



American Federation
of Teachers, AFL-CIO

AFT Teachers
AFT PSRP
AFT Higher Education
AFT Public Employees
AFT Nurses and Health
Professionals

555 New Jersey Ave. N.W.
Washington, DC 20001
202-879-4400
www.aft.org

Randi Weingarten
PRESIDENT

Loretta Johnson
SECRETARY-TREASURER

Mary Cathryn Ricker
EXECUTIVE VICE PRESIDENT

VICE PRESIDENTS

Shelvy Y. Abrams
Mary J. Armstrong
Barbara Bowen
Linda Bridges
Elsie P. Burkhalter
Christine Campbell
Stacey Caruso-Sharp
Kathy A. Chavez
Melissa Cropper
Evelyn DeJesus
Marietta A. English
Eric Feaver
Francis J. Flynn
Andy Ford
Catalina R. Fortino
David Gray
David Hecker
Fedrick C. Ingram
Keith R. Johnson
Jerry T. Jordan
Dennis Kelly
Susan M. Kent
Ted Kirsch
Frederick E. Kowal
Karen GJ Lewis
Karen E. Magee
Louis Malfaro
John McDonald
Martin Messner
Daniel J. Montgomery
Michael Mulgrew
Ruby J. Newbold
Candice Owley
Andrew Pallotta
Joshua Pechthalt
Paul Pecorale
David J. Quolke
Stephen Rooney
Denise Specht
Tim Stoelb
Richard Stutman
Ann Twomey
Adam Urbanski

February 18, 2015

Mr. Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Ave. S.W.
LBJ Education Building, 7W311
Washington DC 20202

Dear Secretary Duncan:

On behalf of the 1.6 million members of the American Federation of Teachers, including more than 200,000 higher education professionals, I write to share our views of the college ratings framework that is meant to be the basis for a new federal college ratings system.

Like you, we believe in a higher education system that is accessible and affordable, and results in positive outcomes for students. We appreciate your acknowledgement of the diversity and complexity of our nation's many colleges and universities. We share your belief that the federal government should not act as a national governing board, making decisions about how every dollar is spent in an institution or exactly which inputs institutions must use. But we fundamentally disagree that a college ratings system established under the proposed framework will move us toward our shared goals, and we believe that such a system is in fact more likely to move us in the opposite direction.

The framework aims to rate an institution by identifying a few key outcome-based metrics, measuring institutions based on those metrics, and assigning a rating based on those measures. The stated goal of the department is to attach high stakes to these ratings by tying funding, through federal financial aid, to the rating an institution receives. We oppose this ratings system for several reasons: a lack of good data for meaningful outcomes; a belief that the punitive nature of these ratings will harm, not help, institutions move toward our shared goals; and concerns over the proposed timeline of the ratings. We discuss each of these concerns in more detail below.

Lack of meaningful data

Good data is the key to making a ratings system, like the one the department has proposed, work. But by the department's own admission, much of the data contemplated for use is problematic. Other key data is simply missing or excluded from the proposed metrics.

The framework lists many possible metrics, based on available data, discussing the shortcomings of each. We agree and share the concerns the department has identified regarding these data points. For example, the department acknowledges that the Integrated Postsecondary Education Data System graduation rate captures fewer than half of all students—yet puzzlingly still plans to use IPEDS as the basis for a graduation rate metric. And even if IPEDS data were complete, use of this metric—especially without knowing exactly how the department plans to weigh graduation rate—ignores the many missions of our institutions, especially those of community colleges, which strive to provide a wide range of services to their communities that result in positive student outcomes that may not be degree attainment. A focus on earnings could create a distorted incentive for institutions to steer students away from public education and other public sector work—work that is meaningful and valuable to the individual employee and society as a whole but that often results in lower wages than those in the private sector. The data available for this planned earnings metric is likewise problematic as it will only include students who received federal student aid.

The data this system leaves out is just as problematic as what data it includes. Missing is any mention of race or ethnicity data, which will make it impossible to track racial and ethnic disparities in whatever student outcomes this system does measure. This is a gross oversight, given that the Department of Education’s own data acknowledges that the gap in college attainment rates between black and white students has widened in the last 20 years.¹ The proposed metrics also fail to include data about students’ academic preparation before they reach college or university, such as high school GPA, SAT or ACT scores, or other proxies, even though we know that such preparation correlates closely with student outcomes.² It will be difficult, if not impossible, to track students who fall out of the narrow “first-time, full-time” category, obscuring the success of millions of students. In focusing solely on outcomes without any attention to inputs, the department is ignoring real student progress just because it does not meet its narrow definition of success.

The current framework also ignores other major factors in college quality: faculty working conditions and student support services. It is an appalling irony that contingent workers are expected to prepare students for careers with middle-class incomes and advancement opportunities while they are denied them. Contingent workers are teaching the majority of college classes today while receiving unreasonably low wages and benefits, and no job security (and as a result, no academic freedom protections); are often hired at the last minute before a term begins; and are provided little or no opportunity for professional development. Generally, those colleges serving the most students with profound education and financial needs often have an instructional staff that is the least supported to work

¹ National Center for Education Statistics, “Fast Facts: Educational Attainment,” <http://nces.ed.gov/fastfacts/display.asp?id=27>.

² College Board, “The SAT: Supporting Retention and Graduation,” <http://sat.collegeboard.org/landingpages/higher-ed>.

with students in an ongoing and intensive way inside and outside the classroom. By ignoring these factors, which we know make a difference in student success,³ the department ignores the substance of higher education itself.

Another area of missing data is that on for-profit colleges. The framework largely excludes for-profit colleges, which we know are some of the worst actors in the higher education sector, leaving their students with disproportionately high debt burdens and often valueless degrees. While the department claims that gainful employment regulations will ensure these programs are of high quality, we believe, as we have written elsewhere, that those regulations are not sufficient to prevent fraud and abuse.

In fact, taken as a whole, the outcome-based metrics highlighted in the framework result in what is really a job-readiness rating—not a college rating system that provides meaningful information about program quality or about the difference higher education makes in the lives of young adults.

Punishes, not supports

The current state of higher education is one of distress. Student debt is more than a trillion dollars, state funding has been receding for decades, and institutions are paying adjunct professors poverty wages to teach the majority of classes. We know what it takes for students to succeed in postsecondary education; research has shown that factors such as the ratios of full-time staff to part-time staff, advisers to students, and counselors to students affect student completion, as does the percentage of state investment in the higher education system.⁴ Yet instead of offering the supports we know would address the real problems our higher education system faces and improve student outcomes, this framework conflates accountability with improvement, extending to our higher education system the shame-and-blame accountability system that has failed our K-12 students. We have also seen this type of “performance-based” funding model tried in 26 states without resulting in meaningful improvements in student outcomes.⁵

The department seems to be operating under the theory that institutions will allocate their resources differently based on ratings outcomes, choosing to focus funding on inputs known to improve outcomes. This theory relies on the assumption that institutions have the resources at their disposal to make these

³ Adrianna Kezar, Daniel Maxey, and Judith Eaton, “An Examination of the Changing Faculty: Ensuring Institutional Quality and Achieving Desired Student Learning Outcomes,” CHEA Occasional Paper (January 2014), www.uscrossier.org/pullias/wp-content/uploads/2014/01/CHEA_Examination_Changing_Faculty_2013.pdf.

⁴ Washington State Board for Community and Technical Colleges, “Benefit Drivers Report” March 1, 2013.

⁵ Kevin J. Dougherty, Sosanya M. Jones, Hana Lahr, Rebecca S. Natow, Lara Pheatt, and Vikash Reddy, “Performance Funding for Higher Education: Forms, Origins, Impacts, and Futures,” *The Annals of the American Academy of Political and Social Science* 655, no. 1 (2014) 163-184.

investments— but this could not be further from the truth. States have been disinvesting in public colleges and universities for decades. Even in places where institutions are making the commitment to provide students with the supports they need to succeed, funding limitations are preventing these institutions from expanding their successful programs. For example, the Education Opportunity Program at the State University of New York, which serves economically disadvantaged students by providing financial aid and robust wraparound services, has graduation rates of over 70 percent but has seen its funding threatened again and again. In 2014, more than 30,000 students applied for only 2,500 available spaces. If our system of higher education is going to do a good job serving traditionally underserved populations, we must invest in programs, like the EOP, that provide everything from books to tuition to mental health counseling, to keep short-term difficulties from becoming a reason to leave school.⁶ These are the very services that have been threatened or eliminated over decades of state disinvestment.

Rating colleges based on outcomes while failing to account for the financial support available to those colleges is a glaring omission and must be addressed.

Sadly, we believe that the impact of this college ratings system may be the opposite of what is intended. It is very possible that when initial ratings are released, any problematic outcomes reported—even as the result of faulty or incomplete data—could undermine public confidence in a college, resulting in fewer federal, state and local resources provided to that institution. This, in turn, would make it even more difficult for the college to provide student supports, resulting in continued poor ratings, and so on. While we have no doubt that such a death spiral is not the department’s intent, the punitive nature of the ratings system—and lack of acknowledgement of the enormous role that state disinvestment plays in our current higher education system—may have this end result. This framework is likely to put the oldest, most prestigious and most well-resourced institutions at the top, which will do nothing to help the long-underfunded public higher education system that educates the vast majority of students.

Artificial timeline

Finally, we believe that the department’s expedited and artificial timeline is extremely problematic. A year and a half after President Obama first proposed developing a college ratings system, the framework makes it clear that the task is a complex one and that many questions remain. The framework document even admits that the lack of program-level data will obscure the tremendous variations within institutions. The framework is an outline for considering some type of college ratings system; it is not a proposed system ready for a test run and specific reaction. Yet the department has publically committed to having the ratings system finalized and implemented in the summer of 2015, and to putting it in place before

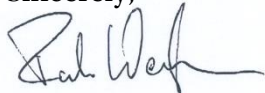
⁶ State University of New York, “Educational Opportunity Program (EOP) Information Summary – 2013,” www.suny.edu/student/downloads/pdf/eop_profile.pdf.

the 2015-16 school year, with the goal of tying funding decisions to the ratings by the 2018-19 school year. In other words, while it took a year and a half to come up with a list of questions to consider, the department now plans to finalize and implement the system in half a year. This rush to an arbitrary finish line does a disservice to students.

In conclusion

We share the department's goal of a higher education system that is accessible and affordable and that results in positive outcomes for students. And we know what it takes for students to succeed in postsecondary education: real investments in the classroom that provide the supports and resources faculty and students need. Unfortunately, this framework for college ratings uses problematic measures to create a punitive accountability system that does not provide those supports. The department should hit pause on this college ratings plan and focus instead on investments that will support our nation's higher education system.

Sincerely,

A handwritten signature in black ink, appearing to read "Randi Weingarten". The signature is fluid and cursive, with a long horizontal stroke at the end.

Randi Weingarten
President

RW:ct opeiu#2 afl-cio