O'Bergh, Jon

From: M Stepniak (b)(6)
Sent: Wednesday, February 18, 2015 11:08 AM
To: College Feedback
Cc: jillvogel@senate27.com
Subject: NO to Proposed College Ratings System

Dear Sir/Madam,

I am writing to provide feedback on the US. Dept of Education's Proposed College Ratings System (outlined: http://www.ed.gov/blog/collegeratings/.

As a father of a (liberal arts) college student, and as a dean of a (performing arts) higher education school, I deal daily with issues and questions related to the value and impact of higher education learning. I also know first hand that this country has an extraordinary variety of institution types serving an extraordinary variety of missions and supporting an extraordinary variety of student populations. Indeed, that variety of goals and missions is one of the strengths of this country's higher education system and source of its ability to serve multiple and different populations.

For that reason, I DO NOT support any move to impose a singular ratings system as outlined. I fully support and greatly hope the federal government will allow institutions (especially private institutions) to be mission-based and pursue goals and priorities that are set independently. A ratings system as outlined would undermine the ability and right of institutions to do just that.

I'm grateful for the opportunity to provide feedback on this important issue,

Michael Stepniak

O'Bergh, Jon

From: Fansmith, Jon <JFansmith@ACENET.EDU>
Sent: Wednesday, February 18, 2015 11:56 AM
To: College Feedback
Cc: Hartle, Terry; Madzelan, Dan; Studley, Jamie; Mitchell, Ted
Subject: Community Comments on the PIRS Framework
Attachments: Community Comments on PIRS Framework 2-18-15.pdf

Hello,

Please find attached to this email a letter from the American Council on Education and twenty-five other higher education associations offering our comments on the framework for the institutional ratings system that was released last December.

Please feel free to contact me directly with any questions or concerns you may have regarding this submission.

Thank you,

Jon

Jon Fansmith
Director, Government Relations
Division of Government and Public Affairs
American Council on Education
One Dupont Circle NW
Washington, DC 20036
Phone: 202-939-9355
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February 18, 2015

United States Department of Education
Lyndon Baines Johnson (LBJ)
Department of Education Building
400 Maryland Ave, SW
Washington, DC 20202

To Whom It May Concern:

The higher education community has anxiously awaited the release of more specific information about the Postsecondary Institution Ratings System (PIRS) since President Obama announced the proposal in August 2013. The goals articulated by the President – enhanced access to accurate, timely and actionable consumer information and strengthened institutional accountability for the receipt of public funds – are laudable ideals that we strongly support. Our concerns with PIRS, therefore, are not with the purposes motivating the effort, but instead with the feasibility of the approach and the serious danger of unintended consequences.

In view of the Administration's stated goal of implementing PIRS by the start of the 2015-2016 academic year, we had hoped that the framework unveiled in December 2014 would provide a concrete and sufficiently specific presentation of the Department's proposed approach to allow institutions to evaluate the plan's strengths and weaknesses and to assess its likely impact. Unfortunately, the document released on December 19th is so incomplete, tentative, and amorphous, that it is impossible to offer the type of critique that this undertaking would otherwise require

One central issue in the PIRS discussion that is not clarified by the draft is the difficulty of developing a system that will serve the two distinct purposes articulated by the President and reiterated by the Department equally well – consumer information and accountability. There is a fundamental distinction between these two objectives. Consumer information needs to be accurate, timely, actionable, and easily accessible to help individuals make a decision about which institution to attend. Accountability, on the other hand, requires making normative judgments about the purposes of higher education. Neither goal is well served by the production of a federal ratings system. However, we believe that we can collectively make progress in the areas of consumer disclosure and accountability without developing a federal rating system.

With respect to consumer information, there are at least four federal consumer information tools currently available – College Navigator, the White House College Scorecard, the Financial Aid Shopping Sheet, and the College Affordability and Transparency Center. It is not clear how the proposed PIRS initiative will relate to, or differ from, the information available at these sites. We welcome a discussion with you on how to merge and simplify these tools to best serve students and families, including an analysis of the additional information consumers want and need, the feasibility of obtaining that information and the most effective ways to disseminate it.

Providing information useful to consumers is very different from establishing accountability measures for institutions participating in the Title IV programs. Developing an institutional ratings system requires someone – in this case a federal agency - to make value judgments about institutions of postsecondary education. In other words, what are institutions to be held accountable for doing, or not doing? The answer to this question – based entirely on values assigned by federal officials and irrespective of the institution's stated mission – will determine how colleges fare under the ratings system. While the Department's document makes clear that it will (at least initially) focus on three broad areas – access, affordability and outcomes - it does not specify whether separate ratings will be issued for each area or whether these three components will somehow be combined into a single score. If the Department decides to issue a single rating, it will be necessary to assign weights to each variable and the weighting decision will have an outsize role in determining how institutions fare. Furthermore, any weighting scheme developed by the Department will inevitably conflict with students' and parents' personal preferences, thus confusing rather than informing the intended beneficiaries of the ratings system. To enable interested parties to understand the Department's plans and to assess their efficacy, the Department should specify exactly how it plans to proceed on this central issue before it rates schools.

A second concern is that once the variables have been determined, prioritized and defined, the data must be assembled. In its December summary document, the Department identified eleven specific data elements in three categories (access, affordability and outcomes) that it might use in constructing this system. Of these, only one (percentage of Pell grant recipients enrolled) is highly accurate, widely understood, and currently available. The other metrics are either inaccurate (such as transfer rates), incomplete (such as completion rates), or completely untested (such as "EFC Gap" – an idea even the Department acknowledges is "confusing"). While the Department indicates that it may be willing to allow institutions to submit alternative sources of information that would be more accurate, such as the Student Achievement Measure (SAM), there are apparently no plans to do so before the initial ratings are published this summer. The inclusion of any data that the Department knows is inaccurate in a first round of ratings is a serious disservice to institutions and thwarts the goal of providing consumers with accurate and meaningful information.

A third concern deals with the peer groups within which institutions will be compared. When the president announced this plan, the Department made clear that "these ratings will compare colleges with similar missions." The consumer information value of rating institutions against their peers is minimal, and ignores how the overwhelming majority of students approach higher education. For example, community college students do not choose their schools based on comparative national reputations (or the "invented" reputations that a federal ratings system would impose), but rather among locally available options. Similarly, the tuition price advantage leads many four-year students to attend in-state public schools. Grouping institutions according to governance structure—public, private and independent not-for-profit, and for-profit and thus the level of public subsidy provided—significantly complicates any price comparisons. Finally, the ratings plan as outlined in the framework does not take into consideration colleges' specific missions, program offerings, or other characteristics that are often the determining factors in a student's choice of institution.

The comparison of institutions with similar institutions may have some merit as an accountability tool. However, this is a very difficult process to make work well, and the Department's plan is unacceptably limited on the issue of peer groups. The agency does note that, at a minimum, it will use two categories: two-year schools and four-year schools. Such a breakdown means, for example, comparing a small liberal arts college with a large public research university. In the case of two-year colleges, it requires that a small rural community college be compared with a suburban for-profit campus and a huge urban community college. Obviously, these are very different types of institutions. Ironically, the system described in the December plan would provide far less specificity than the Department typically uses in presenting aggregated institutional information that it releases to the public. Which schools any individual institution is compared against will determine how well any college fares in the proposed ratings system. Given the clear promise to compare "colleges with similar missions" the Department's failure to provide more detail on this point is a major gap.

We strongly urge the Department to offer more detail about its plans well before publishing any ratings. Specifically, we request that the Department make publicly available and open for comment the formula it plans to use to rate institutions and any weights that will be applied; announce the precise types and sources of information to be included; and offer detailed information about the peer groups that will serve as the basis for institutional comparisons. Furthermore, any ratings produced under this system should be shared with the institutions before they are made public, and a process for appealing inaccuracies must be provided. This is standard practice for the department in other areas, such as determinations of cohort default rates and the net price watch lists, and is a practical safeguard against erroneous, and potentially harmful, outcomes.

A far better use of resources would be to abandon this plan and instead focus on other ways to achieve the central purposes of PIRS – better consumer information and stronger accountability. With regard to the former, we stand ready to work with the Department to consolidate and rationalize the complex and confusing cacophony of disclosures already in place. Such an effort should include an investigation of information that students and families want and need to facilitate postsecondary education planning and whether or not such information is currently available. We believe that this task is both urgently needed and feasible.

With respect to accountability, we encourage the Department to capitalize on tools available under current law. As an example, we would like to work with the Department to identify policies and strategies that use the TRIAD (accreditation, eligibility, and state authorization) to focus attention on institutions of marginal quality and to raise the bar on program integrity, rather than making highly-generalized, relative judgments about every college in the United States.

Sincerely,

(b)(6)

Molly Corbett Broad
President

MCB/ldw

On behalf of:

American Association of Colleges for Teacher Education
American Association of Community Colleges
American Association of State Colleges and Universities
American College Personnel Association
American Council on Education
American Dental Education Association
American Indian Higher Education Consortium
Association of American Colleges and Universities
Association of American Universities
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Governing Boards
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Council for Christian Colleges and Universities
Council for Higher Education Accreditation
Council of Independent Colleges
Council of Regional Accrediting Associations
EDUCAUSE
Hispanic Association of Colleges and Universities
NASPA - Student Affairs Professionals in Higher Education
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
UNCF
University Professional and Continuing Education Association

O'Bergh, Jon

From: Sarah Cohen, Legislation <scohen@aft.org>
Sent: Wednesday, February 18, 2015 12:11 PM
To: College Feedback
Subject: College Ratings feedback
Attachments: RW College Ratings System Comments.pdf

Please find feedback on the college ratings framework from the American Federation of Teachers – attached.

Thank you.

Sarah R. Cohen
Senior Associate | Government Relations
T: 202-879-4452 | F: 202-879-4402 | E: scohen@aft.org

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A Union of Professionals

American Federation of Teachers, AFL-CIO

AFT Teachers
AFT PSRP
AFT Higher Education
AFT Public Employees
AFT Nurses and Health Professionals

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Randi Weingarten
PRESIDENT

Lorretta Johnson
SECRETARY-TREASURER

Mary Cathryn Ricker
EXECUTIVE VICE PRESIDENT

February 18, 2015

Mr. Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Ave. S.W.
LBJ Education Building, 7W311
Washington DC 20202

Dear Secretary Duncan:

On behalf of the 1.6 million members of the American Federation of Teachers, including more than 200,000 higher education professionals, I write to share our views of the college ratings framework that is meant to be the basis for a new federal college ratings system.

Like you, we believe in a higher education system that is accessible and affordable, and results in positive outcomes for students. We appreciate your acknowledgement of the diversity and complexity of our nation's many colleges and universities. We share your belief that the federal government should not act as a national governing board, making decisions about how every dollar is spent in an institution or exactly which inputs institutions must use. But we fundamentally disagree that a college ratings system established under the proposed framework will move us toward our shared goals, and we believe that such a system is in fact more likely to move us in the opposite direction.

The framework aims to rate an institution by identifying a few key outcome-based metrics, measuring institutions based on those metrics, and assigning a rating based on those measures. The stated goal of the department is to attach high stakes to these ratings by tying funding, through federal financial aid, to the rating an institution receives. We oppose this ratings system for several reasons: a lack of good data for meaningful outcomes; a belief that the punitive nature of these ratings will harm, not help, institutions move toward our shared goals; and concerns over the proposed timeline of the ratings. We discuss each of these concerns in more detail below.

Lack of meaningful data

Good data is the key to making a ratings system, like the one the department has proposed, work. But by the department's own admission, much of the data contemplated for use is problematic. Other key data is simply missing or excluded from the proposed metrics.

The framework lists many possible metrics, based on available data, discussing the shortcomings of each. We agree and share the concerns the department has identified regarding these data points. For example, the department acknowledges that the Integrated Postsecondary Education Data System graduation rate captures fewer than half of all students—yet puzzlingly still plans to use IPEDS as the basis for a graduation rate metric. And even if IPEDS data were complete, use of this metric—especially without knowing exactly how the department plans to weigh graduation rate—ignores the many missions of our institutions, especially those of community colleges, which strive to provide a wide range of services to their communities that result in positive student outcomes that may not be degree attainment. A focus on earnings could create a distorted incentive for institutions to steer students away from public education and other public sector work—work that is meaningful and valuable to the individual employee and society as a whole but that often results in lower wages than those in the private sector. The data available for this planned earnings metric is likewise problematic as it will only include students who received federal student aid.

The data this system leaves out is just as problematic as what data it includes. Missing is any mention of race or ethnicity data, which will make it impossible to track racial and ethnic disparities in whatever student outcomes this system does measure. This is a gross oversight, given that the Department of Education's own data acknowledges that the gap in college attainment rates between black and white students has widened in the last 20 years.[1] The proposed metrics also fail to include data about students' academic preparation before they reach college or university, such as high school GPA, SAT or ACT scores, or other proxies, even though we know that such preparation correlates closely with student outcomes.[2] It will be difficult, if not impossible, to track students who fall out of the narrow "first-time, full-time" category, obscuring the success of millions of students. In focusing solely on outcomes without any attention to inputs, the department is ignoring real student progress just because it does not meet its narrow definition of success.

The current framework also ignores other major factors in college quality: faculty working conditions and student support services. It is an appalling irony that contingent workers are expected to prepare students for careers with middle-class incomes and advancement opportunities while they are denied them. Contingent workers are teaching the majority of college classes today while receiving unreasonably low wages and benefits, and no job security (and as a result, no academic freedom protections); are often hired at the last minute before a term begins; and are provided little or no opportunity for professional development. Generally, those colleges serving the most students with profound education and financial needs often have an instructional staff that is the least supported to work

[1] National Center for Education Statistics, "Fast Facts: Educational Attainment," http://nces.ed.gov/fastfacts/display.asp?id=27.
[2] College Board, "The SAT: Supporting Retention and Graduation," http://sat.collegeboard.org/landingpages/higher-ed.

with students in an ongoing and intensive way inside and outside the classroom. By ignoring these factors, which we know make a difference in student success,[3] the department ignores the substance of higher education itself.

Another area of missing data is that on for-profit colleges. The framework largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and often valueless degrees. While the department claims that gainful employment regulations will ensure these programs are of high quality, we believe, as we have written elsewhere, that those regulations are not sufficient to prevent fraud and abuse.

In fact, taken as a whole, the outcome-based metrics highlighted in the framework result in what is really a job-readiness rating—not a college rating system that provides meaningful information about program quality or about the difference higher education makes in the lives of young adults.

Punishes, not supports

The current state of higher education is one of distress. Student debt is more than a trillion dollars, state funding has been receding for decades, and institutions are paying adjunct professors poverty wages to teach the majority of classes. We know what it takes for students to succeed in postsecondary education; research has shown that factors such as the ratios of full-time staff to part-time staff, advisers to students, and counselors to students affect student completion, as does the percentage of state investment in the higher education system.[4] Yet instead of offering the supports we know would address the real problems our higher education system faces and improve student outcomes, this framework conflates accountability with improvement, extending to our higher education system the shame-and-blame accountability system that has failed our K-12 students. We have also seen this type of "performance-based" funding model tried in 26 states without resulting in meaningful improvements in student outcomes.[5]

The department seems to be operating under the theory that institutions will allocate their resources differently based on ratings outcomes, choosing to focus funding on inputs known to improve outcomes. This theory relies on the assumption that institutions have the resources at their disposal to make these

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[3] Adrianna Kezar, Daniel Maxey, and Judith Eaton, "An Examination of the Changing Faculty: Ensuring Institutional Quality and Achieving Desired Student Learning Outcomes," CHEA Occasional Paper (January 2014), www.uscrossier.org/pullias/wp-content/uploads/2014/01/CHEA_Examination_Changing_Faculty_2013.pdf.

[4] Washington State Board for Community and Technical Colleges, "Benefit Drivers Report" March 1, 2013.

[5] Kevin J.Dougherty, Sosanya M. Jones, Hana Lahr, Rebecca S. Natow, Lara Pheatt, and Vikash Reddy, "Performance Funding for Higher Education: Forms, Origins, Impacts, and Futures," *The Annals of the American Academy of Political and Social Science* 655, no. 1 (2014) 163-184.

investments— but this could not be further from the truth. States have been disinvesting in public colleges and universities for decades. Even in places where institutions are making the commitment to provide students with the supports they need to succeed, funding limitations are preventing these institutions from expanding their successful programs. For example, the Education Opportunity Program at the State University of New York, which serves economically disadvantaged students by providing financial aid and robust wraparound services, has graduation rates of over 70 percent but has seen its funding threatened again and again. In 2014, more than 30,000 students applied for only 2,500 available spaces. If our system of higher education is going to do a good job serving traditionally underserved populations, we must invest in programs, like the EOP, that provide everything from books to tuition to mental health counseling, to keep short-term difficulties from becoming a reason to leave school.[6] These are the very services that have been threatened or eliminated over decades of state disinvestment.

Rating colleges based on outcomes while failing to account for the financial support available to those colleges is a glaring omission and must be addressed.

Sadly, we believe that the impact of this college ratings system may be the opposite of what is intended. It is very possible that when initial ratings are released, any problematic outcomes reported—even as the result of faulty or incomplete data—could undermine public confidence in a college, resulting in fewer federal, state and local resources provided to that institution. This, in turn, would make it even more difficult for the college to provide student supports, resulting in continued poor ratings, and so on. While we have no doubt that such a death spiral is not the department's intent, the punitive nature of the ratings system—and lack of acknowledgement of the enormous role that state disinvestment plays in our current higher education system—may have this end result. This framework is likely to put the oldest, most prestigious and most well-resourced institutions at the top, which will do nothing to help the long-underfunded public higher education system that educates the vast majority of students.

Artificial timeline

Finally, we believe that the department's expedited and artificial timeline is extremely problematic. A year and a half after President Obama first proposed developing a college ratings system, the framework makes it clear that the task is a complex one and that many questions remain. The framework document even admits that the lack of program-level data will obscure the tremendous variations within institutions. The framework is an outline for considering some type of college ratings system; it is not a proposed system ready for a test run and specific reaction. Yet the department has publically committed to having the ratings system finalized and implemented in the summer of 2015, and to putting it in place before

[6] State University of New York, "Educational Opportunity Program (EOP) Information Summary – 2013," www.suny.edu/student/downloads/pdf/eop_profile.pdf.

the 2015-16 school year, with the goal of tying funding decisions to the ratings by the 2018-19 school year. In other words, while it took a year and a half to come up with a list of questions to consider, the department now plans to finalize and implement the system in half a year. This rush to an arbitrary finish line does a disservice to students.

In conclusion

We share the department's goal of a higher education system that is accessible and affordable and that results in positive outcomes for students. And we know what it takes for students to succeed in postsecondary education: real investments in the classroom that provide the supports and resources faculty and students need. Unfortunately, this framework for college ratings uses problematic measures to create a punitive accountability system that does not provide those supports. The department should hit pause on this college ratings plan and focus instead on investments that will support our nation's higher education system.

Sincerely,

(b)(6)

Randi Weingarten
President

RW:ct opeiu#2 afl-cio

O'Bergh, Jon

From: O'Bergh, Jon
Sent: Wednesday, February 18, 2015 12:43 PM
To: College Feedback
Subject: College Rating System Feedback from Nebraska State College System
Attachments: 2178_001.pdf

Attached is a letter sent to Jamie Studley.

Jon O'Bergh
Policy Advisor
Office of the Under Secretary
U.S. Department of Education
202-260-8568

Nebraska State College System

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NSCS
Nebraska State College System

February 3, 2015

Ms. Jamienne Studley
Deputy Under Secretary of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Ms. Studley,

As the Chancellor of the Nebraska State College System, I am writing to comment on the Department of Education's January progress report on the Postsecondary Institution Ratings System (PIRS). Published goals of the ratings system include measures to help institutions around the United States benchmark and improve their performance as it relates to access, costs, and outcomes which, in turn, will influence students and their families to make informed decisions when choosing a college. While I recognize that this has been a long and arduous task for you and your staff, I again wish to express my concerns about emerging details and the, perhaps unintended, negative consequences the rating system will have on individual colleges and universities.

As I developed my Chancellor's Report (a copy is included with this letter) for the Nebraska State College System (NSCS) Board of Trustees last fall, I was faced with a daunting task. The goal of the Report was to provide an overview of the many successes experienced by students, faculty and staff at the member institutions of the NSCS, i.e., Chadron, Peru and Wayne State Colleges. The task of narrowing down the items to include in the report proved to be much more difficult than I had anticipated. Short of having developed a "coffee-table type book of 100's of pages," I knew I had to select items that were representative of the myriad of possibilities that take place each and every day at our colleges. This Report represents many of the reasons students choose to attend Chadron, Peru and Wayne State Colleges.

My fear, as I have stated before, is that the metrics chosen for PIRS will not provide an accurate portrayal of colleges and universities across the nation, not just the Nebraska State Colleges. We know that PIRS is not to be the only source used by students and their families. However, can a system as proposed reach students from all backgrounds? Can it adequately portray the available scholarships and grants, some unique to particular colleges, which make college affordable? Can it separate the small four-year teaching institutions from the large four-year research institutions?

From our conversations, I hope that I have conveyed to you the importance that I place on accountability and transparency for the NSCS. My concerns with PIRS is not that we have measures to address our successes, but that the nuances to all measures be carefully examined so that none favor one type of institution over another, for example, the size of the institution skews the results in one direction or the other.

The Nebraska legislature is in full session while I write this letter. With the introduction of new legislation related to state appropriations, funds used to pay for scholarships, construction proposals and numerous accountability measures, I often have the opportunity to testify before the education committee or one of the other standing committees. This year, we have 19 new Senators which means I have many opportunities to tell the NSCS story. The Senators, the new Governor and Lt. Governor, and many other decision makers received the NSCS Report I mentioned earlier. I want to make sure you, along with Nebraska's political arena, have the opportunity to read about what makes the NSCS special to our students and their families, our communities and regions, and the state of Nebraska and beyond. I know that the State Colleges have a long future ahead of them, and I will continue to lead our efforts of accountability and transparency as long as I am Chancellor. Our story goes beyond a set of numbers and statistics. Each and every story has a face behind it, sometimes the face of an entire community.

As I have said before, I have great regard for the work undertaken by you and your colleagues. I applaud accountability as a cornerstone for every enterprise. There is no doubt that we use data to improve recruitment, retention and persistence. The State Colleges have long participated in continuous improvement models acknowledging our strengths and weakness. These efforts are locally driven as well as through our commitment to regional and national accreditation.

At the risk of being repetitious, I am very concerned about any rating system that would primarily use measures that are simply mathematical equations that attempt to compare institutions through a one size fits all model. Results from "a one size fits all model" cannot measure an institution's true value nor its ability to change a life – or to change many lives. The metrics and the definitions that are used, the institutions that are included in the rating system and how they are categorized, and the time frame for gathering metrics and allowing for trends are, in my mind, critical to the final rating system that is developed. Unfortunately, much about the proposed PIRS rating system remains unclear. And, the rating system as it has been described appears to contain a complex set of metrics that will result in misrepresentations and incorrect interpretations. Perhaps even more damaging than helpful, the rating system includes policies that limit the educational opportunities of the very populations we strive to educate, i.e., first generation students, diverse populations, and the middle class families.

As my parents told me, "The hard decisions are also the best decisions because nothing in life comes easy. You have to work hard for what you want." I believe this is especially true for the work you and your staff have undertaken. Once, again, I offer you and your team my assistance in any way you deem helpful. Let's make sure what we do is good for our students, their families, our colleges, and our states. To do anything less means we have not yet made the hard decisions.

Sincerely,

(b)(6)

Stan Carpenter
Chancellor

cc: Board of Trustees
Presidents

O'Bergh, Jon

From: Jill Holtzman Vogel <jh@hvjlaw.com>
Sent: Wednesday, February 18, 2015 12:51 PM
To: M Stepniak; College Feedback
Cc: jillvogel@senate27.com
Subject: Re: NO to Proposed College Ratings System

Thank you for cc'ing me on this. Very helpful background!!

Jill

Senator Jill H. Vogel
District 27

From: M Stepniak (b)(6)
Sent: Wednesday, February 18, 2015 11:08 AM
To: collegefeedback@ed.gov
Cc: jillvogel@senate27.com
Subject: NO to Proposed College Ratings System

Dear Sir/Madam,

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For that reason, I DO NOT support any move to impose a singular ratings system as outlined. I fully support and greatly hope the federal government will allow institutions (especially private institutions) to be mission-based and pursue goals and priorities that are set independently. A ratings system as outlined would undermine the ability and right of institutions to do just that.

I'm grateful for the opportunity to provide feedback on this important issue,

Michael Stepniak

O'Bergh, Jon

From: Sarah Cohen, Legislation <scohen@aft.org>
Sent: Wednesday, February 18, 2015 1:10 PM
To: College Feedback
Subject: RE: College Ratings feedback
Attachments: RW College Ratings System Comments.pdf

Please use this attached version instead for AFT's feedback.

Thank you.

Sarah R. Cohen
Senior Associate | Government Relations
T: 202-879-4452 | F: 202-879-4402 | E: scohen@aft.org

American Federation of Teachers, AFL-CIO
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From: Sarah Cohen, Legislation
Sent: Wednesday, February 18, 2015 12:11 PM
To: 'collegefeedback@ed.gov'
Subject: College Ratings feedback

Please find feedback on the college ratings framework from the American Federation of Teachers – attached.

Thank you.

Sarah R. Cohen
Senior Associate | Government Relations
T: 202-879-4452 | F: 202-879-4402 | E: scohen@aft.org

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A Union of Professionals

American Federation
of Teachers, AFL-CIO

AFT Teachers
AFT PSRP
AFT Higher Education
AFT Public Employees
AFT Nurses and Health Professionals

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February 18, 2015

Mr. Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Ave. S.W.
LBJ Education Building, 7W311
Washington DC 20202

Dear Secretary Duncan:

On behalf of the 1.6 million members of the American Federation of Teachers, including more than 200,000 higher education professionals, I write to share our views of the college ratings framework that is meant to be the basis for a new federal college ratings system.

Like you, we believe in a higher education system that is accessible and affordable, and results in positive outcomes for students. We appreciate your acknowledgement of the diversity and complexity of our nation's many colleges and universities. We share your belief that the federal government should not act as a national governing board, making decisions about how every dollar is spent in an institution or exactly which inputs institutions must use. But we fundamentally disagree that a college ratings system established under the proposed framework will move us toward our shared goals, and we believe that such a system is in fact more likely to move us in the opposite direction.

The framework aims to rate an institution by identifying a few key outcome-based metrics, measuring institutions based on those metrics, and assigning a rating based on those measures. The stated goal of the department is to attach high stakes to these ratings by tying funding, through federal financial aid, to the rating an institution receives. We oppose this ratings system for several reasons: a lack of good data for meaningful outcomes; a belief that the punitive nature of these ratings will harm, not help, institutions move toward our shared goals; and concerns over the proposed timeline of the ratings. We discuss each of these concerns in more detail below.

Lack of meaningful data

Good data is the key to making a ratings system, like the one the department has proposed, work. But by the department's own admission, much of the data contemplated for use is problematic. Other key data is simply missing or excluded from the proposed metrics.

The framework lists many possible metrics, based on available data, discussing the shortcomings of each. We agree and share the concerns the department has identified regarding these data points. For example, the department acknowledges that the Integrated Postsecondary Education Data System graduation rate captures fewer than half of all students—yet puzzlingly still plans to use IPEDS as the basis for a graduation rate metric. And even if IPEDS data were complete, use of this metric—especially without knowing exactly how the department plans to weigh graduation rate—ignores the many missions of our institutions, especially those of community colleges, which strive to provide a wide range of services to their communities that result in positive student outcomes that may not be degree attainment. A focus on earnings could create a distorted incentive for institutions to steer students away from public education and other public sector work—work that is meaningful and valuable to the individual employee and society as a whole but that often results in lower wages than those in the private sector. The data available for this planned earnings metric is likewise problematic as it will only include students who received federal student aid.

The data this system leaves out is just as problematic as what data it includes. Missing is any mention of race or ethnicity data, which will make it impossible to track racial and ethnic disparities in whatever student outcomes this system does measure. This is a gross oversight, given that the Department of Education's own data acknowledges that the gap in college attainment rates between black and white students has widened in the last 20 years.[1] The proposed metrics also fail to include data about students' academic preparation before they reach college or university, such as high school GPA, SAT or ACT scores, or other proxies, even though we know that such preparation correlates closely with student outcomes.[2] It will be difficult, if not impossible, to track students who fall out of the narrow "first-time, full-time" category, obscuring the success of millions of students. In focusing solely on outcomes without any attention to inputs, the department is ignoring real student progress just because it does not meet its narrow definition of success.

The current framework also ignores other major factors in college quality: faculty working conditions and student support services. It is an appalling irony that contingent workers are expected to prepare students for careers with middle-class incomes and advancement opportunities while they are denied them. Contingent workers are teaching the majority of college classes today while receiving unreasonably low wages and benefits, and no job security (and as a result, no academic freedom protections); are often hired at the last minute before a term begins; and are provided little or no opportunity for professional development. Generally, those colleges serving the most students with profound education and financial needs often have an instructional staff that is the least supported to work

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[1] National Center for Education Statistics, "Fast Facts: Educational Attainment," http://nces.ed.gov/fastfacts/display.asp?id=27.
[2] College Board, "The SAT: Supporting Retention and Graduation," http://sat.collegeboard.org/landingpages/higher-ed.

with students in an ongoing and intensive way inside and outside the classroom. By ignoring these factors, which we know make a difference in student success,[3] the department ignores the substance of higher education itself.

Another area of missing data is that on for-profit colleges. The framework largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and often valueless degrees. While the department claims that gainful employment regulations will ensure these programs are of high quality, we believe, as we have written elsewhere, that those regulations are not sufficient to prevent fraud and abuse.

In fact, taken as a whole, the outcome-based metrics highlighted in the framework result in what is really a job-readiness rating—not a college rating system that provides meaningful information about program quality or about the difference higher education makes in the lives of young adults.

Punishes, not supports

The current state of higher education is one of distress. Student debt is more than a trillion dollars, state funding has been receding for decades, and institutions are paying adjunct professors poverty wages to teach the majority of classes. We know what it takes for students to succeed in postsecondary education; research has shown that factors such as the ratios of full-time staff to part-time staff, advisers to students, and counselors to students affect student completion, as does the percentage of state investment in the higher education system.[4] Yet instead of offering the supports we know would address the real problems our higher education system faces and improve student outcomes, this framework conflates accountability with improvement, extending to our higher education system the shame-and-blame accountability system that has failed our K-12 students. We have also seen this type of "performance-based" funding model tried in 26 states without resulting in meaningful improvements in student outcomes.[5]

The department seems to be operating under the theory that institutions will allocate their resources differently based on ratings outcomes, choosing to focus funding on inputs known to improve outcomes. This theory relies on the assumption that institutions have the resources at their disposal to make these

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[3] Adrianna Kezar, Daniel Maxey, and Judith Eaton, "An Examination of the Changing Faculty: Ensuring Institutional Quality and Achieving Desired Student Learning Outcomes," CHEA Occasional Paper (January 2014), www.uscrossier.org/pullias/wp-content/uploads/2014/01/CHEA_Examination_Changing_Faculty_2013.pdf.

[4] Washington State Board for Community and Technical Colleges, "Benefit Drivers Report" March 1, 2013.

[5] Kevin J.Dougherty, Sosanya M. Jones, Hana Lahr, Rebecca S. Natow, Lara Pheatt, and Vikash Reddy, "Performance Funding for Higher Education: Forms, Origins, Impacts, and Futures," *The Annals of the American Academy of Political and Social Science* 655, no. 1 (2014) 163-184.

investments— but this could not be further from the truth. States have been disinvesting in public colleges and universities for decades. Even in places where institutions are making the commitment to provide students with the supports they need to succeed, funding limitations are preventing these institutions from expanding their successful programs. For example, the Education Opportunity Program at the State University of New York, which serves economically disadvantaged students by providing financial aid and robust wraparound services, has graduation rates of over 70 percent but has seen its funding threatened again and again. In 2014, more than 30,000 students applied for only 2,500 available spaces. If our system of higher education is going to do a good job serving traditionally underserved populations, we must invest in programs, like the EOP, that provide everything from books to tuition to mental health counseling, to keep short-term difficulties from becoming a reason to leave school.[6] These are the very services that have been threatened or eliminated over decades of state disinvestment.

Rating colleges based on outcomes while failing to account for the financial support available to those colleges is a glaring omission and must be addressed.

Sadly, we believe that the impact of this college ratings system may be the opposite of what is intended. It is very possible that when initial ratings are released, any problematic outcomes reported—even as the result of faulty or incomplete data—could undermine public confidence in a college, resulting in fewer federal, state and local resources provided to that institution. This, in turn, would make it even more difficult for the college to provide student supports, resulting in continued poor ratings, and so on. While we have no doubt that such a death spiral is not the department's intent, the punitive nature of the ratings system—and lack of acknowledgement of the enormous role that state disinvestment plays in our current higher education system—may have this end result. This framework is likely to put the oldest, most prestigious and most well-resourced institutions at the top, which will do nothing to help the long-underfunded public higher education system that educates the vast majority of students.

Artificial timeline

Finally, we believe that the department's expedited and artificial timeline is extremely problematic. A year and a half after President Obama first proposed developing a college ratings system, the framework makes it clear that the task is a complex one and that many questions remain. The framework document even admits that the lack of program-level data will obscure the tremendous variations within institutions. The framework is an outline for considering some type of college ratings system; it is not a proposed system ready for a test run and specific reaction. Yet the department has publically committed to having the ratings system finalized and implemented in the summer of 2015, and to putting it in place before

[6] State University of New York, "Educational Opportunity Program (EOP) Information Summary – 2013," www.suny.edu/student/downloads/pdf/eop_profile.pdf.

the 2015-16 school year, with the goal of tying funding decisions to the ratings by the 2018-19 school year. In other words, while it took a year and a half to come up with a list of questions to consider, the department now plans to finalize and implement the system in half a year. This rush to an arbitrary finish line does a disservice to students.

In conclusion

We share the department's goal of a higher education system that is accessible and affordable and that results in positive outcomes for students. And we know what it takes for students to succeed in postsecondary education: real investments in the classroom that provide the supports and resources faculty and students need. Unfortunately, this framework for college ratings uses problematic measures to create a punitive accountability system that does not provide those supports. The department should hit pause on this college ratings plan and focus instead on investments that will support our nation's higher education system.

Sincerely,

(b)(6)

Randi Weingarten
President

RW:ct opeiu#2 afl-cio

O'Bergh, Jon

From: Robert Lambeth <Lambeth@cicv.org>
Sent: Wednesday, February 18, 2015 1:17 PM
To: College Feedback
Subject: Comments from Virginia
Attachments: Joint Letter on High Ed Rating System.pdf

Attached please find a letter signed by 4-year public and private college presidents in Virginia citing their concerns about the proposed rating system. House Joint Resolution 707 also expresses concerns about the proposed rating system. This resolution has passed the VA House of Delegates and is now pending in the VA Senate.

It is clear that the Virginia higher education community has serious reservations about the proposed rating system.

Sincerely,
Robert B. Lambeth, Jr.
President
Council of Independent Colleges in Virginia
P. O. Box 1005
Bedford, VA 24523
Tel: 540.586.0606
Fax: 540.586.2630
www.vaprivatecolleges.org

COUNCIL OF PRESIDENTS
Virginia's Public Colleges and Universities

Virginia Private Colleges

To: Virginia Congressional Delegation and U.S. Secretary of Education
Cc: The Honorable Terry McAuliffe

Ladies and Gentlemen:

The undersigned 50 presidents of Virginia's public and private non-profit institutions of higher education write to express our concerns about the higher education rating system proposed by the Obama Administration and linkage of the rating system to the award of federal student aid. We very much support President Obama's goals to make college accessible and affordable. We all have initiatives underway to help achieve those goals. We also appreciate President Obama's strong support of programs designed to help families pay for college and his support for increases to funding for the Pell Grant. In addition, we support accountability and efforts to improve our work in this area. However, we have serious reservations about the proposed college rating system.

While we fully support transparency of data concerning our institutions, and are deeply committed to our students' success as both a practical and philosophical matter, we feel that linking the award of federal student aid to the proposed new college rating system is misguided because of the problematic nature of the rating system itself and because it will disadvantage many needy students. We believe that there are adequate data currently available that already provide students and parents with the information the new rating system proposes to supply.

Our primary concerns are the following:

1. Institutions traditionally serving low income or non-traditional populations would be disadvantaged under the current proposal. Institutions would have an incentive to enroll higher income students. In addition, place-bound students who do not have the opportunity to "shop" for a highly rated institution would potentially receive less federal student aid solely because of their economic circumstances. The proposed system would also disadvantage institutions that enroll a greater number of part-time students, many of whom are lower income and take longer to graduate.

2. We feel that a rating system that places substantial weight on the income of graduates is fundamentally flawed and counter to basic principles that continue to serve the American higher education system well. In our judgment, it would be a serious error for students to receive a message that their success in life is evaluated solely, or even primarily, by their earnings, and especially so in the period shortly after earning their degrees. Many American higher education institutions have excelled in training and encouraging students to work in critical but lower paying jobs in areas of high need. Students who choose public service or non-profit sector employment with lower starting salaries than their peers should not be

considered failures, and their higher education institution should not be penalized for those choices. A one-size-fits-all rating system fails to acknowledge the unique missions of various higher education institutions in America.

3. It would be a serious error to base a new rating system on graduation rates using the current system of calculating graduation rates – a system that is widely regarded as flawed. The Department of Education should focus on developing data not just for first time and full-time students, but also for students who enroll in more than one institution during their higher education career, which is an increasingly common practice. Current graduation rates calculated by the U.S. Department of Education do not take into consideration students transferring from a community college to a four-year institution, or a student who transfers from one four-year institution to another. Currently, students who transfer from a community college to a four-year institution before earning a community college degree are considered as "drop outs" from the community college. We are also mindful that there is a clear correlation between family income and graduation rates. Institutions enrolling students from lower income backgrounds generally have lower graduation rates and would be penalized by the proposed rating system.

We urge careful consideration of the unintended consequences and incentives that would result from the proposed new system. In order to be successful, institutions would be under pressure to increase graduation rates by enrolling higher income students and to graduate students who enter high paying professions. This unintended consequence would be especially true if there is a linkage of the federal student aid to the new rating system.

Every public and private non-profit college in Virginia currently provides data on admissions criteria, the financial aid application process, cost of attendance, campus safety, student populations, faculty qualifications, graduation and retention rates, student life, career and internship opportunities, class size and a net price calculator. The federal IPEDS system collects a massive amount of data each year from all of our institutions. We suggest that the focus should be on clarifying and simplifying the presentation of already available data and, here in Virginia, our State Council of Higher Education has worked diligently over many years to ensure the data are collected, reported and publicly available on its web site.

We urge the President and Congress to reevaluate the proposed rating system and a linkage to the award of federal student aid. Virginia's higher education community would welcome the opportunity to work with you to develop ways to improve the presentation and availability of current data and to ensure that proper transparency for parents and students exists. We feel the proposed rating system will result in negative unintended consequences and will be harmful to many of the students we seek to serve in Virginia.

Yours truly,

(b)(6)

Richard V. Hurley, Chair
On Behalf of the 2013/2014
Virginia Council of Presidents

Michael C. Maxey, Chair
On Behalf of the Council of
Independent Colleges in Virginia

2013-2014 Virginia Council of Presidents

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University of Mary Washington

Dr. Keith T. Miller, President (Vice Chair)
Virginia State University

The Honorable Paul S. Trible, Jr., President
Christopher Newport University

Mr. W. Taylor Reveley, III, President
College of William and Mary

Dr. Angel Cabrera
George Mason University

Mr. Jonathan R. Alger, President
James Madison University

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John Tyler Community College

Mr. W. Taylor Reveley IV, President
Longwood University

Mr. Eddie N. Moore, Jr., Acting President
Norfolk State University

Mr. John Broderick, President
Old Dominion University

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Ms. Penelope W. Kyle, President
Radford University

Dr. Elizabeth H. Crowther, President
Rappahannock Community College

Dr. Debbie L. Sydow, President
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Virginia Council of Presidents, Continued

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University of Virginia

Dr. Donna Price Henry, President
University of Virginia's College at Wise

Dr. Michael Rao, President
Virginia Commonwealth University

Dr. Glenn DuBois, Chancellor
Virginia Community College System

General J. H. Binford Peay, III,
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Virginia Military Institute

Dr. Timothy D. Sands, President
Virginia Polytechnic Institute & State University

Dr. Donald J. Finley, President
Virginia Business Higher Education Council

Council of Independent Colleges in Virginia

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Dr. David Olive, President (Vice Chair)
Bluefield College

Mr. Michael McGlothlin, President
Appalachian College of Pharmacy

Ms. Lucy McGough, Dean and Chief Operating Officer
Appalachian School of Law

Council of Independent Colleges in Virginia, Continued

Dr. Tiffany Franks, President
Averett University

Dr. David W. Bushman, President
Bridgewater College

Dr. Loren Swartzendruber, President
Eastern Mennonite University

Mr. Jake Schrum, President
Emory & Henry College

Dr. Jennifer L. Braaten, President
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Ms. Nancy Oliver Gray, President
Hollins University

Dr. Nathaniel L. Bishop, President
Jefferson College of Health Sciences

Dr. Jerry L. Falwell, Jr., President
Liberty University

Dr. Kenneth R. Garren, President
Lynchburg College

Dr. Pamela Fox, President
Mary Baldwin College

Dr. Matthew D. Shank, President
Marymount University

Dr. Bradley W. Bateman, President
Randolph College

Mr. Robert R. Lindgren, President
Randolph-Macon College

Dr. Tracy Fitzsimmons, President
Shenandoah University

Mr. Paul K. Sybrowsky, President
Southern Virginia University

Dr. Jo Ellen Parker, President
Sweet Briar College

Dr. Edward L. Ayers, President
University of Richmond

Dr. James Wolfe, President
Edward Via College of Osteopathic Medicine

Dr. Claude G. Perkins, President
Virginia Union University

Dr. William T. Greer, Jr., President
Virginia Wesleyan College

Dr. Kenneth P. Ruscio, President
Washington and Lee University

Dr. Steven Knapp, President
George Washington University

Robert B Lambeth, Jr., President
Council of Independent Colleges in Virginia

O'Bergh, Jon

From: Jessica Marcum <jessica.marcum@wgu.edu> on behalf of Bob Mendenhall <RWM@wgu.edu>
Sent: Wednesday, February 18, 2015 1:46 PM
To: College Feedback
Subject: College Ratings Feedback

To Whom it May Concern,

Please find WGU's comments on the proposed college ratings below:

- Several measures depend on the cost of attendance. The Department should realize this is an arbitrary number set by the institutions. Rather than calculating affordability and access using cost of attendance, the Department ought to get actual student costs.
- In measuring completion rates, IPEDS data represents less than 50% of all students (in the case of WGU about 2%). It is not an accurate reflection of all graduates. A valid method for reporting and auditing graduation rates needs to be established.
- If the Department measures the six year graduation rate, what is the plan to capture improvements that have been made in the intervening six years? The Department may need to measure early indicators of graduation such as: one and three year retention rates, students making satisfactory academic progress (or progress to on time graduation), four year graduation rates, etc. (in the case of WGU our three year rate is higher than the six year graduation rate).
- When looking at affordability, the Department needs to factor in the average time to graduation not just annual cost. The cost of a degree is obviously different if the student graduates in four years versus six years. One way to accomplish this is to take all the costs of the university in a year divided by the total number of graduates per year and that is the cost per graduate. However, if the university is growing quickly this will be a distorted cost, and the number will need to be adjusted to account for student growth over that period.
- In doing rankings, the Department must be sure to compare universities with similar student demographics including not just income, ethnicity, parents' education attainment, but also specifically student age. Since older adult students graduate at much lower rates nationally than traditional aged students.
- In terms of tracking employment outcomes post-graduation, this is something that universities cannot reliably do. It is very difficult to track graduates in the workplace as graduates are not required to report this data or report it accurately. The only practical way to get employment outcomes is to use federal databases that already exist.
- We are concerned that all ratings systems have unintended consequences. For example, colleges are gaming the US News and World ratings by encouraging many more admissions applications, only to deny admission to appear more "selective" based on the US News criteria. Reducing educational quality to a ranking or a few numbers is appealing to many, but fails to recognize the differences in students, and will result in tighter admissions standards and restricted access to higher education for already underserved populations. While institutions may generally be compared based on student demographics, sophisticated analytics will allow admissions decisions to maximize an institutions "scorecard" performance. The fastest way to improve graduation rates or cohort default rates is to not admit those students most at risk.
- Existing college ranking systems should not be used in the departments rating system. The department's proposal makes an important differentiation between ranking and rating. The existing systems are rankings –

which are subjective and not useful to nearly every prospective student. The real question prospective students and their parents need to answer is "what is the best college for me?" The existing college rankings systems do not attempt to answer this question – the objective of the college ranking system is create a sorted list of all colleges. This list is as subjective as a list comparing the best movies or best football players. There are statistics available for each, but each metric is subjectively included or excluded, and weighted. Additionally, the sorted list gives the impression of a measurement precision that doesn't exist. The schools that sort to the top of these lists are highly selective universities with large endowments. These schools are only options for a very select group prospective students. At best these ranking systems are ignored by most prospective students, at worst they further the stigma that a high quality college education is inaccessible.

Best regards,

Bob

Robert W. Mendenhall, Ph.D.
President
Western Governors University
www.wgu.edu

O'Bergh, Jon

From: Yates, Lindsay <Lindsay.Yates@mail.house.gov>
Sent: Wednesday, February 18, 2015 2:01 PM
To: College Feedback; Stanek, Taylor
Cc: Rodarte, Samuel; Adams, Erin
Subject: Congressional Comments on PIRS
Attachments: PIRS Framework Comment_GoodlatteCapuanoRibble.pdf

Hi Taylor, I hope you're doing well!

Please find the attached letter from Congressmen Goodlatte, Capuano, and Ribble on the Department of Education's proposed college ratings system.

Please let me know if you need any additional information. I will also fax and send a hard copy.

Thanks!

Lindsay Yates

Senior Legislative Assistant | Congressman Bob Goodlatte
Rayburn House Office Building 2309
p: 202.225.5431 | www.goodlatte.house.gov

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Congress of the United States
House of Representatives
Washington, DC 20515
February 17, 2015

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-3100

Dear Secretary Duncan:

We write to provide comment on the proposed Postsecondary Institutions Ratings System (PIRS), for which feedback was originally solicited in the Request for Information published by the Department of Education in the Federal Register on December 17, 2013 (78 Fed. Reg. 76289 et seq.). An invitation to comment was also made after the PIRS "framework" was released on December 19, 2014.

Since this proposal was announced, many have been concerned about the unintended consequences that may result as the federal government attempts to rate institutions, and we share these concerns. The underlying assumption that the federal government can, let alone should, rate colleges and universities – thereby attempting to place a monetary value on the education of an individual – is imprudent.

While the federal government does, and should, have a role to play in ensuring that taxpayer dollars are spent effectively and efficiently, it seems that this initiative has lost sight of that goal in particular and is more concerned with directing students to institutions, and ultimately professions, that the federal government feels are of good value. The proposed ratings system purports to focus on just a few "key critical measures of institutional performance, while accounting for the diversity and complexity of the nation's rich system of higher education," yet does not actually do so. The ratings system itself will likely carry an image of validity that will mislead prospective students on college choice, and decrease the ability of colleges and universities to openly compete with each other and seek to educate students who best fit their missions, goals, and personalities. No bureaucrat, neither in this Administration or a future one, should have the ability to determine the value of an individual's education.

Lastly, the Department of Education already collects large amounts of data and metrics from postsecondary institutions, with much of this information being made public. It is unclear why it would be necessary to reduce those various measures into a single rating system, rather than simply setting them forth and allowing individuals useful access to the information they want. Each individual is unique, and what is most important to each in looking for a college or university will vary significantly from person to person.

We appreciate the opportunity to comment on the PIRS framework and offer to work with you on alternative methods for encouraging our higher education system to provide cost-effective, quality education for all Americans who want to further their education.

Sincerely,

(b)(6)

Bob Goodlatte
Member of Congress

(b)(6)

Michael E. Capuano
Member of Congress

(b)(6)

Reid Ribble
Member of Congress

O'Bergh, Jon

From: Jessica Thompson <jthompson@ticas.org>
Sent: Wednesday, February 18, 2015 2:38 PM
To: College Feedback
Subject: TICAS Comments on College Ratings Framework
Attachments: FINAL TICAS Ratings Framework comments 2015.pdf

Importance: High

Good afternoon,

Please find attached comments from The Institute for College Access & Success on the college ratings framework. Thank you for this opportunity to provide feedback, and please contact us at any time with questions or feedback!

Sincerely,

Jessica Thompson

Jessica L. Thompson
Senior Policy Analyst
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February 18, 2015

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

(submitted via email: collegefeedback@ed.gov)

Dear Secretary Duncan:

Thank you for providing this opportunity to comment on the Department of Education's college ratings framework, released publicly on December 19, 2015. The Institute for College Access & Success (TICAS) is a nonpartisan, nonprofit research and policy organization based in Oakland, California. Our mission is to improve both educational opportunity and outcomes so that more underrepresented students complete meaningful post-secondary credentials without incurring burdensome debt.

We appreciate the Department's openness to feedback in developing the ratings system, and these comments build upon the detailed recommendations TICAS submitted last year. We agree strongly that students and families need better information about costs and outcomes when making college choices. The proposed framework includes a number of elements that help to achieve that goal, including rating institutions across a small number of broad categories to avoid false precision (e.g., high, low, middle), incorporating key metrics like net price, enrollment of Pell grant recipients and first generation students, and a commitment to transparency and privacy regarding the underlying data. However, we also have serious concerns, most significantly the lack of debt as a measure of affordability, the conflation of a ratings system designed for consumers and a system designed for policymakers, and the potential harm in adjusting the ratings based on student or institutional characteristics. These and other concerns are detailed in the comments below, and are echoed in joint comments signed by TICAS, the Institute for Higher Education Policy (IHEP) and seven other organizations.

Major Concerns with the Proposed Ratings Framework

The ratings system must measure cumulative student debt and the share of students borrowing. As more students borrow, and borrow more, public concern about student debt continues to rise. It is surprising and highly problematic that the proposed ratings framework does not include student debt as a measure of affordability. Data on borrowing provide important information not conveyed by net price alone. Borrowing rates and amounts are not merely a reflection of the family resources of a college's student body. There is significant variation among institutions, including among those with similar costs and low-income enrollment, as shown by the examples in the table below.

Variation in Cumulative Debt Within Institutional Types							
College type	**College name**	**Tuition and fees**	**Total cost of attendance (on campus)**	**% low income**	**% of graduates with debt**	**Average debt of graduates**	**Bachelor's degree recipients**
Large Publics (California)	California State University-Sacramento	$6,620	$23,746	51%	**42%**	**$4,551**	5,514
	Humboldt State University	$7,135	$23,391	50%	**78%**	**$22,262**	1,505
Large Publics (Michigan)	Ferris State University	$10,354	$22,094	40%	**81%**	**$37,325**	2,364
	Wayne State University	$10,190	$22,265	42%	**60%**	**$23,136**	2,657
Small, High-Tuition Non-Profits (California)	Harvey Mudd College	$44,442	$60,613	13%	**58%**	**$28,255**	189
	California Institute of Technology	$39,588	$56,382	10%	**40%**	**$15,010**	256
Mid-Sized, High-Tuition Non-Profits (Texas)	Rice University	$37,292	$52,242	18%	**30%**	**$17,856**	964
	Trinity University	$32,868	$46,274	15%	**44%**	**$38,540**	572

Source: Calculations by TICAS on data for 2012-13 from the U.S. Department of Education and Peterson's. Cumulative debt data copyright 2014 Peterson's, a Nelnet company.
Note: Figures for "tuition and fees" and "cost of attendance" are for in-district/in-state students for public colleges. Figures for "% low Income" reflect the share of 12-month undergraduate enrollment receiving Pell Grants (as reported by colleges on the Department's FISAP form).

The framework document expresses concern that including student debt data in the college ratings may discourage colleges from enrolling low-income students. However, such concerns are based on presumptions that colleges' costs and practices have no bearing on student debt, and that student debt data are unimportant for students to consider when choosing a college. We disagree with both presumptions. Student debt impacts a student's life for years, and it is paramount that students and families be able to compare colleges on this important point. Window stickers providing comparison information for car purchases have not stopped consumers from buying cars with high gas mileage, nor have they stopped car makers from producing them, but it has ensured that consumers can compare cars and make more informed decisions. College students deserve to know how much debt they may be expected to take on to attend any given college.

As outlined in our previous comments, the ratings should specifically include the share of undergraduates borrowing federal student loans in a given year, as well as the share with cumulative federal debt and the average cumulative federal debt per borrower at graduation. The Department could immediately begin collecting data on total debt, including private loans, in IPEDS. Until those data are available, cumulative debt data are available on College InSight for colleges that report them via the Peterson's Common Data Set (CDS) survey. For institutions that do not voluntarily report debt data, the Department could use the most recent sector average (e.g., the average for four-year for-profit colleges) available via the National Postsecondary Student Aid Study (NPSAS) until institution-level data become available, and indicate that the school does not currently report this key information. Going forward, the ratings should use data on cumulative federal student loan debt at graduation through the National

Student Loan Data System (NSLDS) when they become available. Once available, the cumulative debt data should be expanded to include total debt (including both federal and private loans) for undergraduate completers.

Note that it is important that cumulative debt upon entering repayment not be used because it combines data for completers and non-completers. Using debt on entering repayment makes colleges with high drop-out rates look like a good deal, because students who left the school after borrowing for only a semester or two bring the median debt level down.

A single ratings system cannot meet the needs of both consumers and policymakers. These two very different audiences have distinct goals that do not always overlap and, in some cases, may conflict. The ratings systems need to be separate: one designed to help students and families make informed decisions about where to go to college, and a different one designed to help policymakers increase college accountability. For example, accounting for a public college's state funding per student might be an important consideration for policymakers' interpretation of net price data, but the student needs to know the actual net price regardless of the underlying factors. Additionally, as discussed below, separate systems for consumers and for policymakers will allow the Department to protect students and families from unknowingly using input-adjusted metrics as an indicator of a college's actual performance.

"Input adjustments" will mislead prospective students and could excuse or protect low-performing institutions. Adjustments based on student or institutional characteristics should never be used in ratings for consumers, and they warrant great caution before use in funding formulas or other accountability mechanisms. Input adjustments distort what a prospective student should expect if he or she attends that institution, can effectively set different standards and expectations for different students and schools, and may reinforce current disparities in student outcomes. Consider a student interested in a school where just one in five students graduates. She does not need to know that this school performs better than expected given its demographics or selectivity level. She needs to know that *only 20 percent of students graduate*. It is misleading and harmful to present information that distorts consumer expectations by giving a school a high score for something because others are even worse. Imagine if health departments adjusted public restaurant ratings in this manner (e.g., adjusting for the significant rat population on a restaurant's block, the presence of rats in the kitchen is lower than expected so the restaurant receives a high rating for customer health).

Even in the context of accountability, many experts have highlighted serious weaknesses and holes in currently available data that significantly undermine the ability to design input-adjusted metrics that are robust, meaningful, and fair. This was made especially clear in a policy paper presented at a Civil Rights Project briefing last fall. Anne Marie Nuñez from the University of Texas-San Antonio found significant volatility in results depending on which variables she chose, and, due to the lack of better data, could not even attempt to properly account for potentially important variables like academic preparedness. Input-adjusted metrics have no place in consumer information, and in other contexts are, at best, a complex undertaking that without better data can result in significant unintended consequences.

Other Important Recommendations for Improving the Framework

Below are additional recommendations for improving the college ratings framework.

Incorporate the ability to compare colleges by degree level, selectivity, and location. Students should be able to filter the universe of institutions in ways that align with common college selection processes: what degree do I want to attain, what are my odds of getting in, and how far away am I interested in going. As noted in our previous comments, additional filters could be considered, but *in no case* should comparison groups be defined by characteristics that bear little resemblance to how a prospective student is likely to consider colleges (e.g., sector or Carnegie classification). Additionally, national context should always be provided so that a student will know if there is a significant gap between the schools in their filter and schools overall.

Do not award colleges a single aggregate rating. The framework invites feedback on the possibility of awarding colleges a single ratings. We strongly recommend against this because a single rating can obscure significant differences in performance across key metrics. Rating colleges in more than one area can still allow for the incorporation of multiple metrics in each area, but it is essential that users can always quickly and easily access the underlying data to make their own determinations about which elements are the most important to them.

Start with primarily bachelor's degree granting institutions. There is no doubt that students need and deserve better information about costs and outcomes at all types of colleges, and that there is room for improvement at all types of colleges. However, while no data are perfect, the limitations of currently available data are far more pronounced at institutions serving a less traditional student population. After the initial ratings system has been developed and refined, the Department will be better positioned to determine how best to expand it to all colleges as well as how it might be revised for accountability purposes.

Include non-degree-granting schools. By including only degree-granting institutions, the ratings exclude about 2,500 non-degree-granting schools. For students considering an undergraduate certificate program in a given field, the choices often include both degree- and non-degree-granting schools. At the point in which ratings cover both two-year and four-year institutions, they should cover non-degree granting institutions as well.

Include the Student Default Risk Index (SDRI). While we appreciate the potential inclusion of cohort default rates (CDRs) and/or a repayment rate as outcomes measures in the ratings, we recommend using the *Student Default Risk Index (SDRI)*, which is the three-year CDR multiplied by the school's borrowing rate. By incorporating the share of students who borrow loans into the measure, the SDRI more accurately conveys a student's risk of default at a given school than the CDR alone. For instance, at a school with a 10 percent borrowing rate and a 20 percent CDR, a student's chance of defaulting is only 2 percent. The Department already has the data to calculate an SDRI for each school. The borrowing rate data are currently reported via the Student Financial Aid component of IPEDS, and CDRs are calculated by the Department. Note that in comments submitted last year, the American Association of Community Colleges (AACC) and the National Association of College Admissions Counselors (NACAC) joined TICAS in recommending the use of the SDRI as an outcomes measure in college ratings.

Include graduation rates for Pell grant recipients. Graduation rates for Pell grant recipients will help students and families understand which colleges not only enroll substantial numbers of Pell grant recipients, but also graduate them. The only colleges where this reporting requirement would constitute additional burden are those that are not already calculating and disclosing the data, and as such are not complying with federal law. Until other sources are available, these data should be collected in IPEDS so they are comparable to existing graduation rates for students of all economic backgrounds.

Do not include net price by income or enrollment by family income beyond the first or second income quintiles. As discussed in the framework, the limitations of available income data are significant because they are self-reported on the FAFSA, which is only completed by a non-representative portion of college students. These limitations are especially pronounced beyond the first and second income quintiles because students from families with higher incomes are significantly less likely to complete the FAFSA. As a result, metrics by income quintile may be reliably incorporated into the ratings for the first and perhaps second income quintile, but not beyond that.

Do not include the 'EFC gap' measure. The 'EFC gap' measure as described in the framework is confusing and overly complex when much simpler affordability metrics suffice.

What the Framework Gets Right

As stated at the beginning of these comments, we appreciate the Department's solicitation of feedback, much of which has been reflected in the framework. In particular, we are pleased that the ratings will:

- *Group institutions by predominant credential awarded.*[1] This is a key difference between institutions and should be the default comparison group for ratings.
- *Rate institutions as high, middle, or low.* As stated in the framework, this is an important feature to avoid creating a sense of false precision.
- *Include net price as a measure of affordability.* Net price is a key measure of affordability and should absolutely be included in the ratings.
- *Include enrollment of both Pell grant recipients and first generation college students as measures of access.*
- *Recognize that performance over time may be useful supplementary information but should not affect ratings.* Indicating longer term trends in performance on a metric (up or down) with an arrow or similar marker may be helpful in some cases, but performance over time should never factor into how a college is rated. Consumers need to know what attending a given institution may mean for them given current performance.
- *Use rolling averages of metrics.* This is an appropriate safeguard against anomalous variability from one year to another and helps to protect student privacy when data points may represent a small group of students in a given year.
- *Recognize existing federal information tools.* As discussed in the framework, existing tools created by the Department like College Navigator and the College Scorecard overlap with and could compete for attention with a separate college ratings tool. We recommend that the ratings build off of the existing College Scorecard tool, but not fully eliminate or replace it.
- *Commit to consumer testing, student privacy, and data transparency.* We commend continued efforts by the Department to reach out to all stakeholders, and for committing to consumer testing, safeguarding student data, and releasing underlying data used to construct the ratings.

[1] Note that the example on the top of page five of the framework ("30 percent certificate programs, 30 percent associate degree programs, and 40 percent baccalaureate degree programs") is incorrectly labeled a predominantly four-year instiution. We presume this was a mistake. As stated at the bottom of page four, institutions such as this that primarily award associate degrees and/or certficates should be considered predominantly two-year institutions.

Thank you again for providing this opportunity to comment. Please feel free to contact me at jthompson@ticas.org or 202-223-6060 if you have questions or would like further details.

Sincerely,

(b)(6)

Jessica L. Thompson

cc: Ted Mitchell, Under Secretary of Education
Jamienne Studley, Deputy Under Secretary of Education

O'Bergh, Jon

From: Andrew Rakaczki <arakaczki@higherone.com>
Sent: Wednesday, February 18, 2015 2:58 PM
To: College Feedback
Subject: Higher One Comments on PIRS College Rankings
Attachments: Higher One Comments on PIRS College Rankings.pdf

Please find attached Higher One's comments to the Department of Education's new system of college ratings.

If you have any questions, please do not hesitate to contact me.

Regards,
Andrew

Andrew M. Rakaczki
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On behalf of Higher One, I am writing to offer comments on the Department of Education's college ratings proposal.

Initiatives such as the college ratings system continue to be a positive step towards democratizing data access and equipping students, parents, and other stakeholders with more information to help support the complex decision making process of enrolling in post-secondary education. While such a system has many benefits, it can also be costly for institutions to implement if the required data is difficult to obtain. Additionally, participation in the ratings system can be politically fraught if the data used for comparison is not standardized across the institutions being measured. This lack of standardization will leave students to make seemingly informed decisions from incomplete information. We would recommend that the Department of Education consider convening a commission or panel of public and private sector experts to help refine these metrics in creating a viable path forward.

Efforts by the Department of Education to standardize the metrics for use in the ratings system and willingness to seek input from experts and stakeholders helps to ensure that data elements used to evaluate schools are balanced between those that provide meaningful information for students and families, and those that may be focused on larger public policy objectives. However, as with any standardized system that has a stated purpose to "help provide better information about college value to student and families" it is imperative to acknowledge that the value of college will depend greatly on what individuals seek from their education. In that vein, the Department should continue to look beyond purely financial drivers behind enrollment in a post-secondary institution, and strive to evaluate other measures that could drive student success including metrics such as engagement and learning which also help students succeed beyond the completion of their studies.

The Department's proposed rating system should provide consumers with a centralized, comprehensive and intuitive database of information that will allow students and their families to analyze, evaluate and compare institutions. Those comparisons should be based upon a system that enables clear interpretation of the data by students and other stakeholders. However, we believe the impact of this rating system may have little effect on most institutions if only three rating levels are utilized. The Department's use of these three levels should recognize dramatic improvements for extremely low-performing institutions as well as institutions rated in the middle. Failing to do so could lead to a lack of motivation by institutions to improve their ratings level.

To address challenges with distribution of category assignments, the ratings should be based on criterion-referenced measures. This would allow for improvement over time to be captured and the ideal scenario of enabling all institutions to achieve a high-performing status. A criterion-based approach could also empower institutions to action with a focus on improvement as an outcome and not simply the rating category or process itself.

An inherent challenge in the creation of the ratings system is the subjective nature of any selection process. Individual students will always have varying needs and unique motivations that will affect their decision-making. Establishing a system that provides an adequate comparison of institutional performance measures to guide this choice requires that the metrics support informed action on behalf of the student. This ratings system should be one of many data points that students and their families use as part of a comprehensive decision-making process.

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The current focus of these metrics is to devise a system that would recognize institutions that "excel at enrolling students from all backgrounds, focus on maintaining affordability, and succeed at helping students to graduate." With this in mind, there seems to be a number of metrics that seek to define aspects of enrolling students from all backgrounds such as expected family contribution gap and family income quintiles. These measures should be accessible for institutions to report on; however, they are limited in helping perspective students understand the various backgrounds of students enrolled at an institution. Other metrics should be included to demonstrate this dynamic or more clarity about the purpose of the inclusion of such metrics should be provided to consumers within the ratings system itself.

Completion and transfer rates are important metrics for inclusion in the ratings system. They can provide perspective students and families insight into the time to degree completion. However, the current standard of measurement for transfer and completion rates in IPEDS is problematic for institutions serving vulnerable demographics. A recalibration or expansion of the definition of "transfer" would likely be required. Similarly, the use of IPEDS data is problematic given the speed at which the data is available for comparative purposes. Outdated information, even by a year, can drive down the utility of certain metrics being considered for use in ratings system.

Transfer rates provide another interesting challenge for use in the system. While the rate could be seen as a positive outcome for students at certain institutions, it can also be seen as a negative in others, since no context would be provided around why students transferred. Without providing the connection between transfer rates and subsequent completion rates of those students, the ratings system could be establishing a misleading performance metric.

Metrics such as labor market success have varying relative values on both an institutional and program level. Applying employment metrics universally across all institutions and programs may be divergent to the stated outcome of the ratings system. However, including this type of metric can be of value for many programs that focus primarily on workforce preparedness.

Loan performance measures are important for helping perspective students understand and meet their financial obligations. This metric could also be a proxy for labor market success as it could likely indicate successful entry into the workforce without having to account for contributions for low-paying fields or public service.

While loan performance is included as a possible metric, the exclusion of debt load as a metric seems noteworthy. Helping perspective students and families understand the average or typical debt load of students at an institution or in a particular program would seem to strengthen the system's aim of bringing more transparency to students about the true affordability of the institution or course of study.

In conclusion, the ratings system's success seems dependent on its ability to provide functionally objective data points about the cost of education and institutional and student performance. The system must keep this as a focus. A system that creates an inherent bias that steers students toward particular institutions as a policy objective may do more harm than good. The metrics that are included in the system should avoid creating additional burdens on institutions and should be simple, straightforward and informative for those making the decision to attend a post-secondary institution.

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O'Bergh, Jon

From:	Sarah M. Castro <smcastro@uw.edu>
Sent:	Wednesday, February 18, 2015 3:17 PM
To:	College Feedback
Cc:	Becka Johnson Poppe; Christy D. Gullion
Subject:	UW's response to the proposed College Ratings framework
Attachments:	College Ratings Framework Final.pdf

Please see the attached response by the University of Washington to the Administration's College Ratings framework. Please let us know if there are any questions.
Best,
Sarah

SARAH CASTRO
Associate Director, Federal Relations / External Affairs

444 North Capitol Street, NW, Set 418 / Washington D.C. 20001
Desk: 202-624-1426 / Cell: (b)(6)

W UNIVERSITY of WASHINGTON

Federal Relations Blog

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February 18, 2015

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Ave, SW, Room 7W301
Washington, DC 20202-1510

Dear Secretary Duncan,

The University of Washington (UW) appreciates the opportunity to provide feedback on the Administration's invitation for feedback on "A New System of College Ratings" as announced in December or 2014 and we look forward to continuing to participate actively in this dialogue. The UW's recommendations regarding the new ratings system include:

- Create a single public website to house all college ratings and information, and only one ratings tool for students and families to use.
- Create institutional comparison categories based not only on institution level, but also on the type of control of the institution (public/private nonprofit/private for-profit) and its mission.
- Allow institutions to choose the metrics that are most relevant to their individual missions.
- Ensure that institutions receive credit for *maintaining* a high level of performance, not just for improving.
- Recognize that an institution's ability to influence certain metrics can vary by sector and student population; avoid holding institutions accountable for factors beyond their control.

The attached to this letter the UW describes these and other recommendations in detail. Again, thank you for this opportunity, and we welcome engaging in a meaningful dialogue with the Department of Education as this effort progresses.

Sincerely,

(b)(6)

Ana Mari Cauce

Interim President

TO: The Department of Education

FROM: Ana Mari Cauce; Interim President, University of Washington

SUBJECT: The University of Washington's Response to the New System of College Ratings Invitation to Comment

COLLEGE RATINGS

President Obama is calling on colleges to restrain soaring tuition costs in light of the fact that Americans with some higher education are more likely to maintain steady employment and earn a comfortable income (or, as the President declared, "be part of the middle class").

The President has juxtaposed college access and affordability against college costs without making the important connection to overall funding. President Obama's rally cry to mitigate the higher education costs borne by students (used interchangeably with the term "affordability") is to be coupled with the Department of Education's (Department) efforts to develop a mechanism by which federal financial aid would be contingent on a determination of "affordability and value." A nuanced picture is hard to paint not knowing how the Department will ultimately weigh or incorporate this data or how the Department has crafted previous methodology.

Knowing this is a query for that type of information, the University of Washington (UW) has a long tradition of comparing itself to peer institutions, primarily R-1 research universities, on a number of dimensions using data collected from institutions nationwide. UW has previously responded to information for both the College Score Card and PIRS, and we appreciate the opportunities to comment on what and how those should be used.

Singularity & Stability

President Obama has repeatedly announced national efforts and directed the Department to develop and publish a new college ratings system before the 2015-16 school year. These efforts, up to now, have resulted in "The College Scorecard" and the "Postsecondary Institution Ratings System" (PIRS), both of which are intended to help students compare colleges on measures of access, affordability, and outcomes; to encourage colleges to improve their performance in these areas; and help college students and their families make informed choices on college options. Going further, the Department intends to use the ratings to identify institutions that excel or are improving through the College Ratings Framework.

While we applaud the Department for wanting to make a transparent, easy-to-use system, the Administration has made this effort at least twice previously with mixed success. We are concerned how this new tool will interact with the two prior tools and the potential confusion that so many tools, which are so similar and arguably duplicative in intent, will create. We urge the Administration to have only one ratings tool for students and families to use. One central, cohesive tool, with clear and transparent metrics that incorporates or replaces the existing information is critical for a truly consumer-friendly site for students and families.

Further, students, families, and institutes of higher education need a stable means of measurement. We urge the Department, the Administration and Congress to establish, by law, stable and consistent standards that rate all schools against peer institutions and standards that will not change from administration to administration. This is the third time this Administration has attempted to develop these metrics. The coming Higher Education Reauthorization is an excellent forum to publicly discuss and debate, by all stakeholders, which metrics are key to assess and how the data should be calculated. The long term stability of ranking standards and methodologies would be invaluable - to students and families, as well as to the institutions themselves. The President has urged

Congress to reauthorize the Higher Education Act, and we urge the President to include his proposed standards therein, so as to establish long-term stability on this initiative.

THE RATINGS FRAMEWORK

Categorization of Institutions

We understand that the Administration currently plans to rate institutions in two main groups: those offering two-year and those offering four-year degrees. While we appreciate the Administration's attempt to adjust measures by institutional characteristics to tell a more nuanced story, nuance is hard to convey in a simple, consumer-friendly rating.

Public and private institutions operate in exceedingly different political and financial environments – so much so that the Integrated Postsecondary Education Data System (IPEDS) survey itself asks different types of questions of institutions depending on whether they are public, private non-profit, or private for-profit. These institutions differ so strongly on the proposed metrics (e.g. percent Pell, graduation rates, average net price) that it would be misleading to the public to rate them on the same scale. We believe that the improvements in usability and clarity would far outweigh the loss in simplicity associated with creating additional sector-based groupings.

It may be difficult to divide institutions any more finely than this – the more groupings there are, the more difficult it will be to explain to the public exactly what it means to be "high-performing" and what it means to be "low-performing". Institutions risk being labeled as "low-performing" if they happen to trail their high-performing peers, even though they may be considered "high-performing" overall or in a lower-performing group.

Keeping this limitation in mind, we would urge the Department to nevertheless consider categorizing institutions based on their mission. State flagship universities face very specific challenges that would affect their performance on – and their degree of control over – several of the metrics the Department is considering. Being first established public research universities in each state, these schools tend to invest more heavily in graduate and research programs. These investments improve the overall quality of undergraduate education, allow undergraduates to learn advanced skills, and provide them with valuable research opportunities. Necessarily, however, they also increase tuition costs and net price.

State flagship universities also have a limited degree of control over some aspects of performance. For instance, their tuition rates are dependent on the level of state funding, and – in some states – on actual legislation. Since state-based financial aid programs are also vulnerable to state funding reductions, it can be very difficult for state flagship universities to drive their net price down. In addition, since educating the state's resident student population is a key part of the fundamental mission of the state flagship university, the institution's performance on access metrics may be affected more heavily by overall state demographics than by any actions these institutions take.

Suggested Metrics

As previously mentioned, UW has a long tradition of routinely comparing itself to peers on a number of dimensions using data collected from institutions nationwide. As a word of caution for such a comparison, it is important to note that comparisons based on the available data are, by their nature, somewhat limited. Most comparisons use data from the IPEDS, published by the NCES. Although IPEDS has done an excellent job of defining data elements so that institutions report their information in the most comparable way possible, differences in business processes and practices and differences in institutions' data systems make it unlikely that two institutions report data in exactly the same way. As a result, this type of peer comparison should be viewed as suggestive rather than definitive. Furthermore, on many of these metrics, IPEDS data is only available for first-time full-time students, who represent only a subset of the undergraduate population an institution – especially a state flagship university – serves.

To provide consistency and to ensure that data is available on key topics (e.g. access for Pell students), it will likely be necessary to select a handful of metrics on which all institutions are measured. However, a "one size fits all" model should be avoided, as each higher education institution in the United States serves a different student population and geographic region. Thus, each has its own distinct mission and duty.

To the extent possible, the UW recommends that the Administration **allow institutions to choose the metrics that are most relevant to their individual missions.** For example, the Pennsylvania State System of Higher Education measures institutions against ten performance indicators, five of which are mandatory and five of which are selected by each institution from a list of options. Such an approach will allow institutions to select metrics that are aligned with their mission and, if applicable, with their state-level performance goals. Moreover, it will ensure that through combined efforts, higher education as a whole is making progress on all three nationwide goals.

In order to provide succinct, transparent information for students and their families, **we recommend limiting metrics to a certain number per goal, per institution**. For example:

- **Access**: percentage of students receiving Pell grants and percentage of students who are first generation
- **Affordability:** net price and cohort default rates
- **Outcomes:** graduation rates median borrowing, and degrees awarded in STEM fields

The following data points are ones that UW suggests as benchmarks.

Access

Pell Grants: A commonly used metric to indicate access to a university is the number of Pell Grants in a cohort due to the need-based nature of the grant. In 2014–15, 28 percent of UW undergraduates were eligible for Pell Grant funding. In fact, UW has more Pell Grant recipients than all of the Ivy League schools combined.

Of all measures proposed, percent Pell is probably the most robust. However, it needs to be recognized that many students who do not qualify for Pell grants still face financial need, and some institutions are more committed than others to meeting that need. In fact, institutional aid could arguably be one of the best indicators of an institution's commitment to access and affordability.

First Generation Students: Another commonly used measure is the number of students who are first in their families to pursue a post-secondary education. Our reservation with this metric is not the metric itself, but the data that is used to inform it. If the Department relies on data from FAFSA to determine whether a student is a first-generation student, then it will omit a great many students who do not fill out the FAFSA. In addition, information gathered from FAFSA will only help to differentiate between students whose parents never went to college and those whose parents earned a college degree. There is currently no way to determine from answers to the FAFSA questionnaire whether a student's parents attended some college, but never graduated.

Affordability

Net Price: Net price is helpful when considering how average financial aid support may affect what a student pays. However, beyond the fact that it is once again a metric that only applies to first-time, full-time residents, we note that the affordability and price of a public institution should be contemplated alongside an institution's commitments to financial aid and the level of state support that institution receives. There has been a national trend over recent decades in which state appropriations per student have fallen and the price to students and their families (in tuition) has consequently increased. Like many other state institutions, the UW has endured numerous state funding cuts in past biennia. Consequently, the majority of funding formerly provided by the state is now borne by students and their families.

State support, which is often beyond the control of an institution, is an important contextual factor to consider when judging an institution's net price. However, so is an institution's commitment to maintaining access in the face of declining state support. As an example, the UW enrolled more students than ever while it reconciled a 50 percent decline in state appropriations over four fiscal years. This perfect storm necessitated significant tuition increases, but also emboldened us to contribute more to institutional financial aid in order to maintain access for our students with the most financial need.

Loan Default Rate: As an indicator of a school's success - and presumed ability to make a student employable - there still needs to be a balance between school accountability and outside factors like the economy. UW's 4.3 percent three-year cohort default rate[1] – which represents the FY2011 cohort, the most recently updated data – is low compared to the national average of 13.7 percent as well as the average for public institutions, 12.9 percent.

Outcomes

Graduation rates: One commonly used measure of student success is the six-year graduation rate. The UW has a six-year graduation rate in line with those of peers. At UW, the average time to degree is four years and one month, and 82 percent of entering freshmen graduate from the UW within six years.

Median Borrowing: First and foremost, it should be recognized that half of all UW undergraduates graduate with no known debt, and those who borrow graduate with less debt than the national average. The most recent numbers come from 2011 median federal undergraduate debt load taken out while students study at the UW is $15,458. However, the undergraduate debt load figure used most often on campus is $21,555. This figure represents the mean (rather than median) debt of UW undergraduate students graduating with debt, including debt incurred at other institutions before or during a student's tenure at the UW. This presentation of data is not particularly problematic for an institution with a six-year graduation rate of over 80 percent, but as the Institute for College Access & Success notes, displaying median debt load for students without noting drop-out rates is misleading. Any metrics should include retention rates for all institutions, including those that fail to re-enroll a significant population of students who began coursework, for a more complete, and telling depiction.

STEM Degrees Awarded: In Fall 2014, 36.7 percent of UW students were pursuing at least one Science, Technology, Engineering & Mathematics (STEM) major, and in 2013–14, the UW awarded 5,162 STEM degrees.

Troubling Metrics

Going further, there are a number of measures proposed which the UW strongly opposes incorporating into any rating document due to the vast variability of how each institution could calculate and report the information, and the incredibly difficult nature to collect reliable information.

Earnings Information: In Washington State, the Education Research & Data Center (ERDC), in partnership with multiple state agencies, created the Earnings for Graduates Report to provide earnings information for students who completed a certificate or degree at one of Washington's public institutions, or who completed an apprenticeship program in Washington. However, this report is subject to a significant limitation: because earnings data was drawn from the Washington Employment Security Department, the report does not track graduates who are:

- Employed out-of-state;
- Employed by the military or federal government;
- Self-employed;
- Attending graduate school or another postsecondary school; OR
- Missing information so that their records couldn't be matched to ESD data for technical reasons.

[1] http://www2.ed.gov/offices/OSFAP/defaultmanagement/index.html

Consequently, at the Bachelor's level, the report captures roughly 75 percent of UW graduates one-year post-graduation, and up to 84 percent of UW graduates five years post-graduation. At the Master's level, the report captures about 70 percent of UW graduates one-year post-graduation, and 75 percent five years post-graduation. The percentage of UW graduates who are included in the report varies by field of study. Thus, the strength of conclusions that can be drawn from the report also differs by field. At the Bachelor's level, the proportion of UW graduates included in the report is highest in health and business and lowest in the STEM disciplines. At the Master's level, the proportion of UW graduates who are represented in the report is highest in education, and again lowest in STEM.

Washington's experience illustrates that any metric based on employment data will be incomplete, at best, and potentially misleading. Correctly understanding the meaning of employment data requires grappling with many nuances that are difficult to convey in a user-friendly traffic-light-type ratings system.

While UW wishes to assist students and their families in making informed decisions about college, an emphasis on earnings sends the message that low-income professions, like teaching, are somehow less valuable or worthwhile than high- income careers. Society needs both.

Graduate School Attendance: Though the UW is dedicated to graduate education, we are not convinced that using Graduate School Attendance as a performance metric at the institutional level is very informative to the public, since it is expected to vary a great deal from program to program. In addition, using data on loans from NSLDS to determine graduate school attendance would exclude most doctoral students and would not accurately represent the proportion of students from an institution who go on to pursue graduate studies.

Metric Weighting and Scoring

The weighting and scoring of metrics will need to be determined after the metrics themselves are finalized. However, **it is crucial that institutions receive credit for *maintaining* a high level of performance, not just for improving**. In other words, an institution that is highly affordable when the ratings system is implemented and maintains that level in subsequent years should be rated just as highly as an institution that is less affordable at the beginning, but improves to a similar level to the more affordable institution. Similarly, changes should only be considered "improvements" or "declines" if they meet some substantive threshold, to avoid penalizing institutions for noise in the data. Finally, if an institution already excels in a particular area, it typically means it has little room for improvement. It is imperative that institutions not be penalized for this natural fact.

In addition, **the degree of control an institution has over their performance on a given metric should be considered and weighted.** "Affordability," for example, is at least partially dependent on a school's student composition, which varies significantly by institution and is not entirely under an institution's control. Further, for many public institutions, tuition rates are almost entirely dependent on state funding, which is out of institutions' control. In some states, legislators continue to control tuition rates themselves. State-based financial aid programs are also vulnerable to state funding reductions. Some institutions simply cannot control aspects that drive tuition rates up or factors that drive net price down.

If institutions are allowed to select their own metrics, they will likely choose those over which they have the most control. However, it is possible that all the metrics for a particular goal, such as affordability, will be only moderately controllable. **To avoid holding institutions accountable for factors beyond their control, the Department should determine how much influence public, nonprofit, and for-profit institutions have over each potential goal and metric.** Goals and metrics that are more within an institution's control should be weighted more heavily, and vice versa.

We appreciate that the Department wishes to make the ratings system accessible to the public and therefore seeks to separate institutions into only three categories: "high-performing", "low-performing", and a middle category. However, we see at least two problems with this approach: first, there may be more variability in performance among institutions within each of these categories than between institutions on either end of the threshold between categories, so the labels would overstate differences between some institutions while understating differences between others; and second, institutions that find themselves in the "middle of the pack" would not have any motivation to improve given that the improvement is unlikely to be rewarded, while other institutions might invest very little effort and appear to have improved a great deal. We believe this to be contrary to the Department's stated objective of incentivizing all institutions to improve performance.

CONCERNS REGARDING FEDERAL PERFORMANCE-BASED FUNDING

We realize that the long-term goal for these rating is ultimately to tie results to federal funding. Performance-based funding is not a new construct. We are concerned, however about any plan by the Administration to create a performance-contingent scheme for the provision of student financial aid. We advise the Department against using any of these rating to inform federal funding. Nearly two-thirds of states have adopted performance funding models since the 1970s, and many have been abandoned or completely modified those schemes since their initial implementation. This fact should give some pause.

The President's attention to these policy areas may be lauded, but careful consideration should be given to a construct wherein low-income students at different institutions with varying missions are not able to compete on an even playing field for needed grants. Our concerns are as follows:

1. **Federal performance-based funding could harm access and social mobility for middle-income students.** Some higher education leaders have expressed concern that federal performance-based funding could prompt institutions to abandon need-blind admissions in the pursuit of higher ratings. Many public institutions remain need-blind and admit students regardless of their ability to pay. This critical value ensures that our public institutions are engines of social mobility for both low- and middle-income students. If federal aid is dispersed based on performance, institutions may, by necessity, consider applicants' finances in admissions decisions. If institutions are rated on the percentage of students receiving Pell grants, institutions would likely give such students preference in admissions in order to receive higher ratings. However, to financially support those students, preference would also need to be given to students who are able to pay the *full* cost of their education without any aid. We worry that middle-income students would be squeezed out and left without many affordable options. Currently, institutions that pride themselves on admitting many Pell Grant recipients and low-income students do so because of their outreach programs and their financial aid structures. Admission at the UW is based on merit, not on familial finances.[2]
2. **Students may be inequitably awarded or disadvantaged, depending on their institution.** Students studying at institutions that exhibit progress along these measures might enjoy extra Pell Grant funding, but students studying at institutions that lack in performance might not receive the same level of assistance. Traditionally, student need has driven federal aid funding and public higher education institutions have simply allocated federal funds to student accounts. The primacy of student need would change under this construct. Before this change went into place, careful consideration of unintended consequences to students would be critical.
3. **Unpredictable grant levels would make it difficult for students to financially plan for college.** Not only would financial aid awards potentially be inequitable, they would also be unpredictable. Although the *current* student-based federal financial aid system is often confusing—the forms are complicated, the process is onerous, and the lack of financial aid information available to students before they commit to schools is frustrating—students can expect a predictable grant amount given their expressed level of need. This predictability helps students financially prepare for college, which can make it easier for students to persist and complete their degrees. Under a federal performance funding system, students' financial aid awards could change as they prepare for college and progress toward their degree, depending on their institution's performance. Students would be unable to predict how much money their institution would receive in a given year and, thus, how much they themselves would receive. This uncertainty would make it difficult for students to financially prepare for the future and would increase the risk of students dropping out if college becomes less affordable than they expected.

[2] http://chronicle.com/article/Obama-Plan-to-Tie-Student-Aid/141229/

4. **Federal performance funding could duplicate existing state-level efforts and, thus, be costly for institutions to plan for and comply with.** Efforts should be made to ensure the PIRS is coordinated with state-level systems as much as possible. The more accountability or performance systems the institutions have to comply with, the more institution-level costs will increase to hire staff to do this work. Over **twenty** states currently operate performance-based funding systems for public colleges and universities. Public higher education institutions are under pressure to cut costs and moderate tuition increases. Thus, it is problematic to have multiple accountability systems seeking the same ends, through possibly different goals and definitions, data sources, incentives, and/or punitive structures.

Given these concerns, we recommend tying funding to performance only for institutions that derive the vast majority of their funding from federal financial aid. For all other institutions, the UW believes that accountability and performance improvements can be successfully achieved by publishing information in a targeted, transparent manner. The heaviest accountability requirements and penalties should apply to the institutions that rely most heavily on that funding.

Distribution of federal aid has become less strict in recent years and, as a result, we see more institutions over-using it and/or using in ways that are not sanctioned. In 1992, Congress approved a rule with strong bipartisan support that prevented for-profit institutions from receiving more than 85 percent of their revenue from federal student aid. Since then, the rule, known as the "85-15" rule, has been watered down to the point of futility. The current "90-10" rule lets too many problematic institutions fly under the radar due to diluted restrictions and a loophole that allows GI Bill funds and Dept. of Defense Tuition Assistance to count as private dollars instead of federal aid.[3] [4] In 2011-12, only 1.4 percent of for-profits (29 institutions) violated the 90-10 rule, whereas 22.8 percent (470 institutions) would have been out of compliance with the 85-15 rule.[5] A 2012 Senate investigation revealed that at the thirty for-profit colleges with the most students leaving with debt, the majority of those students also left without a degree. These same institutions spent over twice as much on marketing, recruiting, and profits (42 percent) as they did on instruction (17 percent).[6]

Situations like these are the antithesis of the President's goals for higher education and, therefore, must be targeted by the PIRS. Tying federal financial aid allocations to performance metrics for institutions—public, nonprofit, or for-profit—that receive more than 85 percent of their revenue from federal aid would accomplish this.

CONCLUSION

We appreciate the opportunity to respond to the Administration's request for information, and are grateful for the Department's commitment to release the data used to construct the ratings to the institutions. We would request that this be done prior to the publication of the metrics, as it is much easier to provide specific comments once a rating system is fully developed than to speak in general terms. We would hope that there will be time for another round of comments once a draft rating system is published, and before it is displayed for the public. We look forward to continuing this dialogue.

[3] Section 487(a)(24) of the *Higher Education Opportunity Act*
[4] http://www.harkin.senate.gov/documents/pdf/4dda7eecf0200.pdf
[5] "2011-2012 Award Year, Report" Retrieved on 9-25-2013 from: http://studentaid.ed.gov/about/data-center/school/proprietary
[6] http://www.help.senate.gov/imo/media/for_profit_report/Contents.pdf

O'Bergh, Jon

From: Fitzsimmons, Tracy <tfitzsim@su.edu>
Sent: Wednesday, February 18, 2015 3:38 PM
To: College Feedback
Subject: feedback on proposed Ratings System

Dear Secretaries Duncan, Studley and Mitchell,

You have undoubtedly received volumes of input on the proposed ratings system and I am grateful for the opportunity to add my thoughts to those of my colleagues:

1. I concur that **access and affordability are essential goals** for our colleges and universities -- and many institutions, including Shenandoah, are working hard to make a not-for-profit college degree more affordable and accessible.

2. I also concur that **transparency of information and sector-wide benchmarking are essential** as stated in your proposal. But the information you are proposing for inclusion is already available in the public sector and institutions already use this data to benchmark against each other -- you are therefore proposing nothing new with regard to transparency or benchmarking.

3. The strength of America's higher education sector is in its diversity. **It is not the job of the federal government to tell parents and students which of the diverse data points equates to "value"** -- should earnings or default rates really be prioritized over a family's religious values or geographic preferences? That is what you are implying by choosing a limited data set.

4. The **data points you propose using do not measure quality or value**.

5. An **institution could be on the verge of going bankrupt or could be on the verge of having its accreditation revoked, and your rating system would not reflect that**. If fact, an institution could score well on the rating system and go out of business next year.

5. We are a free market economy -- **let the market do its job**. If an institution is too expensive or does not ensure student success, students will vote with their feet and attend another institution. The offending institution will either adapt to market/student expectations by lowering price and/or raising quality, or it will go out of business. Please do not intervene in the market.

My appreciation to you for allowing this period of extended input. As you know, I am just an hour away from Washington, DC and am happy to come into the city to participate in further discussions on this topic.

Most sincerely,
Tracy Fitzsimmons

Tracy Fitzsimmons, Ph.D.
Past Chair, NAICU
President. Shenandoah University
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540-665-4841

O'Bergh, Jon

From: Carolyn Henrich <Carolyn.Henrich@ucdc.edu>
Sent: Wednesday, February 18, 2015 3:54 PM
To: College Feedback
Cc: Gomez, Robert; Perrotti, Carmine; jeff.appell@ed.gov
Subject: University of California comments on ED's proposed college-ratings framework
Attachments: duncan ratings.PDF

Importance: High

Greetings,
Attached is a letter from the University of California to Education Secretary Arne Duncan in response to ED's call for comments on the proposed framework for a college ratings system. Please do not hesitate to contact me if you have questions, would like more information about UC's recommendations, or wish to speak to someone in the UC Office of the President about our views.

Thank you.
Carolyn

Carolyn Henrich
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February 17, 2015

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

Dear Secretary Duncan:

The University of California (UC) appreciates the Department of Education's invitation to comment on the draft framework for a new system of college ratings. As the nation's largest public research university, UC applauds President Obama's commitment to strengthen the performance of colleges and universities in promoting access, affordability, and improved student outcomes in higher education.

UC educates nearly 190,000 undergraduates and 50,000 graduate students across its ten campuses. It serves as a model for the nation's colleges and universities in combining access, affordability, and positive student outcomes. Many public institutions enroll large numbers of first-generation-college and low-income students. Similarly, many nationally ranked private and public institutions provide quality instruction, high-value degrees, and excellent graduation and time-to-degree rates. As recognized in *Washington Monthly*, UC's unique contribution to California and to higher education is its success in combining world-class quality with such a large and diverse student body. Fully 42 percent of UC's undergraduate students are Pell Grant recipients; 41 percent are the first in their families to attend college.

UC is open to engaging in a national discussion of a framework for a college ratings system that leads to increased institutional accountability and provides families and students with important information when they are selecting a college. Further, UC supports increased transparency and improved data analysis to ensure that taxpayer-funded student financial aid is directed to institutions that show success in offering high-quality educational opportunities to students from a broad range of family income levels, and in assisting students achieve academic success without taking on unmanageable levels of debt. In looking at ways to sustain the federal government's investment in student financial aid over the long-term, UC would like to continue to be part of the conversation about data elements, collection, analysis, methodology, reliability, validity, consistency, variability, and other aspects of the Department's proposal.

Data Sources

The UC system is committed to preserving and enhancing access and affordability, and we take pride in our record of educating students from across all socioeconomic communities and backgrounds. UC has a strong commitment to transparency in the areas of cost, educational outcomes, and the quality of the student experience. As a public and regionally-accredited institution, UC provides a significant amount of consumer information publicly on our website and has long committed to transparency and accountability to policymakers, taxpayers, parents, and students through our annual Accountability Reports, which can be found online at accountability.universityofcalifornia.edu. In addition, as a public institution, UC is subject to careful auditing, oversight and program effectiveness reviews by the California State Legislature and State government. As a regionally-accredited institution, UC is subject to rigorous evaluation by the Western Association of Schools and Colleges.

UC strongly recommends that any college ratings system developed by the Department should seek to minimize additional and redundant reporting on public institutions. UC therefore supports the Department's decision to rely primarily on existing sources of data from federal administrative data systems and data collections, such as the Integrated Postsecondary Education Data System (IPEDS) and the National Student Loan Data System (NSLDS) in constructing the new ratings system. Leveraging these existing data sources will encourage a basic level of consistency in reporting standards and avoid burdening institutions with new and potentially inconsistent reporting requirements.

With respect to existing data sources, the Department collects a great deal of postsecondary education data through IPEDS that can be deployed in the proposed ratings system. IPEDS contains data on student enrollment, financial aid, and degree completion that many institutions already use for comparative analysis and benchmarking. The historical data and the standardization of definitions and data elements across institutions, which are available in IPEDS, provide a good baseline for a ratings system. UC recognizes, however, certain limitations with IPEDS and encourages the Department to continue its efforts to broaden the scope of IPEDS, to address the weaknesses inherent in information that is self-reported, and to assure that data are valid and comparable in different contexts.

Completion Rates

Transfer Students. As currently conceived, many of the metrics for the college ratings framework, such as completion rates, would focus only on first-time full-time undergraduate students. For many public institutions, such as UC, limiting the college ratings system metrics to first-time full-time undergraduate students would not account for the full population of students who are served. One of UC's highest priorities is to ensure that a UC education remains accessible to all Californians who meet its admissions standards. This goal is articulated in California's *Master Plan for Higher Education,* which calls for UC to admit all qualified freshman applicants in the top 12.5 percent of California public high school graduates and all qualified California Community College transfer students. Accordingly, nearly 30 percent of UC's undergraduate class is composed of transfer students from community colleges. The Department should continue to explore alternatives to the IPEDS-based completion rate that would incorporate completion outcomes for all federally aided students, including part-time students and transfer-in students.

Pell Grant Recipients. An additional metric that would be valuable to include in any college ratings system is the Pell Grant student graduation rate. Since reauthorization of the Higher Education Act in 2008, all institutions are required to calculate and disclose four, five, and six-year graduation rates separately for students receiving Pell Grants. This metric highlights how well students from low-income and disadvantaged backgrounds are succeeding at postsecondary institutions, a metric which is often masked by the overall graduation rate. This measure would help the Department assess the extent to which institutions are supporting low-income students funded by the Pell Grant program.

Institutional Groupings

UC appreciates the Department's continued consideration of how differences in institutional characteristics and mission ought to be taken into account when rating institutions. This is consistent with President Obama's goal to compare institutions with similar missions.

The proposal to simply group two-year and four-year institutions, however, may be *too* basic because it cannot adequately distinguish between institutions of different sizes, selectivity, and mission. Within four-year institutions alone, for example, the cost structures, student demographics, and assets/endowments of private institutions may allow for more robust financial aid programs than those possible for most public institutions, which maintain a mission of educating large numbers of students from all socioeconomic backgrounds. Moreover, research-intensive institutions (public and private) should be separately grouped and assessed since their research infrastructure leads to higher costs while offering a distinctive student learning experience that incorporates exposure to faculty research. For-profit institutions should be separately grouped and assessed, because their missions are more directly employment-oriented, and their profit-oriented models can have a significant impact on access and affordability.

In drilling down to more specific elements of a ratings system, it is important that metrics be adjusted to account for different governance and control, level of research activity, and other variable factors. Using a more detailed classification system would provide a clearer picture of comparative institutional strengths and how well institutions are fulfilling their particular educational missions.

Labor Market Success

The Department has made a positive step toward addressing UC's concerns about the use of short-term earnings of alumni as a metric for rating institutions' labor market success. Limiting the evaluation of earnings for recently-graduated alumni to a threshold measure of "substantial employment" will help avoid devaluing the contributions of those students who seek employment in the public service or non-profit sectors shortly after graduation.

As the Department continues to develop metrics for evaluating labor market success, it will be important to identify a source that offers standardized and reliable data for all states and institutions. The Department must also remain cognizant that graduate employment and earnings are susceptible to factors both inherent in the institution's mission and identity, such as the population served, and the goal of the institutions (e.g., preparation for graduate study vs. preparation for non-academic careers in technical fields). Factors external to the institution, such as proximity to high paying industries and variations in the regional economy and labor markets should also be taken into account.

Student Debt

One of the most significant areas of concern in higher education revolves around students who incur substantial levels of debt for educational programs of little value. UC believes that there should be mechanisms in the college ratings system to identify poorly performing institutions, and that federal oversight should target resources to identify and impose sanctions on institutions with high default rates, unsustainable levels of student debt and low completion rates.

The federal student loan default rate will be an important metric to consider in assessing access and affordability. This figure is one way to assess the manageability of student debt, which is influenced by the size of the debt relative to the income students are able to secure after graduation. It also reflects on the extent to which institutions are fulfilling their obligation to inform student borrowers on the responsibilities of debt repayment. The Department already calculates the default rate from each institution in a standardized fashion and displays it publicly in many venues. As such, the federal student loan default rate will be easy to incorporate into a ratings system and will be valuable from both an accountability and a consumer-information perspective.

Conclusion

Thank you for your consideration of the University of California's comments on the draft college ratings framework. UC looks forward to continuing to work with the Department to ensure that any new ratings system provides policymakers and the public with appropriate, manageable, and reliable information about higher education institutions. We believe that any rating system must be eminently useful, not only for providing information to students, families, consumers, and the public, but also for protecting the integrity of the federal government's investment in student financial aid. We look forward to continuing to work with the Department as it considers how best to present information about access, affordability, and outcomes in a way that increases transparency and meaningfully informs student choice.

Yours very truly,

(b)(6)

Janet Napolitano
President

cc: Provost Aimeé Dorr
Senior Vice President Nelson Peacock
Vice President Pamela Brown
Associate Vice President Gary Falle

O'Bergh, Jon

From: Smith, Mark [NEA] <MarkSmith@nea.org>
Sent: Wednesday, February 18, 2015 3:58 PM
To: College Feedback
Cc: Harris-Aikens, Donna [NEA]; Wissink, Rebecca [NEA]
Subject: NEA Comments on College Ratings System
Attachments: Feb 17, 2015 NEA Comments on College Ratings Framework.pdf

NEA would like to submit the attached comments on the Proposed College Rating System

Mark F. Smith
Senior Policy Analyst – Higher Education
Education Policy and Practices Department
National Education Association
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Win or lose – What matter? We fight for freedom of spirit

Ienaga Saburo

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Princess R. Moss
Secretary-Treasurer

John C. Stocks
Executive Director

February 17, 2015

Arne Duncan
Secretary of Education
Lyndon Baines Johnson Department of Education Building
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Duncan:

On behalf of more than 3 million members, the National Education Association (NEA) submits the following comments on the U.S. Department of Education's proposed framework for a new college ratings system. NEA strongly advocates for access and affordability in all aspects of post-secondary education. NEA President Lily Eskelsen García recently said:

> Educators believe all students should have a fair shot at a college education so they can pursue their dreams. Today's students are tomorrow's educators, doctors, nurses, engineers, and scientists—the next generation of innovators who will drive our country and our economy forward. The jobs of the future—actually, the jobs of today—increasingly require a post-secondary degree or certificate, and that includes the job of a highly qualified teacher.

NEA supports the president's goal of increasing access, affordability, completion, and post-graduation success. We must ensure that all students have the opportunity to access and succeed in post-secondary programs of value that provide the means to advance themselves and support their families.

We appreciate the concrete steps this administration already has made to improve college access and affordability and the steps it continues to take, most notably the recent proposal to make community college tuition free. This proposal will not only make things better for many students, but by recognizing that such programs need resource support at both the state and federal level, will help move post-secondary education back to the status of a public good, where every qualified student has the opportunity to attend regardless of their ability to pay. We will continue to push for the enactment of this and similar proposals.

We share the administration's desire to provide greater transparency for students and their families as they make choices about which colleges they should consider for their own academic goals and financial situations. We too want to see increased access and completion for diverse populations in all of the nation's diverse collection of colleges and universities. The increased openness and information available on public sites will help achieve that goal.

We cannot however, support a rating system as proposed by the president in late 2013, nor can we support the framework released by the Department of Education last December. We appreciate all the work that has gone into this proposal, but we believe that this framework fails to recognize the complexity of the American higher education system, and does not do justice to the subjectivity of the choices that students and their families must make in deciding what path to post-secondary education they take.

Many of the metrics laid out in the framework are important for the Department to capture in order to provide information to help students and their families make the necessary decisions, but they still do not enable one to compare institutions rationally and objectively. One size does not fit all, and the strength of our system of higher education is its diversity of institutions and institutional missions that speaks to the wide range of needs of students just out of secondary school, young adults looking to improve their situations, and older workers looking for re-training and career change opportunities.

While we neither support the basic concept of the rating system, nor the development of a framework to implement such a system, we do want to make the following specific points as the Department continues to consider this proposal and its ramifications:

- First, do no harm. Take care to ensure that the system does not harm institutions that serve first-generation, low-income, and minority students. Whatever framework is used, it must take into account in its metrics, the levels of preparation these students have received prior to attending the post-secondary institution being evaluated.
- Second, reward those institutions that reach out and work with students who need developmental or remedial coursework, and non-traditional older students. In addition, credit those institutions that reach out to primary and secondary schools to increase their students' college and career readiness.

Finally, we will object strenuously to any steps taken in 2018 and beyond to tie any ratings proposal to eligibility requirements for student aid. We continue to support appropriate accountability standards, such as the recently re-enacted gainful employment standard. This proposed rating system, however, has too many shortcomings in its conception and attempts to objectively measure subjective decisions to serve as that level of standard.

NEA respectfully submits the above comments for your consideration. Please do not hesitate to contact Mark F. Smith, senior policy analyst, higher education, at marksmith@nea.org should you have any questions.

Sincerely,

(b)(6)

Donna M. Harris-Aikens
Director, Education Policy and Practice

O'Bergh, Jon

From:	Pamela Murphy <pmurphy@aacom.org>
Sent:	Wednesday, February 18, 2015 4:10 PM
To:	College Feedback
Subject:	AACOM Comments on College Ratings System 2-18-15
Attachments:	AACOM Comments on College Ratings System 2-18-15.pdf

Please find attached comments from Stephen C. Shannon, D.O., M.P.H., President and CEO of the American Association of Colleges of Osteopathic Medicine to the U.S. Department of Education on its College Ratings System Framework.

Thank you,

Pamela Murphy
Vice President of Government Relations

aacom

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AMERICAN ASSOCIATION OF
COLLEGES OF OSTEOPATHIC MEDICINE

OFFICE OF THE PRESIDENT

February 18, 2015

The Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Ave., S.W.
Washington, D.C. 20202-1510

VIA ELECTRONIC SUBMISSION (collegefeedback@ed.gov)

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

Dear Secretary Duncan:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), we are pleased to offer comments to the U.S. Department of Education (USDE) on A New System of College Ratings. AACOM represents the 30 accredited colleges of osteopathic medicine (COMs) in the United States. These colleges are accredited to deliver instruction at 42 teaching locations in 28 states. In the 2014-15 academic year these colleges are educating over 24,600 future physicians – more than 25 percent of new U.S. medical students.

AACOM applauds the Department for proposing a framework designed to promote the principles of accountability in the Title IV student financial aid programs. We recognize that appropriate oversight is a fundamental function of the USDE to ensure that federal funding is properly allocated.

Although we support the Department's goal of ensuring that students receive a cost-effective and high quality education, AACOM has specific concerns with the implementation process of the college ratings system in terms of data, metrics, and the potential regulatory burden on schools and institutions. As we have stressed in previous comments, we suggest greater clarity in the assessment of comparing like institutions with similar missions. Secondly, with regard to standardizing a graduation rate measure for medical schools, we propose using a cohort-based measurement similar to the measure used for undergraduate education, while also allowing for more than four years as the calculated time frame to allow for the standard/traditional four years of medical school education (to include additional time for personal medical leaves or the possibility of extended time for research, fellowship, or multiple degree completion). Finally, the framework states that "a critical purpose of the ratings system is to recognize institutions that are succeeding at expanding access, maintaining affordability, and ensuring strong student outcomes and setting them apart from institutions that need to improve." As you are aware, there

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are different types of medical schools; these schools should be assessed differently using unique criteria.

At a time when our nation faces a critical and growing shortage of physicians, AACOM asks that the Department, in examining the college ratings system and regulations such as gainful employment as well as proposals such as student loan repayment reform, consider the factors unique to medical education. U.S. medical students follow a common sequence of course work, clinical training, and national board exams, regardless of whether they attend a public, non-profit, or for-profit medical school. Following graduation, physicians cannot begin to practice until they complete additional graduate medical education training, which takes between three to seven years (depending upon their field of specialty), and pass additional national licensure exams.

The unique process of medical education can pose a significant financial burden to medical students who risk large amounts of debt and rely on various federal loan options. During residency training, physicians earn a stipend; however, that income is generally not sufficient to begin full repayment of educational loans, and is certainly not indicative of the future practicing physician's salary. As a result, medical residents depend on federal financial aid options such as forbearance and income-based repayment to postpone or reduce their obligations until they become licensed physicians. Any proposed rating system should not penalize borrowers who depend upon these repayment options after graduation.

While AACOM understands that the proposed college ratings system would only impact colleges and universities, and the gainful employment regulation affects for-profit institutions, we are concerned with the potential negative non-regulatory impact of these requirements and their potential extension to graduate and professional schools to include U.S. medical schools. We further caution that if proposals and regulations such as these are applied to medical schools, it could have an adverse impact on medical students participating in Title IV student financial aid programs. In addition, a ratings system that considers income as a factor in determining Title IV eligibility would likely discourage service in primary care and lower-paying specialties, further exacerbating the nation's physician workforce shortage.

Thank you for providing the opportunity to share our views. AACOM looks forward to working closely with the Department to ensure medical students and schools are well-served by Title IV student financial aid programs. If you have questions or require further information, please contact Pamela Murphy, Vice President of Government Relations, at 301-908-2137 or pmurphy@aacom.org.

Respectfully,

(b)(6)

Stephen C. Shannon, D.O., M.P.H.
President and CEO

O'Bergh, Jon

From: Commissioner Freeland <commissioner.freeland@bhe.mass.edu>
Sent: Wednesday, February 18, 2015 4:10 PM
To: College Feedback
Attachments: 2015-2-18 Freeland to Reeves DOE RFI - Ratings System.pdf

Please see the attached letter of response regarding the Postsecondary Institution Rating System.

Richard Freeland
Commissioner, Massachusetts Department of Higher Education

Massachusetts Department of Higher Education

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Richard M. Freeland, *Commissioner*
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Massachusetts Board of Higher Education

February 17, 2015

Richard Reeves
National Center for Education Statistics
Attention: Postsecondary Institution Rating System RFI
U.S. Department of Education
1990 K Street, NW, 8th Floor
Washington, DC 20006

Dear Mr. Reeves:

I submit this comment on behalf of the Massachusetts Department of Higher Education (DHE) in response to the U.S. Department of Education (DOE)'s request for information regarding the Postsecondary Institution Rating System.

The DOE's objective of collecting data for institutional improvement, stakeholder awareness, and tax payer accountability aligns well with our agency's mission and statutory authority. I should point out that while the Massachusetts Board of Higher Education (BHE) approves new academic programs at both independent (with a physical presence in the state) and public institutions of higher education, our major authority focuses on the three segments of public higher education: the community colleges, state universities, and the University of Massachusetts (UMass).

Since 2009, the Massachusetts Board of Higher Education (BHE) has created a metrics-driven accountability framework that aligns quite well with the underlying purpose and goal of the Postsecondary Institution System. A number of system- and campus-level indicators have been developed to reflect performance in the area of college participation and readiness, college completion, closing achievement gaps, student learning outcomes, workforce development, civic learning, and research. Performance in these areas is captured by a number of different campus-level indicators and compared to segmental averages. This data serves to assess campus progress as well as to inform local boards of trends and accomplishments in the evaluation of their presidents. At the system level, we strive to assess our progress by measuring ourselves against the highest performing public higher education systems in the nation.

A more recent development in Massachusetts has been to review campus strategic plans (for which we also have statutory authority) to ensure that these plans incorporate goals and metrics related to the areas of performance assessment referenced above. Although at early stages, this process is proving important in gauging campus progress leading to in-depth discussions between the Board of Higher Education, campus leadership, and local boards of trustees. This work will culminate in action by the BHE to approve all campus strategic plans.

Another element of DHE's oversight and accountability is to submit our public community colleges to a performance-based funding formula that incorporates many of the indicators described previously. The Massachusetts legislature has asked that efforts be made to expand the performance-based funding formula to the state universities—something we fully endorse. The funding formula provides base funding as well as distributes funding to those institutions that are high performing—again, using metrics agreed to by the campuses and the BHE.

The framework the Department of Higher Education employs to measure key accountability metrics is structured within a tool called the Vision Project Dashboard. Essentially, the Commonwealth's goal with the Vision Project is to create the nation's best-educated citizenry and workforce in the nation by: attracting more students; boosting college completion rates; closing achievement gaps; assessing learning outcomes, promoting workforce development; and preparing students for citizenship. These overarching goals are similar to those which the Obama Administration's Postsecondary Institution Rating System intends to capture in promoting college access, affordability, and student success.

The Vision Project Dashboard, as briefly illustrated in the Addendum below, is a reporting system. It is neither a ranking nor a rating system. It has been developed with consultation and cooperation from the Commonwealth's public institutions of higher education. They are now incorporating these elements into their official strategic planning processes and gauging progress by this work. This has fostered transparency and accountability and the results will provide important information to students and families considering college as well as those charged in measuring progress at these institutions.

The DHE recommends that federal efforts to establish a Postsecondary Institution Rating System to promote institutional improvement, stakeholder awareness, and tax payer accountability align with state efforts in this regard. We also see considerable value in working with the DE to extend a robust statewide performance measurement data system to incorporate independent institutions. The Postsecondary Institution Rating System is envisioned to encompass all institutions of higher education and DHE would be willing to share statewide data and metrics to support this goal.

We recommend that the DOE allow states that have existing or are developing rigorous and robust systems of institutional accountability to continue that work without diverting attention to an IPEDS-reliant ratings system. The latter may not measure the reality it attempts to capture; is much more challenging to get consensus; and many institutions of higher education question the feasibility and benefits of its implementation.

Sincerely,

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Richard M. Freeland
Commissioner

c. Carlos Santiago, Senior Deputy Commissioner