

Congress of the United States
Washington, DC 20515

March 22, 2013

Gabriella Gomez
Assistant Secretary for Legislative and Congressional Affairs
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-3100

Dear Assistant Secretary Gomez:

It has been brought to our attention that the College Scorecard, a program administered by the College Affordability and Transparency Center under the United States Department of Education, has assigned Marylhurst University in West Linn, Oregon a zero percent graduation rate. The fact that Marylhurst graduated 204 students in 2012 demonstrates the need for major modifications to the Scorecard.

We believe the discrepancy is the result of the College Scorecard using an out-dated and flawed formula that fails to recognize the changing nature of higher education while doing an injustice to institutions, such as Marylhurst, with a student population that deviates from the traditional definition of “undergraduate.”

The College Scorecard’s ratings are based on the six-year graduation rate for full-time undergraduates who have not previously enrolled in college. This formula totally ignores two important facts: the dramatic technological and economic changes rippling through the country and the world and that people re-enter college at different times in life. The dynamic and accelerating rate of change in the U. S. economy and culture in the 21st Century requires continuous educational opportunities. As a primarily nontraditional student-serving institution, Marylhurst achieves great success in offering such opportunities, educating those who are returning to college as well as others who do not fall under the out-dated definition used by the College Scorecard to measure graduation rates.

Marylhurst University offers very few lower division courses, largely serving students with prior college credit, rather than traditional entering freshmen. The result is that the College Scorecard lists Marylhurst University as having a zero percent graduation rate when in fact it awarded 204 bachelor’s degrees in 2012.

The College Scorecard graduation rate formula radically misrepresents and penalizes Marylhurst because of its emphasis on serving nontraditional students. As a result, prospective students who rely on the College Scorecard may be led to believe that Marylhurst does not succeed in graduating its students when, in fact, just the opposite is true. Furthermore, the scoring points to the broader need for better data on part-time and transfer students.

We strongly support improved access to transparent information about colleges and universities, but the information provided must be as accurate as possible so that we are

not yet have any indication of how the Department plans to make such adjustments, it will take months if not years to correct the misinformation. Accordingly, we request that the Department of Education take immediate steps to adjust the formula to reflect Marylhurst's actual graduation rate or apply a new category of N/A, with appropriate disclaimers, to recognize Marylhurst's success in adapting to the changing needs of 21st Century students.

We appreciate your due diligence and immediate attention to updating the College Scorecard to accurately reflect the work of Marylhurst and other nontraditional student-serving institutions. Thank you for your consideration.

Sincerely,



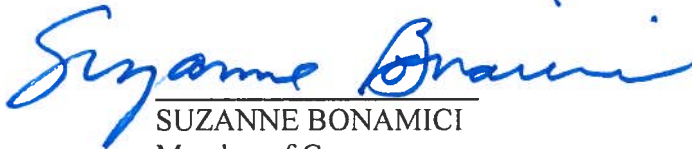
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