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#####RE: Comment on Student Assistance
General Provisions-Student Right to Know, OMB Control Number: 1845-
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Because the nature of your comments is about the expansion of information that a postsecondary institution is required to disclose to potential students, students and staff, and would likely require either statutory or regulatory changes, I have forwarded your email and the supporting report to the Policy Planning and Innovation staff in the Office of Postsecondary Education for review and consideration.

Thank you again for your time and thoughtful comments.

Sincerely,

Beth Grebeldinger

U.S. Department of Education
Federal Student Aid
Policy Liaison and Implementation

From: Kantrowitz, Mark [mailto:Mark.Kantrowitz@Monster.com]
<mailto:[mailto:Mark.Kantrowitz@Monster.com]>
Sent: Thursday, August 23, 2012 6:54 PM
To: IC DocketMgr
Cc: Kantrowitz, Mark
Subject: Comment on Student Assistance General Provisions-Student Right to Know, OMB Control Number: 1845-0004.

I am writing to comment on the Notice of Proposed Information Collection Requests; Federal Student Aid; Student Assistance General Provisions-Student Right To Know, 2012-20775, Student Assistance General Provisions-Student Right to Know, OMB Control Number: 1845-0004 <<http://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=1845-0004>> , that appeared at <https://federalregister.gov/a/2012-20775>.

These regulations require colleges and universities to disclose the following information:

- Employment and placement rates
- Retention rate of first-time, full-time undergraduate students
- Completion and graduation rate

The data is also disaggregated by gender, race and grant/loan assistance.

The US Department of Education should consider requiring disclosure of the following additional information:

1. Cohort default rates and/or loan repayment rates. Requiring disclosure of institutional loan repayment rates would be superior to disclosing default rates because the loan repayment rates are less prone to manipulation. If disclosure of cohort default rates is required, it should be supplemented with disclosure of economic hardship deferment, forbearance and delinquency rates.
2. Average undergraduate debt at graduation and the percentage of undergraduate students graduating with debt, preferably disaggregated by degree level (Bachelors, Associates, Certificate) in addition to overall statistics.
3. Completion rates not just for first-time, full-time undergraduate students, but also figures for transfer students and part-time students.

Requiring disclosure of this additional information would help families make more informed decisions about college costs, college affordability and college quality.

The US Department of Education should also consider implementing the recommendations in the NPEC report:

Patricia Steele, Matthew Reed (Chair), Sandy Baum, Victor Borden, Nancy Borkow, Bryan Cook, Archie Cubarrubia, Rita Grogan, Tammy Halligan, Gigi Jones, Mark Kantrowitz, Christine Keller, Lesley McBain, Elise Miller, Shirley Ort, Brian Prescott and Dawn Geronimo Terkla, Suggestions for Improvements to the Collection and Dissemination of Federal Financial Aid Data <<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=NPEC2012834>> , NPEC 2012834, October 2011.
<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=NPEC2012834>

Mark Kantrowitz

Publisher of Fastweb.com and FinAid.org

Author, Secrets to Winning a Scholarship

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