

**Congress of the United States**  
**Washington, DC 20515**

March 10, 2014

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

Dear Secretary Duncan:

We are proud to represent Massachusetts, home to numerous diverse and thriving colleges and universities, all committed to providing excellent educational opportunities for our students. Since the release of the “President’s Plan to Make College More Affordable,” we have had the opportunity to meet with leaders of our educational institutions, as well as representatives of various educational associations, to discuss the President’s proposal for a new rating system. As the U.S. Department of Education works to develop the rating system outlined in the President’s plan, we write today to provide you with our comments, in the hope that we can assist the Department in the difficult task of designing this new system.

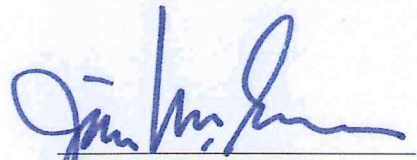
Specifically, we are concerned about the metrics that are currently used to calculate graduation rates. It is our understanding that the current calculation only captures data concerning first time freshmen, and does not include students who are returning to school after an absence or consider that students may transfer from one institution to another. This concern is especially prevalent in the Northeast, where students have many transfer options due to the large number of educational institutions. It should also be noted that educators have raised the concern that this metric relies solely on the time it takes to graduate, and does not address quality of education or learning outcomes. In considering how to incorporate graduation rates into the rating system, we ask that you account for populations and metrics not currently reported in the data.

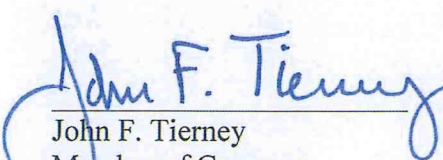
Additionally, as you work to establish these ratings, we ask that you carefully consider the use of post-graduation employment data, taking into account that career choice is not only driven by money. In particular, we remain concerned by the potential for a reliance on first year post-graduation salaries alone. Assigning one average salary to each institution may not accurately reflect the successes of students post-graduation, and does not take into account other important factors like job satisfaction. For example, students who choose public service or the non-profit sector may receive lower starting salaries than their peers, and while these recent graduates have productive and important careers, their total earnings could decrease an institution’s salary average. We are also concerned that utilizing the average salary for students one year after graduating does not appropriately reflect the long-term value of higher education, and could devalue liberal arts degrees. The Department should consider these observations, and work to provide students with an accurate picture of post-graduation successes.


We strongly support efforts to increase access to higher education and make college more affordable, and appreciate the work of both you and President Obama to achieve these goals. As you continue your review of the formal comments submitted, and work to develop this rating system, we ask that you carefully consider the metrics used for calculating graduation rates and capturing graduate employment data.


Thank you for your steadfast commitment to quality, affordable, and accessible educational opportunities, and for taking the time to review our comments. Please do not hesitate to contact us should we be of further assistance.

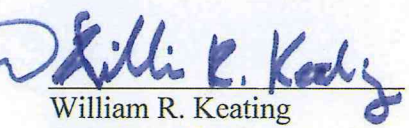
Sincerely,

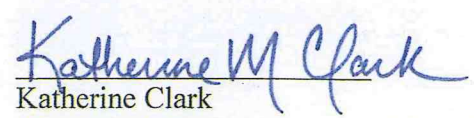
  
James P. McGovern  
Member of Congress

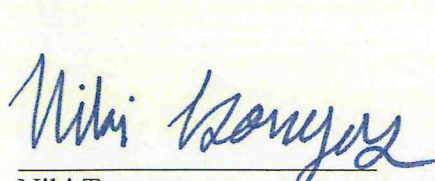
  
John F. Tierney  
Member of Congress

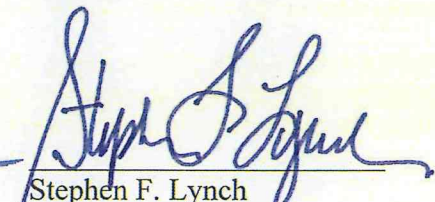
  
Richard E. Neal  
Member of Congress

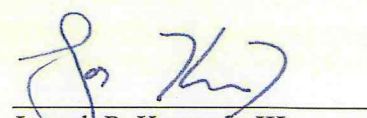
  
Michael E. Capuano  
Member of Congress

  
William R. Keating  
Member of Congress

  
Katherine M. Clark  
Member of Congress

  
Niki Tsongas  
Member of Congress

  
Stephen F. Lynch  
Member of Congress

  
Joseph P. Kennedy III  
Member of Congress