



February 13, 2015

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

Dear Secretary Duncan:

JOSEPH E. AOUN, PHD
PRESIDENT

NORTHEASTERN UNIVERSITY
COLUMBUS PLACE, SUITE 620
360 HUNTINGTON AVENUE
BOSTON, MA 02115-5000

PHONE: 617.373.2101
FAX: 617.373.5015
PRESIDENTAOUN@NEU.EDU

I write to offer my views on the Department of Education's draft ratings framework for assessing the performance of postsecondary institutions. As a threshold matter, Northeastern University shares the concerns some have raised about the ratings initiative, particularly with respect to the limitations and reliability of publicly available data and the likelihood that the rating system will be seen as a government-sanctioned effort to designate some institutions as winners and others, losers.

Nevertheless, a greater truth must not be obscured, namely, that enhancing transparency, improving access to reliable information for higher education consumers, and measuring student outcomes are eminently reasonable, appropriate, and worthwhile goals. The higher education community's responsibility to prepare students for a lifetime of personal fulfillment and professional success is a sacred trust. Parents and families have an absolute right to know the return they can expect from their higher education investment.

Regardless of whether a federal ratings framework ultimately enters into effect, Northeastern believes that institutions—*on their own*—must do more to provide consumers with information about student outcomes. This requires moving beyond input measures traditionally used by institutions to exclude applicants (and valued by some ratings publishers as the gold standard in selectivity) toward a continuum of value-added indicators measuring throughputs and outcomes. If we are to help students and families truly distinguish value and reduce costs, institutions must provide students with information not only about whether they can afford to attend a given institution, but also how likely they are to complete their degree on time, secure meaningful postgraduate employment or related experience, or advance to further education.

The Honorable Arne Duncan
February 13, 2015
Page two

In response to the Department's request for input on possible metrics to illuminate institutional value, below is additional information on a series of key indicators we call "The Northeastern Value Continuum." We would encourage institutions in our sector to make these readily available to consumers.

Throughputs. Research has increasingly shown that students' participation in experiential learning—whether service- or work-based—has a positive effect on career engagement, employment, and success. Moreover, there are several high impact learning practices, including participation in undergraduate research, community engagement and service learning activities, and global study, which correlate to stronger academic learning outcomes. Institutions should systematically track, measure, and publicize them.

Outputs. In today's global economy, an undergraduate degree is a prerequisite for employment. Therefore, the Department's inclusion of graduation rate as a foundational outcomes measure is well founded. In addition, the Department's emphasis on the Pell-eligible student population, including encouraging institutions to enroll more Pell-eligible students, is laudable. But a better measure of an institution's ability to transform the lives of its underserved and first-generation students—not to mention the government's return on its substantial student aid investment—is Pell completion rate. Moreover, providing consumers with a snapshot of graduates' actual employment outcomes would address a glaring deficiency of the 2013 White House College Scorecard. In contrast to salary data, which only reinforces that some careers tend to be more lucrative than others, actual employment rates would demonstrate how well an institution prepares all of its graduates for professional achievement. Finally, consumers want to know whether an institution's alumni believe the school prepared them well for career and personal success. Many institutions, including Northeastern, have tracked this type of outcome for several years.

As others have noted, we urge that any affordability metrics make note of the substantial and unprecedented investments many institutions are making in student financial aid to assist low- and middle-income students. For example, this year alone, Northeastern provided more than \$220 million in institutional aid to its students, which allowed the university to meet full need for its entering class.

We are pleased that the current draft framework incorporates many of the comments we made previously in response to the Department's 2013 Request For Information. In particular, we are encouraged by the move away from a summative letter grade rating system that would render many important value metrics virtually meaningless. Similarly, we support the effort to consider the many different types of institutions serving traditional and non-traditional students in order to reflect and make meaningful the broad diversity of the various postsecondary sectors. Further, we support the goal of recognizing institutional progress, as well as identification of those that do not sufficiently progress over their previous performance.

The Honorable Arne Duncan
February 13, 2015
Page three

We hope this feedback will be helpful to you going forward, and we would be happy to work with the Department to convene stakeholders in further structured discussions, particularly with respect to development of additional outcomes measures. While it would be convenient for the higher education sector to dismiss measuring outcomes as unworkable, we cannot afford to ignore students and families who are demanding transparency and clear information about value. They need to make informed choices, and institutions must assist them. I look forward to continuing to partner with you on our shared goals of strengthening the federal investment in student aid, improving opportunity, and measuring student outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Aoun", with a horizontal line extending from the end of the signature.

Joseph E. Aoun
President