Comment on Proposed College Ratings Framework

Purpose
Since its inception, the Association of Big Ten Students has provided a voice for the over half a million Americans enrolled in our member institutions. Central to our mission has been a focus on the accessibility, affordability, value, and long-term effects of higher education in America. To this end, we are pleased to take advantage of the Department of Education’s offer to issue a public comment on its proposed college ratings system framework.

The following document was authorized at the January 2015 ABTS Conference in Evanston, IL, and is a summary of the discussions and research of a number of ABTS representatives since that time. Our intent is to assist the Department in its continued development of a ratings framework and to provide direction to elements of the framework in which we see potential, as well as those for which we seek further clarification. It is our hope that conversation surrounding the framework’s evolution will continue even after the comment period ends on February 17th 2015.

Comments
The Department's proposed ratings system places a strong commitment to "[helping] students and families make more informed choices during the college search and selection process." To this end, we are encouraged by efforts to increase transparency, especially financial transparency, throughout the higher education landscape.
We appreciate the suggestion to use metrics including frequency of Pell Grant usage among students and average loan debt. While these metrics have their limitations, they are well-known, reputable measures. We seek greater clarity from the Department regarding how the frameworks would work through some ambiguity within these measurements. For example, we would find it valuable to know how the ratings would reconcile Average Net Price with economic and utility variance in the value of a wide variety of housing and student service options at universities across the country. Such clarity would strengthen the Department’s ability to provide transparency on the vital question of college affordability.

However, we observe a two-pronged approach to creating transparency in the document informed by a philosophy, one that needs further clarification. The first facet is the aforementioned financial transparency, which we generally view favorably. The second is the provision of a value-based rating system, the metrics of which are derived from varied measures of institutional “value”. To this portion of the ratings framework we recommend caution. We believe that any attempt to measure the consumer value of an institution inherently makes certain presuppositions of the intrinsic value of higher education. In this case, such measurements presume that higher education’s most valuable purpose lies in how it affects the preparedness and economic impact of the workforce it prepares. These are vitally important considerations, but not the most important for young students and their families in making decisions about where to attend college, which the Department has valued highly in its statement of purpose.

By contrast, the Association of Public and Land-Grant Universities (APLU) has presented its own statement on evaluating the value of institutions of higher education. The report spends a great deal of effort balancing the different benefits that result from pursuing a college education, including Human Capital vs. Economic and Public vs. Personal benefit. By doing so, the APLU recognizes that, while the prospects of gainful employment should be recognized as a vital component of a quality education, other concepts such as social consciousness, personal health habits, and a greater diversity of individual skills can be just as valuable to the individual and, when taken in aggregate, have an equally positive effect on both the economy and national civic life.

Yet the Department of Education’s inclusion of metrics like graduate school attendance, completion rates, and other factors is based on a retrospective and economically-centered viewpoint. This limited view of the higher education experience would inevitably favor institutions specializing in more lucrative fields, such as finance.
and business, at the expense of institutions that specialize in other fields, such as teaching. We suggest that a clearer statement of how the Department views these metrics and their inherent value as measurements of higher education quality would be valuable.

In applying this concern to the metric of Graduate School Attendance, we would recommend examining the rate at which students are admitted only after applying, rather than measuring the rate as a whole. This allows for the ratings to gauge how an institution prepares its students for postgraduate education without penalizing the school for students that may choose not to pursue an additional degree.

The department acknowledges the need to account for the diversity of students and institutions alike, but its plan to accomplish this seems more conceptual than functional at this time. Without a more complete indication of how it will account for such variables, we believe it premature to include such measurements of “institutional value” as described above. However, with greater clarity of process, such an inclusion may become appropriate.

It seems most effective for the Department to instead focus its efforts on providing a clearer examination of the financial realities imposed by various colleges and universities, such as their average levels of debt and the rates of student loan defaults. These measurements are both more explicitly quantifiable and accurately measured than other questions of inherent institutional value and have the added benefit of being more closely related to the realm in which the federal government, by the Department’s own admission, can have its most effective impact on the system. That is to say, “[ensuring] the wise and effective use of the $150 billion invested in the federal student aid program annually…[and investing] federal aid where it will do the most good.”

Next Steps

We appreciate the opportunity to lend the voice of the students to this important discussion. It is our hope that we may continue to partner with the administration in seeking to renew the health and value of our rich tradition of higher education. In doing so, we look to leave for our peers who will follow us an even more stable and effective learning community. We encourage the Department to reach out to us should there be any way in which we can be of assistance and look forward to our continued partnership.