February 17, 2015

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

Dear Mr. Secretary:

I join with colleagues at other private colleges and universities, including through the National Association for Independent Colleges and Universities (NAICU) and sister Jesuit colleges and universities through the Association of Jesuit Colleges and Universities (AJCU), to express my concern about the proposed federal rating system.

At The University of Scranton, we are committed to the core principles you have expressed through your proposal: access, affordability and transparency. To this end, we feature the Net Price Calculator prominently on our website, and have assembled information about student outcomes, student financial assistance, health and safety, intercollegiate athletics and other campus information on our Consumer Information website as part of our response to the Summary of the Higher Education Opportunity Act (HEOA) reauthorized in 2008. Moreover, we participate in the consumer search tool, University and College Accountability Network (U-CAN), to further help students and parents make an informed choice about whether The University of Scranton is right for them.

We are also making every effort to meet the financial needs of students and to reduce expenses to keep college affordable, as we respond to market pressures and, most importantly, to concerns expressed by students and families about college cost. Specifically, we have kept our tuition increases at the lowest levels since the 1970’s. Last year we increased our financial aid by more than $1 million, awarding more than $60 million in student aid. Financial aid represents 30% of our budget. In just the last year, we reduced our budget by more than $4 million. The University of Scranton is not unique among colleges and universities to exercise fiscal restraint in this pressured environment, a process that I believe will bear fruit as higher education is increasingly challenged to provide value by those most important judges and critics: prospective students and their families.

What particularly troubles me about the proposed rating system is its inability to capture what makes colleges and universities unique and especially well suited for particular students. For example, the rating will not be able to communicate adequately how The University of Scranton, a Catholic and Jesuit university, seeks to provide our students
with a transformational educational experience that is faith-based and grounded in the
liberal arts, while preparing them for immediate employment or graduate studies. It will
not be able to show sufficiently how many of our students combine career-focused
majors, such as pre-med, nursing or education, with studies in philosophy, theology and
literature in ways that will help them encounter future ethical and moral dilemmas with
depth and nuance. It will not be able to encompass our deep commitment to service and
community engagement that combines our students’ academic study with experiences
that prepare them to become “men and women with and for others” in a broken world. It
will not describe our attention to “cura personalis” – care of each person in his or her own
 uniqueness – which empowers our faculty and staff to help each student achieve her or
his God-given potential. In sum, it will not communicate what is special about Scranton
or about the many other colleges and universities that have helped young men and
women open their minds, search their souls, and become thoughtful, caring and
compassionate citizens. Indeed, as our colleagues at NAICU have stated,

The values that the federal government has an interest in, and their relative worth,
may not be the same as those for a student who is searching for a school that best
fits his or her needs. For example, that a college is related to a particular church or
faith may be the most important factor to a particular student, but not a highly-
rated value by the federal government.

At Scranton, we remain committed to providing transparency to our consumers and to
maintaining affordability in an increasingly competitive environment. The federal
government can encourage and support this process in a variety of ways. I do not believe
the rating system to be your most effective tool. In this regard, I agree with a bipartisan
group of members of Congress in their conclusion that the current “oversimplified federal
rating system will lead to less choice, diversity, and innovation and should be rejected.”

Increases to Pell grants to help serve those students most in need are an important federal
effort that I applaud. Moreover, a reinvestment in campus-based aid programs would help
us at Scranton better serve our low-income students.

As I have stated here, we share many of the same goals. Moreover, like many other
presidents of independent colleges and universities, I firmly believe I am addressing
important concerns related to the future of higher education through concerted and
committed efforts – efforts that must be undertaken not as mere adherence to regulation,
but as fundamental to the survival and success of our institutions, and that of our students
and graduates.

Thank you for providing this opportunity to share with you my feedback and I appreciate
your consideration of these concerns.

Sincerely,

Kevin P. Quinn, S.J.
President