



National College Access Network

Building Connections. Advancing Equity. Promoting Success.

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Kim Cook

18 February 2015

Dear Mr. Secretary:

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

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



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

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

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

Sincerely,

A handwritten signature in black ink that reads "Kim Cook". The signature is written in a cursive, flowing style.

Kim Cook
Executive Director

Attachment

Ratings System Structure

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

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

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

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

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

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

Individual Metrics

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

Access Metrics

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

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

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

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

Affordability Metrics

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

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

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

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

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

Outcome Metrics

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

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

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

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

Ratings Tools for the Student Consumer

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

Features of the Online Tool

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



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

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

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

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

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

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



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

Integration with Other Federal Tools

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

Campaign for the College Ratings Tool

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

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