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February 17, 2015

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

RE: Public Comment on College Ratings Framework

Dear Secretary Duncan:

The Campaign for College Opportunity is a California-based higher education policy and advocacy organization committed to ensuring all Californians have an equal opportunity to go to college and graduate with a quality education. As you know, California is the country's most populous state with the largest GDP in the country. California is also among the most racially/ethnically diverse states in the country; in fact, one out of every two children under the age of 18 is Latino. That said, what happens in California affects our entire nation and we have an economic and moral imperative to ensure all of our residents have an equal chance at earning a higher education degree.

For this reason, we appreciate President Obama's and the Department of Education's (the Department) efforts to provide more and better information to students through a Postsecondary Institution Ratings System (PIRS) and the opportunity to comment on such a framework. We applaud the Department in its broader efforts to increase the rate of higher educational attainment for all Americans and to inform the public on institutional measures.

We believe that an effective college-rating system should be rooted in three guiding principles: (1) low-income and underrepresented minority students must be at the forefront of the access and success conversation; (2) institutions, not just students, should be held accountable for student success; and (3) tools and systems are helpful only if they are utilized and understood by the consumer for whom it is intended and by advocates and policy makers who can act upon the data effectively.

Based on these guiding principles, the Campaign for College Opportunity offers the following five recommendations to the

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Department as it develops its Postsecondary Institution Ratings System.

- 1. Include race/ethnicity as part of metrics.**
- 2. Include level and quality of student support at institutions.**
- 3. Include data around student satisfaction.**
- 4. Develop an outreach plan so that students and their families understand and use the ratings system.**
- 5. Develop an outreach plan so that colleges and universities use the ratings plan effectively and as part of informed, strategic decision-making.**

### **1. Include race/ethnicity as part of metrics.**

The Campaign supports the inclusion of income, first-generation status, and Pell grant recipient as part of the metrics in the rating system. However, a separate key equity measure is glaringly absent—that of race/ethnicity. Income and first-generation status certainly matter when discussing college enrollment and completion but they are not always proxies for race/ethnicity. Including race/ethnicity in PIRS also demonstrates to students and their families that diversity matters; that equity matters; that all students matter and will help ensure that more colleges and universities are paying attention to the racial/ethnic gaps that exist on their campus. The Department of Education should include race/ethnicity for all access, affordability, and success measures in its ratings system—this should not add extra burden to data reporters as such information is already collected. At the same time, we do not think that expected outcomes should be adjusted by race/ethnicity—doing so would indicate that separate standards or expectations exist for students depending on their skin color or background—a concept anathema to our ideals as a country.

### **2. Include level and quality of student support at institutions.**

Nationally, only an average of 40 percent of students graduate from four-year universities within four years and 60 percent within six years. A large number of students have prepared and worked hard to access higher education but a large proportion are not graduating on time, if at all. Research has shown that college institutions play a large role in ensuring students' progress through college and graduate on time. One of the best ways colleges can ensure this progression and timely degree completion is by offering a wide array of services to support students every step of the way. These supports include, but are not limited to:

sufficient number of trained and passionate counselors to guide, advise, and track student progress along with clearly informing students that enrollment in less than 15 credits per term will result in delayed time to degree; the utilization of technology to track degree progress and schedule coursework by semester to fulfill academic requirements; tutoring and academic support centers to students who need extra help; mandatory orientation to new students so they are aware of the various ways colleges are committed to their success; and career centers to help students explore career options and prepare to enter the workforce to name a few. Some colleges excel at offering these supports while many fall short. It would be helpful to applicants to know which schools offer strong student services.

**3. Include data around student satisfaction.**

One of the concerns about PIRS is that a ratings system will not tap into the numerous intangible benefits a college education provides. We all know that a college education is more than just a pathway to a job and earned income. A college education inspires, opens minds, and ignites a passion for lifelong learning, all important yet intangible benefits. One way to make the intangible tangible is by measuring student satisfaction—are you satisfied with your college experience? This measure could speak volumes to potential students in ways that enrollment, completion, and jobs data might not.

**4. Develop an outreach plan so that students and their families understand and use the ratings system.**

A college ratings system will only help students if they are aware of such a tool and are able to use and understand it. We encourage the Department to prepare a comprehensive plan that addresses how the Department will publicize and market the ratings system and teach users how to utilize the tool to make an informed decision. Such a plan should acknowledge that the digital divide is reality for many low-income, first-generation, and underrepresented minority students—the very population that requires the most assistance and support in accessing higher education—and have a plan to access these marginalized groups. The Department should also recognize that English is not spoken at home for about 20 percent of the national population—in California that figure is 44 percent. It is critical to ensure that the ratings tool and any and all associated trainings, documents, webinars, are available in a variety of languages to ensure equal access and understanding.

**5. Develop an outreach plan so that colleges and universities use the ratings plan effectively and as part of informed, strategic decision-making.**

One of the goals of this new ratings system is so that institutions can benchmark their performance and compare it to similar institutions. The Department should provide a plan so that colleges understand the various ways in which they can use the information from the ratings system to set goals for improvement where necessary and to measure progress over time. A key component of this would be an opportunity or summit hosted by the Department of Education where colleges can discuss best practices and engage in conversations around making improvements, not only to the ratings system but also to their campus. Any efforts to support state policy makers to set forth clear goals and to fund and align accountability around them is

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critical. As is any incentive and reward that the federal government can utilize to support colleges that are making progress, and closing critical gaps to improve outcomes for students.

We understand and appreciate the enormity of undertaking a ratings system of the thousands of colleges and universities that exist in the United States. We thank the President and his Administration for making college opportunity and affordability a key priority. Barriers to college access and success stifle the country's economic growth while widening the gap between the rich and poor and among students of different ethnic/racial backgrounds.

The Campaign for College Opportunity appreciates the opportunity to comment on the college ratings system framework. We hope to be a resource for the Department in the future and look forward to seeing how the program progresses. Please feel free to contact our Vice President of External Affairs and Operations, Audrey Dow, at [audrey@collegecampaign.org](mailto:audrey@collegecampaign.org) with any questions.

Sincerely,

Michele Siqueiros  
President  
The Campaign for College Opportunity