

Boston University Enrollment & Student Affairs
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The Honorable Arne Duncan
Secretary, U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Via collegefeedback@ed.gov

Dear Secretary Duncan:

On behalf of Boston University, I am responding to the U.S. Department of Education's invitation to comment on a proposed federal college ratings framework. We endorse the comments submitted by the Association of American Universities, and wish to add our own. While we have reservations about a federal ratings system, we appreciate the Administration's continued focus on helping students make thoughtful college choices.

BU enrolls more than 16,000 undergraduates and provides over \$200 million in institutional financial aid each year. Our students choose BU for a variety of reasons, many of which could not be captured in a ratings system: academic rigor, urban location, diverse arts offerings, opportunities to be involved in research and scholarship with faculty, and myriad study abroad options, among others. Our views on the specific issues raised in the framework are as follows:

Ratings categories and institutional groupings

We recommend the Department consolidate its proposed three category rating system (high-performing, low-performing, and middle) into a single designation of "Department commendation." We understand the Department's efforts to highlight outstanding schools and bring focus to institutions that are lagging, but the current inconsistencies in the available data and the untested nature of a federal rating system make any greater distinction inadvisable. Such an endorsement will allow the Department to identify and work with struggling institutions while also reinforcing the perception that these efforts are a rating, not a ranking.

Data

We share the concerns many have raised about a ratings system based on federal data sources that are known to have numerous limitations. We urge the Department to have a process for institutions to review their reported data and ensure its accuracy. We also endorse the concept of "allowing institutions to provide alternative sources of data to supplement their information in the ratings system."

Metrics

Percent Pell: Pell grant eligibility and the percentage of a population receiving Pell Grants should not be used as a stand-alone measure of access, as it ignores families with significant financial need whose income just exceeds Pell eligibility.

First-Generation College Status: College access for first-generation students is important, but evidence suggests that students who complete the Free Application for Federal Student Aid (FAFSA) do not always report their first-generation status. This makes it an ineffective indicator.

Net Price by Quintile: Evaluating the net price by income bands using the actual family income and financial need the institution uses in determining financial aid eligibility would reduce the incentive for institutions to favor Pell recipients over other needy students, and would perhaps eliminate the need for net price calculators, as it would provide the consumer with more meaningful information.

Labor Market Success: We appreciate that the framework describes some of the challenges inherent in utilizing labor market success as a metric for a quality college experience. We are as proud of BU graduates who excel in public service and graduate school as we are of those who pursue lucrative careers. A federal ratings system should not conflate earnings – which are very difficult to quantify – with the value of college attendance.

Graduate School Attendance: While we are pleased the Department recognizes graduate school attendance as an important outcome for college graduates, the presence of graduate loans in the National Student Loan Data System for Students is not an accurate measure for this outcome, as the framework rightly points out. Many doctoral students do not utilize loans since their course of study is funded through other means, including, in the STEM fields, funding through research assistantships by other government agencies.

Ratings web site and transparency tools

In the spirit of simplification, we recommend consolidating the College Scorecard, Data Navigator, and federal college ratings into a streamlined source of information for students and families. Multiple tools may result in inconsistent information for families, which is detrimental to the Department's ongoing simplification efforts, students, and the institutions being rated.

We support the framework's assertion that the Department must implement consumer testing of the ratings web site and associated tools to ensure they are truly useful to students and parents.

Thank you for your consideration of our feedback on the ratings framework.

Sincerely,

A handwritten signature in dark ink, appearing to read "Laurie Pohl". The signature is fluid and cursive, with the first name "Laurie" written in a larger, more prominent script than the last name "Pohl".

Laurie Pohl

Vice President, Enrollment and Student Affairs

cc: Robert A. Brown, President
Jean Morrison, University Provost and Chief Academic Officer
Jennifer Grodsky, Vice President of Federal Relations