

August 31, 2015

The Honorable Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

As college and university leaders, we appreciate the U.S. Department of Education's responsiveness to concerns from the higher education community about a post-secondary rating system. Moreover, we support the Department's recent announcement that it is instead focusing on the development of consumer-focused tools with newly available data. This effort could benefit students and their families, policymakers, and the public by providing them with new comparison tools and additional information on post-secondary institutions. That is why we are writing you about the Student Achievement Measure (SAM), a voluntary web-based tool that allows institutions to show the progress and graduation of significantly more students than the federal graduation rate.

We know you share our belief that the most accurate data available should be used in order for these new tools to be effective and meaningful. Federal graduation rates as reported through the Integrated Postsecondary Education Data System (IPEDS) are a key piece of data likely under consideration for the new reporting tool. However, the commonly used federal graduation rate is limited to the success of first-time, full-time college students who graduate from their original institution. This has led to a misrepresentation of institutional performance because the federal rate does not account for the success of all students – particularly those students who attend multiple institutions.

This month a report from the National Student Clearinghouse revealed that more than one-third of the 3.8 million first-time, full-time students who entered college in 2008 transferred at least once within six years and nearly half of those students changed institutions multiple times. The pathways through which students attend college have evolved, but the method for calculating the federal graduation rate hasn't fully evolved to reflect student behavior. Even with the collection of additional outcomes data within IPEDS this fall, the ultimate graduation of a student who transfers cannot be recognized as a successful outcome by his or her original institution, and the school to which that student transfers doesn't receive credit for their contributions to the student's successful completion.

Using data from the National Student Clearinghouse, SAM is able to track the progress and completion of transfer students, part-time students, full-time students, and the outcomes of students who enroll in multiple institutions. Launched just two years ago, SAM has 575

participating institutions across all sectors of higher education. To date, the program is already reporting the progress and completion of over 570,000 students more than the federal government. Given the shortcomings of the federal graduation rate and the advantages of SAM, we were pleased that the Department publically indicated that it might allow institutions to include data from SAM within the proposed Postsecondary Institutional Rating System when it released the detailed framework in December.

We understand that the Department is now working through how SAM information can be included as a supplemental resource within the new transparency tools. We strongly support and encourage the inclusion of a dedicated link within the new tools that would allow institutions the option to link to their SAM data and provide additional information on the success of their students. Doing so would help ensure the integrity and reliability of the new consumer information and tools.

Thank you again for your work on this critical initiative. We are pleased to serve as a resource to you and the Department as you further develop this new and valuable tool for students and families.

Sincerely,
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