that have measured the actual cost of educating low-income students reveal these costs to be significantly higher than educating more affluent students. A study by the New America Foundation found that at hundreds of well-endowed colleges, low-income students must still pay very high prices even after grant aid is applied. The paper, “Undermining Pell: How Colleges Compete for Wealthy Students and Leave the Low-Income Behind,”<sup>1</sup> demonstrates this occurs because these institutions prioritize not on the basis of need-based aid, but on the ‘relentless pursuit of prestige and revenue.’ President Obama has suggested that one of the goals of a new ratings system would be to incentivize more colleges and universities to graduate low-income students. The HBCU/PBI community shares this goal to be sure, however, a ratings system must first reward those colleges and universities that enroll disproportionate percentages of low-income students and provide them with incentives and adequate resources to continue doing so and to graduate these students on time. A new ratings system must reward institutions, like HBCUs/PBIs, that are graduating disproportionate percentages of low-income students, with cost-of-education grants.

The Advisory Committee on Student Financial Assistance, ETS, and other education research and assessment organizations have long affirmed that lower graduation rates at some institutions are directly correlated to the disproportionate percentages of low-income students enrolled. In Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance (July 2013), The Advisory Committee found a direct adverse impact on student 6-year graduation rates and the percentage of first-time students who are Pell recipients; the average test score of the student body; and level of endowment per student.

In addressing the above and other issues within the context of the Department’s proposed ratings system, ETS will partner with the NAFEO Assessment Council to assist the Department in devising the framework for a ratings system that is not only helpful to parents and students in making informed

choices, but also uses appropriate assessment metrics that shine a brighter light on institutional performance, student outcomes, and student diversity.

It is the tremendous diversity between higher education institutions that could spawn the greatest opportunity. The diversity of mission, resources, programs, institutional wealth and student socio-economic make-up inherent to all of higher education applies equally to the NAFEO community of member institutions. The HBCU and PBI cohort of nearly 200 richly diverse colleges and universities is neither well known nor understood. These institutions are public and private, 2 and 4-year, large and small, rural and urban. Spelman College and Sojourner Douglass College; Texas Southern University, Talladega College, and Trenholm State Technical share certain features, but there are enormous differentials in missions and resources between these institutions. And yet despite the diversity within the diversity of NAFEO member institutions, each institution shares one important trait that has persisted for the last 150 years: when the way ahead seemed impossible, and there appeared to be no way forward, they each found a way or else made one.

The paradox within the NAFEO community is that the accomplishments of HBCUs appear to starkly contradict the corrosive effects that *de jure segregation* and historic underfunding have exacted on these institutions. The Presidents and Chancellors who stand at the helm of NAFEO's member institutions have moved their institutions forward and continued to graduate disproportionate percentages of low-income students as well as others, including students of great advantage despite the persistent gap in institutional resources and their wealth gap, as documented by the National Science Foundation, a number of think tanks, executive, congressional, judicial and administrative bodies. HBCUs have developed, tested and they are honing models to improve their ability to graduate more, and more diverse students, and to increase the numbers of the growing populations they are graduating, including their historic base of low-income students. HBCUs can offer the nation a profound vision of educational excellence that can expand equity, access, and success for all students that has stood the test of time. The successes of the HBCU model for educating disproportionate percentages of low-income students is demonstrated by a few highlights of the many contributions made by HBCUs:

- HBCUs represent only three percent of all colleges and universities, yet they enroll 16 percent of all African Americans in four-year degree granting institutions;
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*If You Can Dream It, You Can Achieve It at an HBCU or PBI!*

**Postsecondary Institution Ratings Response  
DOCKET ID 2013-IES-0151-0001  
January 29, 2014**

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The following list of questions from a recent report by ETS<sup>ii</sup> and developed by an advisory panel of national assessment experts, including those in the HBCU and PBI communities, may provide a useful framework from which to begin consideration of how to develop appropriate performance metrics within cohorts. The report includes practical suggestions for improving, revising, and introducing comprehensive systems for the collection and dissemination of information on student learning outcomes. [Click here to access full report.](#)

1. Articulating Desired Student Learning Outcomes: What are the skills and abilities students must attain and for what purposes do we wish to document the results?
2. Assessment Audit: What existing evidence can address these student-learning goals?
3. Assessment Augmentation: What additional evidence is needed?
4. Refining the Assessment System: Is there a need for new assessments?
5. Learning from Our Efforts: What do the results from our assessment of student acquired skills and abilities tell us regarding each program?
6. What Institutional Changes Need to be Made to Address Learning Shortfalls and Ensure Continued Success?
7. Ensuring that a Culture of Evidence is Created Within the Institution: Continuing the effort over time and expanding to new areas of interest.

In the paragraphs below, we attempt to answer some of the above questions. We first contextualize the information being submitted.

## **II. Context for Information Being Provided**

We appreciate the Administration's effort to devise creative ways of providing additional information to assist students in selecting institutions of higher education that are aligned with their preparation and aspirations, and that offer good value at an affordable cost. We are grateful for the President's understanding of the importance of incentivizing colleges to enroll, retain and graduate more low-income, first generation and traditionally underrepresented students; and for proposing to reward those institutions that are graduating disproportionate percentages of these students. This is exceedingly important at this time in which the majority of students in the education pipeline are low-income students and students of color.

We also appreciate the efforts of the Administration in the proposed higher education affordability and value rating system to reward those institutions that are keeping their tuition and fees low. According to The College Board, HBCUs are leading the way in college cost containment. Private HBCUs are approximately \$10,000 per year less than their Historically White College and University (HWCU) counterparts. Public HBCUs are roughly \$2,500 per year less expensive than their HWCU counterparts. (*Trends in College Costs* 2012, The College Board.) HBCUs will continue to keep their costs lower to

keep open their doors of opportunity for all students, disproportionate numbers of whom are students of least advantage.

While the Administration feels the need to provide students and families with additional information about higher education institution “affordability and value,” we underscore the complexity of so doing, given the diversity of higher education institutions, the challenges associated with measuring success in higher education, and the Academic Freedom protections of higher education institutions. We stress the importance of getting this new initiative right prior to its roll-out. NAFEO and its HBCU and PBI member institutions look forward to working with the Administration, the Department of Education and other stakeholders to ensure that the “affordability and value” initiative is thoughtfully and scientifically crafted to be sound, compelling, and rooted in the best understandings of measurement and assessments, development and use of assessment tools. If a decision is made to proceed with some iteration of a new “affordability and value” initiative, it must comport with best practices, and be fair and equitable, measuring like institutions, missions, inputs and outcomes.

NAFEO and the HBCU and PBI communities of colleges welcome this opportunity to respond to the Department’s request for information today and to work with the Department and various stakeholders in the coming months as the stakeholder input is distilled and the proposed rating system takes shape. We want to add our important voice to the voices of the other stakeholders shaping the ratings system, and offer the expertise of our psychometricians and other assessments technicians.

The information we are providing today is the first of what we hope will be an ongoing engagement until the ratings system is designed and rolled-out.

### **III. The HBCU/PBI Cohort of Colleges<sup>1</sup>**

*“HBCUs are the Patron Saints of Universal Access”  
~President William Jefferson “Bill” Clinton~*

Sixty years ago, the 1954 Supreme Court decision of *Brown v. Board of Education* and its progeny focused national attention on the dual and unequal primary and secondary education systems, nationwide, and spurred two decades of litigation and legislation that were designed to redress the inequalities. The initial debate paid little attention to inequalities in higher education and did not focus on the nation's HBCUs as equal educational opportunity institutions until 1965. At that time, Congress recognized HBCUs as a solution to some of the nation's higher education problems when it added Title III, Part B, Strengthening Historically Black Colleges and Universities, commonly known as The Black College and University Act (BCUA), to the HEA.

BCUA defined an HBCU as a college or university that existed before 1964 with an historic and contemporary mission of educating blacks while being open to all. To be recognized and receive federal funding under the HEA, an HBCU must either be accredited by a nationally recognized accrediting agency

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<sup>1</sup> Taken from the Recommendations of the HBCU and PBI Coalition for the Reauthorization of the Higher Education Act, Submitted to the House Committee on Education and the Workforce at the Request of Chairman Klein, and Ranking Member Miller, August 2013.

or be making reasonable progress toward accreditation. There are currently 105 HBCUs located in twenty-five (25) states, the District of Columbia and Virgin Islands.<sup>2</sup>

Since the period just after the Civil War, HBCUs have recruited and enrolled, nurtured, developed and offered a personalized, welcoming and challenging environment to primarily African American students, some of whom might not have otherwise obtained a higher education because of race, ethnicity, gender, religion, socio-economic status or some other non-*bona fide* bar to admission in other institutions. HBCUs educate a disproportionate number of students of limited financial means. They have additionally served and are continuing to serve as resources for meeting the vital social service, economic, educational and recreational needs of the communities in which they are located. They are the economic engines for their service areas, and have a \$13 billion short-term direct economic impact in their communities.

HBCUs are not monolithic. This cohort of colleges is as richly diverse as the overall cohort of higher education institutions. There are 2- and 4-year colleges and universities, public, private and land-grant institutions; undergraduate, graduate and professional schools, and seminaries.

Despite being a small fraction of the larger community of higher education institutions, HBCUs have a strong track record of identifying students with strong potential, supporting them through graduation and producing exceptional leaders. HBCUs enroll more than 300,000 students, of whom approximately 80 percent are African Americans. While comprising only 4 percent of the nation's four-year colleges, HBCUs enroll approximately 21 percent of all African American undergraduate college students and confer 22 percent of all bachelor's degrees earned by African Americans, despite serving a community of students who many think are not capable of earning a college degree.

At a time when Congress and consumers are concerned about the cost of college, HBCUs offer students an accessible and affordable postsecondary educational experience. Moreover, they continue to do more for their students with fewer resources than other higher education institutions, on average, the cost of attaining a four-year degree at a public HBCU is approximately \$2,500 less per year than at a public historically white institution. Similarly, the cost differential for attaining a four-year degree at a private HBCU compared with private historically white institutions is approximately \$10,000 per year.

Importantly for the ability of the nation to realize its education, workforce and economic goals, HBCUs and PBIs are producing a diverse pipeline of the well-educated workers America needs to compete in the global economy. In particular, HBCUs are leading the way in producing highly skilled graduates, particularly in scientific, technological and other high-need fields.

- HBCUs produce 19 percent of undergraduate science graduates and 20.1 percent of black undergraduate engineering graduates.<sup>3</sup>
- Six (6) of the top twenty (20) institutions graduating blacks with baccalaureate degrees in science and engineering are HBCUs.
- Forty percent (40 percent) of African Americans receiving four-year degrees in STEM areas.

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<sup>2</sup> List names of HBCUs and states in which they are located.

<sup>3</sup> William R. Spriggs, Ph.D., (2013)

- Twenty-four percent (24 percent) of all PhDs earned each year by African Americans are conferred by twenty-four (24) HBCUs.
- Four (4) of the top ten (10) producers of successful African American medical school applicants are HBCUs.
- HBCUs not only graduate disproportionate percentages of blacks in STEM, they also graduate 50 percent of African American teaching professionals.



## HBCUs are leading producers of Black Baccalaureates in Science and Engineering

Black Baccalaureate Degrees in Science and Engineering All Institutions 2006-2010	207,022
<b>Top 20 institutions</b>	<b>29,977</b>
Georgia State University	2,148
University of South FL, Main Campus	1,937
University of Maryland, College Park	1,885
<b>Howard University</b>	<b>1,881</b>
<b>North Carolina A&amp;T State University</b>	<b>1,863</b>
<b>Florida A&amp;M University</b>	<b>1,806</b>
<b>Spelman College</b>	<b>1,559</b>
University of Florida	1,487
Florida State University	1,479
University of Phoenix, Online	1,412
<b>Southern University and A&amp;M College</b>	<b>1,391</b>
<b>Morgan State University</b>	<b>1,355</b>

Source: Table 5-12 <http://www.nsf.gov/statistics/wmpd/race.cfm> (acc: 15 January 2013)

HBCUs are the leading baccalaureate institutions of blacks who earn doctorates in Science and Engineering. Of the top ten (10) baccalaureate institutions for blacks who go on to receive a Ph.D. in Science or Engineering, nine (9) of the ten (10) are HBCUs.



## HBCUs are the leading baccalaureate institutions of those Blacks who earn doctorates in Science and Engineering

Top 10 Baccalaureate Institutions of Black Science & Engineering Doctorates | Doctorate recipients

<b>All institutions 2006-2010</b>	5,804
Foreign or unknown	1,747
Top 52 U.S. institutions	1,713
<b>Howard University</b>	112
<b>Spelman College</b>	80
<b>Florida A&amp;M University</b>	73
<b>Xavier University of Louisiana</b>	66
<b>Hampton University</b>	64
<b>Morehouse College</b>	61
<b>Morgan State University</b>	61
<b>North Carolina A&amp;T State University</b>	49
<b>Southern University and A&amp;M College</b>	46
University of Maryland, Baltimore County	46

Source: Table 7-10 <http://www.nsf.gov/statistics/wmpd/race.cfm> (acc: 15 January 2013)

The top twenty-one (21) undergraduate producers of blacks in all disciplines who go on to receive Ph.Ds. are HBCUs.

HBCUs are playing an increasingly important role in offering unique and enriching educational opportunities that develop students' human and social capital. HBCUs are at the creative forefront of American education, offering the tools and skills necessary to prepare students for today's diverse, globally interdependent, and technologically advanced world. HBCUs prepare students to promote peace at home and abroad; secure our communities and our homeland; meet pressing global and community health care needs; and fight injustice with the power of ideas. They provide students with the intercultural, interpersonal and political skills with which to compete and thrive in a pluralistic world.

For over a century, HBCUs have provided a pathway to opportunity for diverse students, disproportionate numbers of whom are African American students. With approximately 45 percent of high school graduates expected to be traditionally underrepresented minorities by 2019-20<sup>iii</sup>, HBCUs, as well as MSIs, must play an even more significant and impactful role in producing excellent, diverse college graduates that the nation needs. HBCUs have contributed immeasurably to the economic, political, scientific, and social welfare of this country. Yet, the nation has only scratched the surface of their enormous potential.

As we consider ways and means of assessing student learning, “affordability and value”, HBCUs stand ready to be assessed against a reasonable cohort of their peers for the purpose of doing their jobs better.

#### IV. Critical Components of a Ratings System

##### **A. A Ratings System Must Assess Institutions on Expansion of Access & Closing the Achievement & Attainment Gaps**

President Obama established a goal of having the most educated nation in the world by 2020. This will require a dramatic increase in the numbers of Americans with some post secondary education—roughly 60% of Americans with a 2- or 4-year certificate or degree. This equates to approximately 8 million more Americans with a 2- or 4-year degree.

The Department of Education’s White House Initiative on HBCUs suggests that to realize the 60% goal, the nation must educate approximately 2 million more African Americans, with 167,000 of these students graduating from HBCUs. HBCUs currently graduate about 35,500 students per year. To meet the President’s goal, HBCUs will need to increase the number of students they graduate per year to more than 57,000 by 2020.

The United States is 13<sup>th</sup> in the world in educating its populace and the gaps are widening between race, income and ethnicity. The data elements, metrics, data collection, weighing, scoring, and presentation of any postsecondary institution ratings system must address the gap head on.

Demographic shifts, especially the growth in the Latino population, and the entrenched and accelerated wealth gap in the aftermath of the Great Recession, must measure the extent to which every institution is moving the nation closer to closing the achievement and attainment gaps. Closing the gaps is imperative for reaching our 2020 goal, imperative for global competitiveness, and imperative for expanding civic learning. In its report, *A Crucible Moment: College Learning & Democracy's Future*, AAC&U indicated that closing the gap is critical for the economic and civic health of our nation. To achieve the true benefits of a college “affordability and value” ratings system, the plan must incentivize and the metrics must measure the extent to which every institution is moving the nation closer to closing the achievement and attainment gaps.

Federal higher education policies and assessments must focus on enhancing access to and success in postsecondary education to be sure, but equally, they must move the nation’s diverse colleges and universities toward closing the achievement and college attainment gaps. While some progress has been made in this regard, closing access, achievement and attainment gaps between students from low- and high-income families and between students of color and white students, remains a significant issue for the nation. There is much work to be done and much more that the federal government can and must do. Only 19 percent of African Americans and 13 percent of Latinos, ages 25-34, have earned a bachelor’s degree or higher, compared with 36 percent of whites and 55 percent of Asians in the same age group.<sup>iv</sup> Only about 1 in 10 of young adults from families in the bottom income quartile earn a college degree by age 24, compared with about 8 in 10 of young adults in the highest income quartile.<sup>v</sup>

For millions of Americans, eliminating disparities in access, achievement and attainment is an essential, economic mobility pathway out of poverty and into the middle class. Without a college degree, children in families in the bottom income quartile have a 45 percent chance of remaining there as adults. With a degree, they have less than a 20 percent chance of staying in the bottom income quintile.<sup>vi</sup>

Addressing the achievement and attainment gaps becomes even more critical considering that students from racial and ethnic backgrounds will represent the majority of the traditional college-seeking population in the years ahead. Many of these students will be the first in their families to attend college. The Census Bureau projects that minorities, now 37 percent of the U.S. population, will comprise 57 percent of the population by 2060, with the total minority population more than doubling, from 116.2 million to 241.3 million.

**B. A Ratings System Must Foster and Reward Universities that Enroll and Graduate Disproportionate Percentages of Students From the Lowest Performing High Schools and Families of Least Advantage. It Should Not Measure Graduate Earnings or Student Loan Debt**

A ratings system must take into consideration the level of academic preparation of the general student body. Any metrics that might have a chilling and inhibitory impact on the colleges and universities that currently enroll a range of students including or disproportionately those from the lowest performing high schools and from families of least advantage must be avoided. It would be inimical to the national goal of having 60 percent of Americans with a 2-year certificate or 4-year degree, and contrary to the imperative of closing the achievement and attainment gaps. A ratings system that rates institutions based on graduate earnings and student loan debt would most assuredly deter enrollment and retention of low income, first-generation, and minority students, the fastest growing student populations in the nation. A consideration of graduate earnings should **not** be a measure of the quality of education. It would run counter to promoting and supporting public service and civic engagement, core American values. Using student loan debt as a criterion could be perceived as and might become a disincentive for low-income students to prepare for and aspire to attain a college certificate or degree. It would certainly lead colleges and universities to move away from educating the growing populations of this nation, disproportionate numbers of whom are low-income, first generation. **Neither criterion should be included in the assessment metrics.**

**C. A Ratings System Must Take into Account the Socio-Economic Make-Up of Students on a Campus (as Measured by Pell Grant Eligibility and Other Factors); the Wealth of the Institutions; the Mission, Vision, Values of the Institutions; the State Investment Level in Higher Education; the Extent to Which an Institution Enrolls and Graduates Veterans and Other Non-Traditional Students; the Geographic Area of An Institution; and Leveling the Playing Field**

There is a direct and determinative correlation between each of the above and student graduation rates. Unless each of the above factors is controlled for we will be advancing a ratings system that will yield a false and inequitable assessment. Neither students nor institutions should be assessed using yardsticks that are not designed to measure the realities of the universes and students being assessed.

Our position is underscored and supported by data from The Advisory Committee on Student Financial Assistance. To demonstrate the impact that serving low-income students can have on raw measures of college performance, the Commission explored “the relationship between 6-year graduation rates and three inputs: the percentage of first-time students who are Pell recipients, average test score of the student body, and level of endowment per student.” They found and reported to Congress that these three inputs are powerful determinants of 6-year graduation rates at nonprofit 4-year public and private colleges. They found:

- As the percentage of a college’s students who are Pell recipients (serving Pell recipients) rises, 6-year graduation rate declines from **80%** to **25%**, and average test score declines from **29** to **19**.
- Serving Pell recipients and average test score, combined, account for **76%** of the observed variation in 6-year graduation rates of 4-year public and private colleges.
- As endowment per student falls, serving Pell recipients lowers average 6-year graduation rate from **67%** to **28%** and from **85%** to **33%** at public and private colleges, respectively.
- Serving very high percentages of Pell recipients, with very low endowment per student, reduces average 6-year graduation rate to **23%** at public colleges and **19%** at private colleges.
- The more a 4-year college defines its mission as serving low-income students, and the more modest its endowment per student, the more its 6-year graduation rate will deviate from a valid and reliable assessment of its relative performance. Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance (July 2013).

#### D. A Ratings System Must Incentivize and Reward “Affordability,” Preparation for Growth and High Need Disciplines and Service in Areas of Highest Distress

The primary reason students give for leaving college without a college credential is that they cannot pay for their college expenses. At HBCUs, many, low-income and first generation college students who attend these institutions face significant financial challenges. They are more likely to have lower levels of academic preparation and need remedial education and more time to earn their degrees. They are more likely to face unmet financial need, requiring work and loan assistance to pay their college expenses after receiving available grant aid. This is the case even though HBCUs as a cohort are more affordable for students compared to other institutions. As an indicator of financial need, 62 percent of all HBCU students are Pell eligible and 41 percent of HBCU students come from families earning less than \$25,000. The economic recession, which disproportionately impacted low-income students, made it even more difficult for students at HBCUs and their families to afford tuition, fees, books, room and board, and other college-related expenses.

The federal government must invest more strategically in student financial aid given the substantial return on investment in higher education not only to individuals, but to society as well. The Pell Grant Program – the federal cornerstone of aid to low-income students – today covers less than 1/3<sup>rd</sup> of the average cost of college and represents less than 1/5<sup>th</sup> of all federal student aid. A ratings system must reward institutions that are keeping costs lower and preparing proportionately more under-represented students in growth and high need disciplines. HBCUs have provided **extraordinary** rates of return in relation to the comparatively **modest** investments that have been (and continue to be) made by the funding sources.

For years, The College Board has tracked and reported annually, *Trends in College Pricing*. The annual report relays information about the prices charged by colleges and universities, the changes year-to-year and over time, how the prices differ within and across types of institutions, states, and regions. *Trends in College Pricing* also provides statistics on the net prices that students pay after taking financial aid into consideration. “Highlights” in the 2013 *Trends in College Pricing* report indicates, “The story is a complicated one, with different students paying different prices at the same institutions, depending on their financial circumstances; on their academic qualifications, athletic ability, or other characteristics; and on their year or program of study.” The complexity of assessing “affordability” notwithstanding, The College Board’s “*Trends in College Pricing*” reports are deemed the gold standard bearers. The College Board has reported that the average price of a private 4-year HBCU is roughly \$10,000 less per year than the average price of a private 4-year Historically White College and University (HWCU); and that the average price of a public 4-year HBCU is roughly \$2,500 less than the average price of a public HWCU. This degree of relative affordability should be rewarded with targeted institutional support.

In determining college affordability, consideration should be given to the impact of state funding, which has been cut substantially in recent years. Consideration should also be given to the extent to which the colleges and universities maintain operational efficiencies; the extent to which they are graduating students in “debt relievable,” growth and high need disciplines and serving in underserved communities. Consideration should also be given to the percentage of an institution’s overall budget that is allocated to student financial aid.

### **E. A Ratings System Must Include Critical Domains that Align With Employer Priorities for College Student Success**

In a 2013 report titled, It Takes More than a Major: Employer Priorities for College Student Success, the American Association of Colleges and Universities identified from an online survey of employers conducted by Hart Research Associates on their behalf, the employee competencies and critical domains deemed most important to employers. The employers found the following to be the most important competencies for college graduates:

- Effective Oral and Written Communications Skills
- Critical Thinking Skills
- Complex Problem Solving Skills
- Innovation
- Digital and Information Literacy
- Teamwork
- Diversity and Cross-Cultural Competency
- Ethical Judgment
- Knowledge Application to Real World Settings

While possessing in-depth knowledge in a major and proficiency in research and the use of evidence-based analysis were deemed important, employers believe these competencies are “teachable” on the job.

A report of ETS, a global leader in student learning outcome assessments, contained findings closely aligned with those of AAC&U, in, “A Culture of Evidence: An Evidence-Centered Approach to Accountability for Student Learning Outcomes.”

Understanding that the purpose and value of a college education is far greater than preparing persons for the workforce, it is nonetheless an important and for many a predominant factor in choosing to pursue higher education. A rating system must, therefore, factor in employer priorities and what they deem the most important outcomes from the college experience.

### **F. A Ratings System Should Respect and Align with Regional Accrediting Standards**

Degree-granting institutions of higher learning are or are working toward becoming accredited by a regional accrediting body. The regional accrediting bodies serve as the common denominator for the accountability of the colleges and universities in its region. Each regional accrediting body reflects the core values, common practices, and quality controls for the institutions in its region. Their accreditation fosters a common yardstick, integrity, peer review, self-regulation and accountability. The regional accrediting bodies foster student learning outcomes and continuous improvement. A national ratings

system must respect and align to the extent possible, with the accountability measures of the regional accrediting bodies. Examples of the regional accrediting bodies outcomes guidance or requirements include:

- NCA-HLC Accreditation Standards' Core Component 3a – “The organization’s goals for student learning outcomes are clearly stated for each educational program and make effective assessment possible” and Core Component 4b – “The organization demonstrates that acquisition of a breadth of knowledge and skills and the exercise of intellectual inquiry are integral to its educational programs;”
- Middle States' Accreditation Standard 12 requires an institution of higher learning to demonstrate that students are achieving proficiency in essential general education skills such as written communication, quantitative reasoning and critical analysis;
- SACS "Principles of Accreditation" Section 3.3.1: Comprehensive Standards — *The institution identifies expected outcomes, assesses the extent to which it achieves these outcomes, and provides evidence of improvement based on analysis of the results.*
- NEASC Standard 5.11: Faculty requires that *"the institution employs effective procedures for the regular evaluation of faculty ..."* and *"has equitable and broad-based procedures for such evaluation."*
- Standard D2 of the WASC Accreditation Standards, which states, *"Institutions will employ a variety of assessment strategies to evaluate student learning and*

#### **V. HBCUs and PBIs Are Committed to Enhancing Student Learning, Increasing Institutional Effectiveness, and Developing Strategies for Building “Cultures of Evidence” to Scientifically and Equitably Demonstrate Learning Outcomes. Current Assessments Provide the Means to Measure**

America’s HBCUs and PBIs are committed to enhancing student learning and increasing institutional effectiveness. To some degree, current assessments provide the means to measure student -learning outcomes, which define what students should know, understand, and be able to do upon completion of a course of study. Accountability pressures from accreditors, federal and state agencies, have placed increased demands on our institutions and others to provide evidence of student learning. Colleges and universities increasingly must use assessments to determine student baseline competencies upon arrival in college and to demonstrate that students have acquired expected knowledge, skills and abilities from courses and programs upon completion. Institutions use these data to improve the curriculum and teaching. But determining what a student should know, understand and be able to do, and what s/he actually knows, understands, and can do, is a challenge even within a department or institution. Determining how to make this determination across richly diverse colleges and universities is rife with challenges. One unanticipated challenge may be the dubious constitutionality of a ratings system that would tie performance to increased student or institutional aid. Linking performance in the college ratings system to federal student and institutional aid (e.g., an increase in a student’s Pell Award or more affordable student loans, larger Title III awards for HBCUs), must be given thoughtful consideration and be mindful of Academic Freedom considerations.

Academic Freedom refers to the right of a university to determine on academic grounds, its educational mission, who to enroll, who will teach, how they will teach, what will be taught, and how the teachings will be measured, free from governmental intervention. See, Sweezy v. New Hampshire, 354 U.S. 234, 255 (1957) (“the four essential freedoms” of the university). Except in rare cases, Academic Freedom insulates higher education institutions from interference by the government. That is, academic institutions may freely determine, on academic grounds, who may teach, what may be taught, how it shall be taught, who may be admitted to study, See, Sweezy v. New Hampshire, Id., and how to measure the success of their academic curriculum.

HBCUs and PBIs are increasing student learning and institutional effectiveness by using a range of assessments that might achieve the value and affordability goals of President Obama’s proposed new outcomes initiative. Among the assessment that seventy percent (70%) of HBCUs began using in recent years and are finding helpful are three (3) ETS Student Learning Outcomes Services (SLO)] - a series of workshops that are designed to guide faculty, staff, and institutional leadership in using data to increase institutional effectiveness and student success. In using these tools, HBCUs have accelerated their institutional effectiveness and positioned to continue doing so. The likelihood is the 30% of HBCUs that are not using one of the above assessment tools are using an internal measure of student learning. HBCUs and PBIs are voluntarily positioning themselves to more effectively and efficiently meet challenges posed by accountability and accreditation standards.

The SLO workshops, which can be purchased as separate modules or as a set, take into consideration the entire “assessment process,” including identifying student learning outcomes, mapping curriculum and activities to SLO’s, designing or selecting assessments, gathering data, interpreting results, communicating results to stakeholders, and using results for improvement. There is an opportunity to deepen understanding gained from these workshops with follow-up on-site coaching for leadership and faculty. Student Learning Outcomes Services incorporates the knowledge base of ETS’ world-renowned expertise in educational assessment and measurement to provide institutions the training necessary to use assessments and student-learning data to improve teaching and learning and help institutions meet and exceed accreditation expectations.<sup>4</sup>

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#### **4 Brief Description of Overall SLO Services:**

##### **Student Learning Outcomes (SLO) Fundamentals**

What a student knows, understands, and can do is the fundamental basis for student learning outcomes. But how does a department come together to agree on these outcomes? How does agreement on student learning outcomes lead to better learning? This session engages faculty in the development of SLOs: how to decide what they should be, how to write them in a clear and concise way, and most importantly, how to make them meaningful to internal and external stakeholders. After establishing sound SLOs, the next steps in the process, introducing the fundamentals of assessment is discussed. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. Initial on-site coaching appointments extend from 1-2 days.**

##### **Mapping of SLOs to Assessments**

Reliable assessment results can only come from clear, well-established objectives. This session engages faculty in deconstructing a sample of pre-determined SLOs to develop a plan around how to actionably measure what a student knows, understands and is able to do upon completion of a course. Various types of assessment are discussed, including surveys, standardized assessments, and embedded assessments, among others, and their relative value in addressing various SLOs. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

##### **Data use 101**

Postsecondary education institutions are often inundated with data, but are unsure how best to turn it into actionable information that helps make the best decisions about policy and practices. Using principles from psychometrics, analytics, and organizational behavioral, this session helps institutions organize data and make sound inferences about effectiveness and student learning. By considering various forms

## VI. Final Thoughts

While these, our first set of technical recommendations, are not all encompassing, we underscore the importance for a ratings system to do the following:

- **Assess Institutions on Expansion of Access & Closing the Achievement & Attainment Gaps**
- **Foster and Reward Universities that Enroll and Graduate Disproportionate Percentages of Students From the Lowest Performing High Schools and Families of Least Advantage**
- **Establish Benchmarks in Reading, Math, Critical Thinking Across All Two- and Four-Year Higher Education Institutions**

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of data and a wide array of analyses, this session helps to inform decision making and improve practice in academic departments. **This module is an on-site 1 day event that can be used by various roles at the institution using multiple facilitators. Because of the nature of the offering, an hour webinar could be used to entice potential takers. Lastly, it directly relates to use and understanding of institutional data (information), and it creates the opportunity for on-site coaching. On site initial coaching appointments extend from 1-2 days.**

### **Leading Institutional Change Leadership**

At no time in our nation's history have postsecondary education institutions and their stakeholders been confronted with more change and increased expectations. Educational leaders cannot engage in leadership-as-usual. Amid a flurry of research and best practice, leaders are constantly faced with the challenge of implementing large, effective changes on campus, all while managing multiple internal and external stakeholders. This session presents a sequential model designed to not only identify the right institutional actions, but the most effective way to introduce them within institutions. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Organizing for Action - Targeted at leadership**

There are considerable challenges in responding to accreditation, accountability and federal and state mandates. When institutions are faced with significant external pressure or even a legal mandate, how do they address the mandate, change policy, mold organization behavior, and ultimately benefit students and the organization? Using real world examples of applying research-based and effective practice, key points in organizational change within institutions are identified and lessons are tied back to the issues on campus. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Assessment 101**

For evidence of student learning to be both sound and compelling, it must be rooted in an understanding of measurement and assessment, including proper use and development of assessment tools. Sometimes, a review of (or an introduction to) psychometrics and assessment can be useful in helping institutions ensure that they are getting the most from their assessments. This on-site one day informational session can be targeted to faculty or newer University Assessment Directors and others who would benefit from a review of test types and uses; test validity, reliability, and fairness; understanding scale scores; and basic statistics associated with assessment. **This model is an on-site 1-day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Using Evidence-Centered Design to Create Valid and Reliable Assessments**

When introducing assessment at their institutions, many administrators and assessment leaders often hear from faculty, "But we're already assessing student learning in our classrooms. Why do we have to do this, too?" Indeed, faculty often write their own exams to measure what students have learned in class, but how can they be assured that the exam is really testing what they want it to test? How can faculty be assured that test scores accurately reflect claims they want to make about what students know? In this workshop, participants work collaboratively to design an exam using the principles of Evidence-Centered Design and learn how ECD leads to exams that are valid and reliable. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

**\*Student Learning Outcomes (SLO) Fundamentals & Mapping of SLO and Objectives (Though these modules are one day events, they can be modified so that the one day event includes both).**

- **Take into Account the Socio-Economic Make-Up of Students on a Campus; The Wealth of the Institutions; the Mission, Vision, Values of the Institutions; the State Investment Level in Higher Education; the Extent to Which an Institution Enrolls and Graduates Veterans and Other Non-Traditional Students; The Geographic Isolated Area of an Institution; and Leveling the Playing Field**
- **Incentivize and Reward “Affordability,” Preparation for Growth and High Need Disciplines and Service in Areas of Highest Distress**
- **Include Critical Domains that Align With Employer Priorities for College Student Success**
- **Respect and Align with Regional Accrediting Standards**

As President Clinton aptly noted in announcing Executive Order 12876, Historically Black Colleges and Universities, renewing the White House Initiative on HBCUs in 1994, “HBCUs are the patron saints of universal access.” They are also among the nation’s most diverse higher education institutions with 15% student diversity on average, and 30% faculty diversity on average. (NAFEO Survey of Member Institutions 2006). They are vitally important for the nation’s economic success, for expanding financial freedom and justice. A ratings system must reward institutions, like HBCUs and PBIs that do the “heavy lifting” of educating low-income students, diverse students, and preparing them for the growth and high needs jobs and entrepreneurial opportunities of today and tomorrow; and for service in the areas of most distress across the nation. A ratings system must incentivize the investment of proportionately more of our public, private, and philanthropic dollars in these and similarly missioned institutions. The rating system should also incentivize other institutions to play a larger role in graduating the growing populations of this nation: persons of color, first generation and low-income students; persons with disabilities, and veterans. In the face of legal, ideological and financial pressures, the inevitability of a global future, the nation’s stretch goal of having all Americans with a 2- or 4-year degree by 2020, and the shifting higher education landscape, these recommendations are designed with today’s students and those of tomorrow in mind. Institutions will not raise their graduation rates, and the nation will simply not meet its goals to raise college attendance, retention and completion without paying attention to the core questions and recommendations contained herein.

We thank you kindly for affording us the opportunity to make this submission.

We stand ready to assist in any manner of means.

**Lezli Baskerville**

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Endnotes

<sup>i</sup> The article was written by Stephen Burd, a senior policy analyst at the New America Foundation, and evaluates how well individual colleges with varying resources serve low-income students. His analysis considers, for the 2010-11 academic year, the share of undergraduates receiving federal Pell Grants as well as the average net price paid by students whose families earn \$30,000 or less.

<sup>ii</sup> ETS, *A Culture of Evidence III: An Evidence-Centered Approach to Accountability for Student Learning Outcomes*: 2013. This paper presents a framework that institutions of higher education can use to improve student learning outcomes. It follows a second report, *A Culture of Evidence: Critical Features of Assessments for Postsecondary Student Learning*, which took a detailed look at current, state-of-the-art commercially available assessments. The report provides two- and four-year college and university presidents and provosts with a 30,000 foot overview.

<sup>iii</sup> Western Interstate Commission for Higher Education. 2012. *Knocking at the College Door: Projections of High School Graduates*.

<sup>iv</sup> U.S. Department of Treasury. 2012. *The Economics of Higher Education*.

<sup>v</sup> The Education Trust. 2013. *Doing Away with Debt*.

<sup>vi</sup> Ibid.

**O'Bergh, Jon**

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**From:** Scott McMahon <shmcmaho@smumn.edu>  
**Sent:** Tuesday, February 17, 2015 10:02 PM  
**To:** College Feedback  
**Subject:** College Ratings Comments from Saint Mary's University of Minnesota  
**Attachments:** Saint Marys University Ratings Comments.pdf

Attached, please find the comments, submitted on behalf of Br. William Mann, FSC, president of Saint Mary's University of Minnesota, regarding the proposed college ratings system.

With gratitude,

Scott H. McMahon

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Scott H. McMahon

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February 17, 2015

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

Dear Mr. Secretary:

On behalf of Saint Mary's University of Minnesota, I want to thank you for the opportunity to comment on the Administration's proposed college ratings system. We welcome and support the President's commitment to college access, affordability, transparency, and consumer information. However, with regards to this initiative, we share the concerns raised by the National Association of Independent Colleges and Universities (NAICU).

Saint Mary's University is a comprehensive university offering a range of degrees, from bachelor to doctoral. Our main campus—which is a traditional undergraduate, residential, liberal arts campus—is located in Winona, MN, and enrolls almost 1,200 traditional, 18-22 year old students. We also have our Schools of Graduate and Professional Programs, based in Minneapolis, which enrolls almost 4,500 students and offers degrees ranging from bachelor completion, certificates, masters, and doctorates in the fields of business, health and human services, and education. Students in our graduate school programs, including our bachelor completion programs, are adult learners, who are generally enrolled part-time while working full-time.

Within our bachelor programs, we serve two very different populations of students through two very different delivery models. One educates traditional undergraduate students in a traditional campus setting. The other educates adult learners who are looking to complete their bachelor degrees five, ten, fifteen years or more after they last attended college. We are concerned that the federal ratings system would force us to treat these two, distinct student populations as one. The resulting data reported and rating given by the federal system would ultimately misinform students despite your effort to inform students.

We are concerned about the lack of clarity in terms of what the purpose of the rating system is and how it would be used. To date, it has been noted that the system could help institutions improve access, help students learn more about the institutions, provide accountability measures for policymakers, and align the governments financial aid investment with outcomes. Each of these purposes requires a value structure to be placed within the collection and analysis of the information sought. However, what the system cannot do is quantify or qualify the value structure of the institution itself or the students who will use the ratings system to influence their own college selection process. Instead, the ratings included will be based on the values and judgment of the federal government, without regard for the mission of the institution, its place in society, and the actual goals and needs of students.

OFFICE OF THE PRESIDENT

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We believe transparency is critically important in helping students decide where to invest for their education needs. It is because of this belief that we are active participants in the U-CAN platform developed by NAICU. U-CAN is a consumer resource tool that reports the key data points that students and families identify as the critical quantitative data they need to help make appropriate decisions about their education options. The real benefit of U-CAN is that the students and their families can access the data for the institutions they want to consider, but then incorporate the information into their own decision-making process, and consider it through their lens rather than through a filter structured on a value-system they may not share. U-CAN also allows the institution to provide some context about itself, such as listing its mission, which can further assist students in their college decision-making process. If the administration's intent is to help students make informed decisions, then supporting or developing a system like U-CAN will go much further in helping students than a federal ratings system.

We are concerned about the emphasis the rating system will have on the analyzing the outcomes of our graduates. At Saint Mary's, we have a strong focus on encouraging and supporting students in going where life takes them. For most of our graduates, that takes them into the workplace in an appropriate position given their degree attainment. For others, it takes them into additional education in graduate school. For a minority of students—albeit a significant minority—it means giving back through service work domestically and abroad. We are very concerned that the federal rating system will place a higher value on a graduate working on Wall Street than students serving their communities through programs such as AmeriCorps, the Peace Corp, or participating in our Lasallian Volunteers.

Finally, we are concerned that the emphasis the rating system places on outcomes like labor market success and graduate school placement ignores deep and important aspects of the educational experience at Saint Mary's University of Minnesota. We prepare our graduates richly for the responsibilities and challenges they face as global citizens - citizens whose judgments, decisions and actions will profoundly affect the decency, integrity and sustainability of the human family and our global environment. As a Catholic university that prepares graduates with a distinctive identity in fidelity to the Church's mission in service of the Good News of the Gospel and with a world vision rooted in the Catholic intellectual tradition, we inspire in our students an appreciation of and thirst for truth and knowledge; an understanding of the unity of faith and reason; a profound reverence for the self, the other and all of creation; a respect for all human life and protection of the vulnerable; the celebration of community and sacrament; a commitment to the issues of peace, justice, solidarity and human equality; and a desire to serve the common good. As a Lasallian Catholic university, we grow in our students respect for the dignity of all individuals; a commitment to inclusive and participatory community, a belief in civility, innovation, and the presence of a benevolent God. We are gravely concerned that these values that we hold so dear will be lost in a rating system that focuses on such limited outcomes.

We are encouraged by the administration's desire to help students become more educated about their college opportunities, and encourage you to take action to fulfill this desire. But the outcome should not be a tool that creates greater confusion for students. Instead, the administration should strive to enable students to make better-

**informed decisions, encourage them to go beyond the commercially produced rankings, but most of all do it in a way that encourages students to use their own judgment, and take into consideration their own personal needs.**

**Sincerely,**

(b)(6)

**Brother William Mann, FSC  
President**

## O'Bergh, Jon

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**From:** Tod Massa <todmassa@yahoo.com>  
**Sent:** Tuesday, February 17, 2015 10:09 PM  
**To:** College Feedback  
**Subject:** Comments on Proposed Rating System

I have many concerns about this proposal. Here, I will focus on the rating government's current record with rating nursing homes. While I appreciate the challenges, and some of the necessity in such ratings, it is not an appropriate role for the government. As I have written and spoken elsewhere, I have a lot of experience with new cars and the government's EPA ratings are not to be taken seriously.

The following blog post took all of five minutes to produce, primarily using search and replace, from the New York Times article linked at the end. It provides evidence of my concerns sufficiently.

Published at: <http://randomdatablog.com/2015/02/14/feb-13-2025-government-will-change-how-it-rates-colleges/>

### Feb 13, 2025 - Government Will Change How it Rates Colleges

The federal government on Thursday announced that it was changing the way it measures colleges, essentially adjusting the curve that it uses to rate institutions to make it more difficult for them to earn coveted four- and five-star government ratings.

Under the changes, scores are likely to fall for many institutions, federal officials said, although they did not provide specific numbers. Institutions will see a preview of their new scores on Friday, but the information will not be made public until Feb. 20.

"In effect, this raises the standard for colleges to achieve a high rating," said Thomas Hamm, the director of the survey and certification group at the Commission of Education Economics within the Executive Office of the President, which oversees the ratings system.

Colleges are scored on a scale of one to five stars on College Compare, the widely used federal website that has become the gold standard for evaluating the nation's more than 15,000 colleges even as it has been criticized for relying on self-reported, unverified data, that is limited in scope and function.

In August, The New York Times reported that the rating system relied so heavily on unverified information that even institutions with a documented history of quality problems were earning top ratings. Two of the three major criteria used to rate facilities — graduation rates and student input quality measures statistics — were reported by the institutions and not audited by the federal government.

In October, the federal government announced that it would start requiring colleges to report their staffing levels quarterly — using an electronic system that can be verified with payroll data. They will also report their enrollments weekly by the individual student to be verified against the National Student Loan and Tuition Tax Credit Data System. This allows to begin a nationwide auditing program aimed at checking whether an institution's quality statistics were accurate.

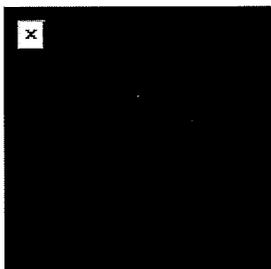
The changes announced on Thursday were part of a further effort, officials said, to rebalance the ratings by raising the bar for colleges to achieve a high score in the quality measures area, which is based on information collected about every student. Colleges can increase their overall rating if they earn five stars in this area. The number of colleges with five stars in quality measures has increased significantly since the beginning of the program, to 89 percent in 2024 from 62 percent in 2015.

Representatives for colleges said on Thursday that they worried the changes could send the wrong message to consumers. "We are concerned the public won't know what to make of these new rankings," said Mark Parkinson, the president and chief executive of the Association of Private Sector Colleges and Universities, which represents for-profit colleges. "If colleges across the country start losing their star ratings overnight, it sends a signal to families and students that quality is on the decline when in fact it has improved in a meaningful way."

But officials said that the changes would be explained on the consumer website, and that the public would be cautioned against drawing conclusions about a institution whose ratings recently declined. Still, Mr. Hamilton said scores would not decline across the board. "Some colleges, even when we raised the bar, continued to perform at a level much higher than the norm," he said in a conference call Thursday with college operators. "We want to still recognize them in the five-star category." The updated ratings will also take into account, for the first time, a college's use of antipsychotic drugs, which are often given inappropriately to elderly administrators with dementia.

--Thanks to John Nugent for the link to the original article and the inspiration.

### John Nugent on Twitter



### John Nugent on Twitter

In this article re fed'l ratings, you can just about re place "nursing home" with "college" and get the #P IRS debate <http://nyti.ms/1JSakyV>

[View on twitter.com](#)

Preview by Yahoo

### **Tod Massa**

[about.me/todmassa](http://about.me/todmassa)

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## O'Bergh, Jon

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**From:** anthony.j.pinhoiro@accenturefederal.com  
**Sent:** Tuesday, February 17, 2015 10:21 PM  
**To:** College Feedback  
**Subject:** College Ratings Framework - Public Comment  
**Attachments:** Accenture\_DoED\_College\_Ratings\_Framework\_Request\_for\_Feedback.docx

The Department of Education's College Ratings Framework represents a unique opportunity to leverage the Department's existing educational data to improve student outcomes and provide students and parents with informed choices when considering a school.

The effectiveness and impact of the College Ratings scheme can be maximized by pursuing an open data approach, with ratings and key educational metrics made available in a machine readable format through a set of standardized Application Programming Interfaces (APIs). Using an API approach, the Department can engage with the developer community and key educational stakeholders, while allowing for user customization and dissemination of the College Ratings. The attached document provides our qualifications as a service provider to the Department of Education and includes ideas for how an API can be implemented.

Accenture recently submitted a response to the Department's request for information on APIs in higher education, which provides our perspective on how APIs can be strategically applied to other higher education processes. The College Ratings scheme is very relevant to this broader strategy of enabling the Department's key processes through APIs, and could provide a good demonstration of the benefits of open data and flexible infrastructure. We would be happy to provide a copy of our earlier response to the Department's RFI on APIs in higher education upon request.

We would also welcome the opportunity to further discuss the Department's goals for the ratings scheme, and the opportunities presented by adopting an API centered approach for their future development.

Regards,

Anthony Pinheiro

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## Department of Education – College Ratings Framework: Request for Feedback

The successful implementation of a College Ratings plan will provide critical information to students and parents in their higher education journey, leading to better student outcomes, increased access to college, and more affordable college offerings for all Americans. As a long-time service provider to the Department of Education's Office of Federal Student Aid (FSA) since 2002, Accenture supports the delivery of over \$150 billion in student aid to 14 million students and their families each year, and provides the technical capabilities and deep understanding of the higher education industry to assist the Department in delivering and publicizing their College Ratings information after final determination.

In support of FSA's core mission, we have supported critical initiatives to improve the delivery of higher education aid and assist FSA in improving borrower outcomes and student success. In 2010, we supported the seamless transition from the Federal Family Education Loan (FFEL) program to 100% Direct Lending by doubling system capacity in under three months. With the increased responsibilities inherent in delivering 100% of government aid to students, we launched and continue to maintain several borrower facing websites (StudentLoans.gov, TEACH-ATS.ed.gov) as a platform for tools and processes to enable FSA's core legislatively mandated and educational interactions with users. We have also helped support the implementation of large-scale Department initiatives such as the Special Direct Consolidation Loan, Income Based Repayment, and Pay As You Earn programs. In FY14 alone, StudentLoans.gov enabled:

- 33 M logins by over 12.5 M unique StudentLoans.gov users to complete required loan documentation, apply for PLUS loans, complete Direct Loan Counseling, and understand and apply for alternative repayment plans.
- 6.9 M Direct Loan Counseling sessions to provide critical, contextual information synthesized from a variety of sources (IPEDs, NSLDS) to students at key moments of their education.
  - Required Entrance Counseling and Financial Awareness Counseling allow students to compare their estimated expenses (drawn from IPEDs) with their available funding and make an informed decision before borrowing money, or borrowing in subsequent years
  - Required Exit Counseling allows a student to use their current NSLDS loan information, automatically polled in real time, to explore their options for repayment and create a financial plan to satisfy their loan obligations upon leaving school
- 2.8 M users accessed the repayment estimator to understand their current repayment situation (again using current data pulled from NSLDS) and examine alternative repayment plans.
- Over 530 k loan consolidation applications and 1.6 M Income Driven Repayment Applications, combining real time data from NSLDS and the IRS to allow borrowers to easily manage their repayment plans and consolidate their loans.
- Email campaigns about alternative repayment plans targeted at 2 M borrowers who had fallen behind on their student loan payments, undergraduate borrowers with higher-than-average debts, and borrowers in deferment or forbearance because of financial hardship or unemployment.

Accenture helps FSA achieve mission outcomes, including educating Students about their educational and financial aid options. We bring the technical knowledge, deep industry experience, and qualified resources in support of the Department's College Ratings initiative.

## API Framework to enable innovation and further insight

The Department of Education plays an active role in promoting open data and increasing access to its information. The recently released draft College Ratings Framework is an opportunity to continue this role and encourage greater access, transparency, and innovation through an open data / Application Programming Interface (API) approach for educational data. Through our ongoing partnership with the Federal Student Aid – providing services to schools, borrowers, and servicers – Accenture has valuable experience integrating complex data, services, and interfaces, and combining them to achieve the Department’s priorities. As an example, our counseling tools aggregate publically available IPEDs and school data, and sensitive personally identifiable NSLDS and IRS information, subject to appropriate security controls to educate borrowers.

Accenture supports the Department’s interest in pursuing an API approach to disseminate data from the eventual College Ratings Framework. A properly implemented API platform could offer key advantages and further establish the Department as the trusted, open, and relevant source of data for higher education. Disseminating College Ratings information and raw data through an API will maximize the reach of this information to students, parents, and schools and ensure that the most recent data and ratings are always accessible. Further, by effectively engaging 3<sup>rd</sup> party developers and educational stakeholders (schools, non-profits, state agencies), an API approach can multiply the benefits for students by providing more channels (through websites, games, apps, etc.) for comparative ratings to help them make more informed educational choices.

An effective API management approach is required to realize the benefits of open data. This should encompass security, terms of service, branding, a developer portal to promote 3<sup>rd</sup> party engagement, and monitoring to ensure that all parties that use the Department’s data are working in support of its mission. Implementing a properly designed API platform first, while the ratings scheme is still under active development, lays the groundwork for continuous innovation, adaptability, and scalable performance. An API platform provides a “future-proof” College Ratings scheme, where more features can be progressively added without affecting the existing structure – for example, additional data submitted by schools can be incorporated into future iterations of the ratings scheme, allowing users greater options for customization.

A well-managed API approach ensures that the Department captures the maximum benefits from their College Ratings scheme, and is not required to build an all-encompassing app or website that perfectly addresses every user’s unique needs. By openly releasing the data, with defined terms of use, and managing interactions with 3<sup>rd</sup> party developers and stakeholders, the Department can achieve the same goal: providing students and parents with access to accurate, contextual information, while allowing for customization and personalization of the ratings.

Accenture recently submitted a response to the Department’s request for information on APIs in higher education, which gives our perspective at a broad level on how APIs can be strategically applied to higher education data and processes. The College Ratings scheme is very relevant to this broader strategy of enabling the Department’s key processes through APIs, and could provide a small scale demonstration of the Department’s commitment to open data and flexible infrastructure. We have collaborated with Federal Student Aid’s lead for open government, Abraham Marinez, to inform possible implementation approach options and strategy.

**Federal Student Aid Open Government Lead:**

Abraham Marinez  
FSA Open Government Lead  
[abraham.marinez@ed.gov](mailto:abraham.marinez@ed.gov)

**Future Discussion**

Accenture's capabilities and experience across the private sector and federal government, particularly as a solution provider to the Office of Federal Student Aid, can offer a valuable perspective to the Department of Education on designing and implementing an open data, managed API approach to the College Ratings scheme.

We welcome the chance to meet with the Department to further discuss the Department's goals for the ratings scheme and the opportunities presented by adopting an API centered approach for its dissemination and future development.

Anthony Pinheiro  
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703 201 9700

## O'Bergh, Jon

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**From:** WordPress <WEB@ed.gov>  
**Sent:** Tuesday, February 17, 2015 11:01 PM  
**To:** College Feedback  
**Subject:** User Comment on New System of College Ratings

**User Comment:** February 17, 2015

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

Dear Mr. Secretary:

On behalf of Point Loma Nazarene University (PLNU), I am writing in response to your "College Ratings Draft Framework" proposed on December 19, 2014. While I share the President's commitment to the areas of access, affordability, accountability, and transparency, I strongly oppose the method put forth in the "Draft Framework" and instead ask the Administration to work with me and other college presidents to achieve these goals in a different way.

Located in San Diego, California, PLNU exists to provide higher education in a vital Christian community where minds are engaged and challenged, character is modeled and formed, and service becomes an expression of faith. Being of Wesleyan heritage, we aspire to be a learning community where grace is foundational, truth is pursued, and holiness is a way of life. We accomplish this mission through excellence in teaching and learning in an intentionally Christian community. The development of students as whole persons remains paramount. We recruit women and men from a variety of cultural, ethnic, and socio-economic backgrounds as students, faculty, and staff. A willingness to hear and learn from many diverse voices is foundational to a Christian liberal arts education and prepares our students to become truly educated people, equipped to live in, and contribute to, a diverse society and world.

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

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

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

shared goals.

Positively,

Bob Brower, Ph.D.

President

**Constituency:** University Staff/Faculty

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

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

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