



February 17, 2015

The Honorable Jamiene Studley
Deputy Under Secretary
Office of the Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Deputy Under Secretary Studley:

The National Association of State Directors of Career Technical Education Consortium (NASDCTEc) and the Association for Career and Technical Education (ACTE) would like to submit the following comments on the Administration's recent draft College Ratings Framework. Our organizations represent the broadest spectrum of the Career Technical Education (CTE) community with regards to secondary, postsecondary, and adult CTE throughout the country. We applaud the President's continued focus on college affordability, student access to postsecondary education and outcomes at a time when our nation's students and families are struggling with the rising costs of college, and with their employment prospects following the completion of a postsecondary education.

While we believe that the federal government has a vital role to play with regards to these three areas—particularly in providing accurate and transparent postsecondary performance data for public consumption—we do not believe the creation of a federal ratings system will ultimately accomplish the Administration's intended objectives. The current proposal's three broad "ratings" of high, medium, and low performing institutions carry with them inherent value judgments regarding the highly varied purposes and missions of postsecondary institutions and we are concerned regarding the Department's capacity to make this type of determination regarding an institution's value based on only a few data points.

However, we remain hopeful that future iterations of this ratings system will reflect the perspectives we've shared with you below as you continue to hone and improve this proposal in the coming years.

We have organized our comments around a selection of proposed metrics included in this most recent draft and have provided more general suggestions for ways to improve upon this proposal below.

Compare Programs, Not Institutions

The current draft ratings system seeks to compare a great variety of entities within our nation's postsecondary education system ranging from four-year baccalaureate degree granting institutions to two-year institutions awarding associate degrees and certificates. While we applaud the draft's effort to create separate groupings for these two broad institutional categories, we remain deeply skeptical that these groupings will fully take into account the diversity of these institutions in terms of size, student populations served, institutional mission, program offerings, and many other important factors. To build upon this aspect of the draft, we strongly encourage the Department to incorporate additional institutional characteristics such as program mix and institutional selectivity in order to account for the differences between institutions outlined above.

Many students seeking to enroll in postsecondary CTE have a limited set of institutions from which to choose and are oftentimes limited by geographic proximity. If the purpose of the draft ratings system is to provide more transparent information to students and families for the purposes of deciding between institutions, the choice will likely fall between two and four-year institutions rather than within one institutional grouping or the other. Alternatively, presenting information to students and families regarding the pros and cons of an institution's available programs would prove to be much more valuable for postsecondary education consumers. As a consequence, we strongly believe the focus of a ratings system should be on postsecondary *programs*, not institutions.

At the very least, making program-level information publicly and readily available would empower students to make more informed choices when selecting a pathway and also enable the Department to more accurately assess the employment and earnings outcomes of students in a more comparable and accurate fashion within the context of a ratings framework.

Develop and Implement Quality Data Systems

As with any endeavor of this type, a ratings framework for postsecondary institutions will only be as useful and effective as the underlying data and information that supports and informs it. In its current form, the draft framework proposes to measure the "labor market success" of an institution's students and possibly use earnings as a metric indicative of success. We remain concerned about any proposal that would use student earnings alone as a barometer of success. Factors such as local and regional labor market conditions, disruptions to the wider economy, and a host of other variables largely outside of an institution's control have an enormous impact on individuals' earnings.

As such, we believe that such a metric could unfairly penalize institutions if incorporated for evaluative purposes within this ratings framework. Instead, we urge you to include this as a public reporting requirement to increase public transparency and accountability, but do not support including an earnings metric as a way to “rate” a postsecondary institution.

As touched on earlier, the earnings associated with various degrees, programs and certifications can vary greatly even within a single institution. Using student earnings as a way to measure students’ and graduates’ labor market success would not take into consideration the important contributions relatively low-paying occupations, such as those in public service, would make to society more broadly. These types of contributions are critically important to take into consideration when “rating” postsecondary institutions as the framework proposes to do.

Those concerns aside, to implement this metric the Department would need to link Social Security or Unemployment Insurance (UI) wage data of individuals back to the institutions where they attended. However, even here challenges persist. Students will often attend more than a single college making the attribution of an individual’s earnings to one institution quite difficult. UI wage data in particular has several limitations including the exclusion of individuals who are self-employed, making this data incomplete at best.

The draft proposal also remains unclear as to whether students, graduates, or a combination of the two would be included in this measurement. With regards to this broad measurement, we would encourage the Department to only include an institution’s graduates, not all students who may have enrolled in a given academic year. This would more accurately assess the impact of a program or institution on student’s employment prospects. A combination of both short and long-term measures of labor market outcomes would also be needed to adequately capture student progress within the labor market. This would take more fully into account the many factors contributing to a student’s future earnings and employment prospects that are sometimes out of an institution or program’s control.

We also encourage the Department to take into consideration the characteristics of the students who are served. For instance, first-time or traditionally aged students (under the age of 24), typically have relatively little career experience when they enter into the labor market, which can have enormous consequences for earnings immediately following program completion. This further underscores the complexity of using earnings as a metric of success and the need for a combination of short and long-term measurements to truly capture a student’s later progress in the labor market over time.

The most effective way of calculating any measurement of student’s labor market success would be through the creation of a student unit record system— a proposal both of our organizations support within the context of the reauthorization of the Higher Education Act.

Until Congress and the Administration work toward the creation of such a system, we believe that attempting to measure the labor market outcomes of postsecondary students without the necessary data system infrastructure is ill-fated at best.

We therefore remain strongly concerned regarding the proposal to quantify something so complex within a three-tiered ratings framework which could be misinterpreted by the general public. While we acknowledge the utility in presenting this data to these audiences—particularly through a user-friendly online source—we encourage the Department to work with institutions to ensure they have the necessary resources to assist students in making informed choices regarding program selection and federal student financial aid.

We appreciate your consideration of these comments. We remain hopeful that as this ratings system continues to evolve, that much-needed improvements to the framework can be incorporated over the coming years. Should you have any remaining questions regarding the above comments, please contact NASDCTEc's Government Relations Manager, Steve Voytek (Svoytek@careertech.org) or ACTE's Legislative and Regulatory Affairs Manager, Mitch Coppes (mcoppes@acteonline.org) who would be happy to address any concerns.

Sincerely,



Kimberly A. Green
Executive Director
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Stephen DeWitt
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