

Addendum: Accounting for Institutional Effectiveness in the Commonwealth of Massachusetts

The accountability indicators the Vision Project measures and their symmetry with the proposed federal rating system are outlined below:

College Participation:

At the system level the metrics in this area track college preparation in English and Math and college participation rates of young adults and recent high school graduates. At the campus level, metrics focus on readiness for college level coursework and the enrollment of students from underrepresented populations.

The metrics the Vision Project Dashboard uses to track College Participation are:

- *College Readiness Rates*; This metric tracks the percentage of High School seniors scoring proficient in math and English on the twelfth grade NAEP exam.

In addition, the percent of recent high school graduates enrolling in remedial math, English and other remedial courses is tracked to reflect trends over a 5 year period. The metric is broken down further between the Community College, State University and UMASS segments with the means to track one year changes to reflect significant short term improvement.

- *College Enrollment Rates*; This metric tracks the college enrollment rates of recent high school graduates as well as 18-24 year olds to reflect trends over a 5 or 6 year period. As with the previous metric, the yearly change can be tracked to indicate significant yearly improvement in enrollment over the cohort period.
- *Gaps in College Readiness Rates*; This metric tracks the percentage of High School seniors scoring proficient in math and English by ethnic segment over a four year period. The segments compare African American and Latino students to the White segment of the population. In addition, the metric tracks the percentage of students scoring proficient in math and English based on the education level of their parents.
- *Gaps in College Enrollment Rates*; This metric tracks the college enrollment rates by ethnic segment of 18-24 year olds to reflect trends over a 5 year period. The segments compare African American and Latino students to the White segment of the population.

College Completion:

College Completion metrics reflect various measurements of students who successfully graduate from a higher education degree and certificate program. College Completion reflects the successful college graduation rates at the state universities and UMASS sectors. At the Community Colleges successful persistence and transfer is also measured.

The metrics the Vision Project Dashboard uses to track College Completion are:

- *Graduation and Student Success Rates*; This metric tracks the six year graduation success rate of first time degree seeking students within the State university and UMASS segments. In addition, a metric measuring the graduation rates of transfer students is also included. The Community College Success rate tracks the six year combined rate of graduation, transfer and long term persistence.
- *Gaps in Graduation and Success Rates*; This metric compares the gaps in graduation and success rates of African American and Latino students to the White segment of the population among the community colleges, state university and UMASS campus systems.

Student Learning Outcomes:

This indicator tracks the number of students who successfully pass National Licensure exams in high demand medical industries. These tests include Dental Assistant, Dental Hygienist, Licensed Practical Nursing (LPN), Medical Assistant, Occupation Therapy Assistant, Physical Therapy Assistant, Radiation Technologist Registered Nurse, Respiratory Therapy Assistant and Surgical Technologist.

Students attending community college, state universities and the UMASS system are separated in this measurement to reflect the success of each sector.

In comparison with the proposed federal rating system, the student learning outcomes are a prime indicator that is similar to the intent behind federal rating outcomes. Massachusetts is also working with a number of states to develop more authentic forms of assessment tied more closely to student work and classroom outcomes.

Workforce Alignment:

In this area we focus on system level efforts to align with the educational and workforce demands of the Commonwealth and individual campus efforts to support this

alignment. The overarching goal is to create a more skilled workforce and we measure this tracking progress towards having 60% of Massachusetts residents holding a degree in a given field by the year 2020. But overall degree production does not ensure alignment. The Commonwealth of Massachusetts is focused on supporting high growth careers in healthcare as well as science, technology, engineering, and mathematics (STEM) fields.

The Vision Project measures the degree achievement in line with the projected career growth in two tiers: degree graduates as a whole based on campus segment and degree graduates from those segments in a high demand field.

For example under tier one, the Commonwealth tracks the production of certificates and degrees at the Community Colleges and Bachelor degrees at the State University and UMASS campuses. Current degree production is assessed against the estimated production required to achieve the 60% goal by 2020.

Under tier two the community college sector degree and certificate production is disaggregated to measure Associate Degrees and certificates in Health Care support fields as well as Associate Degrees in STEM Technician fields.

Tier two tracks the completion of Bachelor degrees in Health Care Practice, STEM fields and Business and finance at the State University and the UMASS campuses.

At the campus level degree production in these high demand fields are tracked both at the overall production and as a share of all degrees produced.

In comparison with the proposed federal rating system, aligning student's degree completion rates with workforce development is similar to the intent behind federal rating outcomes. The Commonwealth's investment in aligning its graduates with growing career fields supports the Obama Administrations initiative to strengthen community colleges ensuring graduates are adequately prepared for employment.

Closing Achievement Gaps:

The metrics for all of the Vision Project indicators areas are subjected to gap analysis. The goal is ensure that Latino, African American and low income students' achievement mirrors that of the general population. Metrics specifically track the gaps between ethnicity within each accountability category.

In comparison with the proposed federal rating system, this accountability measurement is similar to the federal College Access and Outcome goals. The gaps between racial/ethnic populations need to be addressed. Measuring the achievement gaps can help institutions identify the underlying issues that are contributing to them and make the necessary changes to close them.

The metrics the Vision Project Dashboard uses to track progress toward closing achievement gaps are:

- *Gaps in College Participation and Preparation;* At the system level, metrics examine the gaps in college participation and readiness rates of African American and Latino students to the White segment of the population.
- At the system and campus level, metrics assess the percent of recent High School graduates enrolling in remedial math English and other deficiency courses by ethnic student population.
- *Gaps in College Completion and Success;* This metric compares the gaps in graduation and success rates of African American and Latino students to the White segment of the population among the community colleges, state university and UMASS campus systems.
- *Gaps in College Student Learning;* This metric tracks the long term gaps in student learning among different ethnic student populations who pass the Practical and Registered Nursing Exam to project trends over a 5 year period.
- *Gaps in College Workforce Alignment;* this metric examines the share of degrees and certificates in STEM in Health fields for Latino and African American students. An additional metric assesses the percent of graduates employed and /or pursuing additional education in Massachusetts in the year after graduation by ethnic student population.

O'Bergh, Jon

From: CyndyLit@aol.com
Sent: Wednesday, February 18, 2015 4:29 PM
To: College Feedback
Subject: AJCU Comments on Proposed College Ratings System 2/18/2015
Attachments: AJCUCollegeRatingsFinalComments.pdf

To whom it may concern.

Attached is the Association of Jesuit Colleges and Universities (AJCU) letter from President Rev. Michael J. Sheeran, S.J. commenting on the proposed draft of the College Ratings System.

Should you have any questions, please feel free to contact me.

Sincerely,

Cyndy Littlefield
Vice President for Federal Relations
Association of Jesuit Colleges and Universities
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(b)(6) Cell

ASSOCIATION of
JESUIT COLLEGES
& UNIVERSITIES
AJCU

February 18, 2015

Secretary Arne Duncan
U.S. Department of Education
Washington, D.C. 20002

Dear Secretary Duncan,

On behalf of the nation's twenty-eight Jesuit colleges and universities, I write to express the comments of the Association of Jesuit Colleges and Universities (AJCU) on the December 13, 2014 draft of a proposed college ratings system. AJCU appreciates the President's desire to create a system that focuses on access, affordability, and outcomes, and we look forward to continue working on these national priorities and goals with the Administration.

Adequately reporting comparative data between colleges and universities with a ratings system is a daunting task. It is critical that future students and their parents understand an institution's unique characteristics when comparing colleges. Deciding on which college or university to attend is an important decision in the life and planning of a student and it is with this serious spirit that we offer our comments. At the same time, it is equally important for institutions that these comparisons be accurate and equitable; otherwise, institutions could be affected by misleading or inaccurate portrayals that impact their viability.

The first comparative proposal separates two-year colleges and four-year colleges into two categories. We would urge a further refinement of those categories because there is such a wide difference between private and public four-year institutions. Certainly, the way that private institutions and public institutions are funded is different. Private institutions are more tuition-dependent since public institutions have at least some access to state funding, which can help keep down their tuition. Combining all four-year higher education institutions together disadvantages private institutions on multiple levels and does not tell the whole story. We would therefore suggest that there be a category for private four-year institutions and for public four-year institutions, thus providing a better opportunity to compare similar institutions with each other.

When trying to compare the nuances between private and public institutions, one should consider their missions. For private religiously-affiliated institutions, of which there are over nine hundred in the U.S., mission statements such as those of

the Jesuit institutions focus on educating the whole person and on promoting social justice while preparing future global citizens to make the world a better place to live. We would suggest that mission statements are important indicators of institutions that highlight academic and spiritual priorities. Some of our Jesuit institutions have suggested that there should be a separate fourth comparative category for religiously-affiliated institutions, given their unique characteristics.

We must disagree with the value judgment that a graduate's salary is the sole indicator of his or her success, and therefore for the institution as well. College is an all-inclusive experience not just a career preparatory program. We encourage graduates to work for public service programs such as the Peace Corps or Jesuit Volunteer Corps, and to choose careers to help others, such as those in teaching, policing, medicine, etc. We would stipulate that the purpose of college is not just to get a good job and make good money (through certain particular majors); it is also to educate future educators, historians, psychologists and philosophers who contribute greatly to advancing society, but don't make comparable salaries. These extreme differences in value systems are a critical complication for the proposed draft and must be addressed. Paradoxically, the nine percent of the 114th Congress that graduated from Jesuit colleges and universities could be making more money had they not chosen public service careers.

While we understand that the deadline for finalizing the college ratings system will be before the beginning of the 2015-2016 academic year, we would suggest that the proposed system does not reach the goals articulated in the draft, and should be withdrawn until a system can adequately reflect the vast diversity of our nation's higher education institutions in an accurate and scientifically acceptable manner.

We appreciate the opportunity to offer our comments, and look forward to continuing to work with the Department of Education in the months ahead.

Sincerely,

(b)(6)

Rev. Michael J. Sheeran, S.J.
President, Association of Jesuit Colleges and Universities

O'Bergh, Jon

From: Michael Knies (b)(6)
Sent: Wednesday, February 18, 2015 4:34 PM
To: College Feedback
Subject: Comment on New System of College Ratings

This increases paperwork at colleges thereby requiring the hiring of more staff which increases tuition cost. Instead of increasing the regulatory burden on higher education, the federal government should be dramatically reducing the amount of regulation applicable to higher ed. That reduction would allow higher ed to reduce the number of bureaucratic employees by large numbers and maybe even allow schools to hire full time faculty to teach students. The job of higher ed is to teach not to fill in paperwork. This proposal must be abandoned.

O'Bergh, Jon

From: Taylor Pichette <TPICHETTE@newenglandcouncil.com>
Sent: Wednesday, February 18, 2015 4:40 PM
To: College Feedback
Subject: Comments on draft Postsecondary Institution Ratings System
Attachments: NEC Rating System Comments.pdf

Dear Secretary Duncan,

Thank you for requesting and accepting comments on your draft Postsecondary Institution Ratings System. Attached is a letter with comment from the New England Council. We appreciate your consideration of our concerns. If you have any questions, or we can be helpful in any way, please do not hesitate to be in touch.

Thank you,

Taylor Pichette

Taylor Stone Pichette
Federal Affairs Manager
The New England Council
(202) 547-0048
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THE
NEW ENGLAND
COUNCIL

February 17, 2015

The Honorable Arne Duncan
Secretary of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Duncan,

Thank you very much for your continued efforts to strengthen the higher education system in the United States. Our country has led the world in education, innovation and creating opportunities. With continued hard work, we can ensure that we continue to do so, expanding education opportunities and strengthening America's workforce. The New England Council represents a variety of institutions of higher education throughout the region, as well as businesses that rely on access to an educated workforce. As such, we are particularly interested in the success of efforts to strengthen our talent pipeline.

The New England Council supports increased transparency in higher education, and appreciates the Administration's efforts to enhance transparency, to help students compare the value offered by colleges and to empower students with the best information. In an effort to achieve these goals, however, we must be mindful of the impact the proposed Postsecondary Institution Ratings System (PIRS) could have, particularly if it is not implemented carefully and thoughtfully. As the Administration develops this system, the Council offers the following principles that our members believe are critical for this process.

Careful Design and Testing - A sector-wide rating system should not be rushed into place until it is thoroughly tested and its impact on a variety of institutions is assessed. The model must be fully developed and tested before it is implemented as it will likely become the standard for consumers assessing colleges and will have immense impact on the sector. The consequences of the current proposal have not been adequately considered and the system is not ready for implementation. Furthermore, federal financial aid should not be tied to a ratings system unless the system has been carefully tested to assess its impact on a range of institutions.

Use of Accurate Data - The greatest challenge in developing the system is ensuring the accuracy of the data used. The Integrated Post-Secondary Education Data System (IPEDS) data currently used is grossly inaccurate and should not be the basis for comparison. Without significant improvement to the collect and definition of IPEDS measurement, the data is not only misdirected but inaccurate. This data cannot reliable be used to compare institutions. Graduation rates as they are currently measured are

inaccurate as they do not include students who transfer between institutions before graduation. Net price is similarly difficult to use as a comparison tool.

Recognizing Different Types of Institutions - Any rating system implemented by the federal government must recognize that all institutions do not share the same goals, nor do they serve the same populations. This makes it particularly difficult to determine a set of measurements that can be used across the board, applied to all institutions, and be informative to students. At this point, we do not see a measurement that can be used at the many various institutions in an equitable manner. Measurements of graduation rates should not be used to compare research universities to community colleges.

Access to quality, affordable education and the development of a skilled workforce are critical to our economic growth and global competitiveness. The New England Council is eager to continue to work constructively with our leaders in government and in higher education toward these goals. We would be happy to further discuss these recommendations and our members' concerns with you as you continue to develop this new system. Taylor Pichette, Federal Affairs Manager in our Washington Office, is the best point of contact on this issue and can be reached at 202-547-0048 or tpichette@newenglandcouncil.com.

Sincerely,

(b)(6)

Emily J. Heisig
Senior Vice President, Communications and Federal Affairs
The New England Council

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O'Bergh, Jon

From: Scott Fleming <Scott.Fleming@georgetown.edu>
Sent: Wednesday, February 18, 2015 4:50 PM
To: College Feedback
Subject: Georgetown University Comments on College Ratings Framework
Attachments: Final comments on College Rating System framework.pdf

Per your request, I am attaching comments on behalf of Georgetown University on the recently released framework on the college rating system.

thank you for the opportunity to comment.

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Scott S. Fleming Associate Vice President for Federal Relations Georgetown University 202-687-3455 (phone)/202-687-1656 (fax)



GEORGETOWN UNIVERSITY

Office of Federal Relations

February 18, 2015

We have appreciated opportunities in the past to share with Administration officials our thoughts and perspectives on the proposed college rating system, and we would like at this juncture to share our thoughts as your work in further defining this endeavor moves forward. While we continue to share the Administration's commitment to providing, in very transparent ways, information about affordability and outcomes for students, we remain concerned that the details of how this might be designed could lead to very unfortunate misinterpretation.

First and foremost, Georgetown is very proud of our "need blind" admissions and "full need" financial aid policies that are designed to ensure that we admit academically-equipped students without regard to their families' ability to pay and that financial aid packages will be designed to permit any student to accept our offer of admission. Furthermore, through our Georgetown Scholarship Program, we are working very hard to reduce student loan debt, especially for our neediest students. With that in mind, it is worrisome that data included in any rating system might unintentionally discourage talented students with limited financial resources from applying to Georgetown.

Likewise, in providing information on cost, eliminating average loan debt from the framework calculation would fail to capture our efforts, and those of other institutions, to provide institutional aid to reduce overall debt burden of our students. Pursuing that goal is one which we feel sure the Administration shares, and failure to reflect it in the rating system strikes us as unwise.

We would add, as you explore ways to capture "improvement" in terms of addressing affordability, it will be important to take into account where various institutions stand at the beginning of this process. It would be very troubling were the rating system to compare the progress in this regard of an institution like Georgetown that has already invested heavily in improving affordability for low

income students, with another institution that may not have made any substantial investment at all.

Second, we are concerned about the framework's efforts to quantify the outcomes or "value" of an institution's programs. It is very important that any framework be devised in a way that statistics reported do not discount the importance of work in the public and non-profit sectors. As Dr. Anthony Carnevale, who heads Georgetown's Center for Education and the Workforce, has made very clear in numerous reports published nationwide, future income levels correlate much more closely to the choice of a major than to a particular institution. Furthermore, as an institution whose motto is "Men and Women for Others," we prepare and encourage students to consider careers in public service. In recent years, the largest employer of Georgetown baccalaureate graduates has been the Teach for America program. Others go on to the Peace Corps, Jesuit Volunteer Corps, and government service at all levels. We are confident that the President would agree that these are admirable career paths notwithstanding the fact that their pay grades are far from the highest.

Likewise, we agree that it would be valuable to capture information on graduates who go on to pursue graduate and professional degrees to better reflect outcomes of one's undergraduate education. The reality is that the data source available to the Department, the NSLDS, would capture only those who have taken out federal student loans to finance their graduate education. That would account for only about half of actual graduate and professional students.

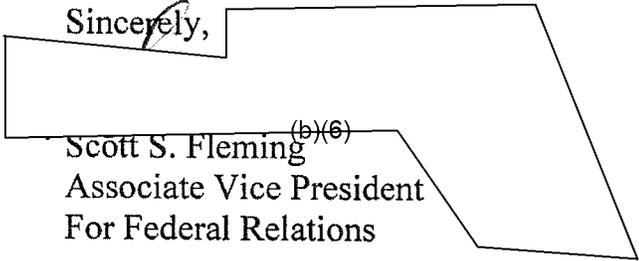
We have also taken the time to explore data sources we currently have available on campus to respond to the information requests detailed in the framework, and there are a number of areas where information is lacking or incomplete. For example, there are a number of institutions, like Georgetown, that use the consensus methodology rather than the federal methodology in determining the allocation of institutional aid. By using "estimated family contribution" calculations from the FAFSA, the further refinement of families' ability to pay used under the consensus methodology would not be reflected and would distort the information reported. Beyond that, accurate information is not available on:

- Outcomes for students who transfer away from Georgetown to other post-secondary institutions
- Short term "substantial employment rates" of graduates
- Long term median income of graduates
- Graduate school attendance

In closing, we emphasize that accurate and personalized information is the key to assisting individual students and their families in determining the best college or university for them. There are, as you noted in your summary, “. . . existing educational tools, including those created by the Department such as the College Scorecard and College Navigator” that are available today. Layering on another rating system on top of what is already available – including the net-price calculators mandated to be available on college and university websites by the Higher Education Act – runs the risk of leading to confusion, not clarity.

Any system – especially one that might, as you suggest - be used for other purposes including policy and accreditation decisions must be very carefully and thoughtfully developed. We favor your goal of improving transparency. Georgetown is an institution that has long worked to increase accessibility and affordability. We appreciate the chance to provide these additional thoughts at this point in your deliberations.

Sincerely,

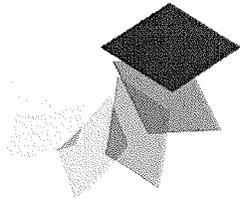
A large, irregular black-outlined redaction box covers the signature area. The text "Sincerely," is positioned above the box, and the name and title "Scott S. Fleming (b)(6) Associate Vice President For Federal Relations" are positioned below the box.
Scott S. Fleming (b)(6)
Associate Vice President
For Federal Relations

O'Bergh, Jon

From: Carrie Warick <WarickC@COLLEGEACCESS.ORG>
Sent: Wednesday, February 18, 2015 5:06 PM
To: College Feedback
Cc: Studley, Jamie; McCann, Clare; Kim Cook; Elizabeth Morgan
Subject: NCAN Comments on College Ratings Framework
Attachments: NCAN Ratings Framework Comments - 2.18.15.pdf

Thank you for this opportunity to respond to the College Ratings Framework. Please let me know if you have any additional questions.

Carrie Warick
Director of Partnerships and Policy, [NCAN](#)
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National College Access Network

Building Connections. Advancing Equity. Promoting Success.

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

18 February 2015

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Helios Education Foundation

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Sasha Peterson
TargetX

Herb Tillery
College Success Foundation –
District of Columbia

Ricardo Torres
National Student Clearinghouse

Executive Director

Kim Cook

Dear Mr. Secretary:

The National College Access Network appreciates this vital opportunity to comment on the College Ratings Framework from the U.S. Department of Education (the Department). Drawing on the expertise of hundreds of organizational members in almost every U.S. state, NCAN is dedicated to improving the quality and quantity of support that underrepresented students receive to apply to, enter, and succeed in college. The majority of our members are nonprofit organizations and schools that provide specialized early awareness information, pre-college advising on admissions and financial aid, and mentoring.

NCAN's primary interest in the college ratings system is to assist the Department in building a tool that will allow students to identify institutions where they are likely to persist and complete as part of their college search process, beginning in the fall of 2015. A federal college ratings system will both support the work of our advisors in the field as well as provide an important resource for students without an advisor or counselor, including students entering higher education from a pathway other than high school. Over time, many college access programs have developed their own, internal, version of a college ratings system to help guide their students' college selection process. The federal government, however, is the only entity that can make this type of information broadly and easily available to all low-income students and families. Ranking/rating products such as U.S. News & World Report or Barrons exist only because upper-income families are willing to pay for the information about selective institutions or have attractive marketing demographics that generate advertising. There is no similar market opportunity to sell information about less selective and nonselective institutions that many lower income students attend. Additionally, the U.S. Department of Education has an authoritative voice, will not be influenced by ads or pay-for-placement like some other college search sites, can reach all college advisors and school counselors to encourage that they use it, and, most importantly, can build a tool with a broad appeal to all college-going students, not just those directly out of high school comparing elite institutions. While the first version of this system may still focus on mostly first-time, full-time students, the additional information on part-time students and transfers coming to the Integrated Postsecondary Education Data System (IPEDS) will broaden the focus over time. With better information for students about college outcomes, we can promote attendance at high-performing institutions and influence low-performing institutions to take serious steps to improve their work with historically underserved students.



National
College
Access
Network

To help craft our response, NCAN members were given two opportunities to respond in February 2015: a webinar with U.S. Education Deputy Undersecretary Jamieenne Studley and a survey asking specific questions about the ratings system as it relates to low-income students. Prior to the release of the Framework, NCAN also participated in the Postsecondary Institution Ratings System Town Hall at George Mason University, submitted written comments to the Department, and served as a witness at the Advisory Committee on Student Financial Assistance hearing on the subject. Additionally, NCAN members in the California Bay Area look forward to meeting with Deputy Undersecretary Studley in late February.

NCAN members touch the lives of more than two million students and families each year and span a broad range of the education, nonprofit, government, and civic sectors. The vast majority of our members welcome the addition of federal college ratings to the college search experience for students and to aid their advisors. One member encouraged the creation of "a tool that helps synthesize the data in a way that's meaningful. Students already feel overwhelmed, and many look at data points and wonder - does this mean something to me? How should I interpret this?" The College Ratings System can fill this important role for students searching on their own while still providing the data points for advisors and counselors to use to assist students.

Thank you again for this opportunity to participate in this important conversation and to help craft an important tool for students. Please find attached our detailed comments on the College Ratings Framework.

Sincerely,

(b)(6)

Kim Cook
Executive Director

Attachment



Ratings System Structure

NCAN supports the creation of a College Ratings System that focuses on students first and accountability second. As a country, we need to help students make choices that support success. Not only is this the most important goal of those stated for the Ratings system, it is the one that the Department can achieve quickly and with the data available either now or in the near future. Developing the Ratings with this goal in mind affects its structure and the time needed to not only design the ratings themselves, but also the interface with which student consumers will engage.

The original proposal for the college ratings system listed three goals: 1) information for consumers, 2) information for institutions to self-improve, and 3) information for government accountability. The latter two goals have audiences that are very different from student consumers. Student consumers need a public facing, appealing, easy to use search tool that reflects actual, not relative, institutional performance. The interface of this tool and the ability to get it into the hands of students cannot be understated. Having the best and most accurate data feed into the tool is crucial, but if the ratings system is not built and marketed to a broad audience, the goal of consumer information will not be met.

Because this goal is paramount to the success of the College Ratings system for consumers, NCAN's comments focus on metrics and formatting with the end result tool in mind. The Department already offers the College Navigator and the College Scorecard. In general, the Scorecard helps students early in the college search stages and Navigator in the later stages. However, in our conversations with members, we found that Navigator was referenced far more as a tool that students are using. NCAN finds it unlikely that students will add a third tool to the mix, but supports the additional type of information that a Ratings system would provide.

To fully integrate with the current tools and to streamline them for consumers, NCAN recommends incorporating the information from the Ratings System into the College Navigator tool. This approach would still use the Department proposed division of institutions into three groupings for the metrics: a band of high performers, and band of low performers, and a group in the middle. Highlighting the high performers (blue ribbon) and low performers (red flag) is helpful for a quick glance, particularly when the divisions are done based on natural breaking points in the metric and not on strict thirds. In this situation, the high- and low-performing groups will likely be much smaller with the majority of institutions falling into the middle, larger group. For students considering the institutions that fall into the low-performing categories, this will be an immediate warning sign to reconsider the institution. However, the majority of students will be examining institutions that primarily fall into the middle categories. For this reason, it is vital that a clear, unadjusted, data point that includes raw numbers be listed for each metric that also includes a performance measure. This will help students, and their advisors/counselors, to differentiate among those in the middle group without the Department making a judgment call within that middle group.

The overall framework from the Department suggests splitting the colleges first into two groups: primarily four-year and primarily two-year institutions. For both the purposes of data management and like-comparison, NCAN recognizes the need for this division. However, many low-income students compare institutions

that they know or are close to them, meaning they are frequently looking at both two-year and four-year institutions. Any consumer solution must keep this in mind, particularly when students are using search functionality. Students must be able to bring up both two-year and four-year institutions in their searches. On the suggestion of creating additional subgroups or nested groups within these groups, the Department should consider whether or not those groupings would allow students would explore their college options. Students are more likely to search by geography than a college's mission statement. While these subgroups may be helpful for accountability, they likely will only artificially filter results for students.

Individual Metrics

When President Obama first proposed the ratings system, he suggested reviewing access, affordability, and outcomes for institutions. A poll of NCAN members found that the majority wanted to see the individual measurement for each metric, which is one reason NCAN recommends adding the ribbon/flag system to College Navigator. The marker will give students the desired "at a glance" view while still pairing it with the raw number data metric. In a related note, no metrics should be combined for the purposes of consumer information. While some combinations may be helpful for institutional accountability measures, information presented to students should be straight forward.

Access Metrics

Percent Pell: Using the percentage of the undergraduate population that has a Pell Grant to measure access for low-income students is common practice and should be continued as part of the ratings. It is an important part of knowing whether an institution has a commitment to helping low-income students. As the most important access metric currently available, this metric (and any related ribbons or flags) should be moved to the section of the Navigator profile that is immediately visible, and not just in the student financial aid subsection.

EFC Gap: This measure, as proposed, should be not included in a ratings system aimed at consumers. It will be very confusing for students to see a measurement based on a specific focal point with that range evaluated. Additionally, as stated above for Pell Percent, only institutions on the cusp of being labeled a poor- or high- performer should be motivated to even try to game the system.

Family Income Quintiles: For low-income students, the inclusion of the percentage of students from each income quintile helps the students with their decision about whether an institution is a good match for them. It is less so a metric to measure whether an institution as a whole is strong in access. It should continue to be a part of Navigator, but not a part of the Ratings system.

First Generation College Status: This measure should be included so that students can have an additional picture of whether "students like me" attend the institution. While it will only represent those students receiving federal student aid, there is a high correlation between family income and educational attainment, meaning that students receiving federal student aid are more likely to be first generation. However, it should be noted that the metric measure student who self-identify as first-generation, since that definition can vary significantly.



Affordability Metrics

Net Price by Quintile: This measurement is the ideal metric for affordability for low- and moderate-income students. It should be listed next to Pell Grant recipient enrollment rate on the main profile Navigator page with any related ribbons or flags so that institutions that keep net price down for low-income families are recognized.

There are drawbacks at the higher ends of the income spectrum because students who do not apply for aid are not counted, meaning that net prices for the upper income quintiles may appear to be lower than they are in actuality for full-pay students. However, sticker price is already readily available and represents what most high-income students would pay unless merit aid is taken into account. Because the focus of this metric is affordability for families who cannot afford sticker price, it is more important for the ratings to include a metric that focuses on the best possible representation of the price that the low- and moderate-income student can expect to pay at a particular institution.

Additionally, at this time out of state student prices are not available for public institutions. Net price by quintile should be labeled as net price for in-state students at public institutions. In the future, if the additional information on out-of-state students does become available, the two price points *must* be listed separately because the majority of students stay in state and attend public institutions. Combining the two numbers would artificially inflate the average net price for in state students, again leading low-income students to believe college is more expensive than it actually is for them.

Average Net Price: This measure is a big improvement over sticker price; however, it is still misleading, particularly to low-income students. For low-income students, average net price will still appear artificially high, possibly dissuading them from applying to college because they fear it is too expensive. NCAN recommends eliminating this measure and focusing on net price by family quintile.

Average Loan Debt – The arguments laid out in the Framework as to why average loan debt should not be included in a ratings system are valid; however, there must be a debt measure of some type in the ratings system. It is one of the most common questions students have about an institution and one of the biggest concerns. What is needed is a debt measure that does not deter institutions from enrolling low-income students, who are more likely to need to take on debt. NCAN recommends a metric that measures a student's ability to repay his/her loans. College Navigator includes cohort default rates, but this is not a consumer friendly term. NCAN recommends renaming and reorganizing this section to focus on those in repayment, rewarding institutions for a high percentage in repayment and vice versa. Additionally, NCAN considers former students using income-related repayment plans to be in good repayment standing.

Outcome Metrics

Completion Rates: Completion rates must be included and updated as more information becomes available on non-first-time, full-time students in IPEDS. For the purpose of rating high- and low-performers, overall graduation rate should be measured. This rating would join Pell Grant enrollment rate and net price for the lowest family income quintile as the highlighted rating. Additionally, once Pell



Grant recipient graduation rate data become available (either via addition to IPEDS or a full cohort in NSLDS), they too must be included. Pell Grant recipient completion rates are the single-most important additional data point that students need to make better-informed choices about where to attend college.

Completion Rate Equity Gap: NCAN also recommends including an outcome measure on the graduation rate gap between the entire student body and under-represented minorities. Research from the Education Trust College Results Online shows that many institutions with similar profiles have very different outcomes for their students. Using this metric will allow students of color to know how well an institution serves them without incenting the institution to change their admission policies. Calculating this metric can be done using the graduation rate by race and ethnicity, already available in the College Navigator. The gap between Pell Grant recipients and non-recipients should also be calculated once those numbers are available.

Adjusting Outcomes in Metrics: NCAN strongly urges the Department not to use regression analysis in the development of the ratings system. Students need clearly defined information that has not been altered so that they can compare actual outcomes and make informed decisions. Rewarding an institution for “over-performing” because it graduates more students than predicted, but still has a low graduation rate, does not aid students in selecting an institution where they are most likely to succeed. Further, institutions should not be rated by lower completion standards because they accept students who are of color, low-income, or deemed at-risk in some other way.

Ratings Tools for the Student Consumer

Combining the Ratings into the College Navigator would require significant consumer upgrades to the Navigator platform and user interface. These changes, however, would both be easier and less expensive to make than creating a new user interface from scratch. It would also aid in sharing any additional data added from other sources, such as NSLDS, with other third party tools as they would be access the data in the same way. Many additional changes should be made to make Navigator more user friendly as a comparison tool. Overall, the most important change will be the addition of the “blue ribbon” and “red flag” next to the metrics that place an institution in the high- or low- performing categories suggested in the Framework.

Features of the Online Tool

Specifically, students need to be able to answer the question, “how will a student like me” fare at this school? When conferring with NCAN members, it is clear that their students use online college search tools that are either well known or readily available to them. The most popular by far is Big Future from the College Board with other favorites including College Navigator, College Greenlight, and College Results Online. Students must create a College Board login to take the SAT, so Big Future is readily available to them. In addition, it receives generally positive reviews from members for usability, value, and trustworthiness. State specific websites are also popular because they are local, include state specific scholarships and information, and are usually recommended or well-known by advisors and counselors.



College Greenlight is a free online resource designed specifically to help traditionally underrepresented students research and apply to college. The tool allows students to search for colleges based on selected criteria, organize their application process with lists and deadline reminders, and find scholarships. The tool is particularly strong at presenting cost information based on a student's individual family circumstances and helping students evaluate potential "fit."

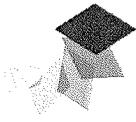
Students start by creating a profile that includes their demographic, academic, and extracurricular information as well as identifying the kind of college experience that interests them (close to home, residential campus, etc.). The profile also asks students about the education levels of their parents, the importance of financial aid to them, and the option to include family income, presented in broad increments of \$20,000 to \$30,000. Students indicate an initial set of colleges that interest them and can learn more about 3,000-plus nonprofit institutions through quick facts, in-depth profiles, and student reviews. The site does not include for-profit colleges. College Greenlight also includes average aid amounts for each school as well as estimated net price based on a range of family incomes.

Some of the site's most popular features are "chance of admissions" scattergrams based on a student's profile as well as a customized "best fit" list of schools. Students can also read about campus and off-campus life and get information about campus diversity. College Greenlight also maintains a large database of national, local, and university scholarships, and students can receive alerts notifying them of matching scholarships.

College Results Online (www.collegeresults.org) was originally designed for researchers, but is growing in popularity among NCAN members because of its focus on equity. In particular, the tool clearly defines schools that are "engines of inequality" based on their Pell Grant recipient enrollment rates and student debt burden. These institutions have clear flags on the top of their main profile pages. One NCAN member particularly likes that College Results allows students to build a portfolio of schools and then compare metrics for those institutions. College Results also allows students to "find similar schools" that may have better affordability or completion outcomes but have comparable admissions requirements.

Looking to other industries for consumer information practices is also helpful. The Consumer Reports model is one that could serve the College Ratings System well. Similar to the comparison mentioned in College Results above Consumer Reports lists all reviewed items and their rating on a variety of metrics. This allows the consumer to easily view the comparable information and decide which feature is most important to them. Nutrition labels are also helpful because they all look exactly the same. The consumer tool should use the same layout for each school, and any eventual requirements for institutions to share data or information should also be in the same format (in the same vein as the Financial Aid Shopping Sheet).

Further, most students stay within a limited geographic radius when applying to institutions. For some students, particularly adult learners, they may be "place-bound" and unable to move. But for many students, even traditional ones, they are considering public college options, colleges with which they are familiar, or those in driving distance. For this reason, it is vital that students be able to filter institutions by geography or distance from home, and not only institution type. One NCAN member says, "Students start with the colleges they know (in the area;



family/friends attend or graduated at that institution; and schools visiting the high school at college fairs or lunch visits) and seldom venture outside of their comfort zone, many times missing great opportunities." Another suggests adding a "find similar schools" feature similar to College Results Online because "many students know one school, usually one in their area, that could be a good fit, but they don't know how to find a similar school somewhere else."

Integration with Other Federal Tools

In addition to the College Navigator, the Department also offers the College Scorecard, which students are more likely to use very early in the search process because it gives a high level overview. Additionally, many members recommended linking the Ratings to the FAFSA and the SAR form, including having some of the ratings appear for the institution when a student adds it to his/her FAFSA. However, some were concerned that FAFSA completion is too late in the college application process to share this information. Also, if the SAR is to be used, the information should be more prominent than the current graduation rates shared on the form.

Campaign for the College Ratings Tool

Spreading the word about the release of the College Ratings System outside of the higher education world will be crucial to its success. The publicity campaign must use several avenues and must consider that many post-traditional students are not based in the high school settings so will need a different type of outreach. For traditional-aged students, high schools, school counselors, and college advisors must lead the way in spreading the word and must have materials, both printed and electronic, to help them in their work. Social media should be a large part of the campaign, and the latest research on which platforms 14-17 year olds are using should be considered. For example, the average user on Facebook is trending older and many students spend more time on Instagram, YouTube, Tumblr, Storify, and Snapchat. Also consider age-appropriate celebrities. Publicity should also be coordinated with existing campaigns such as College Goal Sunday, College Application Week, and Reach Higher. Finally, include information in places where many students must already visit such as standard test registration websites.

For students entering high education through a pipeline other than high school, consider social media and celebrities, but those that are aimed at an older audience. Additionally, consider places these students will be likely to go/visit – such as work centers, GED testing centers, or even tax completion (similar to standardized test sites).

O'Bergh, Jon

From: JENNIFER STIDDARD <jstiddard@acct.org>
Sent: Wednesday, February 18, 2015 5:12 PM
To: College Feedback
Cc: JEE HANG LEE; JENNIFER STIDDARD
Subject: Association of Community College Trustees - PIRS Comments
Attachments: PIRS comments feb 2015.pdf

Thank you for your consideration of the attached comments on behalf of the Association of Community College Trustees.

Jennifer Stiddard
Senior Public Policy Associate
Association of Community College Trustees
1101 17th Street, NW Suite 300
Washington, DC 20036
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202-478-0471 (fax)
jstiddard@acct.org

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:

The Association of Community College Trustees (ACCT) appreciates the Administration's dedication to promoting transparency and affordability for our nation's postsecondary students. Yet we remain concerned regarding the accuracy and prospective limitations of the proposed Postsecondary Institution Ratings System (PIRS). On January 31, 2014, ACCT submitted formal comments to the Department of Education regarding PIRS. While we appreciate the Department's acknowledgement of some of our concerns within the PIRS framework released on December 19, 2014, the framework does not provide definitive guidance on how the Department plans to address these fundamental flaws. In the absence of concrete details regarding the metrics the Department will utilize as part of the ratings system, we are unable to offer an extensive critique based on the tentative details available. Hence, ACCT is once again submitting our prior comments offered in 2014, as they are still applicable to the most recent framework presented.

The federal acknowledgment of data limitations in the PIRS framework is encouraging and appropriate—as is the recognition of many unique aspects inherent to low-cost, public, predominantly two-year institutions. Community colleges are actively involved in accountability and transparency initiatives that evaluate institutional performance. Many such systems reflect the diversity of institutional mission and student pathways into and through higher education—systems like the Voluntary Framework of Accountability (VFA). ACCT supports the Department's suggestion that these voluntary outcomes data could serve as a source of alternative information in the ratings system, and awaits further details regarding this integration. Additionally, we would support the ability to use data from the National Student Clearinghouse in order to create a more precise measurement of student success.

As stated in ACCT's prior attached comments, currently available federal measurements of community college completion and transfer rates are vastly incomplete given existing statutory restrictions on individual-level student data. While the framework recognizes these limitations, it does not provide a timely or definitive plan to attain accurate information for students. For example, reliance on the National Student Loan Data System (NSLDS) provides an inaccurate picture in developing key metrics given that numerous community college students do not participate in the federal student aid program. Many other fundamental questions remain unclear regarding metrics and implementation. Given

deficiency in comprehensive data, as well as an uncertain path forward we request a two year delay in the implementation of PIRS for public two-year colleges.

From an accountability standpoint, the limitations on available data remain a fundamental barrier to instituting an accurate ratings system for the 2015 -2016 academic year. Based on the information provided in the most recent framework, we request the Department delay in moving forward with a ratings system that fails to consider data for a large percentage of community college students. In addition to the inaccuracies in consumer information, a flawed ratings system has the potential for other unintended and unforeseen consequences. We share your goal in providing transparent and accurate information regarding student success, and look forward to continuing the dialogue on PIRS to create a trustworthy tool for institutions and students.

Thank you for the opportunity to share these thoughts regarding the college ratings proposal. If you have further questions, please feel free to contact Jee Hang Lee, ACCT Vice President for Public Policy and External Relations at (202) 775-4450 or jhlee@acct.org.

Sincerely,

(b)(6)

J. Noah Brown
ACCT President and CEO



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January 31, 2014

Mr. Richard Reeves, National Center for Education Statistics
Attention: Postsecondary Institution Ratings System RFI

U.S. Department of Education 1990 K Street NW., 8th Floor
Washington, DC 20006
Docket ID ED-2013-IES-0151

Submitted via: <http://www.regulations.gov/>

Dear Mr. Reeves:

The Association of Community College Trustees (ACCT) appreciates the Obama Administration's continued dedication to students and promoting college affordability. Community colleges are leaders in offering access to higher education to millions of students each year at an affordable cost. ACCT remains committed to increasing student success and has taken steps along with our partners in the sector to improve student success measures and degree and certificate completion rates.

ACCT supports the goal of providing all students and families with pertinent and accurate information regarding institutional value based on sector. However, we also recognize that there will be significant complexities in implementing this system based on currently available information. Using data currently collected by the Department and other federal agencies, and in recognition of the highly varying levels of state support, it would be nearly impossible to develop an accurate assessment of institutional "value" today. A renewed focus on providing consumers with more useful data than what are presently available is highly desirable. This includes the necessary repeal of the federal ban on a student unit record system that would collect anonymous, student-level information that could be used to generate reports and analyses at the programmatic or institutional levels.

From a consumer perspective, it is also important to remember that the vast majority of prospective community college students do not have the luxury or privilege of selecting various institutions to attend – much less one out of state – but instead are searching for affordable, high-quality, and specific programs of study near their home and work. We hope that the Administration, which has been a strong supporter of community colleges, will remain mindful of the diverse array of higher education institutions and the students they serve. Access to affordable, quality higher education is fundamental to the community college model and remains a primary priority for ACCT and our member colleges.

I. Questions Regarding Data Elements, Metrics, and Data Collection

Unfortunately, the data *currently collected* by the Department or other federal agencies related to institutional access, affordability, and outcomes are vastly insufficient for both consumer and

accountability purposes. As you know, each of the elements and metrics associated with existing consumer information portals such as the ‘College Navigator’ or ‘College Scorecard’ largely use information collected through federal data hubs such as the Integrated Postsecondary Education Data Page 2 of 6 System (IPEDS) or National Student Loan Database System (NSDLS). Even using the best data available, many of the required elements are not collected at some colleges, not independently verified, or vastly out of date. The following paragraphs will explore specific college ratings data elements by the stated Administration priority areas.

Access

Community colleges are proud of the access we offer to many low-income students and our overall ability to provide a high-quality pathway to opportunity for those who seek it. As locally-based and governed institutions, our student body often reflects the immediate surrounding community’s demographics, including socioeconomic status.

Nationwide, community colleges serve the largest number of Pell Grant recipients of any sector, and 36 percent of all Pell Grant students. Yet Pell Grant receipt is not the only measure of income diversity. Low-income community college students often do not fill out the FAFSA at all. Just 58 percent of Pell eligible community college students apply for aid, compared to 77 percent of four-year students.¹ Additionally, complicating the use of Pell status as a marker of student access, Congress has repeatedly restricted eligibility for the program for nontraditional students.

Further, despite many attempts by institutions, states, and the federal government to promote and publicize financial aid, many students have consistently cited that they had no idea financial aid existed, believed they would not qualify for aid, thought their award to be a one-time offer, or found the FAFSA application too complex. Community colleges also serve significant numbers of ‘DREAM’ students who are not currently eligible for federal aid. **Any access metrics should recognize that the number of Pell grantees at community colleges will generally be lower than the total number of low-income students served** – a significant limitation on existing access-related data.

Affordability

Community colleges believe strongly in providing an affordable pathway through higher education with minimal debt or none at all. Less than 17 percent of two-year public students borrow federal loans, the lowest of any sector, and even those borrowers have the lowest average debt burdens among all sectors.² This can be traced directly to our low tuition and fee structure. However, this commitment to affordability is in large part dependent on the level of state support provided.

Due to the small percentage of our students who ultimately borrow, we suggest evaluating student debt based on *median loan debt of all completers*. Alternatively, prospective students should be given clear and prominent information about *the rate of borrowing* at each institution so they might evaluate the likelihood that they would need any loan at all. To the extent that the potential ratings system may also

¹ Kantrowitz, Mark. “FAFSA Completion Rates by Level and Control of Institution” (October 14, 2009). <http://www.finaid.org/educators/20091014fafsacompletion.pdf>

² U.S. Department of Education, National Center for Education Statistics. “2011-12 National Postsecondary Student Aid Study (NPSAS:12)” (September, 2013). [http://nces.ed.gov/surveys/npsas/Page 3 of 6 them](http://nces.ed.gov/surveys/npsas/Page%203%20of%206%20them).

focus on the role of “net price,” there are currently significant issues with the representation of this data to students. For example, dependent and independent students – and especially returning adult learners – have vastly different interests in the data presented to independent students, for example, may not need “room and board” to be included in net price if they are already self-supporting and are enrolling in a part-time program while working. This is the role of the Net Price Calculator, but a single, arbitrary number may serve to confuse prospective students. At a minimum, we hope that net price data will be extrapolated for both dependent and independent students. And, the Department should engage in some level of data management and verification, as fluctuations in the self-reported net price information has caused some eye-raising disparities between institutions with very similar cost structures.

Outcomes

Community colleges support the mission of helping more students succeed in their postsecondary pathways. Data need to be reflective of our institutions and the population we serve. Current systems such as IPEDS attempt to collect information on student completion rates in terms of certificate or degree attainment, and transfer-out rates. Taking into consideration the expected performance of a fully open access institution and accurately representing all student participants, completion information may present some limited value for measuring institutional performance. In fact, many states and institutions use completion measures to evaluate performance, such as through the Voluntary Framework of Accountability (VFA) or Student Achievement Measures (SAM). However, the current IPEDS formula used for tracking the progress only of students who began their studies as full-time, first-time degree- or certificate-seeking students, represents a distinctly small portion of all community college enrollments. Students who have already attended another postsecondary institution, or who began their studies on a part-time basis, are not tracked for the IPEDS rate. At a minimum, the number of students represented by these inaccurate measures – a significant limitation – should be prominently displayed in all consumer information tools and especially the ratings system, just as it is in IPEDS.

Students are currently measured in existing data if they complete a degree or other award within 150 percent of “normal time” for the program in which they are enrolled – which depends highly on the intent of the student at the time of matriculation. For instance, many community college students switch to parttime enrollment in order to work part-time, and should not be expected to complete a certificate within an arbitrary full-time course sequence. Even well-meaning full-time students may intentionally take longer to complete; a recent study of 38,000 students who enrolled in Texas community colleges in the year 2000 found that fully 94 percent of these students “stopped out” of college at least once, by experiencing a period of non-enrollment.³ *In addition to existing measures of completion, any college ratings system should also display a completion rate of 300 percent of normal time.*

It is also important to note that institutional “performance” that is disaggregated by subgroup may experience significant data limitations given existing reporting mechanisms. Since the population of community college students represented by first-time, full-time enrollments is so small, individual subgroups are likely to be even less statistically significant. Transfer information is one area that is significantly limited by the federal ban on student unit record data. Recent research has provided strong support for the fact that community college transfer students are quite successful. An August 2013 report from the National Student Clearinghouse Research Center found that over 60 percent of

³ Park, Toby J. “Stop-Out and Time for Work: An Analysis of Degree Trajectories for Community College Students.” Draft Working Paper. Florida State University. 2013. <http://bit.ly/1kE5pWT>

students transferring from a two-year institution go on to complete a four-year degree within six years.⁴ Although it has long been known that community colleges play an increasingly important role for students on the way to a baccalaureate degree, the difficulties of federal data collection have prevented efforts to examine the success rates for students on this pathway. Only full-time students who maintain this enrollment intensity until the time of transfer are reflected in the transfer-out rates if they are reported, and many institutions do not report them because of data limitations.

The existing consumer information portals also display institutional cohort default rates. While the usefulness of these numbers for prospective students and their families is debatable, *cohort default rates are particularly inaccurate measures of student outcomes at community colleges*. As previously discussed, less than 17 percent of two-year public students borrow federal loans, meaning that the repayment choices of very few students can affect the default rate. Any forthcoming ratings should more prominently display the percentage of students who take out federal loans.

The President has also proposed evaluating graduate's earnings or income. It is essential for current and prospective students that this info is accurate. Currently available salary data is mostly state-based and unfortunately incomplete. The federal unit record ban prohibits creating a national database that would link students' income information with their educational history. Instead, Administration officials have proposed that earnings information will be initially pulled via Social Security matches using *Title IV borrowers only*. Given that so few community college students nationally borrow federal student loans, **earnings information based on borrowers alone would not be reflective of our graduates** – and in many ways would represent heavily skewed data. Even if the earnings data matches were to include all Title IV recipients, less than half of community college students would be represented. We believe that potential consumers should be notified about the integrity of the earnings information if the percentage of all completers represented is less than 50 percent and that other minimum statistical thresholds for displaying expected earnings information should be established.

Beyond those discussed here, other potential ratings outcomes metrics worthy of exploration could include: first year retention rates, progression from remedial to college level courses, and student attainment of 15 and 30 college-level credits. Overall, higher education lacks comparable national data on college outcomes for students and society – such as how much students learn, what kind of jobs they may get upon completion (and what those jobs pay), and how their education can affect state or local communities. Establishing accurate data to fill these holes should be a top priority before any federal ratings system attempts to fully measure institutional performance.

II. Questions Regarding the Development of Comparison Groups

One of the most important considerations of the ratings system is the “comparison groups” against which individual institutions should be regarded for consumer and accountability purposes. The most useful consumer distinction for institutions is by Carnegie classification and predominant degree-granting level (i.e. public two-year, predominantly associate degree). However, within this category, it is also important to make further adjustment of any metrics to ensure fair comparisons between institutions serving students with different levels of academic preparation or socioeconomic status.

Many researchers, analysts, and policymakers have suggested using regression analysis to determine how well an institution performs on certain outcome metrics relative to what one would expect based

⁴ National Student Clearinghouse Research Center. “Baccalaureate Attainment: A National View of the Postsecondary Outcomes of Students Who Transfer from Two-Year to Four-Year Institutions” (August 6, 2013).

on the characteristics of its student body. Unfortunately, although this risk-adjusted computation would be most meaningful, the data would not be valid even with the most careful regression modifications due to the limitations on available data.

Community colleges do not measure incoming academic preparation with reported scores on tests such as the SAT or ACT, and reported student demographic information is currently limited to a handful of characteristics. Instead, the percentage of Pell Grant students served and the rates of enrollment in remedial education might prove to be incomplete but useful starting points for this analysis. Regression adjustment is not a perfect solution to leveling the playing field for institutions serving different demographics of students, but is a fairer start than arbitrary groupings produced by a multitude of variables. Ultimately, a completely new and more comprehensive version of federal data collection will be necessary for the ratings system to work.

III. Questions Regarding the Presentation of Ratings Information

Providing consumers more information does not always influence their behavior. Despite “hard facts,” prospective students’ decisions can work against their own interests. Discussions of college ratings systems frequently overlook that this information is only as useful as the role that it plays in actual student decision-making. Students need targeted advising and counseling resources that will help them choose the college and specific program that best suits their needs. A website alone should not, and cannot, fulfill this function for students.

Community college students are far less likely to utilize institutional ratings information because they are also less likely to apply to multiple institutions. This is in part due to their tendency, on average, to be place-bound in pursuing an educational program near their home or work that qualifies for in-state or indistrict tuition. It bears repeating that this geographic convenience and close attention to local economic needs are two of the main reasons that community colleges exist.

The Administration has hinted at its intention to align the future ratings system visually with the existing College Scorecard. The provision of earnings information, for example, could provide a boon for consumers, and help institutions improve their offerings in many areas. However, students do more than simply enroll at colleges, they choose concentrations and majors within departments. Detailed consumer information about those specific programs available is more useful to students, parents, and policymakers than information about the overall college, especially at community colleges where the earnings associated with various certificates and degrees can and does vary widely.

This request for information has made a particular point about the influence of the PIRS on states’ and others fiduciary responsibility to postsecondary education. The reverse consideration – states’ influence on PIRS variables – is also highly relevant. Although state budgets are beginning to recover after the recession, in FY 2012, for the third year in a row, state educational appropriations per-student hit a 25- year low and are down 23 percent since 2007 alone.⁵ Between the 2007-08 and 2010-11 academic years, state funding for community colleges declined on an FTE basis from \$4,578 to \$3,430, or 25 percent.

Annual studies document a long-term trend toward shifting more of the burden of financing higher education onto tuition and fees. In light of these trends, it is critical that policymakers pay more

⁵ State Higher Education Executive Officers Association (SHEEO). “State Higher Education Finance Report, Fiscal Year 2012” (March, 2013). <http://www.sheeo.org/projects/shef-%E2%80%94state-higher-education-finance>

attention to the size and effectiveness of state assistance in providing access and adequate support for enrollment in postsecondary education. The evidence overwhelmingly indicates that students who cannot afford to attend full-time or nearly full-time have lower rates of degree completion. Community colleges clearly receive the fewest resources to serve an academically at-risk student population.

Policymakers may overestimate how many students can be well-educated with existing resources or make unrealistic assumptions about the potential for technology and new delivery methods offset the long-term deleterious effects of budget cuts and tuition increases on access to higher education and the quality of our workforce development. **It is therefore critical that any college ratings system also consider the role of state support in determining institutional performance and affordability,** as these levels of support differ greatly across the nation.

Fortunately, a great deal of positive activity to more clearly define higher education performance, including at community colleges, is occurring outside of the federal government at state, institutional, and consortia levels. For example, the new voluntary Student Achievement Measure (SAM) involves looking at a number of student cohorts not measured by the federal rate and reporting on multiple success measures for each of them. Additionally, AACC and ACCT have developed a Voluntary Framework of Accountability (VFA) that delineates short-term progress and long-term outcomes for students and provides more accurate metrics for community colleges that should help them improve their performance. The VFA provides sector-appropriate data definitions and enables community colleges to benchmark their student progress and completion data against similar institutions on metrics such as student progress and outcomes (including pre-collegiate work and transitions), career and technical education (both credit and noncredit), adult basic education and the general equivalency diploma, and student learning outcomes. It is highly desirable for the Administration to use these efforts as it designs the college ratings system.

Community college leaders share a commitment that the sector as a whole must do a better job of educating the public about what community colleges do and how they do it. We know that developing a common set of markers of effectiveness will help stakeholders, including policymakers, better understand institutional performance. That's why, over the past decade, community colleges have begun to use data more strategically and transparently to improve assessment of institutional effectiveness. Current limitations on federal data create a significant barrier to measures that reflect what is happening at the institutional level – and certainly preclude a fair assessment of postsecondary “value.” But, there never has been and never will be a perfect rating system. Community colleges strongly hope that the future ratings system will focus on institutions’ ability to fulfill the goals of federal financial aid in enhancing opportunity and providing affordable pathways to postsecondary success.

Thank you for the opportunity to share these thoughts regarding the college ratings proposal. If you have further questions, please feel free to contact Jee Hang Lee, ACCT Vice President for Public Policy and External Relations at (202) 775-4450 or jhlee@acct.org. We look forward to working with the Administration to further refine future iterations of the ratings system.

Sincerely,

(b)(6)

J. Noah Brown
ACCT President and CEO

O'Bergh, Jon

From: Krigstein, Alex <Alex.Krigstein@suny.edu>
Sent: Wednesday, February 18, 2015 5:53 PM
To: College Feedback
Cc: Todtman, Jessica; Krigstein, Alex
Subject: SUNY Postsecondary Institution Ratings System Comments
Attachments: SUNY PIRS Comments Final.pdf

To whom it may concern:

On behalf of the State University of New York, the attached letter is submitted in response to the Department's call for comments on President Obama's Postsecondary Institution Ratings System.

As noted in the attached, SUNY appreciates this opportunity to provide feedback and would welcome the opportunity to be part of future discussions on plan development and the selection of metrics.

Best,

-Alex



Alex Krigstein

Assistant Director of Federal Relations

The State University of New York

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February 18, 2015

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

Dear Secretary Duncan:

We would like to thank the Department of Education (the Department) for the opportunity to provide feedback on the development of a Postsecondary Institution Ratings System (PIRS). The State University of New York (SUNY) is encouraged by your and President Obama's agenda to expand college opportunity, and to make higher education more affordable and campuses more accountable for student outcomes. It is within this context that we offer our response to the specific questions put forth in the draft framework the Department released on December 19, 2014.

As indicated in our previous comments (submitted on November 21, 2013, and January 31, 2014), SUNY is in many ways a microcosm of the broader U.S. higher education sector. As the nation's largest comprehensive system of public higher education, our 64 campuses offer access to almost every field of academic or professional study within the system through more than 7,000 degree and certificate programs. As such, our response is developed from extensive experience in setting common (system-level) goals across a diverse set of institutions and then holding each campus accountable on common as well as unique objectives.

To further preface our response, we would like to commend the Department's specific intention to "through these ratings, compare colleges with similar missions and identify colleges that do the most to help students from disadvantaged and underrepresented backgrounds, as well as colleges that are improving their performance." At the highest level, we continue to support the three stated components of the ratings system—information for students and families, benchmarking for institutions, and accountability for federal student aid spending. As a public system, we embrace the ratings system as a tool for stakeholders that will enhance student success through more informed decision making.

Measuring Performance at SUNY

Over the past two years, the SUNY system has engaged in a highly consultative process—enlisting students, faculty, staff, and other stakeholders—to develop a performance system around our statutory mission and strategic plan. We call it "SUNY

To Learn
To Search
To Serve

the Power of (SUNY)

Excels,” and through it we have identified the most important indicators of our success and the metrics with which we will measure them at both the campus and system levels.

The SUNY Excels performance system underscores our ongoing commitment to excellence in service to students, in the development of our faculty and staff, and in our support of New York State and the nation. SUNY Excels will inform the evaluations of each campus president and will guide our requests for investment where it’s needed most.

We are committed to providing evidence at every turn so that our stakeholders have the highest confidence in SUNY. In order to do so, we will be tracking and reporting our progress to provide an ever-clearer picture of all that SUNY has to offer.

In developing SUNY Excels, SUNY faced challenges similar to what the Department now faces, including what metrics to select and how best to ensure that the mission of each institution is appropriately reflected. We began with a set of guiding principles:

- Identify outcomes that are mission-critical and understandable;
- Select measures that are easy to track on a regular basis and are aligned with existing assessments;
- Maintain sensitivity to campus mission;
- Reaffirm SUNY’s commitment to continuous improvement;
- Provide a structure for accountability at all levels;
- Provide a structure for evaluating SUNY’s leaders; and
- Help SUNY better tell its story to prospective students and their families and in support of further investment.

We reviewed the many metrics that were already in use at our campuses, SUNY System Administration, and reported to other entities. We considered alignment to national efforts like the Student Achievement Measure (SAM) and the Voluntary Framework of Accountability. We looked at our regional accreditation body’s (Middle States Commission on Higher Education) priorities and New York State’s needs. In fact, we identified over 200 possible measures that we could choose to benchmark, analyze, and report.

Of course, we realized 200 metrics would be too difficult to effectively manage and that our focus would be spread too thin to achieve meaningful impact. So we began to narrow our focus around five key areas:

Access – Provide the broadest possible access, fully representative of all segments of the population, to a complete range of academic, professional, and vocational postsecondary programs via SUNY’s 64 campuses located across New York State; support SUNY’s existing access programs: educational opportunity programs and educational opportunity centers.

Completion – Enable all those SUNY serves to achieve their goals; increase degree/award production, on-time degree completion, non-degree completion and services, and ensure seamless transfer.

Success – Robust system and campus supports for student success; SUNY students are prepared for the most successful possible launch into further education, career, and citizenship.

Inquiry – Encourage and facilitate basic and applied research for the purpose of the creation and dissemination of knowledge vital for continued human, scientific, technological and economic advancement; increase external investment in SUNY research; continue to increase the level of confidence external entities have in SUNY.

Engagement – SUNY’s economic, societal, and cultural impact on New York State, and beyond; partnerships between the expertise of the state university with the business, agricultural, governmental, labor, and nonprofit sectors of the state; translating innovation into new ideas, products, devices, services, and businesses to benefit communities and society.

We then began to identify more specific areas in which we would determine targets and measure progress:

Measures to be Considered in the Five Key Areas of SUNY Excels

Access	Completion	Success	Inquiry	Engagement
Enrollment NYS Citizens Served by SUNY Diversity (ethnicity/race, Pell, gender, geo, age, etc.) Capacity (high need/high demand, geographic distribution, sector distribution, STEM, clinical availability)	Completions undergraduate, graduate, professional (degrees, certificates, course, credit/non-credit) SUNY Success Rate (intra-SUNY) & Student Achievement Measure (SAM) - transfer, persistence Graduation Rates Time to Degree	SUNY Advantage (Applied Learning, Multi-Cultural Experiences, Student Supports) Financial Literacy (student indebtedness, default rate)	Total Sponsored Activity (research expenditures, industry-sponsored research, grants in high priority areas, investment in faculty hires, sponsored graduate research fellowships, etc.) Courses that include hands-on research & entrepreneurship Scholarship, Discovery and Innovation (publications, citations, creative works, etc.)	START-UP New York and beyond (businesses started / jobs created) Alumni / Philanthropic Support Civic Engagement (estimated student and faculty volunteer hours) Economic Impact

For each measure, targets will be assigned at the campus level and reviewed within the context of each institution's SUNY sector peers (community colleges, technology colleges, comprehensive colleges, and doctoral-degree-granting institutions).

Again, SUNY wrestled with many of the same questions the Department is currently weighing and believes our experience positions us to offer valuable insight on the PIRS undertaking. On January 13, 2015, the SUNY Board of Trustees endorsed SUNY Excels as our University-wide performance system and the key driver of our strategic initiatives. SUNY System Administration will set system-level five-year targets for improvement and regularly re-examine these goals as data becomes available.

How the Postsecondary Institution Ratings System Will Rate Institutions

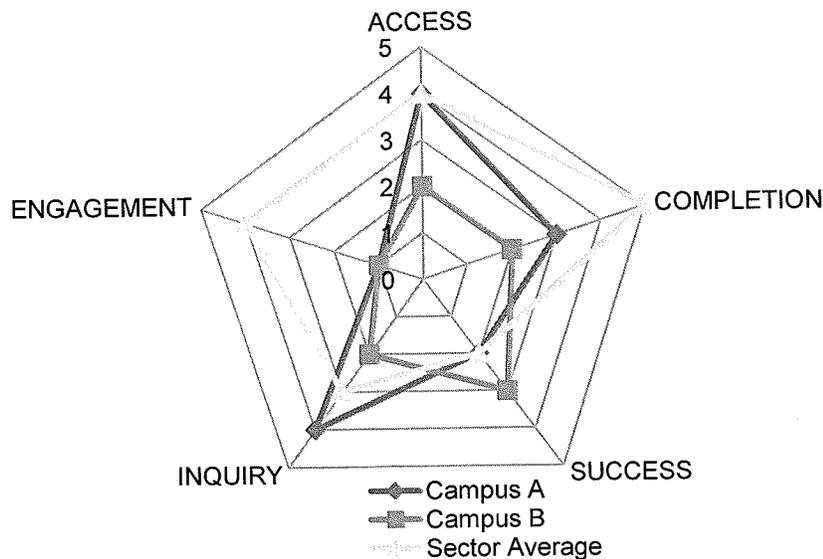
Much in the way that progress under SUNY Excels will be tracked across five focus areas, SUNY feels it is important that PIRS provides a full picture of how each institution performs in access, affordability, and outcomes.

We agree with the approach of assessing institutional improvement over time: A longer-term analysis is necessary to draw meaningful conclusions, especially for those institutions serving a significant number of part-time or non-traditional students. While data about changes in an institution's performance over time is beneficial, institutions may also exhibit improvement without moving between the proposed ratings categories. Alternatively, a slight change in performance may shift a campus over a given threshold. We appreciate the Department's recognition that annual fluctuations in the values used in any ratings system may provide a misleading picture. Therefore, the ratings system must be capable of representing the various dimensions that are to be compared as well as illuminating the interrelationships between those dimensions in a format that is useful to all stakeholders: consumers, campuses, and policymakers.

In the diagram below, performance in the five different SUNY Excels focus areas at a particular institution is displayed compared to that of the college's sector. This representation would allow consumers to see at a glance how the institution performs both along each metric as well as compare this across the "standard" institution of each type. Alternatively, this visualization could be tailored to represent the performance of a single institution across five measures over different time periods.

SUNY recommends a similar visualization tool to the one represented below be utilized by PIRS to represent a campus' standing relative to its peers in each of the areas the system seeks to measure.

Visualization Tool for Campus and Sector Comparison



Institutional Groupings

Grouping institutions by whether they are predominantly two- or four-year schools is a significant first step, but carries with it certain challenges. For example, grouping four-year institutions alone reveals systematic variation in possible metrics that are sector-dependent (e.g., percent of students receiving Pell, graduation rates, average net price, and loan default rates). SUNY is concerned about grouping publics, private non-profits, and for-profits together and obscuring the inherent variations between and among institutional groups and the students who choose to attend them.

We are also concerned about the intended use of ratings regarding the community college sector. Over the past 30 years, the percentage of New York's students attending community colleges from their local sponsorship area has averaged 76.4 percent. Because community colleges primarily serve students from their local community and student choice depends largely upon physical proximity, comparisons between similar institutions across the nation are likely to be of little interest to prospective enrollees and therefore limited as a consumer tool.

In order to provide comparisons, institutions must be categorized by some major characteristics including—but not limited to—size, location, student population (including socioeconomic background and level of preparation), resources, etc. These distinctions would serve to partially accommodate the tremendous diversity within the higher education system.

Our extensive experience in successfully utilizing Carnegie Classifications along with other institutional mission measures informs our opinion that a brand new approach to comparison groups would be inadvisable for the PIRS endeavor. **For the PIRS to have as much credibility as possible, SUNY believes it is important to base the comparison groups on the tried-and-true methodology of the Carnegie Classification.**

Data Sources

The draft framework notes that the primary source of data for PIRS will be federal administrative data or existing federal data collections, including the Integrated Postsecondary Education Data System (IPEDS) and the National Student Loan Data System (NSLDS). As cited by the Department, when searching for a prospective school, most students and parents seek to identify institutions by reviewing information on access, affordability, and outcomes. We believe that PIRS should collect and disseminate easy-to-read information that will help colleges improve their services, as well as help students and their families find the best fit for their academic needs and personal circumstances.

SUNY is also encouraged by the Department's express interest in considering allowing institutions to use alternative data for certain measures, such as SAM completion/transfer rate, in future versions of PIRS. On February 4, 2014, SUNY became the largest system of higher education to reach 100 percent participation in SAM. We believe that this more comprehensive measure of student progress and completion is an important tool in providing information to current and prospective students. SAM provides a clearer and more accurate measure of graduation rates, and we are proud to have every SUNY campus participating in this important initiative.

SUNY supports the Department's effort to think about how to better use existing data sources, such as IPEDS, NSLDS, and the FAFSA, to construct new and potentially useful metrics. However, these data sources are restricted to certain types of students. FAFSA completion rates vary by sector and level of institution, and even for those who fill it out, FAFSA data are only tied back to particular institutions for Title IV aid recipients.

SUNY believes that institutions should have the opportunity to submit other reliable completion-related data to be incorporated into the ratings framework. And to the extent possible, SUNY proposes that the metrics utilized for accountability ratings purposes be drawn from data that is currently collected and available to prevent any additional administrative burden.

Transfer Rate Metrics

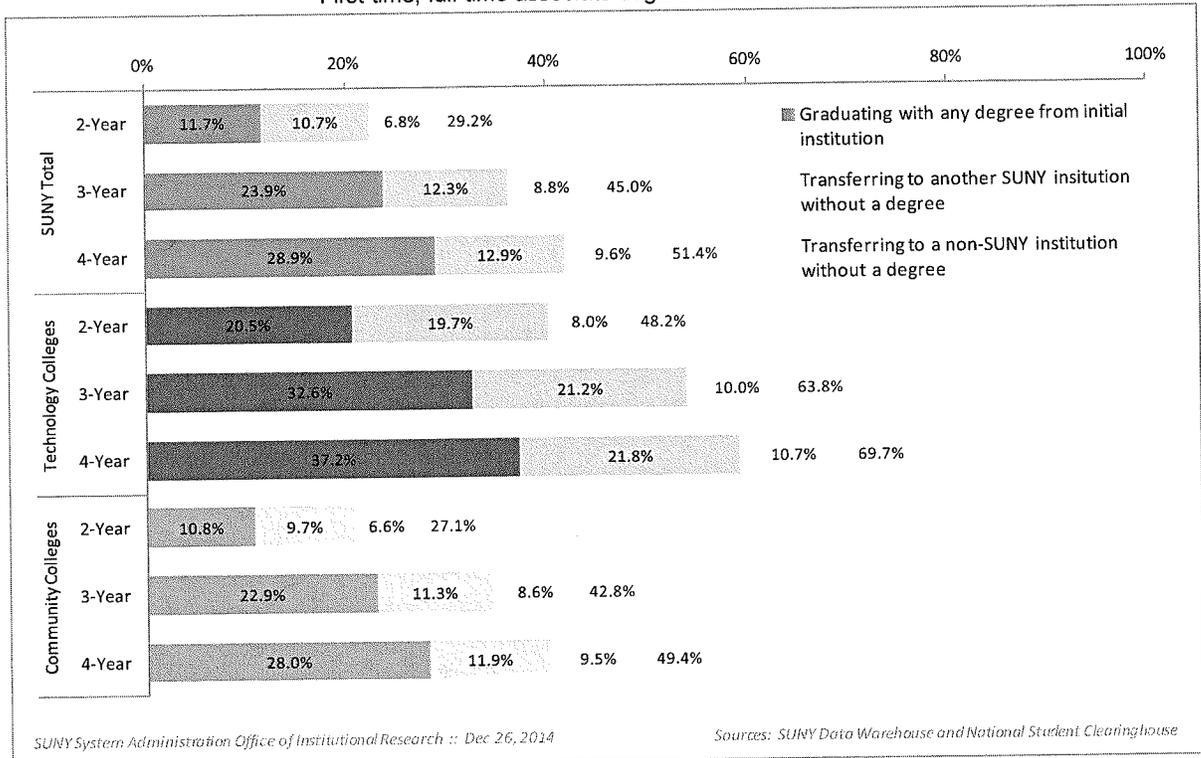
As a result of increasing student mobility, reporting transfer rates—specifically, reporting “transfer out” rates and resulting success of students—is critically important to accurately representing completion and the contributions of multiple institutions to an individual student's success. This is true across all sectors, but especially for two-year institutions. More than 30,000 students transfer between SUNY campuses each year. In fact, in the last year, 44 percent—nearly half—of all four-year degrees awarded at SUNY were earned by transfer students. Not surprisingly, transfer at SUNY occurs in multiple directions, including lateral transfers.

Student mobility can be driven by changes in academic interest, but also by changes in employment, available income, family responsibilities, living situation, and other factors beyond a campus' or student's control. This is why for nearly 15 years SUNY has looked at the “SUNY Success” rate of students transferring from one SUNY institution to another: completion from the initial institution and transfer and completion from a subsequent SUNY institution are regarded as positive factors relating to student success.

The chart below presents two-, three-, and four-year graduation and transfer out rates for SUNY first-time, full-time associate degree students, fall 2009 cohort as of fall 2013.

SUNY Graduation and Transfer Rates

First-time, full-time associate degree students



The first, darkest portion of each bar represents the percent of students who received any degree at the initial institution. Note that this also includes students who may have continued on at the initial institution to obtain a bachelor's degree without obtaining the associate degree they initially reported as seeking. The second, lighter portion represents the percent of students who transferred to another SUNY institution without earning a degree. And the third portion represents the percentage of students who transferred to a non-SUNY institution without earning a degree. At the end of each bar is the sum of the graduation and transfer-out rates.

We feel that this complete view of student success, which "gives credit" to the initial institution for transfer (including lateral transfer), provides the most accurate picture of institutions' contributions to completion. However, if PIRS "gives credit" to multiple institutions for an individual student's success, there remains a question of which institution(s) ultimately get credit for that student's loan debt, labor market success, and other metrics by which institutions may be held accountable.

Conclusion

Notably, it was two SUNY campuses, the University at Buffalo and Binghamton University, at which President Obama announced his plan to improve college access and completion. SUNY hears—and actively embraces—the national call for reduced college cost, greater innovation, and a stronger commitment to degree completion for all college students.

Again, we want to reiterate our support for the underlying goals and appreciation for the Administration’s willingness to work with the higher education community to help craft this new ratings system. At SUNY, we know well the challenges and opportunities inherent in both setting goals across diverse institutions and assessing individual campuses’ efforts to achieve common objectives.

We appreciate your attention to our comments and concerns, and urge the Department to provide an opportunity for public comment on a full and complete rating proposal before the start of the 2015-2016 academic year.

SUNY looks forward to continuing to be a part of this important dialogue, and I encourage you and your team to reach out to us directly if we can be of assistance or can provide additional detail.

Sincerely,

(b)(6)

Nancy L. Zimpher
Chancellor

O'Bergh, Jon

From: Jessi Morales <jmorales@americanprogress.org>
Sent: Wednesday, February 18, 2015 5:57 PM
To: College Feedback
Cc: Sheila Isong; Sarah Audelo; Anne Johnson
Subject: Comments on the design of the new system of college ratings
Attachments: Ratings System - Generation Progress Comments FEB 18 2015.pdf

To whom it may concern:

Please find Generations Progress' comments on the new system of college ratings attached.

Thank you for your consideration,

Generation Progress

Agency: U.S. Department of Education
RE: A College Ratings Framework

To Whom It May Concern:

On behalf of Generation Progress, we are pleased to see the time and effort that the Department of Education (Department) has put into establishing a framework for a national college ratings system. Generation Progress is a national organization that works with and for young people to promote progressive solutions to political and social challenges. We recognize and appreciate the Department's commitment to developing a system that focuses on the wants and needs of students, potential students, and their families.

In particular, we would like to highlight our support for the following metrics and the avenues in which the system will rate institutions:

- **Identify labor market success and earnings in low-paying fields, such as public service, through federal programs such as AmeriCorps.** Labor market outcomes, like success in securing employment and earnings after college is critical as a rating metric. However, it is important to identify positions that are fulfilling a national or public service purpose that may have low-pay as to not disadvantage institutions that prepare, for example, teachers and social workers. One way to identify and measure this information without penalizing institutions may be to identify employers by obtaining EINs from the IRS associated with non-profit and public entities, and using that information to classify and explain why some graduates are currently serving and therefore receive lower pay than their peers.
- **Present data with an adaptable user interface.** The current College Scorecard is a great tool, but it is limited to viewing one institution at a time and providing overall general information. Students should be able to select and compare institutions based on the information that pertains to them as individuals. The interface should allow students to compare institutions in terms of degree programs, price, diversity, major, and more. In addition, the data interface should make available an option for students to enter their home address and pull up a listing of institutions near that address within that city and state. Once that list is given, individuals should be able to choose criteria and compare all of those institutions with one another. Furthermore, because younger generations are increasingly turning to their mobile devices or tablets to access the internet, this information should be accessible via mobile apps.

- **As is the case for for-profit institutions, it is important to include information notifying potential students of lawsuits and settlements by the Consumer Financial Protection Bureau (CFPB) and state attorneys general. Students should also be notified of accreditation actions and sanctions in plain language about an institution they attend, as well as if the school is in the process of being shut down or sold.** CFPB and state attorneys general lawsuits filed against Corinthian Colleges, Inc. are prime examples of the issues that potential students should be forewarned about. Individuals paying for an education have a right to know what pitfalls may prohibit them from obtaining a degree.
- **The ratings system should also provide information to students regarding those institutions that have been subject to investigation by the Department's Office of Civil Rights (OCR) for violations, especially regarding issues under Title IX.** Parents and students alike are concerned with well-being and safety. The Department should make it a priority to inform potential students about institutions that have been found guilty of violations by the OCR.

As an organization that works with and for young people, we believe that the most valuable information for this ratings system will come from the students that will be utilizing this tool. It is for this reason that we believe the Department should continue to create focus groups and ask questions about what information high school students, college students, and recent graduates deem important when choosing a university or college and the best way to present that information so it is easily accessible and understandable.

We appreciate this opportunity to submit comments regarding this new tool, and we look forward to continued collaboration as we work to improve the national ratings system.

Thank you for your consideration,

Generation Progress

O'Bergh, Jon

From: Danielle Ballard <DBallard@pennhillgroup.com>
Sent: Wednesday, February 18, 2015 7:03 PM
To: College Feedback
Cc: Alex Nock
Subject: Rebuilding America's Middle Class - comments on college ratings framework
Attachments: RAMC comments on the College Ratings Framework Feb 2015.pdf

Attached is a letter from Rebuilding America's Middle Class (RAMC), a coalition of community colleges, providing feedback on the proposed framework for a college ratings system.

Thank you, and please feel free to contact us if you need anything else.

Danielle Ballard



RAMC
Board

Steve Head,
Chancellor,
Lone Star
College
System

Glenn DuBois,
Chancellor,
Virginia
Community
College
System

Rob Denson,
President, Des
Moines Area
Community
College

Jim Grohman,
Executive
Vice
President,
Metropolitan
Community
College

Joe May,
Chancellor,
Dallas County
Community
College
District

Jeff Rafn,
President,
Northeast
Wisconsin
Technical
College

Scott Ralls,
President,
North Carolina
Community
College
System

Tom Snyder,
President,
Ivy Tech
Community
College

Monty
Sullivan,
President,
Louisiana
Community &
Technical
College
System

February 18, 2015

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

Dear Under Secretary Mitchell:

On behalf of Rebuilding America's Middle Class (RAMC), a coalition of state and individual community college systems from across the nation representing over 120 colleges and 1.5 million students, I am writing to provide feedback on the U.S. Department of Education's Proposed College Ratings Framework, released on December 19, 2014.

While a college ratings system centered on certain outcome measures could be a useful tool to our current and prospective students, there are numerous issues in the proposed framework that must be addressed for it to successfully function. We are concerned that the proposed framework and the data that it will use does not accurately reflect community college success or the experiences of our students. Ultimately, we believe that underlying issues with the federal data system should be addressed before moving forward with a college ratings system.

RAMC is specifically concerned about the accuracy and relevance of the data that would be used for such a system and the conclusions that would be drawn about individual institutions due to the shortcomings of this data. We are also very concerned about using this system to adjust federal student aid allocations to individual students. For our schools, the measure of a meaningful ratings system is whether it accurately takes into account the needs of the wide range of students that we serve, and reflects real measures of effectiveness of the overall community college experience. In its current form, this proposal does not meet this test.

The first major challenge of the college ratings system as proposed by the Administration is that many of the metrics will be derived from a broken federal data system, including the Integrated Postsecondary Education Data System (IPEDS) and the National Student Loan Data System (NSLDS). Transfer students are a large component of the community college population.



Yet, presently under IPEDs, data is reported only for first-time, full-time students, which is not representative of the vast majority of community college students. As a result, the Department's data fails to accurately count all students who actually attend and graduate from community colleges. The Department in the proposed framework acknowledges these shortcomings even with the planned improvements to IPEDs in the coming years.

Additionally, NSLDS only collects information on those students who borrow through the federal student loan programs. Borrowing via the federal loan programs is generally small at most community colleges and even nonexistent at others. These limitations will provide only a partial snap shot of student performance at community colleges.

RAMC believes that a college ratings system will only be useful if it accurately accounts for all types of students, their educational needs and the schools they attend. To remedy the shortcomings in our current data systems, RAMC supports efforts to update and expand the ability of The Integrated Postsecondary Education Data System (IPEDS) and other federal data systems to more accurately measure and report on community colleges and their students. We believe this needs to happen before a federal college ratings system is put into place.

Secondly, tying student aid to a ratings system, especially one that does not accurately portray community colleges and their students, would disadvantage community college students who often pick institutions of higher education based on affordability, accessibility and geography. Many community college students look for institutions that are accessible by public transportation from their home, and that have the flexibility they need to attend school and also support themselves and their families. Arbitrarily cutting student aid by reducing existing aid levels or changing loan terms and conditions, is extremely unfair to such a student and reduces or eliminates their access to higher education. This type of aid structure could further exasperate the cost concerns that cause many students to not enroll in postsecondary education.

Thank you for your consideration of our comments. We hope that an eventual college ratings system will take into account the unique needs and priorities of community colleges and their students, and will accurately reflect the community college experience.

Sincerely,

(b)(6)

Joe D. May
Board Chair, Rebuilding America's Middle Class (RAMC)
Chancellor, Dallas County Community College District

O'Bergh, Jon

From: Massa, Tod (SCHEV) <TodMassa@schev.edu>
Sent: Wednesday, February 18, 2015 7:18 PM
To: College Feedback
Subject: Comments on PIRS

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

Dear Secretary Duncan:

I am writing to submit comments on the US Department of Education's (USED) proposed Postsecondary Institution Ratings System. The State Council of Higher Education for Virginia (SCHEV) is the coordinating board and state higher education agency for Virginia.

While we support the primary aim of the ratings system, to highlight the high performing and low performing institutions, we have some concerns.

- 1) The data currently available to the Department are inadequate. The one true performance measure currently available, is the graduation rate for all first-time, full-time students. This rate is very limited as to what it represents at many institutions in which a majority of entering students may be part-time or transfer, and thus excluded from the calculations. Further, these data are unaudited and submitted by the institution in the aggregate. Recent studies by the Government Accountability Office have shown wide variability in the accuracy of identified cohorts of entering students.
- 2) A number of institutions, including at least one in Virginia, have been granted approval to report their "traditional" college students under one IPEDS ID and their non-traditional program under a separate IPEDS ID. While this makes sense for the way the data appear on College Navigator, the Title IV participation agreement is with the institution and loss of Title IV would affect students in both aspects of the institution.
- 3) In a similar vein, the identification numbers used in IPEDS and in OPE (as the manager of the Title IV programs) do not have one-to-one correspondence. In fact, 20% of the institutions in OPE do not have corresponding matches in IPEDS.
- 4) There are no measures of learning outcomes available. The implication is that the black box of process in higher education is all that matters to describe the effectiveness of a complex institution.
- 5) The possible use of the National Student Loan Data System (NSLDS) potentially solves a number of data problems while raising others. As we understand NSLDS, it was not designed, built, nor populated with data for the purposes of advanced analytics on higher education outcomes. For example, it only contains data about students receiving Title IV financial assistance, and only relatively recently, were degree awards added. Further, we understand there to be no status flags indicating students as either first-time in college or new transfer. While this can be discerned to some level, it will lead to highly imperfect measures.
- 6) Given the data limitations of the data, both in IPEDS and NSLDS, we think that the Department would be well-advised to describe these rankings as Postsecondary Institution Ratings of Title IV Performance. Granted, it is longer and less catchy, but it narrows the scope of the ratings to an area where all reasonable people would agree that the Department should be evaluating institutional performance and student outcomes.

We took note of the comments made last week by Under-Secretary Ted Mitchell and the meeting of the Association of Community College Trustees and the possibility of using state data. Virginia is known in the higher education community for the quality and availability of its data and we would be happy to work with the Department to forge a new partnership with the state higher education agencies. We believe there is much more we can do as partners than either can do alone.

We offer these comments in the spirit of improving higher education for all students and improving the discussion of institutional ratings and performance beyond soundbites and mere reactions.

Sincerely

Tod R. Massa

Director, Policy Research and Data Warehousing State Council of Higher Education for Virginia v. 804.225.3147 fx.
804.371.2870

"Someone Cares for Higher Education in Virginia"

O'Bergh, Jon

From: Tod Massa <todmassa@yahoo.com>
Sent: Wednesday, February 18, 2015 8:36 PM
To: College Feedback
Subject: PIRS comments

Describe a rainbow in seven words to someone blind since birth.

This is the fundamental problem with PIRS or the current craze towards non-dashing dashboards (if the data change only once a year, it is only a dashboard for a glacier). Institutions are complex with many things going on that simply don't reduce to seven metrics, let alone four or five as in the White House College Scorecard. Spending yesterday and this morning at an NGA-hosted meeting on Higher Education Effectiveness and Efficiency Metrics Learning Lab reinforces my (probably curmudgeonly) belief that knowledge sometimes has to be earned through effort and study – not a 60 second review of a web-page or Powerpoint slide.

I want to believe in the power data to transform systems, to transform lives. I worry though that over-simplification of the presentation of performance data leads to under-recognition of the lives affected.

Speaking of over-simplification, I was part of an expert panel on Tuesday about PIRS and community colleges. Deputy Under-secretary Jamiene Studley was present. She was clear that PIRS is going forward based on existing data. Data that are completely inadequate to the task, in my considered opinion. However, she does seem open to some ideas that others in the Department and the White House find anathema. I won't share those at this time but I was kind of, umm, vocal in my suggestions. I know she heard me.

A timely example of over-simplification is this. "Starbuck's Offers Free College to Employees." Robert Kelchen provides a more in-depth understanding here. Matt Reed does a *mea culpa* from his original position and acknowledges the efforts of others who read the fine print and went beyond the metric of "Free College."

While I am not sure that either of these books were covered in Reading Rainbow, if one compares two of my favorites, *The Sun Also Rises* and *The Stand*, one can easily see a difference in the prose styles. Hemingway is much tighter and sparse than King (I suspect) ever dreamt of being. Despite that, neither can be meaningfully reduced to seven words or other metric. Any critical rating is meaningless to people that eschew one genre over another. And books are static. They don't change over time. Our interpretations may change, their placements in a rating system may change, but the books themselves don't change (except when King added 100-plus previously cut pages to a revised

edition).

Institutions change. Measurement can cause change in institutions. Bad measurement, bad incentive structures are likely to cause bad changes. Let's really be clear what we are doing and why, while recognizing that not everything can be as simple as we might like.

Sent from Yahoo Mail on Android

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, February 18, 2015 9:22 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: To Those Concerned:

The Washington State Faculty Association of Community and Technical Colleges (FACTC) has recently considered the proposed college rating system of the Department of Education.

One area of broad concern, by FACTC, is the inappropriate focus on completion as a measure of college success. Many students who attend community and technical colleges do not have a degree as their goal, and often there is not an effective way in the registration process run by our open institutions to accurately assess their goals. Some of our students already have advanced degrees and are attending just to make a career transition or take courses out of general interest.

We would urge the DOE to consider appropriate measures for open admission community and technical colleges that encourage everyone in our communities to pursue life-long learning. We do want to support those students whose goal is to graduate with a certificate or associate's degree; however that measure does not represent all the students who attend our colleges.

Constituency: Higher Ed Association/Organization

Other Constituency (if supplied):

User E-mail (if supplied): phil.venditti@cptc.edu

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

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, February 18, 2015 9:36 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The potential problems with this rating system are already reflected in the DOE's FAQs. As a community college, Pierce College in Washington will undoubtedly suffer in the Outcomes rating, and platitudes about "the special place in our country" that we hold will not help our bottom line when it comes to attracting students. This will be especially pronounced amongst our military students, who will see these ratings repeated again and again through the Veterans Administration, GoArmyEd Portal, Servicemembers Opportunity College website, etc.

Bottom line: The rating system as currently being proposed is flawed in that it does not compare apples to apples. Rather than this one-size-fits-all (from Harvard University to Pierce College) system, there should be at least a minimum level of categorization (e.g. 2-year, 4-year public, 4-year private). Also, even if there's a rating system that reflects a minimal level of categorization geared toward community colleges, 4-year public, and 4-year private, it is still problematic due to the varying make ups of the student bodies amongst different community colleges, sometimes even at a single college like Pierce College with such diverse campuses in terms of class, race, and needs. How do these rating systems account for students who live in their cars, come into class after working full time, sometimes at multiple jobs, etc., etc.

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied):

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

O'Bergh, Jon

From: Kelly, Susan <skelly@umassp.edu>
Sent: Wednesday, February 18, 2015 10:08 PM
To: College Feedback
Subject: UMass
Attachments: Obama ltr.pdf

Attached is the response from UMass President Caret.



February 18, 2015

The President
The White House
1600 Pennsylvania Avenue
Washington, DC 20500

Dear Mr. President:

As a research intensive public land-grant university with a mission of discovery, education, and engagement, the University of Massachusetts shares the administration's goal of greater transparency and accountability.

We have found that making available key metrics in a way that affords widespread ease of access to students, their families, and the general public encourages better decision-making and desired educational outcomes.

Examples of such instructive metrics might include:

- **Student progress and completion rates:** An option many of us have been exploring is the Student Achievement Measure (SAM), which offers a more realistic picture of student progress and completion by including transfer, part-time and full-time students as well as those who enroll in multiple institutions. We believe SAM can be an alternative to the federal graduation rate, which is limited to tracking the completion of first-time, full-time students at one institution.
- **Median net price by income level:** When we have needed to increase our tuition and fees, we find that providing families the actual out-of-pocket (net costs) for a student to attend the University makes clear what those costs will be for students from different financial backgrounds. This has been a particularly useful tool for students from low income or disadvantaged backgrounds.
- **Post-collegiate outcomes:** We utilize our alumni surveys in order to capture these data on a periodic basis.
- **Loan repayment rates:** Metrics that measure student repayment of federal loan debt can be helpful in assessing whether an institution is successfully preparing students for their future careers and lives without undue debt burden.

Better data, as the various advising-intrusive analytic tools have shown, will also be helpful to faculty and staff to make more informed decisions about ways to help retain students and guide them more effectively to graduation.

With regard to accountability generally, we have found that posting institutional information about the matriculation of its students (such as the VSA) promulgates provides a very clear indication of the stewardship of the institution's responsibilities to its students.

With that background in mind, we write in support of the approaches suggested by APLU in their recent communications with you. APLU's response is both thoughtful and on target relative to the questions raised. I urge you to give strong consideration to their response.

We believe this to be a productive rather than disparaging approach to ensuring for students, their families, and policy-makers clear, accurate data and evidence of accountability.

Thank you for the opportunity to respond.

Most respectfully,

(b)(6)

Robert L. Caret
President

c: Peter McPherson, President, APLU

O'Bergh, Jon

From: William Craft <craft@cord.edu>
Sent: Wednesday, February 18, 2015 10:12 PM
To: College Feedback
Subject: Response to Proposed Federal Ratings Systems

Honorable Arne Duncan
Secretary
U. S. Department of Education

Dear Mr. Secretary:

As a college president, I am thankful for the opportunity to comment on the proposal for a new system of college ratings. My convictions can be summarized concisely: I applaud the Department's concern to enhance access, affordability, and strong outcomes in higher education, but I do not see how the proposed ratings system can achieve these important ends. In fact, I think that such a system will introduce confusion among prospective students and their families and may well undermine the ends you seek.

Let me note briefly that my view does not arise from the way in which such a ratings system could affect the college where I serve. Concordia College in Minnesota's Red River Valley has throughout its history been a college where students of modest as well as greater means thrive, during their undergraduate years and beyond. Retention and four-year graduation rates are high; post-commencement placement of graduates in professional and graduate school and in first jobs is likewise high.

The wide, genuinely puzzling disconnect that I see in the Department's proposal is its largely unexamined assumption that the imposition of federal ratings system will improve access, affordability, and strong higher education outcomes. Why? I concur with the the assessment of David Warren, President of the National Association of Independent Colleges and Universities (NAICU), that every college and every college leader should support efforts to provide basic information to prospective students and their families. And of course we already do much of this through the U-CAN site and the College Navigator. The ratings system proposed by the Department--a system whose nature and purposes are as yet unclear--is blind to the diverse character of America's colleges and universities, ignoring entirely differences in mission, program, and culture that make all the difference in whether a particular student will prosper in a given setting.

Others have eloquently made the case that the metrics the Department has fashioned run the high risk of punishing the very institutions that reach out most fully to low-income, less well prepared college students. Rather than helping them better to prepare for college and supporting them with more substantial and wisely structured means to afford it, the Department simply offers a rating (or ratings?), a number (or numbers?) that will mean little to most and that could disadvantage those who attend less financially flourishing institutions.

Before closing, I make a different kind of observation. As president of a liberal arts college in a democratic society, and as a citizen who has had high hopes for an administration elected on a vision of the common good, I am profoundly disappointed in the radically narrow conception of "outcomes" that the Department's proposal offers. My own college, like the other liberal arts colleges I know, works tirelessly to enable its students to get a good job or a good placement in graduate school. But we also know and believe that in a

democracy our purposes must transcend that real but limited "outcome." We seek to prepare skilled professionals, but we also seek to cultivate active, engaged citizens who serve their communities and their country with devotion and distinction. Neither our students nor our nation will be strengthened by the Department's conception of college as a merely financial transaction.

The motivation for the ratings system is noble. The strange conviction that ratings will make access, affordability, and outcomes better has no basis in fact. Help those of us in higher education bring more students to college. Help us prepare them for that experience. Make higher learning a national priority and occasion for American pride. Drop the ratings and work with us to serve the students and the country we love.

Sincerely,

William Craft
President
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O'Bergh, Jon

From: Lynn Jennings <ljennings@edtrust.org>
Sent: Wednesday, February 18, 2015 11:57 PM
To: College Feedback
Subject: Ed Trust Comments on New System of College Ratings
Attachments: Ed Trust College Ratings Comments_FINAL_jls (3).pdf

On behalf of the Education Trust, please accept the attached comments on the design of the new system of college ratings.

Thank you for the opportunity to provide input. We look forward to continuing to work with the Administration.

February 18, 2015

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

Dear Secretary Duncan:

The Education Trust, which promotes high academic achievement for all students from early childhood through college and works to close the achievement gaps at all levels of education for low-income students and students of color, appreciates the opportunity to provide comments on the U.S. Department of Education's proposed framework for a college ratings system.

As the organization that developed the longest standing and most widely used college comparison tool, CollegeResults.org, we know a good deal about the challenges of comparing the performance of colleges and universities. In crafting a ratings system, access, affordability, persistence and completion should be critical factors. The Department rightly recognizes the emphasis on access in the draft framework by focusing on enrollment patterns by family income and graduation rates for low-income students. Knowing that an institution enrolls students with financial need has an impact on those students' persistence and completion rates. This information is vital to both students and families selecting colleges, but also for the public in evaluating how federal, state, and local support for higher education can drive college success.

This ratings system has the potential to provide students and families with much needed information that will guide them in making the best postsecondary enrollment decisions but, we are concerned that the proposed framework conflates two purposes—supporting consumer choice and advancing institutional accountability—and does not go nearly far enough to advance the latter. We strongly urge the Department to consider the following:

- Identify the lowest-performing institutions, based on completion, access for low-income students and loan defaults: One system aimed at providing consumer information and serving as an accountability framework will be inadequate on both fronts and could undermine the potential merits of this concept. The framework for an accountability system should expose and encourage improvement from schools that are poorly serving their students and are the worst-actors in the higher education sector.
- Disaggregate measures of student success and access by race/ethnicity: As we know from other areas of education policy, disaggregated data provide a much richer picture of student persistence and completion.

- Improve data sources, so that transfer students are accurately accounted for in any ratings system.
- Use consistent measurements for all institutions.

Identify the lowest-performing institutions, based on completion, access for low-income students and loan defaults

Currently, there are too many schools that do not enroll students from low-income families, fail to graduate large percentages of their students, and turn out students with disproportionately high loan default rates. Moreover, too many institutions price out low-income students and students of color, making college access less affordable. Despite this, the federal government continuously rewards these bottom-performing schools with dollars in the form of student aid and tax credits. The nation can no longer afford this troublesome practice.

In our report "[Tough Love: Bottom-Line Quality Standards for Colleges](#)," we propose minimum performance and accountability standards for four-year institutions of higher education, a timeframe to reach those standards, and sanctions if those standards are not met. We have included a link to the report in this email and would recommend its elements, described below, be included in a ratings system designed to encourage greater accountability for results and increased affordability for our nation's postsecondary institutions.

In this report, we propose establishing performance measures that target the bottom 5 percent of four-year colleges based on six-year completion rates, student loan default rates, and the percentage of freshmen receiving Pell Grants. In order to maintain participation in the Title IV financial aid programs and continue receiving tax benefits and institutional grant aid, colleges would have to meet the following minimum criteria:

- Percentage of full-time, first-time freshmen receiving Pell Grants should be at least 17 percent.
- Six-year graduation rates for full-time, first-time freshmen should be at least 15 percent.
- Three-year cohort default rates should not exceed 28 percent.

We propose that colleges be given technical assistance and financial support to help meet these benchmarks. However, institutions unable or unwilling to meet these benchmarks in a reasonable, predetermined timeframe would be held accountable through real sanctions as follows:

- Highly selective colleges that do not enroll enough Pell-receiving, full-time freshmen would lose institutional grant and tax benefits for charitable deductions.
- Colleges with low-graduation and low loan repayment rates would be subject to losing institutional grant and tax benefits as well as all eligibility to receive federal student aid, including grant, loan, and student tax benefits.

Better public reporting will help, but transparency and accountability are not equivalent. Without clear goals for improvement, help for institutions that are struggling, and clear consequences for inaction, students will continue to be poorly served by too many of the colleges participating in federal student loan programs and precious taxpayer dollars will continue to be wasted.

Disaggregate measures of student success and access by race/ethnicity

We strongly recommend that the Department incorporate measures of success and access for underrepresented minorities into the rating system(s). The Department's proposed framework includes graduation rates for Pell Grant recipients, which is critical in promoting college access and success for low-income students, but the omission of racial/minority student populations overlooks the long-history of institutions of higher education failing to adequately serve all groups of students. The large gaps between underrepresented minority students and their white and Asian peers point to the critical need for a rating system that disaggregates measures of student success and access by race/ethnic group. The rating system should measure and evaluate the graduation rates for underrepresented minority students and/or graduation rates gaps between students of color and their classmates, as well as the percent of students enrolled from each racial/ethnic group.

Accurately account for transfer students

We are concerned about how the ratings system will accurately account for students who transfer out of and into individual institutions of higher education. As the Department acknowledges in their draft framework, the current Integrated Postsecondary Education Database System (IPEDs) has significant limitations as it collects data only on first-time, full-time students and does not account for transfers. The Department proposes to supplement IPEDs use with information from the National Student Loan Database System (NSLDS), but this tool is limited to those who borrow and does not include all Title IV students.

Whether assessing the performance of two-year institutions from which students transfer or four-year institutions that receive these students, our current data systems present an incomplete picture of the success of institutions, especially among two-year community colleges. Rating colleges without accurately accounting for transfer students is problematic at best and could skew a ratings system and leave students, their families, and the public with an inaccurate picture of an institution's impact on student persistence and graduation.

Use consistent measurements for all institutions

Lastly, and in many ways most importantly, we do not support the Department's proposal to adjust an institution's ratings based on the race, ethnicity or income of its student body. Adjustments of this nature will only skew a picture of the institution's outcomes. Students and families want to know how they will fare and what their chances of completion are at an

institution of higher education. Adjusting ratings to account for different characteristics will only hide the true outcomes that institutions are producing for their students.

Thank you for the opportunity to comment on the proposed ratings framework. We look forward to working with the Department in the coming months to strengthen this proposal and make it operational for our nation's students, their families and the public.

Sincerely,

(b)(6)

JoseLuis Santos, PhD
Vice President, Higher Education Policy and Practice
The Education Trust