

October 21, 2015

Jamienne Studley
Deputy Undersecretary of Education
U.S. Department Of Education
Office of Postsecondary Education
1990 K Street, N.W.
Washington, DC 20006

Dear Ms. Studley:

As the president of Grove City College, one of many institutions excluded from the recently released federal College Scorecard, I am writing to share my concerns about the online tool's equity and effectiveness.

Grove City College is a well-respected, regionally accredited liberal arts college that routinely achieves high retention and graduation rates, low student loan default rates, and outstanding graduate job placement rates—all at a price well below the national average. Simply put, Grove City College is a unique option for students seeking a college education that offers both excellence and value.

Although eligible to participate in the Title IV federal student loan program, Grove City College has chosen not to accept federal grants or loans in any form in order to safeguard our independent status. We do, however, voluntarily submit most of the data requested annually by the U.S. Department of Education's National Center for Education Statistics (NCES) for inclusion in the Integrated Postsecondary Education Data System (IPEDS) database.

Our Vice President for Enrollment, Dr. John Inman, wrote to the College Scorecard Help Desk on September 14, 2015, to inquire about Grove City College's exclusion from the online tool. The response he received stated that "the Scorecard site is limited to Title-IV participating institutions that predominately grant 2-year and/or 4-year degrees." This stance is troubling for two reasons.

First, including only Title IV participating institutions in the College Scorecard creates structural inequities. Because the College Scorecard is an official website of the U.S. Department of Education, it is likely to be viewed as an objective and legitimate showcase of all postsecondary institutions worthy of consideration by prospective students. By choosing to exclude well-regarded and appropriately credentialed institutions simply because they do not accept federal assistance, the Department of Education has likely fostered skepticism among the general public regarding the academic quality of these colleges. It is also sending the wrong message to schools that benefit taxpayers by not depending on federal financial assistance. These are unfortunate and unjust outcomes.

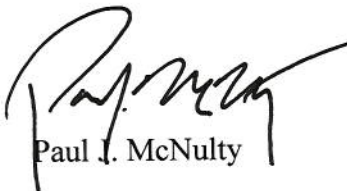
Second, by excluding a number of institutions, the Department of Education has rendered the College Scorecard less effective in achieving its purpose as a consumer information tool. Whether the information presented by the College Scorecard is accurate is the subject of considerable debate, but it is by no means complete, and prospective students have no way of knowing that the website actually presents an artificially limited pool of institutional options. As a rule, consumer information tools, especially those sanctioned by the federal government, should err on the side of presenting more information, not less. Otherwise, measures intended to advance the common good can actually do it great harm.

To remedy the inequities and inefficiencies inherent in the current website, I respectfully request that the College Scorecard's homepage be updated to include a disclaimer that:

- (1) Clearly informs users that the website does not include all Title IV eligible institutions, and
- (2) Provides links to the homepages for each excluded college.

As the former president of a well-regarded liberal arts college, you undoubtedly understand the challenges that omission from a federal consumer information website would present to your institution. As a current federal official, you also understand the importance of providing public resources that contribute to, rather than undermine, the common good. I appreciate very much your consideration of my proposal to strike a balance between protecting institutional and public interests.

Sincerely yours,



Paul J. McNulty