



*If You Can Dream It, You Can Achieve It at an HBCU or PBI!*

**Postsecondary Institution Ratings Response**  
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## **I. Introduction**

The National Association for Equal Opportunity in Higher Education (NAFEO) is pleased to submit the following response to the request of the National Center for Education Statistics (NCES) for information about data elements; metrics; methods of data collection; methods of weighing or scoring; and presentation frameworks for Postsecondary Institution Ratings Systems (PIRS) used to assess the performance of institutions of higher education (IHEs) and advance institutional accountability while also enhancing consumer access to useful information.

The National Association for Equal Opportunity in Higher Education (NAFEO) is the only 501 (c) (3), not-for-profit membership association of the presidents and chancellors of the nation's richly diverse 105 Historically Black Colleges and Universities (HBCUs) and approximately 50 Predominantly Black Institutions (PBIs). NAFEO members are CEOs of 2- and 4-year public, private, land-grant, sectarian and non-sectarian, undergraduate, graduate and professional schools in 35 states, the District of Columbia, and Virgin Islands. They represent 500,000 students, 53,000 faculty, and 5 million alumni worldwide. NAFEO member institutions educate disproportionate percentages of low-income students.

A nineteen member NAFEO Assessment Council has identified a number of data elements, metrics, methods of data collection, methods of weighing or scoring, and presentation frameworks for PIRS for assessing the performance of their diverse students, disproportionate percentages of whom are low-income students, and measuring institutional performance. The most promising ones are discussed below.

We note at the outset that NCES concluded as early as 2006

*The United States “does **not** have one metric, or even a handful of common metrics, that could paint a picture of the accomplishments of its more than 2,500 four-year and 1,600 two-year institutions.” We concur with Dwyer, Millet & Payne (2006), “... there is no commonly used metric to determine effectiveness – defined in terms of student learning – of higher education in the United States.”*

The clarion call for accountability in higher education as exemplified in President Obama's plan for college affordability is reverberating throughout the nation's colleges and universities creating even more pressure to accomplish more with less. NAFEO member institutions know firsthand that the fierce competition for high-demand programs and students can rival a high-stakes football game on the gridiron. The defense on the field are HBCUs, PBIs, and some minority serving institutions competing against an offense of well-endowed institutions with the financial resources to lure students with state-

of-the-art sports facilities and high-end dorms featuring granite counter tops. It is within this hyper-competitive environment that NAFEO makes this submission of technical information that may be helpful in shaping President Obama’s proposed College Ratings System.

We believe that the right type of data gathering or the strategic organizing of currently collected data can assist institutions in better realizing their missions and can also assist in moving the nation to redoubling its effort in closing the achievement and attainment gaps and devising a comprehensive set of methodologies and performance metrics to level the education playing. The proposed **ratings system should** include risk-adjusted metrics; assess institutions on expansion of access and closing the achievement and attainment gaps; take into account the socio-economic make-up of students on a campus and the wealth of the institutions; include critical domains that align with employer priorities for college student success; incentivize and reward “affordability” and preparation of large percentages of low-income students for growth and high need disciplines; respect and align with regional accrediting standards; control for the vast differences between institutions, especially the mitigating and difficult barriers encountered by low-income, first generation students, and the fiscal challenges of the institutions that enroll disproportionate percentages of these students.

Studies that have measured the actual cost of educating low-income students reveal these costs to be significantly higher than educating more affluent students. A study by the New America Foundation found that at hundreds of well-endowed colleges, low-income students must still pay very high prices even after grant aid is applied. The paper, “Undermining Pell: How Colleges Compete for Wealthy Students and Leave the Low-Income Behind,”<sup>1</sup> demonstrates this occurs because these institutions prioritize not on the basis of need-based aid, but on the ‘relentless pursuit of prestige and revenue.’ President Obama has suggested that one of the goals of a new ratings system would be to incentivize more colleges and universities to graduate low-income students. The HBCU/PBI community shares this goal to be sure, however, a ratings system must first reward those colleges and universities that enroll disproportionate percentages of low-income students and provide them with incentives and adequate resources to continue doing so and to graduate these students on time. A new ratings system must reward institutions, like HBCUs/PBIs, that are graduating disproportionate percentages of low-income students, with cost-of-education grants.

The Advisory Committee on Student Financial Assistance, ETS, and other education research and assessment organizations have long affirmed that lower graduation rates at some institutions are directly correlated to the disproportionate percentages of low-income students enrolled. In Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance (July 2013), The Advisory Committee found a direct adverse impact on student 6-year graduation rates and the percentage of first-time students who are Pell recipients; the average test score of the student body; and level of endowment per student.

In addressing the above and other issues within the context of the Department’s proposed ratings system, ETS will partner with the NAFEO Assessment Council to assist the Department in devising the framework for a ratings system that is not only helpful to parents and students in making informed

choices, but also uses appropriate assessment metrics that shine a brighter light on institutional performance, student outcomes, and student diversity.

It is the tremendous diversity between higher education institutions that could spawn the greatest opportunity. The diversity of mission, resources, programs, institutional wealth and student socio-economic make-up inherent to all of higher education applies equally to the NAFEO community of member institutions. The HBCU and PBI cohort of nearly 200 richly diverse colleges and universities is neither well known nor understood. These institutions are public and private, 2 and 4-year, large and small, rural and urban. Spelman College and Sojourner Douglass College; Texas Southern University, Talladega College, and Trenholm State Technical share certain features, but there are enormous differentials in missions and resources between these institutions. And yet despite the diversity within the diversity of NAFEO member institutions, each institution shares one important trait that has persisted for the last 150 years: when the way ahead seemed impossible, and there appeared to be no way forward, they each found a way or else made one.

The paradox within the NAFEO community is that the accomplishments of HBCUs appear to starkly contradict the corrosive effects that *de jure segregation* and historic underfunding have exacted on these institutions. The Presidents and Chancellors who stand at the helm of NAFEO's member institutions have moved their institutions forward and continued to graduate disproportionate percentages of low-income students as well as others, including students of great advantage despite the persistent gap in institutional resources and their wealth gap, as documented by the National Science Foundation, a number of think tanks, executive, congressional, judicial and administrative bodies. HBCUs have developed, tested and they are honing models to improve their ability to graduate more, and more diverse students, and to increase the numbers of the growing populations they are graduating, including their historic base of low-income students. HBCUs can offer the nation a profound vision of educational excellence that can expand equity, access, and success for all students that has stood the test of time. The successes of the HBCU model for educating disproportionate percentages of low-income students is demonstrated by a few highlights of the many contributions made by HBCUs:

- HBCUs represent only three percent of all colleges and universities, yet they enroll 16 percent of all African Americans in four-year degree granting institutions;
- HBCUs graduate 30 percent of African Americans receiving four-year degrees, and 40 percent of African Americans receiving four-year degrees in the sciences, technology, engineering and mathematics (STEM areas);
- Eighteen of the top 23 producers of African Americans who go on to receive science-related PhDs are HBCUs;
- Four of the top 10 producers of successful African American medical school applicants are HBCUs. These HBCUs produce 20 percent more African American applicants than the other six institutions combined;
- Eight of the top 10 producers of African American engineers are HBCUs.

The tenacity, vision, innovation, determination, scholarship, affirmative actions and faith that produced the above results are the same qualities that must guide us as we work on the goals and objectives of the College Ratings System. The stakes couldn't be higher.

The following list of questions from a recent report by ETS<sup>ii</sup> and developed by an advisory panel of national assessment experts, including those in the HBCU and PBI communities, may provide a useful framework from which to begin consideration of how to develop appropriate performance metrics within cohorts. The report includes practical suggestions for improving, revising, and introducing comprehensive systems for the collection and dissemination of information on student learning outcomes. [Click here to access full report.](#)

1. Articulating Desired Student Learning Outcomes: What are the skills and abilities students must attain and for what purposes do we wish to document the results?
2. Assessment Audit: What existing evidence can address these student-learning goals?
3. Assessment Augmentation: What additional evidence is needed?
4. Refining the Assessment System: Is there a need for new assessments?
5. Learning from Our Efforts: What do the results from our assessment of student acquired skills and abilities tell us regarding each program?
6. What Institutional Changes Need to be Made to Address Learning Shortfalls and Ensure Continued Success?
7. Ensuring that a Culture of Evidence is Created Within the Institution: Continuing the effort over time and expanding to new areas of interest.

In the paragraphs below, we attempt to answer some of the above questions. We first contextualize the information being submitted.

## **II. Context for Information Being Provided**

We appreciate the Administration's effort to devise creative ways of providing additional information to assist students in selecting institutions of higher education that are aligned with their preparation and aspirations, and that offer good value at an affordable cost. We are grateful for the President's understanding of the importance of incentivizing colleges to enroll, retain and graduate more low-income, first generation and traditionally underrepresented students; and for proposing to reward those institutions that are graduating disproportionate percentages of these students. This is exceedingly important at this time in which the majority of students in the education pipeline are low-income students and students of color.

We also appreciate the efforts of the Administration in the proposed higher education affordability and value rating system to reward those institutions that are keeping their tuition and fees low. According to The College Board, HBCUs are leading the way in college cost containment. Private HBCUs are approximately \$10,000 per year less than their Historically White College and University (HWCU) counterparts. Public HBCUs are roughly \$2,500 per year less expensive than their HWCU counterparts. (*Trends in College Costs* 2012, The College Board.) HBCUs will continue to keep their costs lower to

keep open their doors of opportunity for all students, disproportionate numbers of whom are students of least advantage.

While the Administration feels the need to provide students and families with additional information about higher education institution “affordability and value,” we underscore the complexity of so doing, given the diversity of higher education institutions, the challenges associated with measuring success in higher education, and the Academic Freedom protections of higher education institutions. We stress the importance of getting this new initiative right prior to its roll-out. NAFEO and its HBCU and PBI member institutions look forward to working with the Administration, the Department of Education and other stakeholders to ensure that the “affordability and value” initiative is thoughtfully and scientifically crafted to be sound, compelling, and rooted in the best understandings of measurement and assessments, development and use of assessment tools. If a decision is made to proceed with some iteration of a new “affordability and value” initiative, it must comport with best practices, and be fair and equitable, measuring like institutions, missions, inputs and outcomes.

NAFEO and the HBCU and PBI communities of colleges welcome this opportunity to respond to the Department’s request for information today and to work with the Department and various stakeholders in the coming months as the stakeholder input is distilled and the proposed rating system takes shape. We want to add our important voice to the voices of the other stakeholders shaping the ratings system, and offer the expertise of our psychometricians and other assessments technicians.

The information we are providing today is the first of what we hope will be an ongoing engagement until the ratings system is designed and rolled-out.

### **III. The HBCU/PBI Cohort of Colleges<sup>1</sup>**

*“HBCUs are the Patron Saints of Universal Access”  
~President William Jefferson “Bill” Clinton~*

Sixty years ago, the 1954 Supreme Court decision of *Brown v. Board of Education* and its progeny focused national attention on the dual and unequal primary and secondary education systems, nationwide, and spurred two decades of litigation and legislation that were designed to redress the inequalities. The initial debate paid little attention to inequalities in higher education and did not focus on the nation's HBCUs as equal educational opportunity institutions until 1965. At that time, Congress recognized HBCUs as a solution to some of the nation's higher education problems when it added Title III, Part B, Strengthening Historically Black Colleges and Universities, commonly known as The Black College and University Act (BCUA), to the HEA.

BCUA defined an HBCU as a college or university that existed before 1964 with an historic and contemporary mission of educating blacks while being open to all. To be recognized and receive federal funding under the HEA, an HBCU must either be accredited by a nationally recognized accrediting agency

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<sup>1</sup> Taken from the Recommendations of the HBCU and PBI Coalition for the Reauthorization of the Higher Education Act, Submitted to the House Committee on Education and the Workforce at the Request of Chairman Klein, and Ranking Member Miller, August 2013.

or be making reasonable progress toward accreditation. There are currently 105 HBCUs located in twenty-five (25) states, the District of Columbia and Virgin Islands.<sup>2</sup>

Since the period just after the Civil War, HBCUs have recruited and enrolled, nurtured, developed and offered a personalized, welcoming and challenging environment to primarily African American students , some of whom might not have otherwise obtained a higher education because of race, ethnicity, gender, religion, socio-economic status or some other non-*bona fide* bar to admission in other institutions. HBCUs educate a disproportionate number of students of limited financial means. They have additionally served and are continuing to serve as resources for meeting the vital social service, economic, educational and recreational needs of the communities in which they are located. They are the economic engines for their service areas, and have a \$13 billion short-term direct economic impact in their communities.

HBCUs are not monolithic. This cohort of colleges is as richly diverse as the overall cohort of higher education institutions. There are 2- and 4-year colleges and universities, public, private and land-grant institutions; undergraduate, graduate and professional schools, and seminaries.

Despite being a small fraction of the larger community of higher education institutions, HBCUs have a strong track record of identifying students with strong potential, supporting them through graduation and producing exceptional leaders. HBCUs enroll more than 300,000 students, of whom approximately 80 percent are African Americans. While comprising only 4 percent of the nation's four-year colleges, HBCUs enroll approximately 21 percent of all African American undergraduate college students and confer 22 percent of all bachelor's degrees earned by African Americans, despite serving a community of students who many think are not capable of earning a college degree.

At a time when Congress and consumers are concerned about the cost of college, HBCUs offer students an accessible and affordable postsecondary educational experience. Moreover, they continue to do more for their students with fewer resources than other higher education institutions, on average, the cost of attaining a four-year degree at a public HBCU is approximately \$2,500 less per year than at a public historically white institution. Similarly, the cost differential for attaining a four-year degree at a private HBCU compared with private historically white institutions is approximately \$10,000 per year.

Importantly for the ability of the nation to realize its education, workforce and economic goals, HBCUs and PBIs are producing a diverse pipeline of the well-educated workers America needs to compete in the global economy. In particular, HBCUs are leading the way in producing highly skilled graduates, particularly in scientific, technological and other high-need fields.

- HBCUs produce 19 percent of undergraduate science graduates and 20.1 percent of black undergraduate engineering graduates.<sup>3</sup>
- Six (6) of the top twenty (20) institutions graduating blacks with baccalaureate degrees in science and engineering are HBCUs.
- Forty percent (40 percent) of African Americans receiving four-year degrees in STEM areas.

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<sup>2</sup> List names of HBCUs and states in which they are located.

<sup>3</sup> William R. Spriggs, Ph.D., (2013)

- Twenty-four percent (24 percent) of all PhDs earned each year by African Americans are conferred by twenty-four (24) HBCUs.
- Four (4) of the top ten (10) producers of successful African American medical school applicants are HBCUs.
- HBCUs not only graduate disproportionate percentages of blacks in STEM, they also graduate 50 percent of African American teaching professionals.



Black Baccalaureate Degrees in Science and Engineering All Institutions 2006-2010	207,022
Top 20 Institutions	29,977
Georgia State University	2,148
University of South FL, Main Campus	1,937
University of Maryland, College Park	1,885
<b>Howard University</b>	1,881
<b>North Carolina A&amp;T State University</b>	1,863
<b>Florida A&amp;M University</b>	1,806
<b>Spelman College</b>	1,559
University of Florida	1,487
Florida State University	1,479
University of Phoenix, Online	1,412
<b>Southern University and A&amp;M College</b>	1,391
<b>Morgan State University</b>	1,355

Source: Table 5-12 <http://www.nsf.gov/statistics/wmpd/race.cfm> (accessed January 2013)

HBCUs are the leading baccalaureate institutions of blacks who earn doctorates in Science and Engineering. Of the top ten (10) baccalaureate institutions for blacks who go on to receive a Ph.D. in Science or Engineering, nine (9) of the ten (10) are HBCUs.



Top 20 Baccalaureate Institutions of Black Science & Engineering Doctorates	Doctorate Recipients
<b>All Institutions 2006-2010</b>	5,804
Foreign or Unknown	1,747
Top 20 U.S. Institutions	1,713
Howard University	112
Spelman College	80
Florida A&M University	73
Xavier University of Louisiana	66
Hampton University	64
Morehouse College	61
Morgan State University	61
North Carolina A&T State University	49
Southern University and A&M College	46
University of Maryland, Baltimore County	46

Source: Table 7-10 <http://www.nsf.gov/statistics/wmpd/race.cfm> (accessed January 2013)

The top twenty-one (21) undergraduate producers of blacks in all disciplines who go on to receive Ph.Ds. are HBCUs.

HBCUs are playing an increasingly important role in offering unique and enriching educational opportunities that develop students’ human and social capital. HBCUs are at the creative forefront of American education, offering the tools and skills necessary to prepare students for today’s diverse, globally interdependent, and technologically advanced world. HBCUs prepare students to promote peace at home and abroad; secure our communities and our homeland; meet pressing global and community health care needs; and fight injustice with the power of ideas. They provide students with the intercultural, interpersonal and political skills with which to compete and thrive in a pluralistic world.

For over a century, HBCUs have provided a pathway to opportunity for diverse students, disproportionate numbers of whom are African American students. With approximately 45 percent of high school graduates expected to be traditionally underrepresented minorities by 2019-20<sup>iii</sup>, HBCUs, as well as MSIs, must play an even more significant and impactful role in producing excellent, diverse college graduates that the nation needs. HBCUs have contributed immeasurably to the economic, political, scientific, and social welfare of this country. Yet, the nation has only scratched the surface of their enormous potential.

As we consider ways and means of assessing student learning, “affordability and value”, HBCUs stand ready to be assessed against a reasonable cohort of their peers for the purpose of doing their jobs better.

#### **IV. Critical Components of a Ratings System**

##### **A. A Ratings System Must Assess Institutions on Expansion of Access & Closing the Achievement & Attainment Gaps**

President Obama established a goal of having the most educated nation in the world by 2020. This will require a dramatic increase in the numbers of Americans with some post secondary education—roughly 60% of Americans with a 2- or 4-year certificate or degree. This equates to approximately 8 million more Americans with a 2- or 4-year degree.

The Department of Education’s White House Initiative on HBCUs suggests that to realize the 60% goal, the nation must educate approximately 2 million more African Americans, with 167,000 of these students graduating from HBCUs. HBCUs currently graduate about 35,500 students per year. To meet the President’s goal, HBCUs will need to increase the number of students they graduate per year to more than 57,000 by 2020.

The United States is 13<sup>th</sup> in the world in educating its populace and the gaps are widening between race, income and ethnicity. The data elements, metrics, data collection, weighing, scoring, and presentation of any postsecondary institution ratings system must address the gap head on.

Demographic shifts, especially the growth in the Latino population, and the entrenched and accelerated wealth gap in the aftermath of the Great Recession, must measure the extent to which every institution is moving the nation closer to closing the achievement and attainment gaps. Closing the gaps is imperative for reaching our 2020 goal, imperative for global competitiveness, and imperative for expanding civic learning. In its report, *A Crucible Moment: College Learning & Democracy's Future*, AAC&U indicated that closing the gap is critical for the economic and civic health of our nation. To achieve the true benefits of a college “affordability and value” ratings system, the plan must incentivize and the metrics must measure the extent to which every institution is moving the nation closer to closing the achievement and attainment gaps.

Federal higher education policies and assessments must focus on enhancing access to and success in postsecondary education to be sure, but equally, they must move the nation’s diverse colleges and universities toward closing the achievement and college attainment gaps. While some progress has been made in this regard, closing access, achievement and attainment gaps between students from low- and high-income families and between students of color and white students, remains a significant issue for the nation. There is much work to be done and much more that the federal government can and must do. Only 19 percent of African Americans and 13 percent of Latinos, ages 25-34, have earned a bachelor’s degree or higher, compared with 36 percent of whites and 55 percent of Asians in the same age group.<sup>iv</sup> Only about 1 in 10 of young adults from families in the bottom income quartile earn a college degree by age 24, compared with about 8 in 10 of young adults in the highest income quartile.<sup>v</sup>

For millions of Americans, eliminating disparities in access, achievement and attainment is an essential, economic mobility pathway out of poverty and into the middle class. Without a college degree, children in families in the bottom income quartile have a 45 percent chance of remaining there as adults. With a degree, they have less than a 20 percent chance of staying in the bottom income quintile.<sup>vi</sup>

Addressing the achievement and attainment gaps becomes even more critical considering that students from racial and ethnic backgrounds will represent the majority of the traditional college-seeking population in the years ahead. Many of these students will be the first in their families to attend college. The Census Bureau projects that minorities, now 37 percent of the U.S. population, will comprise 57 percent of the population by 2060, with the total minority population more than doubling, from 116.2 million to 241.3 million.

**B. A Ratings System Must Foster and Reward Universities that Enroll and Graduate Disproportionate Percentages of Students From the Lowest Performing High Schools and Families of Least Advantage. It Should Not Measure Graduate Earnings or Student Loan Debt**

A ratings system must take into consideration the level of academic preparation of the general student body. Any metrics that might have a chilling and inhibitory impact on the colleges and universities that currently enroll a range of students including or disproportionately those from the lowest performing high schools and from families of least advantage must be avoided. It would be inimical to the national goal of having 60 percent of Americans with a 2-year certificate or 4-year degree, and contrary to the imperative of closing the achievement and attainment gaps. A ratings system that rates institutions based on graduate earnings and student loan debt would most assuredly deter enrollment and retention of low income, first-generation, and minority students, the fastest growing student populations in the nation. A consideration of graduate earnings should **not** be a measure of the quality of education. It would run counter to promoting and supporting public service and civic engagement, core American values. Using student loan debt as a criterion could be perceived as and might become a disincentive for low-income students to prepare for and aspire to attain a college certificate or degree. It would certainly lead colleges and universities to move away from educating the growing populations of this nation, disproportionate numbers of whom are low-income, first generation. **Neither criterion should be included in the assessment metrics.**

**C. A Ratings System Must Take into Account the Socio-Economic Make-Up of Students on a Campus (as Measured by Pell Grant Eligibility and Other Factors); the Wealth of the Institutions; the Mission, Vision, Values of the Institutions; the State Investment Level in Higher Education; the Extent to Which an Institution Enrolls and Graduates Veterans and Other Non-Traditional Students; the Geographic Area of An Institution; and Leveling the Playing Field**

There is a direct and determinative correlation between each of the above and student graduation rates. Unless each of the above factors is controlled for we will be advancing a ratings system that will yield a false and inequitable assessment. Neither students nor institutions should be assessed using yardsticks that are not designed to measure the realities of the universes and students being assessed.

Our position is underscored and supported by data from The Advisory Committee on Student Financial Assistance. To demonstrate the impact that serving low-income students can have on raw measures of college performance, the Commission explored “the relationship between 6-year graduation rates and three inputs: the percentage of first-time students who are Pell recipients, average test score of the student body, and level of endowment per student.” They found and reported to Congress that these three inputs are powerful determinants of 6-year graduation rates at nonprofit 4-year public and private colleges. They found:

- As the percentage of a college’s students who are Pell recipients (serving Pell recipients) rises, 6-year graduation rate declines from **80%** to **25%**, and average test score declines from **29** to **19**.
- Serving Pell recipients and average test score, combined, account for **76%** of the observed variation in 6-year graduation rates of 4-year public and private colleges.
- As endowment per student falls, serving Pell recipients lowers average 6-year graduation rate from **67%** to **28%** and from **85%** to **33%** at public and private colleges, respectively.
- Serving very high percentages of Pell recipients, with very low endowment per student, reduces average 6-year graduation rate to **23%** at public colleges and **19%** at private colleges.
- The more a 4-year college defines its mission as serving low-income students, and the more modest its endowment per student, the more its 6-year graduation rate will deviate from a valid and reliable assessment of its relative performance. Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance (July 2013).

#### **D. A Ratings System Must Incentivize and Reward “Affordability,” Preparation for Growth and High Need Disciplines and Service in Areas of Highest Distress**

The primary reason students give for leaving college without a college credential is that they cannot pay for their college expenses. At HBCUs, many, low-income and first generation college students who attend these institutions face significant financial challenges. They are more likely to have lower levels of academic preparation and need remedial education and more time to earn their degrees. They are more likely to face unmet financial need, requiring work and loan assistance to pay their college expenses after receiving available grant aid. This is the case even though HBCUs as a cohort are more affordable for students compared to other institutions. As an indicator of financial need, 62 percent of all HBCU students are Pell eligible and 41 percent of HBCU students come from families earning less than \$25,000. The economic recession, which disproportionately impacted low-income students, made it even more difficult for students at HBCUs and their families to afford tuition, fees, books, room and board, and other college-related expenses.

The federal government must invest more strategically in student financial aid given the substantial return on investment in higher education not only to individuals, but to society as well. The Pell Grant Program – the federal cornerstone of aid to low-income students – today covers less than 1/3<sup>rd</sup> of the average cost of college and represents less than 1/5<sup>th</sup> of all federal student aid. A ratings system must reward institutions that are keeping costs lower and preparing proportionately more under-represented students in growth and high need disciplines. HBCUs have provided **extraordinary** rates of return in relation to the comparatively **modest** investments that have been (and continue to be) made by the funding sources.

For years, The College Board has tracked and reported annually, *Trends in College Pricing*. The annual report relays information about the prices charged by colleges and universities, the changes year-to-year and over time, how the prices differ within and across types of institutions, states, and regions. *Trends in College Pricing* also provides statistics on the net prices that students pay after taking financial aid into consideration. “Highlights” in the 2013 *Trends in College Pricing* report indicates, “The story is a complicated one, with different students paying different prices at the same institutions, depending on their financial circumstances; on their academic qualifications, athletic ability, or other characteristics; and on their year or program of study.” The complexity of assessing “affordability” notwithstanding, The College Board’s “*Trends in College Pricing*” reports are deemed the gold standard bearers. The College Board has reported that the average price of a private 4-year HBCU is roughly \$10,000 less per year than the average price of a private 4-year Historically White College and University (HWCU); and that the average price of a public 4-year HBCU is roughly \$2,500 less than the average price of a public HWCU. This degree of relative affordability should be rewarded with targeted institutional support.

In determining college affordability, consideration should be given to the impact of state funding, which has been cut substantially in recent years. Consideration should also be given to the extent to which the colleges and universities maintain operational efficiencies; the extent to which they are graduating students in “debt relievable,” growth and high need disciplines and serving in underserved communities. Consideration should also be given to the percentage of an institution’s overall budget that is allocated to student financial aid.

## **E. A Ratings System Must Include Critical Domains that Align With Employer Priorities for College Student Success**

In a 2013 report titled, It Takes More than a Major: Employer Priorities for College Student Success, the American Association of Colleges and Universities identified from an online survey of employers conducted by Hart Research Associates on their behalf, the employee competencies and critical domains deemed most important to employers. The employers found the following to be the most important competencies for college graduates:

- Effective Oral and Written Communications Skills
- Critical Thinking Skills
- Complex Problem Solving Skills
- Innovation
- Digital and Information Literacy
- Teamwork
- Diversity and Cross-Cultural Competency
- Ethical Judgment
- Knowledge Application to Real World Settings

While possessing in-depth knowledge in a major and proficiency in research and the use of evidence-based analysis were deemed important, employers believe these competencies are “teachable” on the job.

A report of ETS, a global leader in student learning outcome assessments, contained findings closely aligned with those of AAC&U, in, “A Culture of Evidence: An Evidence-Centered Approach to Accountability for Student Learning Outcomes.”

Understanding that the purpose and value of a college education is far greater than preparing persons for the workforce, it is nonetheless an important and for many a predominant factor in choosing to pursue higher education. A rating system must, therefore, factor in employer priorities and what they deem the most important outcomes from the college experience.

## **F. A Ratings System Should Respect and Align with Regional Accrediting Standards**

Degree-granting institutions of higher learning are or are working toward becoming accredited by a regional accrediting body. The regional accrediting bodies serve as the common denominator for the accountability of the colleges and universities in its region. Each regional accrediting body reflects the core values, common practices, and quality controls for the institutions in its region. Their accreditation fosters a common yardstick, integrity, peer review, self-regulation and accountability. The regional accrediting bodies foster student learning outcomes and continuous improvement. A national ratings

system must respect and align to the extent possible, with the accountability measures of the regional accrediting bodies. Examples of the regional accrediting bodies outcomes guidance or requirements include:

- NCA-HLC Accreditation Standards' Core Component 3a – “The organization’s goals for student learning outcomes are clearly stated for each educational program and make effective assessment possible” and Core Component 4b – “The organization demonstrates that acquisition of a breadth of knowledge and skills and the exercise of intellectual inquiry are integral to its educational programs;”
- Middle States’ Accreditation Standard 12 requires an institution of higher learning to demonstrate that students are achieving proficiency in essential general education skills such as written communication, quantitative reasoning and critical analysis;
- SACS "Principles of Accreditation" Section 3.3.1: Comprehensive Standards — *The institution identifies expected outcomes, assesses the extent to which it achieves these outcomes, and provides evidence of improvement based on analysis of the results.*
- NEASC Standard 5.11: Faculty requires that *"the institution employs effective procedures for the regular evaluation of faculty ..."* and *"has equitable and broad-based procedures for such evaluation."*
- Standard D2 of the WASC Accreditation Standards, which states, *"Institutions will employ a variety of assessment strategies to evaluate student learning and*

## **V. HBCUs and PBIs Are Committed to Enhancing Student Learning, Increasing Institutional Effectiveness, and Developing Strategies for Building “Cultures of Evidence” to Scientifically and Equitably Demonstrate Learning Outcomes. Current Assessments Provide the Means to Measure**

America’s HBCUs and PBIs are committed to enhancing student learning and increasing institutional effectiveness. To some degree, current assessments provide the means to measure student -learning outcomes, which define what students should know, understand, and be able to do upon completion of a course of study. Accountability pressures from accreditors, federal and state agencies, have placed increased demands on our institutions and others to provide evidence of student learning. Colleges and universities increasingly must use assessments to determine student baseline competencies upon arrival in college and to demonstrate that students have acquired expected knowledge, skills and abilities from courses and programs upon completion. Institutions use these data to improve the curriculum and teaching. But determining what a student should know, understand and be able to do, and what s/he actually knows, understands, and can do, is a challenge even within a department or institution. Determining how to make this determination across richly diverse colleges and universities is rife with challenges. One unanticipated challenge may be the dubious constitutionality of a ratings system that would tie performance to increased student or institutional aid. Linking performance in the college ratings system to federal student and institutional aid (e.g., an increase in a student’s Pell Award or more affordable student loans, larger Title III awards for HBCUs), must be given thoughtful consideration and be mindful of Academic Freedom considerations.

Academic Freedom refers to the right of a university to determine on academic grounds, its educational mission, who to enroll, who will teach, how they will teach, what will be taught, and how the teachings will be measured, free from governmental intervention. See, Sweezy v. New Hampshire, 354 U.S. 234, 255 (1957) (“the four essential freedoms” of the university). Except in rare cases, Academic Freedom insulates higher education institutions from interference by the government. That is, academic institutions may freely determine, on academic grounds, who may teach, what may be taught, how it shall be taught, who may be admitted to study, See, Sweezy v. New Hampshire, Id., and how to measure the success of their academic curriculum.

HBCUs and PBIs are increasing student learning and institutional effectiveness by using a range of assessments that might achieve the value and affordability goals of President Obama’s proposed new outcomes initiative. Among the assessment that seventy percent (70%) of HBCUs began using in recent years and are finding helpful are three (3) ETS Student Learning Outcomes Services (SLO)] - a series of workshops that are designed to guide faculty, staff, and institutional leadership in using data to increase institutional effectiveness and student success. In using these tools, HBCUs have accelerated their institutional effectiveness and positioned to continue doing so. The likelihood is the 30% of HBCUs that are not using one of the above assessment tools are using an internal measure of student learning. HBCUs and PBIs are voluntarily positioning themselves to more effectively and efficiently meet challenges posed by accountability and accreditation standards.

The SLO workshops, which can be purchased as separate modules or as a set, take into consideration the entire “assessment process,” including identifying student learning outcomes, mapping curriculum and activities to SLO’s, designing or selecting assessments, gathering data, interpreting results, communicating results to stakeholders, and using results for improvement. There is an opportunity to deepen understanding gained from these workshops with follow-up on-site coaching for leadership and faculty. Student Learning Outcomes Services incorporates the knowledge base of ETS’ world-renowned expertise in educational assessment and measurement to provide institutions the training necessary to use assessments and student-learning data to improve teaching and learning and help institutions meet and exceed accreditation expectations. <sup>4</sup>

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#### **4 Brief Description of Overall SLO Services:**

##### **Student Learning Outcomes (SLO) Fundamentals**

What a student knows, understands, and can do is the fundamental basis for student learning outcomes. But how does a department come together to agree on these outcomes? How does agreement on student learning outcomes lead to better learning? This session engages faculty in the development of SLOs: how to decide what they should be, how to write them in a clear and concise way, and most importantly, how to make them meaningful to internal and external stakeholders. After establishing sound SLOs, the next steps in the process, introducing the fundamentals of assessment is discussed. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. Initial on-site coaching appointments extend from 1-2 days.**

##### **Mapping of SLOs to Assessments**

Reliable assessment results can only come from clear, well-established objectives. This session engages faculty in deconstructing a sample of pre-determined SLOs to develop a plan around how to actionably measure what a student knows, understands and is able to do upon completion of a course. Various types of assessment are discussed, including surveys, standardized assessments, and embedded assessments, among others, and their relative value in addressing various SLOs. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

##### **Data use 101**

Postsecondary education institutions are often inundated with data, but are unsure how best to turn it into actionable information that helps make the best decisions about policy and practices. Using principles from psychometrics, analytics, and organizational behavioral, this session helps institutions organize data and make sound inferences about effectiveness and student learning. By considering various forms

## VI. Final Thoughts

While these, our first set of technical recommendations, are not all encompassing, we underscore the importance for a ratings system to do the following:

- **Assess Institutions on Expansion of Access & Closing the Achievement & Attainment Gaps**
- **Foster and Reward Universities that Enroll and Graduate Disproportionate Percentages of Students From the Lowest Performing High Schools and Families of Least Advantage**
- **Establish Benchmarks in Reading, Math, Critical Thinking Across All Two- and Four-Year Higher Education Institutions**

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of data and a wide array of analyses, this session helps to inform decision making and improve practice in academic departments. **This module is an on-site 1 day event that can be used by various roles at the institution using multiple facilitators. Because of the nature of the offering, an hour webinar could be used to entice potential takers. Lastly, it directly relates to use and understanding of institutional data (information), and it creates the opportunity for on-site coaching. On site initial coaching appointments extend from 1-2 days.**

### **Leading Institutional Change Leadership**

At no time in our nation's history have postsecondary education institutions and their stakeholders been confronted with more change and increased expectations. Educational leaders cannot engage in leadership-as-usual. Amid a flurry of research and best practice, leaders are constantly faced with the challenge of implementing large, effective changes on campus, all while managing multiple internal and external stakeholders. This session presents a sequential model designed to not only identify the right institutional actions, but the most effective way to introduce them within institutions. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Organizing for Action - Targeted at leadership**

There are considerable challenges in responding to accreditation, accountability and federal and state mandates. When institutions are faced with significant external pressure or even a legal mandate, how do they address the mandate, change policy, mold organization behavior, and ultimately benefit students and the organization? Using real world examples of applying research-based and effective practice, key points in organizational change within institutions are identified and lessons are tied back to the issues on campus. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Assessment 101**

For evidence of student learning to be both sound and compelling, it must be rooted in an understanding of measurement and assessment, including proper use and development of assessment tools. Sometimes, a review of (or an introduction to) psychometrics and assessment can be useful in helping institutions ensure that they are getting the most from their assessments. This on-site one day informational session can be targeted to faculty or newer University Assessment Directors and others who would benefit from a review of test types and uses; test validity, reliability, and fairness; understanding scale scores; and basic statistics associated with assessment. **This model is an on-site 1-day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

### **Using Evidence-Centered Design to Create Valid and Reliable Assessments**

When introducing assessment at their institutions, many administrators and assessment leaders often hear from faculty, "But we're already assessing student learning in our classrooms. Why do we have to do this, too?" Indeed, faculty often write their own exams to measure what students have learned in class, but how can they be assured that the exam is really testing what they want it to test? How can faculty be assured that test scores accurately reflect claims they want to make about what students know? In this workshop, participants work collaboratively to design an exam using the principles of Evidence-Centered Design and learn how ECD leads to exams that are valid and reliable. **This model is an on-site 1 day event with significant coaching recommended as a follow-up. On site initial coaching appointments extend from 1-2 days.**

**\*Student Learning Outcomes (SLO) Fundamentals & Mapping of SLO and Objectives (Though these modules are one day events, they can be modified so that the one day event includes both).**

- **Take into Account the Socio-Economic Make-Up of Students on a Campus; The Wealth of the Institutions; the Mission, Vision, Values of the Institutions; the State Investment Level in Higher Education; the Extent to Which an Institution Enrolls and Graduates Veterans and Other Non-Traditional Students; The Geographic Isolated Area of an Institution; and Leveling the Playing Field**
- **Incentivize and Reward “Affordability,” Preparation for Growth and High Need Disciplines and Service in Areas of Highest Distress**
- **Include Critical Domains that Align With Employer Priorities for College Student Success**
- **Respect and Align with Regional Accrediting Standards**

As President Clinton aptly noted in announcing Executive Order 12876, Historically Black Colleges and Universities, renewing the White House Initiative on HBCUs in 1994, “HBCUs are the patron saints of universal access.” They are also among the nation’s most diverse higher education institutions with 15% student diversity on average, and 30% faculty diversity on average. (NAFEO Survey of Member Institutions 2006). They are vitally important for the nation’s economic success, for expanding financial freedom and justice. A ratings system must reward institutions, like HBCUs and PBIs that do the “heavy lifting” of educating low-income students, diverse students, and preparing them for the growth and high needs jobs and entrepreneurial opportunities of today and tomorrow; and for service in the areas of most distress across the nation. A ratings system must incentivize the investment of proportionately more of our public, private, and philanthropic dollars in these and similarly missioned institutions. The rating system should also incentivize other institutions to play a larger role in graduating the growing populations of this nation: persons of color, first generation and low-income students; persons with disabilities, and veterans. In the face of legal, ideological and financial pressures, the inevitability of a global future, the nation’s stretch goal of having all Americans with a 2- or 4-year degree by 2020, and the shifting higher education landscape, these recommendations are designed with today’s students and those of tomorrow in mind. Institutions will not raise their graduation rates, and the nation will simply not meet its goals to raise college attendance, retention and completion without paying attention to the core questions and recommendations contained herein.

We thank you kindly for affording us the opportunity to make this submission.

We stand ready to assist in any manner of means.

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Endnotes

<sup>i</sup> The article was written by Stephen Burd, a senior policy analyst at the New America Foundation, and evaluates how well individual colleges with varying resources serve low-income students. His analysis considers, for the 2010-11 academic year, the share of undergraduates receiving federal Pell Grants as well as the average net price paid by students whose families earn \$30,000 or less.

<sup>ii</sup> ETS, *A Culture of Evidence III: An Evidence-Centered Approach to Accountability for Student Learning Outcomes*: 2013. This paper presents a framework that institutions of higher education can use to improve student learning outcomes. It follows a second report, *A Culture of Evidence: Critical Features of Assessments for Postsecondary Student Learning*, which took a detailed look at current, state-of-the-art commercially available assessments. The report provides two- and four-year college and university presidents and provosts with a 30,000 foot overview.

<sup>iii</sup> Western Interstate Commission for Higher Education. 2012. *Knocking at the College Door: Projections of High School Graduates*.

<sup>iv</sup> U.S. Department of Treasury. 2012. *The Economics of Higher Education*.

<sup>v</sup> The Education Trust. 2013. *Doing Away with Debt*.

<sup>vi</sup> *Ibid.*