

Written Testimony on President Obama's Plan to Make College
More Affordable: A Better Bargain for the Middle Class

US Department of Education

December 2013



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ASSOCIATION OF AMERICAN UNIVERSITIES

December 2, 2013

Jamie Studley
Deputy Under Secretary
Office of the Under Secretary, Department of Education
400 Maryland Avenue, SW, Room 7E300
Washington, DC 20202

Dear Deputy Under Secretary Studley:

The Association of American Universities, a nonprofit association of 60 U.S. and two Canadian preeminent public and private research universities, would like to respond to the President's "Plan to Make College More Affordable: A Better Bargain for the Middle Class," released on August 22, 2013. AAU applauds the President's focus on college affordability at a time when Americans are concerned about the cost of a college education, the impact of student loan debt, and future employment prospects. AAU member institutions strive to provide the highest quality education possible and to make it affordable through a range of cost-savings measures, substantial institutional financial aid programs for low- and middle-income students, and creative use of technology. AAU is encouraged by many of the goals outlined in the three sections of the President's plan: paying for performance, promoting innovation and competition, and ensuring that student debt remains affordable. This response is focused on the "Paying for Performance" section of the plan, which calls for a new college rating system by 2015, with a link to the awarding of federal student aid by 2018.

AAU does not endorse a new ratings system, but we would like to share our views. As articulated in prior statements about the Administration's consumer disclosure proposals, we believe that any tools designed to be useful to students and parents in their college search should be grounded in data that are reliable and valid, and that are presented with the appropriate context to accurately reflect institutional performance. In preparing this response, we asked AAU institutional research officers and other campus experts to provide us with feedback on the reliability and validity, as well as methodological limitations, of possible metrics related to access, affordability, and outcomes. The sheer volume of responses from these experts speaks to the inherent complications and controversies for this—or any—rating system. We have summarized the responses below and divided the responses into (1) general feedback on rating

systems, (2) data sources and definitional issues, and (3) peer groups, and we have also provided specific feedback on metrics linked to access, affordability, and outcomes.

General Feedback

Limitations of Rating Systems

Despite the proliferation of college rating and ranking systems over the last several years, developing a valid and useful rating system is a daunting endeavor. Given the diversity of higher educational institutions (including their varying sizes, locations, and missions), the shortcomings of available data, and the breadth of the Administration's stated policy objectives, the exercise becomes even more controversial and complex. While the Department of Education website already contains a great deal of information about institutions drawn from a variety of sources, combining a particular set of measures into a single rating raises important questions, including: What methodology will be used to generate the ratings? What measures will be used? How will different measures be combined and weighted? What are the appropriate peer groups for comparison? Do these variables (methodology, measures, weights, peer groups) vary for different objectives? Depending on the answers to these questions, a system may be biased against some group(s) of institutions and toward others, leading to unintended consequences for students and institutions.

One central dilemma, especially if such a rating system is intended for parents and prospective students, is that many of the available measures and metrics require additional context to be useful. Yet providing more context for individual measures seems in opposition to the approach of combining measures into a single rating. Different types of institutions have different missions and may require different metrics to capture their strengths and weaknesses. A one-size-fits-all approach fails to capture the diversity of the U.S. higher education system.

A further difficulty is that a rating system that looks at access, affordability, and outcomes will of necessity consider both the inputs and outputs of higher education. Yet these are not independent of one another: designing a rating system that accounts for these relationships in a way that does not provide incentives to institutions to engage in undesirable behaviors will be a major challenge.

Data Sources and Definitional Issues

Even if a perfect methodology for developing a rating system existed, it would be meaningless without good data. As described, the President's rating system — like other resources for students on the Department of Education website, such as College Scorecard and College Navigator — would likely draw from extant data sources, primarily the Integrated Postsecondary Education Data System (IPEDS). While IPEDS was initially developed to monitor trends in higher education, over the years it has become a tool for enforcing institutional compliance and assessing institutional effectiveness, with mixed results. Fundamental limitations are built into the information in IPEDS, which is self-reported by institutions. Below we provide one example

where schools under-report information, and other examples where the data are available only for a subset (and perhaps not always a representative subset) of students. A rating system must be equipped to deal with missing or limited data, and the use of inappropriate denominators to calculate ratios and percentages is a concern in the construction of many metrics based on student data. Overall, while IPEDS data can be informative for parents and students, they may not provide the whole picture, and require contextualization to be most useful. IPEDS data are inappropriate as the basis for a system that will ultimately make determinations about institutions' eligibility for federal financial aid.

Vague definitions of data specifications or policy terms can also be a problem. Often, it is the availability of extant data that determines the definition of policy terms such as access, rather than stakeholders first agreeing on definitions, with the search for the right data following suit. Such an approach may lead to measuring what's available, rather than what stakeholders truly care about.

Regardless of the final data sources for a rating system, the department should ensure that all data are publicly available and made available to colleges and universities for review prior to publication of such a rating system.

Peer Groups

There is much concern among AAU institutional researchers about how peer groups would be defined in a rating system. Higher education institutions are nearly as diverse as they are numerous, and systems to categorize institutions inevitably have shortcomings. While groupings like the Carnegie Classification capture many of an institution's core characteristics, no classification system captures features such as whether the institution is committed to need-blind admissions or to providing institutional grant aid to meet full demonstrated need of eligible students.

A related issue involves how performance within a rating system will be measured within peer groups: will institutions be compared to one another, to themselves over time, or to an external benchmark of some kind? We caution that comparisons within any peer group necessarily lead to "winners" and "losers." Such an approach seems inconsistent with the Administration's goals of encouraging all institutions to innovate and improve their performance.

Specific Feedback

Beyond the more general issues outlined above, we wish to provide comments on specific types of information that may have a role in a rating system, some of which are currently part of the College Scorecard.

Cost and Access: Currently, the College Scorecard reports average net price and two-year increases in average net price. We believe that access and affordability would be better represented by utilizing average net price by income, as currently reported through IPEDS. We also note that cost at public universities is tied closely to state appropriations and other policies; a rating system should take account of these differences so as not to penalize institutions from particular states.

Numbers and percentages of Pell grant recipients are a simple and direct way to look at access, yet these figures should be compared to the overall population of Pell-eligible students, not necessarily all undergraduates. Looking at Pell recipients also provides a narrow view of access, in that it potentially ignores a large population of low-income, middle-income, and first-generation students who should be part of any access equation. Many students who do not qualify for Pell grants still face considerable financial need. Information on institutional aid, collected through IPEDS, should also be included, as it demonstrates institutional commitment to access and affordability. Finally, some contextual information (e.g., comparisons to state or regional demographics) would give Pell grant figures more meaning.

Graduation rates: The graduation rate reported on the College Scorecard is the six-year graduation rate for first-time, full-time students, which makes sense for some institutions but may not make sense for others. We are also concerned about any potential use of transfer-out rates: in 2011, only 27% of four-year institutions reported transfer-out students to IPEDS. Additionally, the six-year graduation rate as currently reported does not account for students who transfer from one institution and complete their degree at another; other efforts, such as the Student Achievement Measure initiative, contain more comprehensive information about student progress and graduation.¹ Some thought also must be given to institutions that are part of multiple-institution systems.

Regardless of the rating system, we continue to encourage the Department of Education to make progress in improving existing data sources such as the graduation rate data in IPEDS. The need for better data arguably trumps the need for another college rating system.

Loan default rates: Loan default rates are important, but we believe that further honing the information used would make it more useful for students. Loan default rates matched with a particular institution should apply only to debt accrued at that institution. Further, a separate loan default rate should be calculated for graduates only, as this would provide a better point-of-comparison for prospective students. Finally, to properly contextualize this figure, the number of students in default and the number of graduates should be reported, in addition to the default rate.

Median borrowing: Like loan default rates, borrowing and debt are important data, but they require honing and contextualization to be most useful. Borrowing linked with a particular

¹ <http://www.studentachievementmeasure.org/>

institution should apply only to borrowing that students accrued at that institution. Currently, median borrowing for an institution includes both graduates and non-graduates who entered repayment; these groups should be separated to provide better points-of-comparison for prospective students. We also believe that, in addition to providing a median figure, the number and percentage of graduates who have no debt should be reported. The figures as currently reported on the College Scorecard imply that they apply to all students, not just those who borrowed.

Employment: We believe that this section has great potential to do more harm than good. In particular, it is hard to understand how reporting one earnings figure for each institution could be of any use to parents and prospective students without somehow properly accounting for: 1) the mix of majors at the institution, 2) the location of most graduates (e.g., cost-of-living differences), and 3) the timeframe after graduation at which earnings are considered. Reliable data on college earnings demonstrate that the greatest variation in graduates' earnings is *within* institutions, rather than *across* institutions, with these differences being driven by choice of major and occupation, prior employment experience before or during college, and other issues.

Beyond these three factors, there are additional complications. Certain occupations have high societal value, yet pay relatively low salaries (e.g., teachers, social workers); this must be taken into account so as not to provide a disincentive for institutions to provide degrees in these fields, and for students to enter them. Graduates who go on to attend graduate or professional school may earn very low wages during their course of study, and sometimes beyond (e.g., in the case of postdoctoral researchers in some STEM fields). The methodology used by Payscale.com bypasses this issue by excluding students who go on to earn additional degrees, but using such a methodology (i.e. restricting earnings to only those who earn terminal bachelor's degrees) would present a biased, and inaccurate, picture of outcomes for many of our institutions. Even in higher-paying fields, rather than comparing salaries across fields or institutions, a more useful exercise would be to look at graduates' salaries relative to others in the same field, location, and career stage.

The earnings data available for this type of accountability measure also have severe limitations. Even if the Department of Education is able to link Social Security or Unemployment Insurance (UI) wage data of individuals back to the colleges they attended, there would still be other issues that must be addressed. Many students today attend more than one college, so it can be difficult to apportion the value of all of their earnings to any single institution. The wages of individuals who are working less than full time, either by choice (due to parental and other caretaking responsibilities, or for other reasons) or due to labor market dynamics, can skew the results for any single institution. In addition, UI wage data do not reflect self-employment income. Using IRS data can help address this weakness, but it has its own limitations because of the difficulty of disaggregating income data for married joint filers if the data used are restricted to Forms 1040/1040A/1040EZ. Finally, linking earnings data to the CDR cohort limits the reporting of that information only to those who have taken out federal student loans. This potentially

excludes a significant number of graduates and may possibly bias the reported figures, particularly for institutions that graduate a majority of their students without debt. It also may include individuals who did not graduate, which is not useful for prospective students.

Finally, it goes without saying that the value of a college degree goes beyond maximizing earnings. Yet a ratings approach risks quantifying a complex variable like earnings in a way that fails to provide valuable information to prospective students, while simultaneously ignoring and excluding the non-quantifiable ways a college degree contributes toward pursuit of a rewarding and satisfying career. A primary focus on earnings as a measure of institutional performance also exacerbates the recent trend of focusing almost exclusively on the private returns to higher education. It unwisely diminishes the social value that a college graduate provides to his or her community and our nation.

Thank you in advance for your consideration of AAU's views. We look forward to a conversation in the coming months about how we can enhance college access and promote college completion while protecting the integrity of federal student aid funding and encouraging states to reinvest in public higher education.

Sincerely,



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THE WORLD'S PREMIER
CULINARY COLLEGE

November 22, 2013

Josh Henderson
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400 Maryland Avenue SW, Room 7E313
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Dear Mr. Henderson,

The Culinary Institute of America (CIA) supports the efforts of the Department of Education and many higher education organizations to promote college affordability and accountability. We recognize that over the years such efforts have taken many forms, with varying degrees of effectiveness. Controlling college costs is a complicated issue with multi-determined causes. This manifests in a dilemma for higher education as attempts to ensure a high quality education, assure learning outcomes, meet external accreditation standards and regulations, and manage an increasingly competitive admissions market are all now fundamental operating conditions contributing to revenue pressures and significant tuition increases, while simultaneously challenging the need for affordability and access. Nonetheless, higher education has begun to and indeed must respond even more proactively to facilitate affordability for a broad student audience. It is this notion of institutional mission diversity in particular that we would like to address.

For many decades higher education policy and public perception were largely tied to the roughly 200 most selective, traditional colleges and universities in the country, yet an increasing majority of students in America are not represented by these institutions. An important development over the past decade has been higher education policymakers growing recognition of the great diversity of missions and hence student audiences across numerous institutional types, with a corresponding migration in the national dialogue from a singular focus on college access to a focus on successful completion. We welcome these transitions, and think it vital that a new college ranking system be based their integration.

The CIA is in many ways a traditional college, as a nonprofit, independent, residential associate and baccalaureate degree institution offering the nation's premier culinary education. Yet in other ways we have a unique position as having derived from a trade school founding in 1946 on the campus of Yale University, and over the years transforming into an academic environment currently offering a deeply experiential, kitchen/lab-based education to almost 3000 full-time students.

Our graduation rates are well above average and loan default rates below, our students virtually all secure employment in their fields of study upon graduation, and our alumni are highly regarded with countless attaining the highest levels of accomplishment and professionalism. Yet notwithstanding these results, on certain traditional indices that map to first-time-full-time, fall entry students in four-year baccalaureate programs, the CIA and many similar institutions offering specialized competency-based training may not fare as well as their true outcomes should predict. For example, while our student employment rates upon graduation are very high, by nature of the culinary field, students initial incomes are not generally that high, as they tend to appropriately place more importance on the quality of the post-graduation work/mentorship experience than the starting salary. With strong post-graduation experience, our students then have significant advancement opportunities in the coming year. Yet our understanding is that ranking systems will likely use students' starting salary as a metric. For many college majors, that would represent an underestimation of the lifetime value of the degree.

Without knowing as yet the specific metrics upon which a college ranking system will be based it is impossible to comment with much specificity on its efficacy. There is always a balance to be forged between quantitative/generalizable versus qualitative/descriptive metrics to achieve fair measurement outcomes. We urge the Department of Education to make every effort to ensure that the ranking system integrates a variety of metrics and doesn't privilege certain institutional types at the expense of others. Of course the point of a ranking system is to differentiate institutions on the chosen metrics - in our case, such differentiation should be able to distinguish outcomes from the CIA versus those at the numerous for-profit culinary colleges, many of whom have quality challenges. In the end, the metrics employed must be able to discern real educational quality and value, and great long-term outcomes, from among a breadth of institutions and student types across all of higher education.

Sincerely yours,



Michael B. Sperling, PhD
Vice President of Academic Degree Programs



The Education Trust

Closing the gaps in opportunity and achievement, pre-K through college.

The Education Trust's Comments on the Proposed College Ratings Plan

The Education Trust is a national nonprofit organization that exists to promote high academic achievement for all students at all levels — pre-kindergarten through college. Our chief goal is to close the gaps in opportunity and achievement that consign far too many young people — especially those from low-income families or who are black, Latino, or American Indian — to lives on the margins of the American mainstream.

Support for a college ratings system

We support the U.S. Department of Education's efforts to create a college ratings plan and provide students, families, and consumers the ability to compare colleges based on a comprehensive and nuanced definition of value. Shining a bright light on colleges' success with their students, in particular, is a welcome change to higher education. The average six-year graduation rate of first-time, full-time students is less than 60 percent at four-year schools, and that's the category of students who are easiest for institutions of higher education to graduate. Considering student needs and changing demographics, the especially low graduation rates for low-income students and students of color are even more distressing. Graduation rates for African American and American Indian students are approximately 40 percent. The graduation rate for Hispanic students is slightly higher at 51 percent, but this is still lower than the national average.

Colleges can and must do better by improving graduation rates for all students and closing success gaps for low-income and minority students. Having a ratings system that highlights these low success rates and wide gaps can help institutions do a better job of serving their students.

Moreover, a ratings system can help students and families access the information they need to make an informed choice about which institution is the best match for them. It can help them understand that factors such as student outcomes and cost of attendance vary greatly across higher education institutions, and that they need to look closely at how any institution they are interested in performs on these factors vis-à-vis its peers. A detailed, public, widely available, and widely disseminated college ratings system focused on access, affordability, and student outcomes can both provide students and parents the information they need to make good choices about what school to attend *and* inspire institutions to do a better job serving students.

Such a ratings system, if designed and implemented with care, has a potentially major long-term impact on the outcomes of low-income and minority students in particular. Any college ratings system that the

Department of Education develops should focus on how well an institution performs on access, affordability, and student outcomes such as completion rates, particularly those for low-income students and students of color.

Feasibility of a college ratings system

The Education Trust developed and currently maintains College Results Online (CRO, www.collegeresults.org), a public-access, Web-based database that facilitates comparisons across similar institutions of higher education. CRO contains data on nearly all four-year institutions and allows users to search and compare schools based on characteristics like size, sector, cost, location, and student demographics. In addition, CRO contains information on colleges' graduation rates, which reveals that some colleges do a much better job of graduating students than others.

CRO is unique in its ability to construct peer groups of similar or selected institutions that serve similar students. This feature acknowledges the diversity of institutions in our higher education system and seeks to provide users with a reference point against which to compare the graduation rate of a particular college of interest.

CRO's peer groups are chosen by applying an algorithm to all other public and private not-for-profit institutions in the database. Similarity is ranked based on institutional and student characteristics that are statistically correlated with overall six-year graduation rates. These include:

- Sector (public vs. private)
- Number of full-time equivalent (FTE) undergraduates
- Average high school GPA among college freshmen
- Estimated median SAT or ACT equivalent of freshman class
- Percent of full-time, first-time degree/certificate-seeking undergraduate students who received Pell Grants
- Percent of full-time equivalent undergraduate students age 25 and over
- Percent of undergraduates who are enrolled part-time.

CRO's peer group methodology allows for comparisons between similar institutions that serve similar students. It was created following advice and input from experts in the field, including institutional researchers at several universities and education policy specialists. These comparisons have shown that, at any level of selectivity, institutions serving the same kinds of students can have very different results.¹

Due to the drastic variance in mission and purpose of higher education institutions, any new ratings system should rate schools as compared with their peers. CRO has shown that it is feasible to compare institutions based on student outcomes despite this variance.

Similar schools, different results: Syracuse and Hofstra

Syracuse University and Hofstra University offer an example of colleges with similar students and starkly different results. Students enrolled at these mid-size, private New York colleges have similar demographics — nearly the same percentage of Pell Grant and underrepresented minority students and

a median SAT of around 1175. But enrolling similar students does not translate into similar success outcomes.

Of the students who begin at Hofstra, 58 percent graduate in six years — a full 22 percentage points lower than the 80 percent of students who complete at Syracuse. The large gulf in overall graduation rates between these two colleges is also reflected among different student subgroups. Fewer than half of African American students at Hofstra will graduate (49 percent) in the same time frame that nearly three-quarters of black students at Syracuse (74 percent) will complete. Hofstra’s Latino students complete at higher rates than their black peers (54 percent), but they too markedly trail the graduation rate of Latinos at Syracuse (72 percent).

Institution	Carnegie Classification	Median SAT Score, Fall '10	Full-Time Equivalent Undergrad Enrollment, Fall '10	Percent Under-represented Minority Students	Percent of Pell Recipients Among Freshmen	Overall Grad Rate, 2011	White Grad Rate, 2011	African American Grad Rate, 2011	Latino Grad Rate, 2011
Syracuse University	Research High	1165	13,736	16.8%	25%	80.2%	82.0%	73.6%	72.2%
Hofstra University	Doctoral/Research	1185	6,999	17.8%	24%	57.9%	60.4%	49.4%	53.8%

Source: College Results Online, 2013. The Education Trust

The high achievement and student success rate at Syracuse is commendable, but even more so because it has been sustained during a period of increasing student body diversity. Between 2002 and 2011, Syracuse expanded its Pell enrollment from 19 percent to 25 percent among freshmen. It increased its percentage of underrepresented minority students from 10.1 percent to 16.8 percent. And alongside its increase in student body diversity, Syracuse improved its graduation rates for white, African American, and Latino students.²

As we have seen at Syracuse, success isn’t predicated on tonier demographics or more selective admission standards — It’s what colleges do that matters.

Potential benefits of a ratings plan

The creation of an even more advanced college ratings system than CRO will better enable families to make better choices about which college can best serve their needs and provide them with the best chance of success. Nuanced execution of President Obama’s college ratings plan is especially important for low-income and minority students, who are more likely to take on debt and less likely to graduate. The proposed college ratings system must provide all students, but particularly students from disadvantaged backgrounds, with greater ability to choose a college that provides them with the best chance of success.

Basing college ratings on both cost and effectiveness is an important aspect of the proposed ratings plan and will focus competition on the value that particular institutions can provide to their students. Emphasizing degree completion at institutions of higher education will incentivize institutions to

improve in this regard. Perhaps most important, disaggregating graduation rates, along with other measures of effectiveness, by race and income will hold colleges accountable for the results of all their students. By subsequently linking ratings based on access, affordability, and student outcomes to financial aid, the federal government has the potential to send more money to good schools and less to bad.

¹ Joseph Yeado, "Intentionally Successful," (Washington, D.C.: The Education Trust, 2013).

² College Results Online, 2013. The Education Trust.

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Year	Latino	Black	White	Hispanic	Black	White	Hispanic	Black	White
2012	65.7%	52.7%	72.5%	65.7%	52.7%	72.5%	65.7%	52.7%	72.5%
2013	67.1%	54.1%	73.9%	67.1%	54.1%	73.9%	67.1%	54.1%	73.9%
2014	68.5%	55.5%	75.3%	68.5%	55.5%	75.3%	68.5%	55.5%	75.3%

The high achievement and student success at Syracuse is commendable, but even more so because it has been sustained during a period of increasing student body diversity. Between 2002 and 2013, Syracuse expanded its Fall enrollment from 29 percent to 35 percent among freshmen. It increased its percentage of underrepresented minority students from 10.1 percent to 16.8 percent. And alongside its increase in student body diversity, Syracuse improved its graduation rates for white, African American, and Latino students.¹

As we have seen at Syracuse, success isn't predicted or feared demographic or more selective admission standards — it's what colleges do that matters.

Potential benefits of a ratings plan

The creation of an even more advanced college ratings system than CRF will better enable families to make better choices about which college can best serve their needs and provide them with the best chance of success. Wounded execution of President Obama's college choice plan is especially important for low-income and minority students, who are more likely to rely on debt and less likely to graduate. The proposed college ratings system must provide all students, but particularly students from disadvantaged backgrounds, with greater ability to choose a college that provides them with the best chance of success.

Being college ratings on both cost and effectiveness is an important aspect of the proposed ratings plan and will focus competition on the value that particular institutions can provide to their students. Emphasizing degree completion at institutions of higher education will incentivize institutions to

December 9th, 2013

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

Dear Secretary Duncan:

We wish to thank you for inviting comment and conducting a listening tour on the President's Plan to Make College More Affordable. The Department's staff have replied thoughtfully to the concerns of college presidents and have been more than willing to receive further communications about those concerns. Consternation about the proposed ratings plan for colleges and universities, however, may be drowning out the voices on several other elements of the plan. This letter tries to cover some of these other issues, while also responding to the ratings issues.

Student Financial Aid

President Obama has been a strong supporter of programs designed to help families pay for a college education, most notably through the Pell Grant and the Opportunity Tax Credit. All of us in higher education are grateful for this good support. The Pell Program has worked so effectively to provide access to those without means that colleges have changed their behavior to add their own institutional funds to support generous financial aid packages for Pell-eligible families. That effective leveraging of federal dollars to gain private and institutional support for access to higher education has done more than any other program to open higher education to all students with the will and adequate preparation to go to college. We will continue to support these students with institutional funds. In these times of stress, nothing could better support the President's access and completion agenda than to provide sufficient Pell grant funding. To the extent the Administration can find new funding for the Perkins loan program, it would have strong support among colleges to see that this new funding is distributed where the Pell-eligible students go to school.

Transparency of Price and Cost

We support reasonable efforts to make the cost of attending college as clear and transparent as possible. While this is difficult to do because of the variety of financial aid programs and discount policies which require individual family information, there are now 'net price calculators' for families to use to estimate the cost of attendance, and many colleges have easier-to-use 'early estimators' on their websites to perform a similar function. Many provide extensive information on NAICU's U-CAN website. We want to provide as much information as is needed to help families select the most suitable college.

Pay-for-Performance Ratings Plan

The President's plan to deal with the cost of a college education, rising student debt load, and increasing student loan default rates seems to have three main parts. First, establish a rating system to determine which colleges offer "best value"; second, have Congress pass legislation tying federal student aid to the "best value" ratings; and third, cap student loan repayment amounts at 10% of income annually. We are intrigued by this third suggestion and imagine that such a program might help students considerably.

The cost of college varies greatly among our institutions for many reasons. And yet, although the list price of tuition continues to increase at most of them, so also has the amount of institutional financial assistance that is made available to families who are unable to pay the list price. This increase reflects a commitment on the part of private liberal arts colleges to meet the challenges of affordability. Furthermore, in recent years, the *net* price (list price minus discounts and financial aid) has actually *decreased* in inflation-adjusted dollars at a large number of our schools. This drop in real price is partly the result of a weakened economy, which has exerted very effective pressure on colleges to cut costs and seek new sources of revenue. We will continue to find new ways to contain costs as we come to grips with a rapidly changing landscape and the efficiencies of technology.

We have concerns about likely unintended consequences of the ratings plan, something we understand the Department also wishes to avoid. Here are four possible consequences that would be very unfortunate.

First: To the extent that the value of an education is measured in monetary terms—by such factors as cost, price, future earnings, and loan indebtedness—it fundamentally mischaracterizes the nature of higher education. The highest learning—the kind that helps one to become the owner of his or her life—is not a commodity any more than one’s own life is a commodity. To measure the value of an education in terms of its price of entry or its economic return is to encourage yet more of the commodification of education that has already cheapened it. It is true that many of us in higher education have contributed to this state of affairs, but we will continue to seek a more complete way to talk about the value of higher education, and we hope the Department will too. Though we must find a way to pay for college, we should not allow the economic metaphor to determine the standard of educational value.

Second: To the extent that value is *not* measured in monetary terms, it will be extremely difficult, if not impossible, to find a common standard for determining the value of an education since students weigh many different factors in choosing a college suited to their individual needs. Each has his or her own life to discover and pursue, a life that is unique and cannot be easily classified or categorized. Instead of finding a common set of criteria to rate, better instead to find ways of getting as much information as is useful about each school to each student and let the students make their own ratings—ones that will suit their own individual needs.

Third: The President’s plan proposes to group colleges according to similarity of mission. Similarity of mission seldom has anything to do with a student’s choice of college. Consider the many reasons one might choose a school: its perceived strength in a given area of study; its proximity to home; its popularity with friends and family; its size; its proximity to, or distance from, a big city; its sports program, theater program, religious life, political life, or residential life; the climate of its geographical region; the physical or cultural setting of its campus; its demographic diversity; and so on—not to mention the availability of scholarships and cost of attendance. The list is as long as the imagination is inventive.

Fourth: The plan proposes to link federal student aid to the ratings. Students may then feel compelled to choose one school over another for reasons that have nothing to do with their own individual needs or desires. The ratings will indicate the kind of education the government is willing to support, irrespective of the particular needs and desires of the student. The Department has acknowledged that it wants to influence behavior – presumably both the behavior of those making the choice and those providing the educational options. Indeed, money is a powerful incentive. But is this the kind of behavioral influence we value as a society? Do we not value the freedom of our citizens to make choices for themselves – informed choices, to be sure – about the lives they want to shape for themselves?

Only freely educated citizens freely pursuing their own paths to a life worth living can shape a society that will protect the lives and promote the happiness of us all. This last expression ought to be the basis of all public policy in this area. It explains the success of the Pell Grant Program, which resulted in a leveraging of federal dollars to give students from all walks of life a real opportunity to exercise their choices freely within the broad range of accredited schools.

Accreditation

We have heard talk of the need to replace the current peer-review accreditation system with a more regulatory approach. We think this would do our Republic a disservice. A free society needs freely educated citizens to shape lives that belong to them. Education in the arts of freedom makes the promise of America possible. As there are many ways one might achieve such freedom, we ought to promote independence in our institutions of learning to encourage a variety of ways to help a hugely diverse citizenry find diverse paths to their happiness and success. There is no better way to strengthen our many schools of higher learning to do this than to support a system of accreditation that depends on a careful institutional self-study and thoughtful peer review of a school's educational program in the context of its own singular statement of purpose.

Consider that the self-study requires colleges to start with a statement of high aspirations rather than minimal, baseline measures of quality. The distinction is important, because the accrediting bodies ask colleges to assess how they are doing against their aspirations as well as determining whether they meet minimum standards. This gives colleges the freedom to be self-critical and the responsibility to explore ways of improving. And it brings professional judgment to bear from those who understand higher education best. It would be a great mistake to promote so great a "reform" of accreditation that we lose what makes it truly responsive to the need and desire for improvement in educational quality.

Justice Frankfurter, in his concurring opinion in *Sweezy v. New Hampshire*, 354 U.S. 234 (1957), identified the now well-recognized four freedoms necessary to sustain a climate of discovery and free inquiry, of speculation and experiment, on college campuses: the right to determine for themselves on academic grounds who may teach, what may be taught, how it shall be taught, and who may be admitted to study. These four freedoms ought to remain a cornerstone for public policy in matters affecting higher education.

Thank you. We appreciate your support and your attention to our concerns.

Sincerely,

Jeff Abernathy, President, Alma College
Teresa L. Amott, President, Knox College
MaryAnn Baenninger, President, College of Saint Benedict
Steven C. Bahls, President, Augustana College
Dr. Esther L. Barazzone, President, Chatham University
Bradley W. Bateman, President, Randolph College
Lori Bettison-Varga, President, Scripps College
Jonathan Brand, President, Cornell College
John C. Bravman, President, Bucknell University
George S. Bridges, President and Professor of Sociology, Whitman College
Stephen R. Briggs, President, Berry College
Roger N. Casey, President, McDaniel College
Thomas V. Chema, President, Hiram College

Ronald A. Crutcher, President, Wheaton College
Mauri A. Ditzler, President, Monmouth College
Donald R. Eastman III, President, Eckerd College
Adam Falk, President, Williams College
Bobby Fong, President, Ursinus College
William L. Fox, President, St. Lawrence University
Michael L. Frandsen, Interim President, Albion College
Barry Glassner, President, Lewis & Clark College
Philip A. Glotzbach, President, Skidmore College
Nancy O. Gray, President, Hollins University
Marjorie Hass, President, Austin College
Michael Hemesath, President, Saint John's University
Jeffrey Herbst, President, Colgate University
Dr. Christopher B. Howard, President, Hampden-Sydney College
James F. Jones, Jr., President and Trinity College Professor in the Humanities, Trinity College
Rock Jones, President, Ohio Wesleyan University
Elizabeth Kiss, President, Agnes Scott College
Marvin Krislov, President, Oberlin College
Thomas Kunkel, President, St. Norbert College
Jonathan Lash, President, Hampshire College
Karen R. Lawrence, President, Sarah Lawrence College
L. Jay Lemons, President, Susquehanna University
Robert R. Lindgren, President, Randolph-Macon College
D. Michael Lindsay, President and Professor of Sociology, Gordon College
John M. McCardell, President, Sewanee: University of the South
Lex O. McMillan III, President, Albright College
Barry Mills, President, Bowdoin College
Shirley A. Mullen, President, Houghton College
Christopher B. Nelson, President, St. John's College
Brennan O'Donnell, President, Manhattan College
Frederik Ohles, President, Nebraska Wesleyan University
Lynn Pasquerella, President, Mount Holyoke College
Robert W. Pearigen, President, Millsaps College
Michael P. Peters, President, St. John's College, Santa Fe, NM
Mitchell B. Reiss, President, Washington College
Janet Morgan Riggs, President, Gettysburg College
Lyle Roelofs, President, Berea College
Nancy A. Roseman, President, Dickinson College, Carlisle, PA
John A. Roush, President, Centre College
Nayef H. Samhat, President, Wofford College
Lawrence Schall, President, Oglethorpe University
Laura Skandera Trombley, President, Pitzer College, Claremont, CA
Ronald R. Thomas, President, University of Puget Sound
Stephen E. Thorsett, President, Willamette University
Jill Tiefenthaler, President, Colorado College
James A. Troha, President, Juniata College
William E. Troutt, President, Rhodes College
Adam Weinberg, President, Denison University
Eileen Wilson-Oyelaran, President, Kalamazoo College
Richard F. Wilson, President, Illinois Wesleyan University

UNIVERSITY OF ILLINOIS
Urbana-Champaign • Chicago • Springfield

Office of the Vice President for Academic Affairs
377 Henry Administration Building
506 South Wright Street
Urbana, IL 61801

Christophe Pierre
Vice President

November 22, 2013

Arne Duncan, Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW Room 7E313
Washington, DC 20202-0001

Dear Secretary Duncan,

On behalf of the University of Illinois, I am grateful for the opportunity to provide comments on the Administration's plan to develop a college rating system designed to help prospective students make informed choices about which college to attend. The University of Illinois applauds the goals of this initiative, and looks forward to additional opportunities to provide feedback once the rating system comes into sharper focus. As the Administration moves forward in establishing this rating system, there are a number of items outlined below that I urge you to consider.

The University of Illinois is a public land grant research university with campuses in Urbana-Champaign, Chicago, and Springfield. Collectively, our three campuses enroll more than 50,000 undergraduate students, of whom over 30% are Pell grant recipients. Each campus has robust programs to recruit students from under-served populations, and each campus provides financial aid from institutional funds beyond what students receive from Pell awards or Monetary Assistance Program (MAP) grants from the State of Illinois.

Our understanding is that the proposed college rating system will emphasize affordability, accessibility, and success at graduating students, with special consideration given to how effectively each college or university addresses the need to put a college degree within reach of economically disadvantaged students. There are a number of measures that help clarify the effectiveness of higher education institutions in these areas, but relations among them are too complex even in a single institution to be captured usefully in a single rating. The enormous differences among the range of institutions to be rated greatly compounds that complexity. We recommend against developing a system that produces a single rating for each institution.

We believe a set of ratings that address the key issues of affordability and success is preferable. Appropriate measures could include the total number of Pell students enrolled, and the percentage of total student population with Pell Grants. In order to recognize the significance of scale in large public universities, it will be important to use the total number as well as the percentage. Universities with a high number of Pell enrollments are meeting an important critical criterion in this rating system, and should not be penalized for enrolling many non-Pell students as well.

Declining state support and rising tuition in public colleges and universities have resulted in increased student borrowing. A useful measure of what it costs students to attend these institutions is the average loan burden of enrolled students who take out loans. Examining average loan burdens of students, not only those with Pell grants, but all students for whom the mix of family income and financial aid is not sufficient to cover the costs of college attendance, provides a measure that to some degree addresses the problem of having many kinds of institutions in the same rating program.

Student loan default rates provide a helpful complement to student loan burden data. After leaving, are students benefiting from having enrolled at and, ideally, graduated from, an institution of higher learning? A good, yet imperfect, measure of success is the default rate on student loans of graduates and other students who enrolled but did not graduate.

Graduation rates are, of course, exceptionally important, if somewhat problematic because of limitations in the way data are currently compiled. However, an effective accounting of overall four- and six-year graduation rates for each institution, and of graduation rates for Pell students enrolled in those institutions, would provide very valuable measures.

Incorporating employment and earnings figures for students who graduate from an institution can also provide significant measures of how extensively students have benefited from their college work. This information proves more reliable when five and ten years out.

These measures can assess both the overall success of colleges and universities and their particular success with enabling low-income students to enroll, graduate, and secure productive employment.

With campuses as members of the Association of American Universities (AAU) and the Association of Public and Land-grant Universities (APLU), we hope that you will also consider their remarks on behalf of the broader higher education community.

Again, thank you for this opportunity to make advance comments on the development of this proposed federal college ratings program.

Sincerely,



Christophe Pierre
Vice President for Academic Affairs

C: Robert A. Easter
Josh Henderson



INDIANA UNIVERSITY

OFFICE OF THE EXECUTIVE VICE PRESIDENT
FOR UNIVERSITY ACADEMIC AFFAIRS

December 11, 2013

Jamie Studley
Deputy Under Secretary
Office of the Under Secretary, Department of Education
400 Maryland Avenue, SW Room 7E300
Washington, DC 20202

Dear Deputy Under Secretary Studley:

Indiana University appreciates the opportunity to respond to the "Plan to Make College More Affordable: A Better Bargain for the Middle Class", as released by President Obama this past August, on behalf of the IU community of students, parents and alumni.

Of the three components of the President's plan - Paying for Performance; Promoting Innovation and Competition; and Ensuring that Student Debt Remains Affordable - Indiana University's primary concern is concentrated on the "Paying for Performance" section, which calls for establishing a new college rating system that would tie financial aid to college performance. Indiana University is unable to endorse this element of the President's plan.

As a member of the Association of American Universities (AAU), Indiana University assisted the association with the development of its letter commenting on the President's higher education proposal (attached). The views contained in the AAU letter fully embody those of Indiana University on this matter.

Although IU cannot support the creation of a federally-managed ratings system to govern the distribution of student aid, we do appreciate this Administration's efforts to help us in our continued fight to keep college affordable. IU was able to limit a tuition increase to an average of just 1.75% over each of the next two years - the lowest tuition increase possible while ensuring world-class educational opportunities. IU's flagship campus in Bloomington already offers the lowest average net cost of attendance in the Big 10. Additionally, the amount of institutional aid awarded by the university dramatically increased by 30% - from \$21 million to \$81 million - over the last eight years. IU's commitment to keeping college affordable is unwavering.

Again, thank you for the opportunity to respond.

Best Regards,

John S. Applegate
Executive Vice President for University
Academic Affairs



University of Maryland University College

STATE UNIVERSITY OF NEW YORK
 EMPIRE STATE COLLEGE

 THOMAS
EDISON
STATE COLLEGE
101 WEST STATE STREET
TRENTON, NJ 08608-1176

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

Dear Secretary Duncan:

We write to you today as presidents of three leading public adult-serving colleges. For decades our institutions have served adult students, with an annual collective enrollment of nearly 140,000 students. We applaud President Obama's focus on making higher education more affordable. We also thank the department and welcome the opportunity to share some thoughts on his plan.

First and foremost, any new rating system developed must accurately reflect the success and value of an education at schools that we have the privilege to lead. Frankly, the measurement system used today is wholly inadequate and University of Maryland, University College, Thomas Edison State College and SUNY Empire State College all strongly recommend significant improvement to the Integrated Postsecondary Education Data System (IPEDS).

IPEDS is currently reporting on a student body that barely exists at any of our institutions and it can't begin to accurately report on the student body that does exist at our schools.

Because the IPEDS only tracks students going to college for the first time, who go full time, entered in the Fall of the year and graduate from the same institution where they started, it cannot track non-traditional students.

Because non-traditional students now outnumber traditional students, the IPEDS can tell us next to nothing about the vast majority of students in higher education today. In fact, at schools like ours with close to 100 percent non-traditional student body, the data IPEDS produces is highly inaccurate and misleading.

For example, of the 23,000 students attending UMUC in the Fall of 2006, 187 of them fit the "First time full time" definition. Based on those 187 students, IPEDS concluded UMUC has a 4% graduation rate, which is wildly inaccurate. And while the numbers may vary, the same distortion occurs for SUNY Empire State College and Thomas Edison State College as well.

Our three schools recommend that a start to the IPEDS becoming more reflective of our students' success rates would be to make the following changes:

- Cohorts should be measured on a calendar year, to include various start dates across multiple months. Each of our institutions have multiple start dates, ranging from five a year to eight; whereas, most traditional schools have two and some three. We have found that professional students need more options for when to begin their studies than those offered by traditional schedules.
- Track all students transferring into our schools with at least twelve accepted credits.
- Track cohorts at 200% of "normal" time; eight year graduation rates for bachelor's degrees and four years for associate's degrees to reflect the part-time nature of our students and those who must "stop out" at some time during their higher education experience.

Also, IPEDS does not collect any data on military or veteran students. A technical review panel put together by the National Center for Education Statistics (NCES) determined that collecting data was not feasible at this time.

This poses a problem for all schools educating veterans. Our institutions in particular collectively serve nearly 60,000 military and veteran students annually.

To determine the success of the Military Tuition Assistance program for active-duty servicemembers and the Post 9/11 GI Bill for veterans, some way to track them must be devised and implemented. In that effort, UMUC, Thomas Edison and Empire State College fully endorse the recommendations of the Education Working Group convened by the Servicemembers Opportunity Colleges published in 2012.

Our three schools also recommend that in creating and publishing a national rating of all post-secondary schools, great care be given so that schools serving at-risk students are not disincentivized to do so in order to enhance the institution's rating.

In conclusion, if students and their families are to have access to accurate, complete, and timely information about the institutions they attend, or plan to attend, IPEDS must be re-worked from the ground up, accurate data must be collected for military and veteran students and schools should be compared to like institutions.

University of Maryland, University College, Thomas Edison State College and SUNY Empire State College all look forward to working with the Department to develop data systems and metrics that reflect the success and value of the wide diversity of universities and colleges in the country today, particularly those who serve working adults and other non-traditional students who now make up the majority of students in the higher education system. We stand ready to provide any further feedback or expertise. Please feel free to reach out to us.

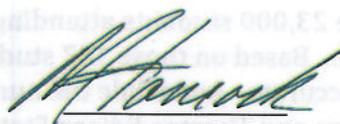
Most Sincerely,



George A. Pruitt
President
Thomas Edison State College



Javier Miyares
President
University of Maryland -
University College



Merodie A. Hancock
President
SUNY Empire State College



NOTES FOR OBAMA'S COLLEGE VALUE AND AFFORDABILITY

OPEN FORUM 11-6-2013

Dr. Ariane Schauer, Provost

We commend the administration for recognizing the important role of higher education and for engaging the conversation on access, quality, value, continued relevance and impact. We appreciate the call to communicate how we as a sector and as individual institutions add value.

We recognize that higher education is...

- I- a private good (in that it advances individual earning power)
- II- a public good (in that it develops the labor force and the citizenry)
- III- and a key industry (an American university degree is a much sought-after global commodity)

The structure of the global economy has been changing, and higher education is called on to adapt and prepare students, not for one career, but many. Private nonprofit colleges and universities are helping address these needs.

- We serve a great diversity of students, including first generation students.
- We are nimble and can offer multiple entry points and a range of programs and certificate courses to respond to labor force needs.
- We complement classroom learning with mentored practical applied learning.
- And we consider the cumulative impact of the degree, where intentional progression of learning prepares students for effective innovation, service and leadership.

Meeting these many needs and serving these diverse students will require a diversity of programs, approaches, modalities, and entry points.

So ... Regarding a college rating system:

- 1. We favor a sufficiently broad array of measures to allow schools to choose from to showcase what they do best and how they meet student needs.**
- 2. We recommend a realistic implementation timeline.**

The **risk** lies in reducing to a standard metric and a cookie cutter approach that would in the end reduce choices and access and innovation. A rating system built around too few factors may over time lead to greater standardization and less innovation.

- For example, the emphasis on earnings in the President's outline suggests that institutions producing graduates that go into lucrative fields may be regarded as more valuable than those who graduate into public service, the ministry, or the arts.
- Furthermore, a job within 6 months of graduation is an insufficient measure of the degree's contribution to a lifetime of adaptability and entrepreneurship, and may serve as a better indicator of the macroeconomic cycle than of an individual college's value added.
- We recognize that it is more difficult to serve students swirling across institutions. Adding credits does not necessarily add up to a cumulative progression and impact. Measures should take into account inbound and outbound transfer and follow up degree completion and success across institutions.
- An institution offering an education that demands high faculty-student interaction will likely have higher overhead costs but may offer meaningful preparation in many fields, such as internship feedback, media, entrepreneurship, leadership, self-assessment and professional direction.
- A student is most likely to succeed at a college which is the best "fit" for him or her. We would not want to see our federal government discourage attendance at a best-fit institution by offering a student more money to go elsewhere.
- In conclusion, one of the great strengths of American higher education is the diversity of institutional choices we offer.

We are pleased that the President has indicated he does not wish to develop this proposal in a vacuum and will reach out to the higher education community in further defining the initiative.

American higher education is one of our key industries, and a key area of comparative advantage for us. Thank you for working with us to highlight our strengths and continued relevance.

Testimony for the Record
Dr. Judson Shaver, President
Marymount Manhattan College
United States Department of Education Stakeholder Forum Regarding Higher Education Reform
and the College Scorecard
November 6, 2013

Mr. Chairman, on behalf of Marymount Manhattan College (MMC), our faculty, and the students and families that we serve, I would like to thank you for the opportunity to submit this testimony for the record regarding the importance of broadening the criteria within the College Scorecard to assess the value of postsecondary degrees from institutions of higher education.

Marymount Manhattan College was founded in 1936 by the Religious of the Sacred Heart of Mary as a two-year women's college and a New York City extension of Marymount College in Tarrytown, New York. In 1948, the College became a four-year bachelor degree-granting college; the first class graduated from MMC in 1950. In 1961, MMC was granted an absolute charter as an independent four-year college by the Regents of the University of the State of New York.

Faithful to the vision of its founders, Marymount Manhattan has a long history of reaching out to diverse populations in need of higher education. As our mission statement reads, the College seeks "to educate a socially and economically diverse student body by fostering intellectual achievement and personal growth and by providing opportunities for career development. Inherent in this mission is the intent to develop an awareness of social, political, cultural and ethical issues, in the belief that this awareness will lead to concern for, participation in, and improvement of society."

Over the years, Marymount Manhattan's mission as an urban, independent, coeducational nonsectarian liberal arts college has expanded to include a greater variety of students, including men, nontraditional students, and students from a variety of ethnic and geographic backgrounds.

We are very proud of our history and our record of producing graduates who are prepared to meet the demands of a highly diverse, global economy. We are also proud of our mission to prepare citizen leaders who are empowered to improve society. Our students' preference for a deep education in the liberal arts – with a special focus on performing and other creative arts – ensures that they are outstanding applicants for graduate school and that they are able to pursue employment from among a wide range of professions, including valuable, but not necessarily highly paid, work in social service. The College Scoreboard's criteria for measuring value leaves out the essential values that a Marymount Manhattan education provides for the public good.

Our graduates are thirsty for knowledge about countries and cultures from around the globe, and we are equally proud of those who forego traditional employment upon graduation and instead pursue their passion or serve individuals who are less fortunate. From living in Cambodia and teaching children in an orphanage, to travelling on a medical mission to the Honduran back country – our students find value of a different kind in their MMC degrees.

While it is important to hold colleges accountable for cost, value and quality, we strongly support the position articulated by the National Association of Independent Colleges and Universities (NAICU), that colleges must develop graduates who are valuable to society through

their caring deeds and larger understanding of the world in which we live. We agree with NAICU's position that the College Scorecard's criteria would be more beneficial to the common good if it were to calculate value using a more broadly defined approach.

Moreover, according to the American Association of University Professors (AAUP) in a statement issued this past August, the higher education professionals consulted for the rollout of the College Scoreboard plan do not include faculty and students, but only administrators.

It is critical that the individuals teaching the courses, and the individuals who are being taught, have a place at the table when measuring the value of higher education.

AAUP also gets to the crux of the problem, which is that the creation of a scorecard which measures value by graduation rates and post-graduation salaries will result in a decline in quality, since many college and universities will standardize their curricula to insure they get a passing grade. For millions of working class and middle class students, particularly students of color, the President's plan will result in a decline in the quality of higher education in the name of increasing graduation rates.

Marymount Manhattan College stands firm in our shared belief with AAUP that performance-based funding for colleges won't solve the issues of increased tuition costs and crushing student debt, and that students and faculty should be consulted if a clear picture of necessary improvements is to appear.

Marymount Manhattan College is also a member of the Council of Independent Colleges (CIC) and we strongly agree with the assessment of its president, Richard Ekman, that there are many reasons why a student may choose to attend a particular college, and the scorecard favors colleges that produce high-salaried alumni immediately following graduation. Studies show that graduates from liberal arts colleges do not earn high salaries directly out of college, but their salaries increase gradually over time following advanced education.

MMC is an undergraduate college and many of our students pursue an advanced degree immediately upon graduation. The value of graduate school and obtaining a master's degree or a Ph.D. may not immediately be evident using the College Scorecard, but in the long term is invaluable. That our students are highly motivated and academically prepared to continue their studies is not taken into account in the current scorecard's parameters; recognizing a student's desire to achieve academic success after graduation is not included in the criteria.

In closing, I urge you to take heed of the recent national survey conducted by the Association of American Colleges and Universities (AAC&U), which found that employers rated ethical judgment, comfort working with colleagues and clients from diverse cultural backgrounds, interest in giving back to their communities, and knowledge of global cultures/values/religions as important or very important in the hiring process. These traits are at the very core of Marymount Manhattan College's mission statement.

And, like many other crucial measures of value, they are not included in the College Scorecard.



THE MINNESOTA STATE UNIVERSITY STUDENT ASSOCIATION, INC.

REPRESENT. INFORM. ORGANIZE.

U.S. Department of Higher Education
collegefeedback@ed.gov

November 13, 2013

This letter is in response to the notice posted on the Federal Register soliciting feedback on President Obama's plan to rate colleges and award federal student aid based on the ratings. Students at Minnesota's seven state universities are thankful that the President has made college affordability a major issue. The average student loan debt of a Minnesota graduate is more than \$29,000.

However, we have concerns that with improper implementation the ratings system could harm the very students it aims to help. It is imperative that higher education institutions not be discouraged from accepting and granting aid to low-income students because it could hurt the school's rankings, which could include graduation rates, debt levels and future income earnings.

The Minnesota State Colleges and University system is tasked with the mission of offering higher education that meets the personal and career goals of a wide range of individual learners, enhances the quality of life for all Minnesotans and sustains vibrant economies throughout the state. It is vital to the success of our state that students can gain access to an affordable, high quality post-secondary education.

Our students believe that programs like these deserve a very thorough and thoughtful discussion. As this proposal begins to be discussed with policy makers we encourage the Department of Education and Congress that students are given ample opportunity to discuss how a ratings system like this could help, or unintentionally harm, their chances for success. Thank you,

Alexandra Griffin
State Chair
Minnesota State University Student Association

555 PARK STREET—SUITE 420—SAINT PAUL, MINNESOTA 55103



WWW.MSUSA.ORG

REPRESENT. INFORM. ORGANIZ.

U.S. Department of Higher Education
collegedback@ed.gov

November 13, 2013

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Thank you



Alexander Griffin
State Chair

Minnesota State University Student Association





National Center for Learning Disabilities
The power to hope, to learn, and to succeed

**U.S. Department of Education Open Forum – College Ratings System –
November 13, 2013**

Good morning, I'm Lindsay Jones, the public policy and advocacy director for The National Center for Learning Disabilities (NCLD). Thank you for the opportunity to speak today on behalf of the 15 million individuals with learning difficulties, disabilities, and attention issues across the United States.

NCLD sincerely appreciates President Obama's commitment to a new college ratings system that will help students and families compare the value offered by colleges and encourage them to improve. I am here to request that this valuable tool also provide a new level of transparency about the services and supports that colleges offer to students with learning difficulties, disabilities, and attention issues.

It's been 37 years, since IDEA the Individuals with Disabilities Education Act (IDEA) was enacted. That means three generations of students have graduated or aged out of our K-12 system after receiving IDEA services for their whole student career. Today, students with learning disabilities are graduating from high school with regular diplomas at an increasingly higher rate each year – in fact, over 67 percent of students with LD graduated with a regular diploma in 2011. This is terrific news and we work daily to promote policies and practices that will keep this trend on an upward glide.

However, too few of these students successfully transition to and complete college. According to a 2011 study conducted by the Institute for Education Sciences,

- Only 19 percent had attended a 4-year university as compared to 40 percent of their peers

- And, only 34 percent of them completed their 4 year college programs compared to 51 percent of their peers.

Although every institution is required to provide students with disabilities accommodations under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, some schools do this much better than others and trying to figure out who to contact, where to go and what is offered is often very frustrating for families. We are contacted every day by parents and students seeking clarity. They call us and ask for pretty basic things – who to contact at the school, what services are offered, how many students with disabilities actually graduate, and what type of documentation is needed to qualify. We urge the Department to use this opportunity to require colleges to provide in one central place some simple, reliable, and accessible information about the types of support available to individuals with disabilities.

Specifically, we urge the Department to require colleges to include the following information in the new rating system, at a minimum:

- Updated and current contact information for the college/university's disability services coordinator or office.
- The number of students with disabilities served by the institution and their completion rate.
- Whether the college offers a universally designed campus facilities, communication and instructional materials (including digital textbooks and appropriate technology to support its use)
- Testing center accommodation policies
- Where the University provides centralized services for students with learning difficulties, disabilities and attention issues – like access to mentoring, counseling, tutoring, referrals, health or other student supports
- Any costs or fees associated with any of the student support services

NEW JERSEY SENIOR PUBLIC COLLEGES AND UNIVERSITIES

December 19, 2013

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

Dear Secretary Duncan:

As the presidents of senior public colleges and universities in New Jersey, we respectfully submit the following comments on the President's proposed plans to make college more affordable.

While we support the plan's overall goals of helping students make more informed choices about their college education, and making the success rates of our students more transparent, some of the metrics suggested for the college ratings on the College Scorecard are likely to be counterproductive.

Because New Jersey is one of the most diverse states in the nation and because our institutions have developed distinct missions to serve our state's diverse population, the danger of a "one size fits all" system is particularly troubling to us. We appreciate that the proposed ratings would compare institutions with similar missions. Nevertheless, several of the proposed measures upon which the ratings would be based are difficult to quantify and often misleading. In the final analysis, these measures are premised on singular and simplistic interpretations of student demographics. The two most obvious of these measures are graduation rates and graduate earnings. Graduation rates, as currently calculated, count only first-time, full-time students, who attend only one institution, and they are a good measure for that group of students, but they overlook part-time students and transfer students, who compose a significant share of the enrollment at some, but not all, institutions. Data regarding graduates' earnings are even more problematic: our institutions depend on surveys of recent graduates for this information, and response rates are typically below 15%. Even if we had robust data on graduates' earnings, the numbers would not necessarily reflect the quality of the education we provide or the contributions our graduates make to society. Many of our institutions have roots as teachers colleges, and we continue to train the next generation of teachers, as well as nurses, social workers, and other professionals whose service to society is not reflected by their salaries. In addition, of course, any student whose undergraduate degree is not a

NEW JERSEY SENIOR PUBLIC COLLEGES AND UNIVERSITIES

professional degree will have a depressed first salary, with little predictive value on what their later salaries might be. Moreover, earnings are impacted significantly by location of employment, and institutions have little control over where their graduates will eventually reside and work.

The proposed measure of average tuition is deeply troubling to us. First, on the face of it, sticker price is rarely an accurate measure of cost. Many of our institutions provide institutional aid that provides support to meritorious and needy students. Second, the state colleges and universities in New Jersey aim to keep the cost of attendance within the reach of our students, who often come from families of modest means, but cuts in appropriations from the state often leave us little choice but to raise tuition to cover our increasing expenses. Unlike the elite private institutions, we cannot turn to multibillion dollar endowments. The maintenance of effort provision in the American Recovery and Reinvestment Act of 2009 greatly assisted institutions like ours by requiring state governments to allocate a portion of their federal stimulus funds directly to public institutions of higher education. As federal stimulus support has disappeared, we have again faced the annual specter of budget cuts. Our choice has been either to discontinue the very academic programs that our students wish to pursue or raise tuition and fees. We encourage President Obama and you to continue to emphasize to governors the critical link between state appropriations for operating support at public colleges and universities and the tuition charged by those institutions.

The proposal to allocate federal financial aid based upon the suggested rating seems particularly unfair to students and their families. Students choose a college based on several factors other than rankings, including proximity to their home, transportation costs, availability of housing, and academic programming. We support holding our institutions accountable, but we also want to preserve the opportunity for students who have less mobility in their college choices to succeed.

We strongly support the other two components of the President's proposal. Our institutions staunchly promote innovation. Some of our institutions are national leaders in prior-learning assessment and competency-based education. Others have been recognized for their success in STEM pedagogy, online learning, undergraduate research opportunities, and strong completion methodologies.

Finally, we applaud the Administration's efforts to limit student debt. The federal income-based repayment plans, which allow graduates to repay their student debt on a sliding scale that adjusts monthly payments with changes in income, greatly assist our new alumni. We pledge to help the Administration in its planned campaign to inform borrowers about the Pay As You Earn and Income-Based Repayment plans, and to work with the proposed "one-stop shop" that will provide our financial-aid staff with resources regarding income-driven repayment options.

Thank you for considering our comments. We appreciate your reaching out to the higher education community as the Administration refines its proposals to try to keep quality college education affordable and accessible to our students.

Sincerely,



R. Barbara Gitenstein, President
The College of New Jersey



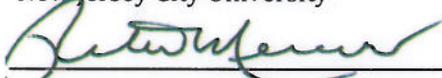
Dawood Farahi, President
Kean University of New Jersey



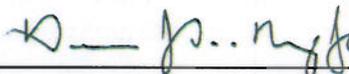
Susan A. Cole, President
Montclair State University



Susan Henderson, President
New Jersey City University



Peter Philip Mercer, President
Ramapo College of New Jersey



Herman J. Saatkamp, Jr., President
The Richard Stockton College of New Jersey



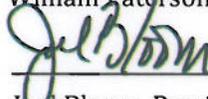
Ali Houshmand, President
Rowan University of New Jersey



George A. Pruitt, President
Thomas Edison State College



Kathleen Waldron, President
William Paterson University



Joel Bloom, President
New Jersey Institute of Technology



GUIDELINES FOR EFFECTIVE COLLEGE RATINGS: EFFICACY IN INFORMING STUDENTS AND SCHOOLS

AS DISCUSSED BY THE OHIO STUDENT GOVERNMENT ASSOCIATION

THIS REPORT IS PUBLISHED BY THE OHIO STUDENT GOVERNMENT ASSOCIATION, A NON-PROFIT, STUDENT-LED BODY REPRESENTING THE VIEWS AND INTERESTS OF THE STUDENTS AND STUDENT GOVERNMENTS OF INSTITUTIONS OF HIGHER EDUCATION IN OHIO. IT WAS WRITTEN BY SPENCER BRANNON, BASED ON FINDINGS FROM THE 2013 OSGA FALL CONFERENCE.

TO FIND OUT MORE ABOUT THE OHIO STUDENT GOVERNMENT ASSOCIATION, AND TO READ OUR OTHER REPORTS, VISIT US ONLINE AT WWW.OHIOSGA.COM.

EXECUTIVE SUMMARY

At many universities, it is non-traditional to be traditional. The traditional student – eighteen years old, a high school graduate, from a middle class family, and paying for school through summer jobs and a college savings fund – is an endangered species in today's world of non-traditional students. Veterans returning from war, middle-aged men and women seeking career changes after manufacturing layoffs, and first-generation college students from non-traditional socioeconomic backgrounds are attending school in record numbers. But college remains expensive – and in fact is getting more expensive every year. These new groups of students are having difficulty finding the right college that they can both be proud of and afford.

The Ohio Student Government Association is a non-profit, student-led body representing the views and interests of the students and student governments of institutions of higher education in Ohio. Its primary focus is to improve and enrich the student experience for all of Ohio's schools, colleges, and universities. At its Fall 2013 Statewide Conference on Higher Education Policy, the organization explored ways of working with the US Department of Education to improve the College Ratings initiative, including twenty-first century designs and deployment of the ratings reports through interactive media that both engage users and guide aid.

The report below outlines the recommendations that OSGA identified as important for the long-term and broad-based success of the College Ratings initiative. Conference discussions indicated that while content is an integral component of the end reports, the dissemination of that information and the engagement of the audience in making the information relevant to the user were understated components also serving as key in the success of this initiative reaching and educated a non-traditional potential student population.

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**RECOMMENDATION 1:
ENSURE THAT RATINGS
DATA IS HOUSED IN
PLACES ACCESSIBLE TO
THE DIVERSE STUDENT
POPULATIONS
ENROLLING IN HIGHER
EDUCATION
PROGRAMS**

FINDING THE INFORMATION HUB

At many universities, it is non-traditional to be traditional. Students enrolling right out of high school are taking classes with veterans returning from war, middle-aged men and women laid off during the recession, and first-generation college students being fed from community colleges. This diverse group of students, which all universities are seeing to various degrees, access and understand information in different ways. While a child born in age of the Internet might seek information online and have technological familiarity to navigate cumbersome websites full of clunky data, a middle-aged former steelworker may have difficulty accessing the same information. By using a centralized information hub – such as college.gov – that is dedicated solely to higher education information and is communicated on a regular basis to the general public and potential students, the Department of Education can ensure that students of all backgrounds can find the information they need.

And while a child born in the age of the Internet might be able to find the information online, if she is a first-generation college student, she still might have difficulty understanding the data she's just found. It is important to ensure that the information hub is clear and understandable to people whose families have never attended college and for whom the entire college experience is foreign. Clearly delineated boundaries of information are important in helping guide potential students along their path, including an interactive website where students can select right from the homepage a path commensurate with their knowledge or their status in the college enrollment process.

**RECOMMENDATION 2:
THE INFORMATION HUB
FOR COLLEGE RATINGS
DATA MUST BE
TRANSPARENT AND
UNDERSTANDABLE; TOO
MANY OPTIONS OR TOO
MUCH INFORMATION
MAY ONLY SERVE TO
CONFUSE USERS**

USING THE INFORMATION HUB

We recommend a digital information hub at college.gov. The homepage would be simple, because too many options can overwhelm viewers and desensitize them to the important parts of what is being presented. We recommend large, colorful boxes on the homepage helping students to find which part of the process – and which piece of information – would be most useful to them. This information hub would actually serve as a routing service, redirecting users to the various websites dedicated to the parts of the process: applying for college, paying for college, and after graduation (including loan repayment). All a viewer would have to do is click one of the boxes to be redirected to the website dedicated to that box's description. We recommend that the routing website redirect to similarly memorable URLs, such as prepareforcollege.gov, payforcollege.gov, and aftercollege.gov.

This form of basic interactive experience will engage the viewer more than a wall of text, and it will also help the Department of Education to guide users who really don't know what to look for because their family has never gone through this process before. Having a starting point for the users most unfamiliar with the process helps ensure that anyone, regardless of their familiarity, can access at least basic information regarding college readiness, while giving them options, as they become more familiar with the information, to explore content in greater depth.

**RECOMMENDATION 3:
THE INFORMATION HUB
MUST BE INTERACTIVE
TO ENGAGE THE USER
AND PRODUCE RATINGS
RESULTS THAT ARE
RELEVANT IN THE
CONTEXT OF THE USER'S
KNOWLEDGE AND LIFE
CIRCUMSTANCES**

DESIGNING THE INFORMATION HUB

Interactivity is integral to the success of a college ratings initiative. Universities across the nation are discovering – as public speakers in the past have learned – that a key component to successful education is an engaged learner. Because the circumstances of some information hub users will predispose them to being disengaged by the volume of information and the worrying figures presented in the college ratings initiative (including what might seem like high costs, low graduation rates, large debt loads, etc.), it is important for the information hub to proactively engage the user and to create an experience that is educational, memorable, and understandable. Interactivity was already established for new users when they were able to select from options on the routing page, which redirected them to the appropriate information hub. In this case, the user selected the option for preparing for college.

Simply being able to select options that guide you through the process isn't enough. The user should also be able to individualize the process to himself and his specific situation, ensuring not only that the data the ratings initiative displays is accurate and useful in the context of his life circumstances, but also promoting the idea of him being able to relate to the process and thereby create a bond from which to remember the information or understand it better. But the interactivity of the process cannot be off-putting; the process must have an ergonomic, easy-to-use perception that fulfills the ultimate goal of the interactivity, which is engaging the user to create an enriched information hub experience.

SEPARATING USERS BASED ON KNOWLEDGE OF COLLEGE

The first step of the interactive process is determining how knowledgeable the user is regarding college. It is not productive to force very knowledgeable people simply seeking information on college ratings to sit through an explanation of the data, but users unfamiliar with college basics should not be expected to look through technical data without a bit of background. Again, we suggest a routing process on the homepage of prepareforcollege.gov. "How familiar with the process of preparing for college are you?", the site might ask in the center of the homepage, with color-coded boxes below with options for "Not at all", "Somewhat", and "Very" familiar.

Those who select not at all may be redirected to an FAQ or basic information guide, as they are not far enough along in the process to be using college ratings information in selecting a college. Those who select somewhat may be presented with options for "Find out more information on preparing for college" or "Information on selecting and applying for college". If they select the former, they will be sent to the basic information guide/FAQ, but if they select the latter, they will be redirected to the page dedicated to the very familiar users. The very familiar users' page will feature a direct link to the college ratings information as well more specific information relevant to advanced users of the information hub.

**RECOMMENDATION 4:
BOTH STANDARDIZED
AND INDIVIDUALIZED
DATA SHOULD BE
AVAILABLE, AS THIS
ENABLES USERS TO
MAKE A DECISION BASED
ON THEIR SPECIFIC
NEEDS AND THE
OVERALL
EFFECTIVENESS OF THE
PROGRAMS THEY ARE
SEEKING**

**RECOMMENDATION 5:
THERE SHOULD BE
CLEAR EXPLANATIONS
OF WHAT METRICS ARE
AND EASY WAYS TO
COMPARE METRICS
BETWEEN INSTITUTIONS**

COLLECTING USER INFORMATION TO CALCULATE RATINGS INFORMATION

The actual ratings information should be available in two forms: static and interactive. The static data would use figures independent of student data, including average debt load upon graduation, graduation rates, and the cost of attendance (or net cost). These are the fields relayed in the College Scorecard or College Affordability and Transparency Center, and will serve as useful pieces of information for those interested in general information about a specific school.

For those interested in more personalized and individually-relevant information, however, the interactive report will allow them to input various user-specific pieces of information for the system to generate a set of likely outcomes at the university. While the interactive data set is not a component of the college rating initiative as currently laid out, it will serve as a useful complementary tool in allowing users to more appropriately one-stop-shop for information and make better-informed decisions using less time and through visiting fewer websites. The interactive portion can also serve as an impetus for aspiring students to complete the FAFSA and be better-prepared to finance their education. This segue and cross-reference into the other facets of the information hub allows for a seamless transition throughout the hub and provide a strategic pathway of coordinated and systematic education of the user.

The interactive data would use information from the college ratings of a specific school, combined with information particular to the FAFSA submission an individual made, to calculate likely outcomes at the school regarding loans, payment ability, and debt load at graduation. The user would input user-specific information regarding family income; desired major; and, for public schools, whether they live in or out of state. The system would then calculate the EFC through the FAFSA system and generate figures specific to the school and student, meaning each report is completely individualized and entirely relevant to the user. It may be beneficial to allow users to generate a report with multiple schools selected, so that holistic, individualized information can be presented in a comparable manner. This allows the user to make a decision informed by reliable, user-specific data and therefore choose a school or program more in line with their life circumstances.

CHOOSING RATINGS METRICS

The most critical component of the College Ratings initiative is the decision regarding which metrics by which to rate colleges and universities. Higher education is a complex field, and each institution is focused on different benefits it brings to students. Designing a report to capture all of these metrics in a way that enables users to compare schools based on criteria specific to the user's situation is a daunting task. While the Ohio Student Government Association believes strongly that clear, understandable, salient information is necessary for the College Ratings initiative's success, we are not in a position to provide feedback on which metrics are most commonly requested by potential students. Instead, it is important for the Department of Education to work with consumer groups and marketing firms to perform a study of the various demographics expected to use the college ratings initiative, and for the

end-result to reflect the results of that study. This is how private firms ensure that they are meeting the needs of the marketplace; the creation of this report is an opportunity for the Department of Education to ensure that the work it is doing aligns with the needs of the potential students it is serving through this initiative.

In the absence of such a study, metrics that the Ohio Student Government Association finds salient for inclusion in College Ratings include:

1. **Graduation Data**, including 4- and 6-year graduation rates, as well as the university's average time to graduation.
2. **Student population demographics**, including racial, gender, veteran, age, and other first-generation college student status.
3. **Cost of Attendance**, included the tuition, fees, and costs associated with taking classes and other costs associated with attending school, including cost of living in the area, parking fees or residential fees, student activity fees, etc. These fees should be added together to form one Net Cost of Attendance, which should have an easily-accessible description and definition that does not clutter the report itself.
4. **Student Debt loads**, expressed in two figures: one as the average level of debt upon graduation and the other as the average level of debt ten years after graduation.
5. **Average non-loan aid**, including Pell grants, scholarships, fellowships, grants, tuition remission, and other public and private financial aid that does not require repayment.
6. **Post-graduation employment**, including how many students had jobs in their field of study within six months of graduation and how many had jobs in any field within six months of graduation. It may be salient to report the number of students who entered a full-time graduate or doctoral program within six months of graduation.

**RECOMMENDATION 6:
THE REPORT SHOULD
INCLUDE METRICS THAT
DESCRIBE THE CULTURE
AND CHARACTER OF THE
UNIVERSITY IN
SUPPLEMENT TO
FINANCIAL DATA**

Many of these fields are already compiled and reported by the College Affordability and Transparency Center, but we believe key metrics describing the culture of the campus (to the extent possible by quantitative data) are important in setting student expectations on an appropriate level. Culture shock is not a phenomenon particular to international travel, and it is important to provide information describing more than just the financial information of a school. A student will spend two, four, maybe even eight years attending this institution – it is important that they be prepared to choose a campus that will be conducive to their study, inclusive of their background, and commensurate with their experiences.

TYING AID TO PERFORMANCE

So far, we have recommended ways of allowing students as consumers to use college ratings information to inform and guide their decisions regarding selecting and enrolling in a higher education program. It is important, however, to note an underlying purpose of the ratings initiative: establishing metrics that will direct government-based aid and support to high-performing institutions of higher education.

OHIO'S OUTCOME-BASED MODEL

In the announcement of the proposal, the White House noted that it is important to base state support on quality of education and not on quantity educated. OSGA could not agree more strongly, which is why we supported the development of a new funding model in Ohio that funds universities on three metrics:

1. How many students graduated
2. How many students enrolled in and finished their classes
3. How many at-risk students the university was able to successfully educate through class completion and program completion

This outcome-driven funding model should serve as an example to the federal ratings initiative, as it garnered support from most colleges and universities in Ohio while strengthening the State's ability to hold underperforming institutions financially accountable. The scope of metrics pursued by the President, however, makes it difficult to use the Ohio funding model as an example. Instead, it should be used as a supplement for outcome-based support that works in conjunction with metrics identifying accessibility and affordability.

DIFFICULTIES OF COMPARING AFFORDABILITY BETWEEN INSTITUTIONS

Outcomes are fairly comparable: an accredited institution's four-year degree is, in theory, exactly equivalent to a similar accredited institution's four-year degree. When comparing college affordability – from scholarships to tuition to loans – there is less comparability. The ratings must somehow take into the account the student demographics being educated by the university and the various measures employed by the university to mitigate the factors inhibiting its ability to serve that demographic market. For example, a private university may have a very large tuition but, because of a sizeable endowment, it offers significant scholarships to its students. Perhaps an urban university's cost of attendance is significantly higher because living expenses are higher in the area – this is something the university cannot control but, if cost of attendance is taken into consideration in the ratings, the university will be penalized for it nevertheless.

The financial information provided to students on the information hub must be delineated to provide deep information on a range of financial issues important to aspiring college students. The information used by the ratings initiative to drive federal support of institutions cannot do this; instead, a system must be developed that includes endogenous factors and mitigates the opportunities for universities to be penalized for factors outside their control. The end result will be a "Cost to Student" number used as the basis for determining an institution's affordability. There should be an ombudsperson in the Department of Education who can receive concerns from institutions of higher education who believe the cost to student calculation is unfairly including exogenous factors. Institutional support for the accuracy of the cost to student calculation is necessary for the legitimacy of the ratings initiative. We predict that after initial resistance, institutions will use the calculation of the cost to student to increase their competitiveness with similar schools, though some schools will try to manipulate the system to create artificially favorable cost to student numbers. The

**RECOMMENDATION 7:
RATINGS SHOULD JUDGE
A SCHOOL'S SUCCESS IN
LIGHT OF ITS UNIQUE
MISSION AND WITH
EFFORT TO MINIMIZE
THE IMPACT OF
EXOGENOUS FACTORS
AFFECTING
PERCEPTIONS OF THE
SCHOOL'S
AFFORDABILITY**

equation for the cost to student must be simple and transparent, to increase accountability and make identification of manipulating institutions easier.

Our preliminary vision for the cost to student would be the net cost of attending the university minus any exogenous costs minus the average per-student aid received at the university, including Pell grants, scholarships, fellowships, and tuition remissions. Because this is a unique calculation of value, it may also be useful to include an opportunity cost for the student in terms of lost income because of delayed graduation; when added to the post-graduation student loan debt held by students, this figure can serve as a metric indicative of the university's efficacy in educating students in a timely and affordable manner. Students who are working while going to school will have somewhat lessened debt than those who are not working at all, but the graduation rate for opportunity cost should be based on full-time enrolled students.

CONCLUSION

College is complicated, and there's no real way to avoid that simple truth. But through coordinated, strategically employed initiatives, the Department of Education can make it easier to navigate the labyrinthine maze of higher education and can help potential students pick schools that match both their intellectual and their financial abilities. Through interactive reports that serve to engage and educate potential students curious about their options, the College Ratings initiative can serve as yet another step in the long journey to perfectly accessible higher education that serves the interests of all the student groups who comprise it. Through accountability measures and efforts to increase stakeholder confidence in the legitimacy of the ratings reports, the Department of Education can increase college affordability and access while improving the quality of the education students of the nation's institutions of higher education receive.

Input to the US Department of Education on the proposed College Value and Affordability College Ratings System (Response to announcement published by the Federal Register)

Attention:

Josh Henderson
Office of the Under Secretary
U.S. Department of Education
400 Maryland Ave., SW, Room 7E313
Washington, DC 20202-0001
(E-mail: collegefeedback@ed.gov)

Respectfully Submitted by the Pima Community College District on November 22, 2013
For more information, contact Chancellor Lee Lambert at: llambert@pima.edu or (520) 206-4747.

Pima Community College endorses the statement made by the American Association of Community Colleges on the Obama Administration's *Proposed Federal College Ratings System and Related Issues*, found here:

http://www.aacc.nche.edu/newsevents/News/articles/Pages/11132013_1.aspx

We are in agreement with all the common concerns of many of the nation's community college CEOs regarding this matter; further, we have highlighted below the issues of greatest concern to us as a service and education provider in the 6th poorest city of its size in the nation, Tucson, Arizona.

- A Community College is not a 'one size fits all' organization. We agree that any uniformly applied rating system may likely have unintended negative consequences due to our diversity, both in terms of our program offerings and our student body.
- If the model proposed only calculates graduation rates of true first year, full-time cohorts, we will be missing the mark in terms of who is actually enrolling in college today. Students with previous credits, transfer students, adults returning, part-time students and veterans would likely not be counted in the calculation, which would result in negative results for virtually all community colleges – including PCC, where our student demographics largely reflect these profiles.
- Our students are, more often than not, place-bound, due to family and/or economic circumstances. The rating system could negatively affect lower-income and adult students who are only interested—or able—to attend the institution nearest to them.
- We must be extremely cautious about establishing any system that punishes schools for admitting students with less privileged backgrounds coming out of high school. Data shows that the more affluent institutions serving Pell-eligible students have higher graduation rates than open-access institutions (like ours) that enroll Pell eligible students.

A significant reason for this is that the richer institutions only take the highest performing among the low-income students.

Further, lower graduation rates of less-elite institutions may be at least partially explained by the lack of preparedness of their students. For some students and their colleges, a graduation rate of 40 percent is success, not failure.

We should not allow a model that would rank elite institutions higher than non-elite institutions based on graduation rates alone and without regard for key causal socioeconomic and competition factors; this would only serve to relegate community colleges (which are best designed to attend to “at-risk” populations) to a “last in line” position for financial aid support.

- We support the creation of a weighting system that rewards institutions for serving the most academically challenged students to make significant educational gains. Those gains may not always show up in the form of receiving a degree, but may result in the receipt of badges, micro-certificates and/or certifications.
- If future earnings are to be used as a factor, it should be recognized that graduates who become teachers and nurses and police officers earn less than students who are employed by investment banks or hedge funds. Clearly, earnings can be a troublesome measure for the value and success of a college education.

The last thing our nation needs is to discourage students from majoring in fields that help support a healthy community (e.g., early childhood education, community organizing, social work), or to pull students away from schools and fields that have a public service orientation. Public service fields are less well paid, but they are vital to the integrity of our democracy. Publishing data on salaries will punish institutions without engineering programs and reward institutions with many graduates heading to Wall Street rather than Main Street. Sorting institutions by mission, as the administration has proposed, will not redress this fundamental problem.

True, college graduates should not be underemployed or employed in fields that do not take advantage of their education. But how we calculate “sufficient” earnings is critically important, and more earnings are not necessarily better for the public good, in terms of the current average salaries of the service occupations noted above.

In conclusion, while the goals of the initiative are laudable, we are not assured that the approach currently being taken will have the result/s of: 1) effectively reducing the financial burden that is placed on students; or 2) an equitable approach that keeps community colleges on a level playing field with institutions attracting less “at-risk” populations.

We wholeheartedly agree that the rising costs of a bachelor’s degree need to be constrained, and that we must find ways to: 1) facilitate middle- and lower-income students entering and graduating from college; 2) reduce or eliminate college-related debt; and 3) ensure that

successful completion of higher education results in acceptable and appropriate wages and salaries throughout the entire spectrum of employment.



Rebuilding America's Middle Class
A COALITION OF COMMUNITY COLLEGES

December 20, 2013

Via email: collegefeedback@ed.gov

The Honorable Arne Duncan
Secretary
U.S. Department of Education

Dear Secretary Duncan,

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 our concerns on the proposed development of a college ratings system. While a college ratings system centered on certain outcome measures may be a useful tool to our current and prospective students, there are numerous challenges in the way the Administration is currently approaching this issue. RAMC is specifically concerned about the accuracy and relevance of the data that would be used for such a system, any tie between this system and individual student financial aid allocations, and the coordination between the data required for the ratings system and forthcoming gainful employment regulations.

The first major challenge for the creation of the college ratings system as proposed by the Administration is that the current federal data system is broken, particularly around outcomes associated with community colleges and their students. Presently, data is reported for first-time, full-time students, which is not representative of the vast majority of community college students.

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. Unfortunately, the current data fails to accurately count the students who actually attend and graduate 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.

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 accessibility and geography. If a student wants a bricks and motor educational

**RAMC
Board**

Richard
Carpenter,
Chancellor,
Lone Star
College
System

Glenn DuBois,
Chancellor,
Virginia
Community
College
System

Joe May,
President,
Louisiana
Community &
Technical
College
System

Jeff Rafn,
President,
Northeast
Wisconsin
Technical
College

Scott Ralls,
President,
North Carolina
Community
College
System

Tom Snyder,
President,
Ivy Tech
Community
College

experience and is limited to colleges they can reach via public transportation, those are the colleges that they will pick from. Arbitrarily impacting the amount of aid a student may get, by either augmenting or reducing existing aid levels or loan terms and conditions, is extremely unfair to such a student. This type of aid structure could further exasperate the cost concerns that cause many students to not enroll in postsecondary education.

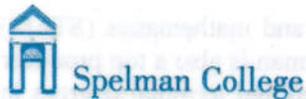
Third, it is not clear how the data elements that have been initially suggested in Administration materials for the ratings system would be coordinated with those required under drafts of gainful employment regulations presently being considered under negotiated rulemaking. Will data have to be collected for gainful employment in one fashion and the ratings system in another? Duplicative or similar but not identical data collection could cause significant burdens for community colleges, especially smaller community colleges with small administrative operations.

Thank you for your consideration of our comments. We look forward to reviewing an eventual proposal from the Department that we hope addresses the issues we have raised. While the rating system is being developed, RAMC members stand ready and willing to discuss these concerns.

Sincerely,



Joe May
Board Chair, Rebuilding America's Middle Class (RAMC)
President, Louisiana Community & Technical College System



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BEVERLY DANIEL TATUM, Ph.D.
President

November 14, 2013

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

RE: Open Forum on College Value and Affordability and College Ratings System

Dear Secretary Duncan:

On behalf of the students, faculty and staff of Spelman College, I write in response to the notice appearing in the *Federal Register* on October 30, 2013 inviting public comment on President Obama's College Value and Affordability and College Rating System proposal. We appreciate the leadership the President and the US Department of Education continue to demonstrate in working to expand educational opportunities and access for all Americans. My colleagues and I who belong to UNCF and the larger HBCU community, look forward to working with the President and others in his Administration to address the critically important issues associated with ensuring that the cost of attending college remains affordable and that students and families receive great value for their investments.

Background on Spelman College

Spelman College is a premier undergraduate institution of higher education, comprised of approximately 2,070 students from 41 states and 15 foreign countries. The College has a student-faculty ratio of 11:1, which promotes an intimate learning environment, with eighty-four percent of Spelman's full-time faculty members holding terminal degrees. Spelman is a member of the Atlanta University Center Consortium (AUCC), the largest consortium of historically black institutions of higher learning in the world. Partner schools within the AUCC include Morehouse College, the Morehouse School of Medicine, and Clark Atlanta University.

Founded as the Atlanta Baptist Female Seminary in 1881, Spelman's mission has always centered on the education, growth, and development of women of African descent. Spelman offers 28 majors in the liberal arts and sciences, and provides abundant opportunities for creative intellectual exploration and discovery, as well as leadership training and development. Spelman has a rich historical tradition and is the alma mater of numerous notable alumnae including noted children's rights activist Marian Wright Edelman and Stacey Y. Abrams, House Minority Leader for the Georgia General Assembly and State Representative for the 89th House District.

Spelman places a strong emphasis on science, technology, engineering, and mathematics (STEM) education. Nearly a third of all Spelman graduates are STEM majors. Spelman is also a top producer of African American female students who continue on to obtain advanced and terminal degrees in STEM fields.

These achievements serve as a backdrop and platform for efforts underway at the College, designed to inform and transform the trajectory of achievement and excellence in higher education for women of color. As we continue to lean into excellence, we move forward knowing that the Spelman model continues to leave an indelible impression within the postsecondary community, and more importantly on the quality of life issues affecting the students and communities we serve. The College's first-year retention rate is 90 percent and our six-year graduation rate over the last six years averages at 77 percent. Moreover, we have an endowment that exceeds \$300 million and are on the verge of concluding a \$150 million comprehensive fundraising campaign.

This success, while exemplary, still falls short of meeting the full needs of the students we enroll. Of the 2,070 students enrolled at Spelman, 92 percent receive some form of financial aid. Spelman prides itself on preparing the whole person for a successful and productive life while in school and after graduation. To meet this objective, other significant resources are dedicated to ensuring that our students graduate with the intangible qualities and tangible assets needed to excel in an increasingly global marketplace. As a majority of these students come from economically disadvantaged families and communities, innovative strategies and approaches have been adopted to ensure they are competitive with students from more affluent and privileged backgrounds, and that they do not leave college saddled with debt. While Spelman students, more often than not, come to college academically prepared, we witness first-hand the financial burdens they carry, sometimes causing them to make decisions related to work and health management that compromise persistence and achievement. During these deliberations, we would be pleased to share the lessons we have learned and strategies we have adopted to address these issues.

UNCF Member Institutions are More Affordable than Comparable Non-UNCF Institutions

Generally, HBCUs and particularly UNCF member institutions serve a disproportionately high number and percentage of students from economically disadvantaged backgrounds. We historically have had to do more with less. This includes doing our part to keep the price of attending college down, and at a level that is affordable to those often coming from the lower economic quartiles.¹ In fact, UNCF reports that its member institutions are more affordable to students than comparable non-UNCF institutions. For the 2012-13 academic year, the cost of tuition and fees at UNCF-member institutions was approximately 30 percent lower than that of all private postsecondary institutions (a yearly difference of about \$12,000).

¹ Information provided by UNCF notes that in 2012, the proportion of students from families in the top income quartile achieving baccalaureate degrees by age 24 was ten times greater than that for poor students from families in the bottom income quartile.

Expanding Educational Opportunity is Appropriate and Necessary

Spelman joins UNCF in supporting the creation of a new program, under the President's plan, to provide Pell Grant bonuses to institutions for enrolling and graduating significant numbers and percentages of Pell students. This new program should direct additional financial assistance to institutions based on superior performance in enrolling and graduating low-income students, and it should also provide reasonable bonuses to Pell students for completing their education within a normal, expected timeframe. Additionally, we support efforts to strengthen the core Pell program by reinstating the "summer" Pell award and returning the income threshold for an automatic maximum Pell award to \$32,000 and repealing the retroactive six-year time limit for Pell grant eligibility. Finally, we recommend that steps be taken by the Administration to consider making an early Pell grant award commitment to low-income high school students to increase their college-going rates.

These recommendations, collectively, support the President's goal of doubling college completion rates by the year 2020. They are also particularly relevant to Spelman. Our number of Pell-eligible students has risen 10 percentage points in the past five years. In the 2008-2009 academic term, Pell-eligible students comprised 43 percent of Spelman's student population. That figure rose to 53 percent of the student population this past academic year with nearly 200 more Spelman students considered Pell-eligible in the 2012-2013 term. Increases like this are happening at colleges and universities all over the country, which is why the effect of changing aid programs that affect so many needy students must be reviewed with the deliberative input of relevant stakeholders.

Consideration of "Degree of Difficulty" is a Necessary and Relevant Factor

It has been said that "success is not defined by what is achieved, but rather is defined by the obstacles overcome to get there." Such is the case with our nation's HBCUs, and such has been the case for Spelman College. Our contributions to the nation in the form of research and production of high-impact talent are unparalleled and indisputable. Recent, highly acclaimed movies such as "The Help," "The Butler," and "Twelve Years a Slave" portray and document the realities we have confronted and overcome under some of the most horrendous circumstances experienced by any group in this nation. Even so, HBCUs have leaned into that space that looked like a void to many and transformed it into a fertile field of opportunity for those who otherwise would have been left behind.

Let us begin this conversation recognizing that the metrics used by most college rating systems often present a distorted view of the true value of HBCUs. Often these rankings are derived by considering factors that are the most challenging to HBCUs. Resources, alumni giving, and student selectivity are the very areas where many HBCUs are the most challenged; whereas, more elite, well-endowed, and selective institutions serve students who are more affluent and well-prepared. We appreciate the metaphor shared by Dr. Walter Kimbrough, president of our UNCF sister institution Dillard University, which underscores the need to consider the development of a college rating system that: (1) provides distinct measures for the distinct classifications of institutions, and (2) which measures HBCUs based on the value they deliver to economically and academically disadvantaged students, who often experience the greatest difficulty in college admission, persistence and graduation.

In the face of the socioeconomic residue associated with historically discriminatory practices, changing demographics and the recent economic downturn² -- all of which have disproportionately affected African Americans -- any college rating system cannot and should not be pursued as a "one size fits all" approach, and must address the unrelenting disparities that persist.³

Recommendations

In addition to the comments above, we concur and support recommendations shared via a separate submission by UNCF. To summarize:

- Institutional performance metrics must be adjusted to account for differences in the socio-economic composition of student populations and per-student expenditures.
- Performance metrics should be disaggregated to consider college student populations who are most critical to the nation achieving its college attainment goals.
- The foundation of any credible college rating system must be accurate, reliable and comprehensive.
- Appropriate institutional peer categories must be included in any system, permitting apple-to-apple comparisons.
- College ratings should not be tied to allocation of student aid.
- The process for development of such a system should be open, transparent and inclusive of HBCUs, including post-development sequencing and appeal processes.
- There should not be a broad implementation of any rating system without first successfully testing a pilot.

² For example, a recent study by the Institute on Assets and Social Policy (IASP) at Brandeis University found that the wealth gap between black and white families exploded in the 25-year period between 1984 and 2009. In 1984, the total wealth disparity between white and African American families was \$85,000. By 2009, that figure nearly tripled to \$236,500. A key reason for this disparity expansion is the effect of the recent housing foreclosure crisis. According to the IASP, homeownership accounts for 53 percent of wealth composition for black families, compared to 39 percent for whites. Between 2005 and 2009, the net worth of African American households dropped by 53 percent as a result of lost home equity comprising such a substantial portion of their wealth portfolios. Such a dramatic loss in wealth severely limits a family's options in leveraging resources to use for other purposes, including financing a child's college education.

³ The IASP study also examines disparities in access to, and completion of, college education as a factor in the growing wealth gap. In addition to wealth reductions based on loss of home equity, student debt and other financial impediments to college completion also play a key role in increasing the disparity. Regarding student debt, the study noted:

Student debt is an issue that affects most graduates, but black graduates are far more vulnerable: 80 percent of black students graduate with debt compared with 64 percent of white students. More blacks than whites do not finish their undergraduate studies because financial considerations force them to leave school...

This open-forum discussion is an important step needed to ensure that appropriate factors unique to HBCUs are considered and adopted in any proceedings related to college value and the development of a rating system. I, along with others in the HBCU community, look forward to continuing the dialogue with the Department on this very important matter.

Thank you for this opportunity to share these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Beverly Daniel Tatum". The signature is fluid and cursive, with the first name being the most prominent.

Beverly Daniel Tatum, Ph.D.
President

Cc: Dr. Martha Kanter, Under Secretary of Education



USC University of Southern California

Office of the Provost
Elizabeth Garrett
Provost and Senior Vice President
for Academic Affairs

November 18, 2013

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

Dear Secretary Duncan,

Thank you for the opportunity to provide comments regarding President Obama's recently outlined college affordability plan and the creation of a new rating system which will rank colleges and universities based on performance and cost.

The University of Southern California (USC) supports efforts to increase transparency regarding college cost for students, parents, and consumers. Independent of federal efforts, USC has developed an institutional net-price calculator that allows prospective students to calculate cost and make informed decisions about what is best for them and their families. We are committed to participating in the debate about how to provide students with the tools they need to fully evaluate the financial implications of their college choice.

USC shares the President's goal of keeping college affordable for students from across the socioeconomic spectrum. Last year, USC committed more than \$232 million in institutional money to financial aid for our students. Further, two-thirds of USC undergraduates receive some type of financial assistance to help reduce total costs. Our *Neighborhood Academic Initiative* provides a pathway for low-income students from Los Angeles to earn their way into USC. NAI students receive a full financial aid package to USC. These are just a few of the ways that USC works to expand access and enroll talented students from all backgrounds.

As a leader in transparency and access efforts, USC is deeply concerned with the proposal for the Department of Education to create a ranking system that could generate more confusion for first-generation and low-income students. Such a ranking system could generalize complicated financial information and make it wrongly appear that private institutions, such as USC, are out of reach for first-generation, low-income students.

Our concerns include:

- Tying federal financial aid to such a ranking system would endanger the goal of expanding access that the Pell Grant was created to address. While USC may receive additional federal student aid in this scenario, we cannot support aid being allocated based on such a system. It would be difficult for any ranking system to accurately reflect the actual cost of attendance for any individual student.
- We also are concerned that such a ranking system will create more bad behavior (i.e. aggressive marketing to Pell eligible students, the creation of lower quality academic programs to move students to completion faster, etc.) in order for some institutions to access this new federal financial aid funding. The federal government must work to ensure that any new transparency efforts do not create harmful unintended consequences for students.

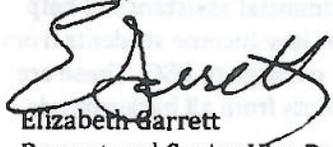
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DEPARTMENT OF EDUCATION
CS/ES/SCC

- Any serious discussion of the future of higher education and education reform must also address the reduction in federal funding for scientific research. This reduction has constrained America's innovation engine and will affect future generations of scientists, researchers, and entrepreneurs. Discoveries in university laboratories help drive new industries and catalyze economic growth. Federal agencies must continue to support a robust research portfolio.
- Over 23 percent of USC undergraduates are Pell-eligible. However, USC also does much to expand access with institutional aid, and community programs and partnership to promote access, even to students who may not attend USC. Therefore, if this new rating system is implemented, we believe there should be other factors to consider than just number of Pell recipients to illustrate an institution's commitment to access.

In addition, a new rating system dilutes information already being distributed to students (College Scorecard, College Navigator, individual financial aid offers, etc. . . .) and will likely further confuse first-generation, low-income students. We believe there is a wealth of information on the College Navigator website, which prospective students and parents are already accessing. Rather than creating a separate ranking system that relies on a subjective definition of "value" related to cost, it is our opinion the Administration should work with the higher education community to develop more useful tools to compare and analyze differences between individual institutions and sectors.

USC supports the overall goal of transparency, but we remain concerned about some of the possible outcomes of the proposed rating system. As a leader in access, completion, and transparency, we look forward to working with the Department on this important issue.

Sincerely,



Elizabeth Barrett
 Provost and Senior Vice President for Academic Affairs
 University of Southern California



The State University
of New York

“College Affordability Rating System” Testimony

**Elizabeth L. Bringsjord, Interim Provost and Vice Chancellor
The State University of New York**

Submitted on November 21, 2013

As Interim Provost and Vice Chancellor of the State University of New York (SUNY) and on behalf of the Board of Trustees of SUNY and our Chancellor, Nancy Zimpher, I want to extend our thanks to President Obama, Secretary Duncan, and the staff of the Education Department for the opportunity to provide testimony now, in the early planning stages of a college affordability rating system. Please know that we would welcome the opportunity to be part of future discussions regarding plan development and the identification of specific metrics and methodologies.

As the largest comprehensive public university system in the nation, SUNY’s 64 campuses include community colleges, technology colleges, comprehensive colleges, and doctoral degree granting institutions. In many ways, SUNY is a microcosm of the broader U.S. higher education sector. We know well the challenges and opportunities inherent in both setting goals across diverse institutions and assessing individual efforts to achieve common objectives. It is from this unique vantage point that we offer the following testimony.

Let me begin by stating that the State University of New York supports the creation of a national plan that takes bold, thoughtful steps toward ensuring that everyone has access to affordable high-quality education and job training.

SUNY’s Commitment to Affordability and Measuring the Impact of Higher Education and Success

Notably, it was at one of SUNY’s 64 campuses, the University at Buffalo, that President Obama announced his plan to improve college access and completion by cutting to the core of the matter: affordability. The choice to launch this plan on a SUNY campus was purposeful. SUNY’s annual tuition remains the lowest among all state university systems in the northeast and in the lowest quartile of all such public institutions of higher learning in the country, as highlighted in “Trends in College Pricing” report by The College Board (2013).

Consistent with the goals of President Obama and Secretary Duncan, SUNY has established a policy framework to support access, completion, and success; with an overarching commitment to data-driven decision making and transparency. We believe we are breaking some new ground in measuring our collective contributions to our students, communities, and other stakeholders and are making that information readily available and user-friendly. We are making particular gains in providing students and families with the information they need to

know about the costs of education. We are also incentivizing our campuses to develop and expand degree programs that align to high needs job openings in New York State.

We agree that we must ensure that students and families have easy access to information about the quality and affordability of institutions; information so transparent that it becomes the impetus for institutional improvement. **SUNY believes that colleges and universities should be recognized for such efforts as part of the President's overall plan to make college more affordable.** Several specific examples of efforts that could be recognized include:

An institution's existing commitment to data reporting and transparency - SUNY's annual *Report Card* measures System system progress in meeting a broad range of goals, tracking more than 90 different outcomes in three broad categories: 1) *A Competitive SUNY* – featuring metrics such as graduation rates (including the SUNY Success Rate which gives credit to both the sending and receiving institution when a student obtains a degree post-transfer), time-to-degree, retention rates, and student participation in research; 2) *Diversity Counts* – which includes metrics on enrollment and performance by race, ethnicity, and gender overall and in STEM fields; and, 3) *A Competitive New York* – evaluating SUNY's contributions to the economy via metrics such as academic programs aligned to high demand fields, research and productivity, inventions, and patents.

An institution's participation in the national dialogue on critical higher education issues - In the same year that SUNY launched its first report card, we held the inaugural *SUNY Critical Issues in Higher Education* conference, which is now an annual convening of national thought leaders to tackle some of the most pressing issues facing higher education. In the first year, we investigated higher education's impact on the national economy and how to better measure that impact. Each year we also publish books on conference topics. SUNY Press has released *Universities and Colleges as Economic Drivers: Measuring Higher Education's Role in Economic Development* (2012) and *Higher Education Systems 3.0: Harnessing Systemness, Delivering Performance* (2013), edited by Associate Vice Chancellor Jason E. Lane and former SUNY Chancellor D. Bruce Johnstone. The next book in the series will highlight work from this year's conference, particularly germane to President Obama's goals: *Building a Smarter University: Big Data, Innovation and Ingenuity*.

An institution's specific commitment to developing student financial literacy - SUNY has long had in place web pages and publications to guide students and their families through the financial aid process. Additionally, SUNY offers state-wide workshops each year where families can come to a SUNY campus and complete the FAFSA form online with the assistance of knowledgeable financial aid staff. We also offer workshops in multiple languages throughout the year that explain the process, eligibility criteria, and guidelines for completion of FAFSA as well as critical information related to loans—from the decision to take a loan to available options for repayment.

SUNY also took the required Net Price Calculator to the next level, providing not only estimated net price and estimated grants and expenses, but an estimate of out-of-

pocket costs. I draw particular attention to SUNY's commitment to accuracy and transparency in estimating the true cost of attendance for students and their families via the calculator. We have an established process whereby each year we conduct an evaluation of actual award against estimates to ensure that the tool is as accurate as possible. **We recommend that the Education Department include this crucial step in guidance provided about managing the calculator, particularly as net price was highlighted as one possible metric for determining Affordability.**

SUNY has also adopted a standard financial aid award letter that we refer to as Smart Track, which means that each student can see—in one, easy-to-read location—information on cost and available financial aid as well as the graduation rate and loan default rate for the campus to which they have applied. We are in the process of expanding SMART Track to include web-based, financial literacy tools to better inform students about choices regarding borrowing, their rights and responsibilities, loan repayment strategies, and cautions about default.

SUNY encourages the Education Department to develop a program that would incentivize institutional commitment to the principles and practices of quality assessment, data reporting, transparency, and financial literacy.

The Importance of Providing Context when Presenting Data

Importantly, a key component of any information campaign, report card, or ratings system is that data must not be presented in isolation, but rather with appropriate context, such as institutional mission, student demographics, and national benchmarks where appropriate. When presenting graduation rates, for example, SUNY typically provides the following contextual data:

- Institution type;
- Admissions selectivity – such as high school GPA and SAT score of incoming students;
- Percent of full vs. part-time students;
- Percent of PELL recipients;
- Average student age (one indicator of traditional/non-traditional student);
- First-year retention; and
- National benchmarks by sector using the Carnegie Classification.

At the associate degree level, we provide campus graduation rates for first-time, full-time students at the two-, three- and four-year mark; and at the baccalaureate level, we provide campus graduation rates at the four-, five- and six-year mark. SUNY also includes information on the pathways of transfer students. If we can identify that a student completed their degree

at a second institution, both campuses are credited for the success. We also look at persistence generally over time.

SUNY believes that any proposed rating system should include contextual information as part of the reporting process and include measures that consider trends in higher education including:

Sensitivity to the Changing Nature of Student Mobility - Each year nearly 30,000 students transfer into and among SUNY's 64 campuses. Not only are they transferring from our community colleges to our four-year institutions, they are transferring from four-year institution to four-year institution, two-year to two-year, and four-year to two-year. Many are even taking classes from multiple institutions at the same time. This kind of movement is not unique to SUNY, it is a national phenomenon. According to a report released last year by the National Student Clearinghouse, one-third of all students transfer at least once before earning a college degree.¹ Of those who do transfer, 25 percent transfer more than once, 43 percent transfer to a community college, and 27 percent transfer across state lines.

Any rating system must account for these new realities in some of the ways I described earlier. Many students graduating from one institution began their academic endeavors at another institution. When more than one institution contributes to the success of a student, they both should receive due credit. **SUNY believes that this new dynamic in higher education requires that metrics used to determine Achievement should account for the various ways in which multiple institutions contribute to student completion and success.**

An Understanding of Mission Differentiation - While various sectors of institutions share some commonalities, each campus has unique qualities associated with their mission, student demographics, community, local workforce demands, and overall programmatic mix. This is particularly true for community colleges.

SUNY urges consideration of mission differentiation throughout the planning process for the affordability rating system and acknowledges that doing so was already anticipated by the Education Department in its recently published FAQ.

Recommendations for Community Colleges

SUNY further suggests that appropriate measures for community colleges—in addition to graduation rate—should include common, pre-completion milestones of student success.

Such measures could include:

- First-to-second year retention rates;
- Remediation exit rates;

¹ National Student Clearinghouse Research Center and Project on Academic Success, Indiana University (2012). Transfer and Mobility: A national view of pre-degree student movement in postsecondary institution. Retrieved from <http://pas.indiana.edu/pdf/Transfer%20&%20Mobility.pdf>.

- Gateway course success;
- Continuous enrollment;
- Subsequent re-enrollment;
- Credit accumulation metrics, and so forth.

These measures could also be adjusted to account for the distinctiveness of a student body by measuring an institution's actual student success rate against a predicted (or modeled) student success rate, based on measurable characteristics known to influence completion, such as designation as an under-represented minority, high school GPA, and income (including looking at the number of Pell Grant-eligible students).

Pell-Eligible Students and Students who have Identified as Under-Represented Minority

In addition, for institutions with high numbers of Pell-eligible students and/or students who have identified as under-represented minorities, SUNY urges the Education Department to look at the Access to Success (A2S)² project of the Education Trust and the National Association of System Heads as a resource for evaluation criteria. SUNY is one of 22 public higher education systems that have accepted the A2S pledge to reduce the college-going and graduation gaps for low-income and minority students in half by 2015. Efforts identified as best practices as part of A2S could be considered as metrics in the college affordability plan in the categories of both Access and Outcomes.

- Early warning systems;
- Early declaration of major;
- Four and eight semester course plans toward degree completion;
- Summer transitional programs;
- Intrusive advising/support;
- First-year seminars; and
- Mentoring, counseling, and learning communities.

Withholding of Pell Funds

While I recognize that this may be more pertinent to later discussions, SUNY does want to go on record as urging caution regarding the withholding of Pell funds from students based on institutional performance. There is already so much pressure on students about how to finance a college education that this approach could easily be perceived as an insurmountable obstacle; particularly for those students who are place-bound for reasons of family or employment. Alternatively, incentives for all institutions, including added weighting to

² <http://www.edtrust.org/issues/higher-education/access-to-success>

applications for Race to the Top like funds, could be a tremendous motivator that accomplishes the same end.

Access to Data

Access to benchmark data and data on students post transfer and graduation continue to be a challenge to assessment efforts and therefore institutional improvement.

SUNY urges the Education Department to take a leadership role in forging new partnerships between institutions of higher education and State Education Departments and State Departments of Labor. Too often, in an errant claim about privacy or perhaps bureaucracy, institutions of higher education are not granted access to critical information on academic preparedness, placement or success post transfer, entrée into the workforce, and wages. It would be challenging to be evaluated on data that institutions heretofore have been unable to access.

Conclusion

In conclusion, I want to reaffirm that SUNY hears—and actively embraces—the national call for reduced college cost, greater innovation, and a stronger commitment to degree completion for college students and adult workers. We must, in short, get down to the business of making our sector more nimble, more accessible, more transparent, and more efficient, and this means measuring our progress and ensuring accountability in ways that universities have not done before.

We hope that we have provided some ideas today about how this challenge can be met. Again, we would welcome the opportunity to participate in future discussions as plans formalize and the hard work of selecting specific metrics begins.



MICHAEL L. LOMAX, PH.D.

PRESIDENT & CEO OF UNCF

**COMMENTS ON PRESIDENT OBAMA'S
PLAN TO MAKE COLLEGE MORE AFFORDABLE**

Introduction

UNCF is the nation's largest and most effective minority education organization, with nearly 70 years of experience in increasing college access and opportunity for minority students. UNCF carries out its mission through its member institutions and its unique role in administering nearly 400 minority scholarship and internship programs.

UNCF and its member institutions believe that the President's *Plan to Make College More Affordable* must support – and not undermine – the work of UNCF member institutions to provide higher educational opportunities and social mobility to low-income and minority students and prepare them for the global economy.

For over a hundred years, UNCF's member institutions have served as an engine of social mobility for millions of students. UNCF's 37 private Historically Black Colleges and Universities (HBCUs) annually enroll more than 50,000 students, who are primarily first-generation, low-income and minority students.

HBCUs, in total, enroll annually more than 300,000 students, again, primarily first-generation, low-income and minority students. Although just four percent of American colleges and universities, HBCUs produce 16 percent of African American graduates with baccalaureate degrees and 27 percent of African American graduates with baccalaureate degrees in science, technology, engineering and mathematics (STEM) disciplines. A 2011 National Science Foundation study found that of the top ten colleges and universities that produced African American bachelor's degree recipients who went on to earn doctoral degrees in STEM fields, nine were HBCUs.¹

Our students face financial and other obstacles that can derail or disrupt their ability to attend, persist and complete college. Indeed, without critical federal grant and loan assistance, higher educational opportunity would be denied to many, if not most, of these students. Approximately 78 percent of students at UNCF member institutions receive federal Pell Grants, a substantially greater share than the 43 percent at all four-

year colleges and universities. Moreover, 84 percent of students at UNCF institutions rely on loans to help pay their college expenses compared to 61 percent of students at all four-year institutions.ⁱⁱ

Because so many of our students are from economically disadvantaged families, UNCF member institutions are doing their part to hold down college prices. UNCF member institutions are more affordable to students than comparable non-UNCF institutions. For the 2012-13 academic year, the total cost of attendance at UNCF-member institutions was approximately 30 percent lower than that of all private postsecondary institutions (a difference of nearly \$12,000 a year).

There is much at stake in the current higher education policy debate for first-generation, low-income and minority students who, in today's economy, must have some type of college credential in order to improve their lives. These students – who, because of disadvantage, face long odds in seeking a college education – are exactly the students who most need the advantages that come with college. And, they are the students the economy most needs to add to the college-educated workforce.

Below, we provide more detailed comments and recommendations concerning several of the Administration's higher education proposals.

Any Credible College Rating System Must Accurately Assess Institutional Value and Reflect “Degree of Difficulty” in Serving Students

UNCF agrees that institutions should be held accountable for the quality of higher education they deliver. HBCUs are high-performing, national assets in serving students and the nation by enrolling, retaining and graduating students whom the country needs to remain globally competitive. According to an empirical analysis by the UNCF Patterson Research Institute, HBCUs outperform non-HBCUs in retaining and graduating African Americans by 14 percentage points, after controlling for the socioeconomic status and academic preparation of enrolled students.ⁱⁱⁱ

Nonetheless, the metrics used by most college rankings often present a skewed view of HBCUs that fails to capture the distinctive value of our institutions.^{iv} These rankings “are based on many of the very issues that HBCUs struggle with – resources, alumni giving, and student selectivity – and there is no contextualization of these issues,” notes researcher Mary Beth Gasman.^v

Measures of affordability, completion, graduation and degree attainment are greatly influenced by levels of institutional wealth, resources and selectivity. Wealthy, elite and highly selective institutions serve mostly well-off and well-prepared students who have all the right inputs, which almost guarantee high retention, graduation and employment rates as well as relatively low student debt.

Dr. Walter Kimbrough, president of UNCF member institution Dillard University, has developed an apt metaphor for college performance ratings based on the scoring used in competitive diving.^{vi} In diving, swimmers receive a raw score from one to ten based

on dive execution. That score is averaged by the judges and then multiplied by the degree of difficulty for the overall score. For any college rating system to be fair, degree of difficulty must be calculated when judging institutional performance.

Yet, most college ratings have lauded wealthy, selective institutions that serve few low-income students (as well as part-time and students of color) as the gold standards for providing an excellent education. These institutions essentially have done simple dives – forward in a tuck position off a one-meter springboard which has a degree of difficulty of 1.2 (based on USA diving). Meanwhile, HBCUs and other colleges serving students with greater challenges attempt a back 4 1/2 somersaults in a tuck position off a three-meter springboard, with a degree of difficulty 4.6. The problem is that the degree of difficulty is not factored in. Only the raw score is calculated and HBCUs are determined to be lesser institutions.

For example, there is a strong correlation between the proportion of Pell Grant students (a proxy for low-income students) served by an institution, the average test score of the student body (a proxy for academic preparedness) and the level of endowment per student (a proxy for institutional resources). These three inputs are powerful determinants of graduation rates according to the federal Advisory Committee on Student Financial Assistance (Advisory Committee), which is charged by Congress with providing advice to the Secretary of the U.S. Department of Education (Department) on student financial aid policy.

The Advisory Committee recently analyzed IPEDS data and documented this relationship in its July 2013 report, *Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients.*^{vii} The Advisory Committee's empirical findings are that:

- There is an “inverse relationship between the percentage of first-time students who are Pell recipients, average test score, and 6-year graduation rate at nonprofit 4-year public and private colleges.”
- “4-year colleges with up to 20% Pell recipients have an average 6-year graduation rate of 80% and an average test score of 29.”
- “4-year colleges with 80% or more Pell recipients have an average 6-year graduation rate of 25% and an average test score of 19.”
- “Serving Pell recipients and average test score, combined, account for 76% of the observed variation in 6-year graduation rates among 4-year public and private colleges.”
- “Serving very high percentages of Pell recipients, with low endowment per student, reduces average 6-year graduation rate to 23% at public colleges and 19% at private colleges.”

More importantly, after examining this data, the Advisory Committee reached several critical conclusions:

- **“The more a 4-year college defines its mission as serving low-income students, and the more modest its endowment per student, the more its**

6-year graduation rate will deviate from a valid and reliable assessment of its relative performance.”

- **“Using raw output measures, such as rates of graduation or student academic progress; in the awarding of Title IV student aid will harm low-income students and the colleges that serve them.”**
- **“To prevent such harm, output measures must be adjusted to adequately reflect differences in inputs, in particular, college mission, student characteristics, resources, and factors beyond colleges’ control.”**
- **“Failing to account for inputs when measuring and evaluating college performance unfairly penalizes colleges that are efficiently serving large numbers of low-income students, particularly colleges doing so with limited resources.”**

We strongly urge the Department to review and act on the findings of the federal Advisory Committee in developing the proposed college rating system.

The Department must ensure that its college rating system measures institutions based on the value they deliver to economically and academically disadvantaged students, who experience the greatest difficulty staying on the college graduation track, and to the country, which needs more college graduates. To be clear, UNCF does not endorse the development of a college rating system. However, if the Administration pursues this course, UNCF believes that any college rating system must address the following issues:

- Institutional performance metrics must be adjusted to account for differences in the socio-economic composition of student populations, student academic preparation, institutional resources and other factors beyond an institution’s control, using a methodology developed by the National Center for Education Statistics (NCES). Development of a “degree of difficulty” adjustment in Dr. Kimbrough’s parlance would appropriately move away from a one-size-fits all approach. It would recognize the value added by institutions, with limited resources, who serve students from low-income families and those whose pre-college education has put them at a disadvantage in doing college coursework.
- Performance metrics should be disaggregated to shine a spotlight on the college student populations who are most critical to the nation achieving its college attainment goals. At a minimum, performance metrics should be reported for first-generation, low-income students, ethnic/minority groups that are underrepresented in higher education and students who were not ready for college coursework and needed remedial education.

- Any college rating system must include appropriate institutional peer categories so that “apples-to-apples” comparisons can be made, which is currently not the case with the College Score Card. Colleges and universities have diverse missions, histories, sources and levels of government support and student populations.
- The foundation of any credible college rating system must be accurate, reliable and comprehensive data on all students enrolled in postsecondary education institutions. Currently, the federal government is not able to meet this test. The flaws of the federal higher education data collection system, the Integrated Postsecondary Education Data System (IPEDS), are well known. IPEDS currently captures information on only a small share of matriculating students by excluding part-time and transfer students and those students who stop in and out of education over a long period of time. While the Department identified this problem over a year ago^{viii}, it will be several years before part-time and transfer students are captured in IPEDS according to recent NCES proposals. Before publication of any college rating system, NCES must develop a comprehensive and accurate data system built on common definitions and data elements that counts all students. Moreover, any college rating system must be based on federal data (as compared with self-reported information or private surveys) in order to ensure data quality and integrity.
- The development of any college rating system must be done through an open, transparent process that provides an opportunity for institutions to review and assess any metrics that are to be included in such a system, and understand how they were calculated.
- The Department should develop a process and timeframe during which institutions may challenge and appeal their performance metrics.
- The Administration should re-evaluate and consolidate the confusing array consumer shopping tools – the proposed college rating system as well as the College Navigator, College Score Card, Financial Aid Shopping Sheet, and Paying For College comparison tool – developed variously by the Department, Consumer Financial Protection Board and the White House. UNCF supports providing students with meaningful information to help them select the college that is the best fit for them and provides the best value. However, the challenge is to provide *more meaningful information*, not simply more data, about colleges and universities that puts into context the mission, student population and unique strengths of each institution that can lead to student success. We believe that this is best done through early intervention, expanded counseling, and support services to students in high school and continuing through freshman year. These types of services are currently being provided through programs such as GEAR UP and TRIO and should be greatly expanded.

College Ratings Must Not Be Used to Allocate Federal Student Aid

While UNCF and its member institutions support providing students with meaningful information and counseling to support access and choice, we strongly oppose awarding and distributing federal student assistance funds based on college ratings. Such a system would result in significant inequities in the allocation of federal financial aid to low-income students, undermine access and choice, and turn on its head the longstanding principle that federal student assistance is awarded to students based on financial need (and not institutional characteristics).

It is unwise and unnecessary to take a chance in allocating more than \$150 billion in annual federal student aid, impacting more than 14 million students, based on a high-stakes rating system that purports to accurately measure colleges' value. Federal student aid programs can certainly be fine-tuned to incorporate stronger completion and graduation incentives for both institutions and students. However, allocating federal student aid using college ratings can create a perverse incentive to limit enrollment of at-risk students and, thus, hurt the very students that the system is intended to help. If history is any guide, we have little confidence that the federal government will be able to design and implement a college rating system that is sufficiently fine-tuned and fair without significant unintended, negative consequences that result in widening the opportunity gap for low-income students. One can only look to the Parent PLUS loan debacle to see how one seemingly well-intentioned policy change resulted in lost educational opportunity for thousands of students.

We urge you to heed the warnings of the Department's own Advisory Committee, which cautioned against using institutional performance metrics to allocate Title IV student aid. The Advisory Committee concluded that: **"To ensure the adjusted outputs, estimates of value added, and definitions of peer group are sufficiently precise for use in the awarding and allocation of Title IV student aid, far more research is needed."**^{ix}

If the Administration pursues legislation to link the allocation of federal student aid dollars to college performance ratings, we strongly recommend that the Administration start small. Any such proposal should be piloted on a small scale as many states have done, and its results carefully evaluated, before consideration is given to wide-scale implementation.

An HBCU Race to the Top Program Should be Established and Funded

HBCUs have a stellar record of providing opportunities for college success for underserved students and transforming them into the nation's leaders, despite a history of limited resources. The nation now has an urgent education and economic need to help more of these students get the college education that they need and the nation needs them to have. Expanding and enhancing the institutional capacity of HBCUs is critical to increasing the number of first-generation, low-income and minority college graduates entering the economy.

Accordingly, UNCF proposes that *additional* financial resources be provided to HBCUs (in the Administration's fiscal year 2015 budget) to help them strengthen their institutional performance, better utilize technology, and build capacity to enroll, support and graduate more students. To distinguish from the formula-based Title III Strengthening HBCUs operating support, the Department of Education should implement a "Race to the Top" type competitive program that would provide extra resources to incentivize HBCUs to address performance goals in certain categories. This could include student retention and completion, technology-enabled innovations and implementation of alternative educational delivery methods.

Educational Opportunity Must Continue to be the "North Star" for Federal Higher Education Policy

For nearly 50 years, the "North Star" for federal student financial aid policy has been the elimination of disparities in higher education opportunity for students of limited financial means. Sadly, our country still has far to go in addressing the access crisis.

In 2012, the proportion of students from families in the top income quartile achieving baccalaureate degrees by age 24 was ten times greater than that for poor students from families in the bottom income quartile^x. Low-income students – even those who are academically prepared for college – continue to confront financial barriers that require them to attend part-time, work long hours and commute to campus, compromising their ability to persist and complete their degrees. Moreover, changing demographics and public education reforms are colliding to produce even greater numbers of financially needy students who are academically prepared for college. That is why federal higher education policies must continue a laser focus on eradicating differences in college opportunity, which, if not reversed, will consign a growing pool of low-income students to a life on the bottom rung of the economic ladder.

Thus, UNCF supports the creation of a new program, under the President's plan, to provide Pell Grant bonuses to institutions for enrolling and graduating significant numbers and percentages of Pell students. This new program should direct additional financial assistance to institutions based on superior performance in enrolling and graduating low-income students, and it also should provide modest bonuses to Pell students for completing their education, within the normal, expected time. In addition, the new Pell bonus program should supplement current federal Pell Grants and student loans that travel with students to the institutions of their choice.

UNCF also believes that making college more affordable for low-income students must include strengthening the core Pell Grant program and reversing recent eligibility restrictions. Low-income students must make extraordinary sacrifices to work and borrow in order to attend a four-year institution full-time and live on campus. Restoring the purchasing power of the Pell Grant, reinstating the "summer" award to enable students to receive assistance for all periods of enrollment, returning the income threshold for an automatic maximum Pell award to \$32,000 and repealing the retroactive six-year time limit for Pell Grant eligibility would all significantly reduce the financial struggle that low-income students face today. Moreover, the Administration

should consider making an early Pell Grant funding commitment to low-income high school students to increase their college-going rates.

Endnotes:

- ⁱ National Science Foundation, Division of Science Resources Statistics. 2011 (Updated July 2012). *Women, Minorities, and Persons with Disabilities in Science and Engineering: 2011*.
- ⁱⁱ Data compiled by the Frederick D. Patterson Research Institute, UNCF.
- ⁱⁱⁱ UNCF Frederick D. Patterson Research Institute. 2012. *Understanding HBCU Retention and Completion*.
- ^{iv} Awokoya, J. Richard, D., & Myrick-Harris, C. 2012. *Serving Students and the Public Good: HBCUs and the Washington Monthly's College Rankings*. Fairfax, VA: Frederick D. Patterson Research Institute, UNCF.
- ^v Ibid.
- ^{vi} Walter Kimbrough. 2013. Inside Higher Education. *When Rating Colleges, Think Diving*.
- ^{vii} Advisory Committee on Student Financial Assistance. July 2013. *Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients, A Policy Bulletin for HEA Reauthorization*.
- ^{viii} U.S. Department of Education. 2012. *Action Plan for Improving Measures of Postsecondary Student Success*.
- ^{ix} Ibid.
- ^x Tom Mortenson, Postsecondary Education OPPORTUNITY. 2013. *Unequal Family Income and Unequal Opportunity for Higher Education In the United States, 1970 to 2012*.

WHEELOCK COLLEGE

United States Department of Education
400 Maryland Avenue, SW
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December 16, 2013

Thank you for the opportunity to submit testimony on a topic of great significance to me as the President of Wheelock College and to the students who attend our institution in pursuit of its unique public mission – to improve the lives of children and families. As a small, private, nonprofit higher education institution in Boston, Wheelock College shares President Obama's concerns about the issue of high debt levels for students and alumni. Indeed, balancing college access and affordability to ensure that higher education remains possible for lower and middle class families is a top institutional priority of Wheelock College. As the Obama Administration moves forward in formulating detailed policy proposals to address the problem of student debt, I urge officials to avoid one-size-fits all approaches. Such a strategy could penalize small, socially minded colleges, such as Wheelock, that are currently making low to middle class students' dream of a college education possible.

First, I recognize the need for some uniform and accurate reporting systems within higher education not only for students and parents, but also for higher education institutions. As you know, a number of news organizations create their own ranking system and issue reports annually. The lack of uniform standards, voluntary nature of data sharing, and willingness of some institutions to be more transparent than others results in varied and skewed information for public consumption. For example, the data in these reports typically includes student debt only—it excludes parental borrowing or other parental financial contributions which make other institutions appear more affordable. Wheelock students carry a larger share of the cost of college than students at many other schools, coming from families who are not able to take on much debt. As a result, news reporting does not paint an accurate picture of college affordability and performance at Wheelock and other colleges like ours that serve low-income families.

To this end, sharing information about colleges by the federal government could be helpful if it is comprehensive, accurate and transparent. It must also balance the unique qualities and characteristics of colleges and universities with financial information in order to be useful and relevant. A ranking system, however, that uses narrow criteria primarily based in finances and outcomes could overlook the intrinsic elements unique to every higher education setting that students can only acquire at a particular school, and could be an essential factor in determining their success towards completion and work post-graduation. In short, college is not simply a financial decision – it is a decision about location, personal family needs, institutional philosophies and mission, college culture, student life, education rigor and support, future professional aspirations and much more. These varied elements cannot be captured across a hand full of criteria and then ranked. Again, while I support uniform information sharing, I urge the Obama Administration to re-consider a system of ranking, especially one that would eventually tie federal financial aid to such rankings.

Forty percent of Wheelock students are Pell grant eligible, meeting the federal definition of high need. We also boast a diverse student body with almost 30 percent of reporting students identifying as racial or ethnic minorities. Making college accessible to and retaining traditionally underserved populations are qualities the President's plan proposes to reward. I must underscore that these are elements of the plan that should receive significant weight, as they require a great deal of work on the part of higher education institutions, particularly smaller ones where these students can receive individualized attention and support, such as Wheelock.

In addition, because of Wheelock's unique mission and commitment to social justice, our graduates often enter fields that do not pay high salaries, such as social work, teaching, counseling, and youth advocacy. Our graduates follow Wheelock's mission to improve the lives of children and families by making this a better world - there is no more noble cause. As education and human service professionals, the salaries of our alumni are much lower than students of colleges that focus on business, finance, technology and the like. The Obama Administration must take this fact into account in order for any information sharing system that weighs earnings post-graduation to be equitable.

Furthermore, I question if a ranking system would actually make college more accessible and affordable. Lowering student debt is not only about providing more information but about when and how it is shared. Focusing on programs that connect students and parents with financial literacy and decision-making information starting early in high school or even in middle school will prepare them to make financially-minded decisions when it comes to college senior year of high school. We have found at Wheelock that many students and families enter college without all the information about financial aid and financing opportunities available to them - believing that borrowing the entire sum of tuition is their only option. Financial counseling takes place at colleges, but this process must begin much earlier. In addition, federal loan forgiveness programs for students who enter health, human service, teaching, public service and other similar professionals are attractive options for students. The expansion of such programs would provide another avenue for so many students like those at Wheelock to cancel or pay back their loans while entering their desired human and social welfare field.

Again, thank you for the opportunity to provide thoughts on a critical issue facing colleges, universities, families and students across the nation. I am available to provide additional feedback or to answer questions at any time. I can be reached through Marta Rosa, Wheelock College's Senior Director of Government & External Affairs and Strategic Partnerships, at mrosa@wheelock.edu or 617-879-2314.

Sincerely,



Jackie Jenkins-Scott
President



Wilmington University's Position on Proposed Federal College Ratings System

Background

In August 2013, President Barack Obama outlined the Administration's plans for combating the rising cost of college tuition and student loan debt. Part of that proposal includes measuring college performance by creating a new ratings system. Once the system is in place, Congress can tie federal student aid to college value so that students can maximize their federal aid at institutions providing the 'best value'.

Summary

Wilmington University has serious concerns about the creation of a federal ratings system because all ratings apply to traditional colleges and universities. Wilmington University is a non-traditional university that serves a large segment of low-income students.

Although the Administration's intentions are good, a ratings system is not the most effective way to contain the cost of college tuition. The concept of tying financial aid to college performance using traditional metrics like six-year graduation rates, including that of Pell Grant recipients, is flawed in today's society and imposes a "one-size-fits-all" approach to higher education that may not be reflective of an institution's mission or the population it serves. In addition, the ratings system may actually limit one's access to higher education.

Wilmington University is a private, non-profit, open admissions institution that provides the opportunity for an affordable education to those who may not otherwise have one. The University has 13 different locations throughout Delaware, Maryland and New Jersey; offers online courses; and has an enrollment of more than 18,000.

Linking Performance to Graduation Rates

We disagree with examining certain metrics to assess a college's value. For example, graduation rates only measure first-time, full-time freshmen, a very small portion of our total student body (3% - approximately 250 students). Wilmington University offers undergraduate and graduate degrees and has a significant number of non-traditional age students who return to college after being out for several years. Many of our students work full-time and/or raise families, forcing them to take courses part-time. Approximately 76% of our student body work in some capacity. We serve a majority of first generation college students who take a part-time course load in order to reduce their student loan debt and/or their expense; therefore, it takes them longer to graduate. If these students were forced to take a heavier course load in an effort to graduate faster, they would also be forced to borrow more in student loans, thus defeating the goal of containing costs.

The University's population is also transfer heavy, serving many well-prepared students from community colleges or other institutions where they may not have experienced full academic success (Our average class size is 17). The traditional method of measuring graduation rates, by looking at how quickly first-time, full-time freshmen graduate does not accurately portray the makeup of our student body.

Linking Performance to Tuition

Wilmington University charges tuition based on what it costs to do business. We are 98% tuition driven and do not receive any state or federal funds. The University does not assess any fees other than a registration fee and a course-specific fee where applicable. Tuition is \$990 per class or \$3960 for a full-time course load. We have raised our tuition by only 2.5 percent each academic year for the last seven years. This is the lowest tuition increase of any state institution (public or private) and is well below the national average.

A Disservice to Underprivileged Students

A ratings system may actually harm underprivileged students if they live in a community where local colleges performed poorly in the ratings and, therefore, received less federal aid. In terms of ensuring academic success, what works for one student, may not necessarily work for the next. Ideally, the money should follow the student, not the institution. Forcing students to attend schools that they would not normally choose or to which they have limited geographical access may be a detriment to their future achievement.

Wilmington University provides a variety of student services designed to help students succeed. The University offers small class sizes so that students receive individualized attention as well as flexible course scheduling options (day, evening, weekend, online, hybrid, etc.) to accommodate a variety of schedules. We also offer free tutoring and free financial advisement sessions on campus. Acknowledging that students can only learn so much from a textbook, our instructors actually work in the field in which they teach. Our practitioner-based programs have been developed to enhance the marketability of our graduates. Forcing a student to go to college only so they can receive federal aid for that particular college, is not in a student's best interest.

If aid were to be reduced based on the number of Pell Grant recipients that graduate, it may require students who currently rely on Pell Grants to borrow more elsewhere. Because of work and family obligations, our non-traditional students do not always take courses on a consistent basis. Would their Pell Grant funding cease because they choose to take off a semester or are not taking a full-time course load? Currently 35% of Wilmington University's students are Pell-eligible. If that were to change based on a 'scorecard', about 5,500 students would not receive that assistance. Again, this is the danger of applying traditional methods in a non-traditional world.

Conclusion

Wilmington University does not support the creation of a federal college ratings system. We do, however, applaud the Administration's proposal to promote innovation and competition. The University has already created and is currently implementing many of the concepts outlined in The White House factsheet entitled, "A Better Bargain for the Middle Class"¹. We offer credit for prior training and learning experiences, co-operative education; and Massive Open Online Courses (MOOC) certification to reduce the overall cost of tuition. We have created accelerated degree programs and hybrid (online and face-to-face) courses. In an effort to promote a seamless transition from high school to college, we have established dual-enrollment partnerships with select high schools as well as an Early College High School Scholarship that enables a qualified high school junior or senior to take a college course free of charge.

The aforementioned characteristics of Wilmington University are just some of the ways our administration has chosen to address the rising costs of college tuition and student loan debt. The concepts employed at our institution are successful, not because of forced regulation, but because we understand our student population. We know who we are and we know the population we serve; I am quite sure we are not unique in this aspect. Imposing a federal ratings system reduces the autonomy of colleges to develop their own best practices. We are only one institution among thousands across this country; however, there are others like us who cater to a specific student population and offer unique services that others may not offer. We ask that you reexamine the idea of such a ratings system. We urge the Administration and the U.S. Department of Education to motivate colleges to develop their own remedies.

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