Ms. Jean-Didier Gaina
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW, Room 6W232B
Washington, DC 20202

August 1, 2016

RE: DOCKET NUMBER ED-2015-OPE-0103

Dear Ms. Gaina:

As the Executive Vice President of Monroe College, I write regarding the proposed Defense to Repayment Rule ("Rule") as published in the Notice of Proposed Rulemaking on June 13, 2016.

At Monroe College, we have consistently championed an approach to higher education that focuses on:

- **Student outcomes** across all institution types
- **Constructive** policies that encourage and permit responsive actions from institutions that positively impact students
- **Transparency** in data and process

Our comments on the Rule focus on two areas:

- A concern that the proposed Repayment Rate Warning does not adequately protect or inform students and reflects a flawed approach that jeopardizes the entire Rule
- Risks stemming from an overly broad Borrower Defense Framework will lead to unintended consequences that harm community colleges, HBCUs, and other institutions that provide access to underrepresented students

For 83 years, Monroe College has consistently produced some of the best outcomes in the country for urban and low-income minority students. We have one of the highest graduation rates and one of the lowest default rates for the populations we serve. We are proud of the recognition we have earned as a model for increasing student access and the resources we allocate to student support services, including financial literacy, student loan counseling, remediation and career services.

Given that Monroe is located in the poorest congressional zip code in the country, we are a laboratory for many of the great higher education policy debates, particularly those that relate to access for minorities and low-income students, graduation rates, student debt, college readiness, or employment outcomes. We relentlessly work to serve our students' best interests first, and have created an institutional culture and academic framework that enable us to support their personal and academic development needs beyond traditional classroom learning.

Monroe College has a strong history of partnering with the Department whenever possible to share our insights and feedback. Given our location and the student populations we serve, we have a particular vantage point on how national policy impacts underrepresented students, and value the opportunities given to share our observations and perspectives. These comments are consistent with that practice, and are submitted in a spirit of collegiality to produce the most fair and effective higher education policy.

Under the Obama Administration, there has been considerable policy attention and regulatory might focused on the for-profit sector for reasons well-covered by the national media. Institutions with weak outcomes or unscrupulous practices warrant a swift, punitive response from the Department, whatever sector they are in.

Our concern and, indeed, our primary purpose in submitting this public comment, however, is that this regulation will impact far more institutions than the bad actors in the proprietary sector, which is its core target. Many community colleges and HBCUs are also rendered vulnerable for reasons to be outlined shortly, and that could potentially stifle access for countless students already underrepresented on campuses nationwide.

The Department's discordant philosophies on higher education policy for the proprietary sector versus all other institution types are already resulting in separate and unequal protection of students and the institutions themselves. Generally, students at for-profit institutions with weak outcomes are afforded far more compassion, public outcry, and regulatory protection than their counterparts at public or non-profit colleges. Whereas there is a clear sense of paternalism with respect to students at for-profit institutions, that same level of protectionism and interventionism is lacking when it comes to students at other higher education providers.

We respectfully ask the Department to carefully weigh the comments and insights that follow, and examine how recent regulatory actions might be adversely impacting the "wrong" students and colleges and not holding accountable institutions whose poor student outcomes strongly suggest they are not deserving of such favor.

A detailed discussion of our perspectives and observations follows.

Deficiencies in the Proposed Borrower Defense to Repayment Rule

I. The proposed Loan Repayment Warning fails to adequately protect or inform students, and does not provide the necessary data to judge institutional quality. Such flaws jeopardize the Rule's integrity.

A. The Department's multiple repayment rate formulas are causing significant confusion and are insufficiently transparent. There needs to be a single, accurate, and fair formula that has been subject to review before a punitive regulatory framework is implemented.

The Department of Education has already devised and implemented three repayment rate formulas — one affiliated with the College Scorecard, for which some limited data are available to the public, and one for the 2014 Gainful Employment Rule, for which no supporting data have ever been published. In addition, the Department proposed an alternate repayment rate formula in the first Gainful Employment Rule. Accordingly, the formula proposed in the current NPRM used to calculate "repayment rates" would represent the fourth unique repayment rate formula. *(See Appendix A: Multiple Repayment Rate Formulas)*

The multitude of formulas, their complexity, and the lack of transparent data on which to judge their validity should give the Department reason to pause before implementing a new repayment scheme, especially one that is punitive in nature and applicable to only one segment of higher education.

B. The argument that only students at for-profit colleges deserve warnings about low repayment rates does not withstand scrutiny.

The Department justifies its proposal that only students at for-profit institutions deserve the benefit of low repayment warnings by arguing that weak repayment outcomes are concentrated in that sector and that the "administrative burden" for the other sectors does not justify requiring warnings from those other institution types, regardless of how low their repayment rates may be. This position does not serve students well.

To justify singling out only one sector, the Department states:

> *"For instance, a preliminary Department analysis of the College Scorecard five-year undergraduate repayment rates (using a comparable threshold of 50 percent of borrowers or fewer making progress on their loans) shows that more than 70 percent of institutions with a repayment rate below the threshold are proprietary institutions, and those institutions represent more than two in five of all proprietary institutions."*

Unfortunately, the Department's analysis fails to tell the whole story.

For your consideration:

1. **Almost 75% of HBCUs have five-year repayment rates below 50% *because they serve low-income students*, including some very high-performing institutions such as Grambling State and Morgan State, which have repayment rates of 40% and 47%, respectively.** *(See Appendix B: HBCUs with Repayment Rates 50% or Less)*

   From College Scorecard data: Sixty-one (61) of 85 HBCUs serving 90,434 borrowers have five-year repayment rates below 50%.

   HBCUs with lowest five-year repayment rates:

Institution	5 Year Repayment Rate
Arkansas Baptist College	20%
Lane College	22%
Texas College	24%
Central State University	28%
Livingstone College	29%

2. **Many public colleges also have low repayment rates because they serve low-income students.**

   From College Scorecard data: One hundred and fifty-one (151) public colleges serving 165,939 borrowers in repayment have five-year repayment rates at or below 50%. *(See Appendix C: Public Colleges with Repayment Rates 50% or Less)*

3. **Private non-profit colleges serving low-income students are not immune to low repayment rates either.**

   From College Scorecard data: Seventy-one (71) private two- and four-year colleges serving 70,505 borrowers in repayment have five-year repayment rates below 50%. *(See Appendix D: Private Colleges with Repayment Rates 50% or Less)*

Repayment rate data across all institution types clearly show that the problem is not unique to the for-profit sector and that student demographics play a role. For this reason, the Department should abandon the Repayment Rate Warning requirement.

C. The five-year data are unreliable. Using three- or seven-year repayment data is more appropriate.

One of the most interesting aspects of the Scorecard data relates to the trend of three- and five-year repayment rates. Generally, one would expect repayment rates to improve each year as borrowers' earnings increase. Yet, surprisingly, that's not what we found looking at the data.

- *Forty-three percent (43%) of private, non-profit colleges (541 out of 1,246) have five-year repayment rates that are lower than their three-year repayment rates.*
- *Twenty-five percent (25%) of public colleges (370 out of 1,497) have five-year repayment rates that are lower than their three-year repayment rates.*

Monroe College's three-year repayment rate is 57%. Our five-year rate is 50% and our seven-year rate is 57%.

A look at the schools with the largest variance in three- and five-year Scorecard rates demonstrates the pattern:

Top Five Variances in 3- and 5- Year Scorecard Repayment Rates

Institution	Scorecard 3-Year	Scorecard 5-Year	Variance
MacCormac College	69%	34%	-35%
Universidad Del Este	49%	18%	-31%
Remington College-Colorado Springs	70%	42%	-28%
Opportunities Industrialization Center	63%	42%	-21%
Pontifical Catholic University of Puerto Rico-Arecibo	62%	44%	-18%

There's a counter-intuitive anomaly with the data that needs closer inspection and verification by the Department before it implements penalties associated with a five-year repayment rate.

D. It is unclear whether the repayment rate data presented in the Scorecard are accurate.

When the Department published the Scorecard repayment rates, Monroe College attempted to verify our published rate by replicating the data the Department presented. To date, we have been unable to reproduce the Department's published rate. The explanation that accompanies the Scorecard Repayment data states that it reflects:

> *"The share of students who have repaid at least $1 of the principal balance on their federal loans within three years of leaving school."*

Although somewhat opaque, the statement is commonly taken to mean that the repayment percentage published on the Scorecard represents the percentage of students in repayment *who have lowered their principal loan balance* at the end of three years.

The FY 2009 repayment data published in 2010 during the first Gainful Employment negotiations should give the Department reason to pause. That Rule required a repayment rate of 35% to pass and measured the total dollars in loans that positively amortized against all that were in repayment for three years.

With that data, the Department also identified the number of students who positively amortized their loans versus all students in repayment. What we cannot reconcile is how the loan repayment results from that FY 2009 data doubled (or more) under the Scorecard formula. To illustrate, we compared the repayment rates for HBCUs.

The rates for Alabama A&M more than doubled from 21% to 44%, Grambling University almost tripled from 12% to 35%, and our rate at Monroe College went from 25% to 57%. *(See Appendix E: HBCU Repayment Rate Comparison)*

We are unsure of what accounts for the dramatic increase in published repayment rates from the FY 2009 GE repayment rate data as, to our knowledge, no explanation has been provided.

In addition, the data presented in *A Crisis in Student Loans?*, by Looney and Yannelis[1] of the U.S. Department of the Treasury and NYU's Stern School of Business, respectively, seems to contradict the Scorecard data. In Table 8 of their paper, they report that in 2012:

- 57% of all students had negative amortization two years out
- 74% of students at for-profit colleges had negative amortization two years out
- 64% of students at public and nonprofit two-year colleges had negative amortization two years out

This data are hard to reconcile with the three-year Scorecard data illustrated below, which shows that:

- 93% of private non-profit colleges have repayment rates above 50%
- 83% of public institutions have repayment rates above 50%
- 55% of for-profit institutions have repayment rates above 50%

With respect to the variation in the Scorecard's published repayment rates, our staff surmises that the actual repayment rate includes students who are making payments, but are enrolled in income-driven and other repayment plans that are negatively amortizing.

We respectfully seek the Department's response and clarification on the incongruities.

1. Looney and Yannelis, A Crisis in Student Loans? https://www.brookings.edu/bpea-articles/a-crisis-in-student-loans-how-changes-in-the-characteristics-of-borrowers-and-in-the-institutions-they-attended-contributed-to-rising-loan-defaults/

E. The proposed repayment rate formula inappropriately penalizes institutions for students choosing income-driven repayment plans.

The Department's methodology fails to properly account for the impact of special repayment plans that financially savvy borrowers are selecting in increasing numbers. These Income-Driven Repayment Plans (IDRs) enable students to reduce their payments based on their family size and income levels. For example, a non-traditional student with a $25,000 loan, three dependents, and an income of $50,000 would pay $113 monthly with an IDR as opposed to $265 monthly without one. During the Gainful Employment comment period, the Department took the position that schools with large populations of borrowers opting for IDRs must be low-performing. While we are not sure of the rationale for this assumption, we feel compelled to point out that choosing an IDR is, in many cases, a wise financial decision.

Given the financial benefits, it was no surprise to the College when students began to select IDRs in large numbers in 2013. Two years later, in 2015, New York State introduced a new program called *Get on Your Feet*, which entitles students to have New York State make their monthly payments for two years as long as they select an IDR and meet certain other criteria.

This new program makes the selection of an IDR almost a given in New York State for a non-traditional student. As such, schools like Monroe College that serve a large population of these students saw an uptick in the number of students choosing IDRs; those institutions will have difficulty meeting the 50% repayment threshold. Looking at Monroe as an example, we estimate that 35 out of every 100 students in our 2014 loan cohort will select IDRs in order to reap all of the benefits identified above.

F. Repayment rates reflect student demographics, not institutional quality.

As a Gainful Employment negotiator in 2013, I spent many, many hours researching repayment rates. Working with Mark Schneider of College Measures, we analyzed the FY 2009 Institutional Repayment Rates the Department issued in 2010. Around the country and across sectors, the findings clearly showed that *low-income students are less likely to repay the principal on their student loans.*

The oft-quoted Looney and Yannelis[2] study notes how non-traditional borrowers are much more likely to struggle with repayment, while high-income students are more likely to repay the principal on their student loans. Thus, institutions that enroll a higher percentage of high-income students who borrow will have higher repayment rates while institutions that enroll a higher percentage of students receiving Pell will have lower repayment rates. This Rule does not take these established patterns into account.

According to the College Scorecard data, Monroe College had a 57% three-year repayment rate and a 50% five-year repayment rate, which is just on the cusp of failing this formula. If we enroll 10% more high-income students who borrow, the repayment rate is going to increase. Our institution will not have changed at all, other than the addition of more high-income borrowers in the classrooms. Such an "easy fix" could not have been the Department's intention.

2 http://www.brookings.edu/about/projects/bpea/papers/2015/looney-yannelis-student-loan-defaults

G. For repayment data to be meaningful, the demographic of the students in repayment should be transparent.

Since student loan repayment characteristics should logically match broader consumer loan repayment trends, one would expect that the higher the percentage of low-income students in the pool, the lower the repayment rate. The Rule does not account for this in a way that allows for a true reflection of institutional performance.

For example, at Monroe College, our Title IV student population is more than 80% "Pell-eligible" and our five-year repayment rate is 50%. Assume the students in repayment perfectly reflect our Title IV population. Looking downtown at New York University, its five-year repayment rate is 91%. However, the data do not reflect what percent of those students in repayment are Pell-eligible, obscuring how those low-income students perform repaying their loans. The repayment rate formula masks this important information.

A college with a repayment pool consisting of 70% Pell recipients with a repayment rate of 49% is performing much better than a college with a repayment pool consisting of 20% Pell recipients with a repayment rate of 55%. Yet, the proposed methodology does not take this into consideration.

For repayment rates to be meaningful, we respectfully suggest that the Department, at the very least, disclose the percentage of Pell recipients in the repayment pool or, preferably, adjust the threshold to reflect a higher percentage of Pell recipients at an institution.

H. Contrary to the Department's assertion, the proposed repayment rate methodology does not correspond to the five-year Scorecard data and is much more punitive.

The Department has offered very little explanation or justification for introducing a fourth formula to calculate repayment rates. The only guidance offered is a statement indicating that results under this new formula would roughly reflect the College Scorecard five-year rates[3].

The Department indicated that the 50% threshold was set after an analysis of the Scorecard's five-year undergraduate repayment rates showed that 70 percent of institutions with 50 percent of borrowers or fewer making progress on their loans were proprietary institutions.

If analysis of the Scorecard data is the basis for the 50% threshold in the proposed regulation, the repayment rate should be calculated with the same methodology. The Department's decision to construct a new methodology makes the stated basis for the threshold illogical and puts the entire regulation in jeopardy.

3 Source: NPRM, June 13, 2016: "For instance, a preliminary Department analysis of the College Scorecard five-year undergraduate repayment rates (using a comparable threshold of 50 percent of borrowers or fewer making progress on their loans) shows that more than 70 percent of institutions with a repayment rate below the threshold are proprietary institutions, and those institutions represent more than two in five of all proprietary institutions."

II. Risks stemming from an overly broad Borrower Defense Framework will lead to unintended consequences that harm community colleges, HBCUs, and other institutions that provide access to underrepresented students.

The Department's rhetoric suggests that it invisions all defense to repayment claims to be aimed at for-profits. The data and arguments below illustrate how public and non-profit institutions would be vulnerable to student claims.

A. Institutions that provide access to non-traditional and underrepresented students will be at risk.

On July 21, a group representing the interests of HBCUs sent a letter to Secretary John King outlining their concerns, which we share. The letter states:

> *"This regulation could undermine financial viability and potentially put them [HBCUs] out of business….Should a disgruntled former or current student at an HBCU feel "misrepresented" by their institution by any means, the broad language outlined in the proposed ED rule could open the floodgates for frivolous lawsuits that will only adversely affect the greater HBCU student body."*

We believe that this risk to HBCUs is real, especially if one sets aside their historic mission of providing access for underserved communities and looks systematically at their Scorecard data for graduation rates, default rates, repayment rates, and debt-to-earnings rates.

B. Schools with default rates higher than graduation rates are at risk.

The chart on the next page illustrates the risk should a disgruntled student claim that his or her institution should have warned, for example, that student borrowers there are more likely to default on their loans than graduate (or that students are unlikely to be able to repay their loans based on repayment rates below 50%).

A little more than two years ago, *The New York Times* published an editorial that called for the loss of Title IV eligibility for proprietary institutions where default rates surpass graduation rates.[4] From that piece:

> *"…But a startling analysis released in the Spring by The Institute for College Access and Success, a nonprofit research group, found that even some programs where defaults outnumber diplomas would remain eligible for aid under the proposed rules."*

Interestingly, neither the *Times* nor TICAS noted that, according to a July 2013 *USA Today* article, *College Default Rates Higher than Graduation Rates*[5], there are 58 community colleges with default rates higher than graduation rates. In addition, close to one out of five HBCUs have default rates higher than graduation rates. *The outcomes data for many of these institutions are worse than that of Corinthian College, where the Department has approved to date more than $170 million in borrower defense to repayment claims.*

4 *The New York Times,* July 8, 2014: *"Lessons of a For-Profit College Collapse"* (http://www.nytimes.com/2014/07/09/opinion/lessons-of-a-for-profit-college-collapse.html?_r=0)

5 *USA Today,* July 2, 2013: *"College Default Rates Higher than Grad Rates"* (http://www.usatoday.com/story/news/nation/2013/07/02/college-default-rates-higher-than-grad-rates/2480295/)

If having a higher default rate than a graduation rate defines a poor-performing institution, as the *Times* seems to argue, then a disgruntled student at any institution with such outcomes could plausibly argue that failure to disclose it is an act of omission that qualifies as a material misrepresentation under the proposed NPRM.

As a result, any school with high default rates would be at risk under the NPRM.

HBCUs with Default Rates Higher than Graduation Rates

Institution	Graduation Rates	Default Rate (FY12)
Allen University	19%	29%
Arkansas Baptist College	5%	25%
Cheyney University of Pennsylvania	17%	27%
Denmark Technical College	15%	27%
Edward Waters College	20%	24%
Harris-Stowe State University	7%	26%
Hinds Community College	18%	24%
Huston-Tillotson University	22%	23%
Jarvis Christian College	18%	22%
Le Moyne-Owen College	13%	21%
Lincoln University	20%	21%
Livingstone College	24%	25%
Paul Quinn College	13%	28%
Southern University at Shreveport	13%	19%
Southern University State Community College	15%	17%
St. Paul College	21%	25%
Texas College	13%	26%

***Community Colleges with Default Rates 15 Points Higher than Graduation Rates**

Institution	Graduation Rates	Default Rate (FY12)
Ivy Tech Community College	5%	22%
New River Community College	5%	21%
Wayne County Community College District	7%	28%
Clark State Community College	7%	25%
Columbus State Community College	7%	23%
Reading Area Community College	7%	25%
Henry Ford Community College	8%	23%
Klamath Community College	9%	33%
Chattanooga State Community College	8%	28%
Dyersburg State Community College	8%	27%
Kalamazoo Valley Community College	10%	25%
Owens State Community College	10%	28%
Sinclair Community College	10%	26%
Mountwest Community and Technical College	10%	32%
Lane Community College	12%	31%
West Virginia Northern Community College	12%	32%
Umpqua Community College	13%	39%

* There are an additional 41 community colleges with default rates greater than graduation rates.

C. Schools with high default rates and numbers of defaulters are at risk.

Nothing is more catastrophic for a student borrower than default. As one website put it, *"If education debt is evil, then defaulting on your student loans is a one-way ticket to hell."*[6]

The consequences are indeed severe. A student borrower that defaults faces any number of long-term financial challenges, including ruined credit, possible wage garnishment, a debt that is non-dischargeable in bankruptcy, the inability to seek future grant aid, and problems securing employment due to bad credit.

There are 27 HBCUs with default rates above 20%, as well as 392 other public and non-profit colleges with default rates above 20%.

We believe that the consequences associated with default are so much more severe than those associated with low repayment rates, that warnings for *defaults* would be more appropriate than warnings for low repayment rates.

The 10 Community Colleges with the Highest Number of Defaulters

Institution	Cohort Default Rate	Number of Defaulters
Ivy Tech Community College of Indiana	22%	4,269
Columbus State Community College	23%	2,052
Owens State Community College	28%	1,449
Wayne county Community College District	28%	1,120
Kirkwood Community College	23%	1,061
Austin Community College	22%	1,037
Lansing Community College	26%	980
Sinclair Community College	26%	970
Portland Community College	20%	972
Columbia Gorge Community College	20%	972

6 *FastWeb*, May 28, 2015: *"The Horrors of Defaulting on Education Debt"* (http://www.fastweb.com/financial-aid/articles/the-horrors-of-defaulting-on-education-debt)

D. Public and nonprofit colleges with high institutional debt-to-earnings ratios are at risk.

With its Gainful Employment Rule, the Department concluded that academic programs at certain institutions where students' monthly payments on their debt exceeds 8% of their monthly earnings are so deficient that they warrant closure. Despite multiple requests to produce similar data for degree programs at public and nonprofit colleges, the Department has refused. Fortunately, the Scorecard provides median debt and median earnings on an institutional basis.

There are well over 100 non-profit institutions with institutional debt-to-earnings rates above 8%. There are 28 public institutions with debt-to-earnings rates above 8%. Again, the GE Rule has set a quality measure precedent that will boomerang back under Borrower Defense to Repayment to hurt programs that are exempt under the former but beholden to the latter. *(See Appendix F: Public D/E Rates and Appendix G Non-Profit D/E Rates.)*

Without question, students who have been misled or defrauded by their higher education providers deserve relief from the burden of onerous student loan debts that they took on in good faith. However, the community colleges, HBCUs, and private colleges serving low-income students that would now be put at risk by this well-intended, but too broadly written regulation deserve the Department's consideration and protection as well. To do otherwise would be counter to the Administration's heightened focus on improving access for the very student populations these institutions serve.

While the Department has made some data available through the Scorecard, we believe the data have not been properly vetted. That concern, coupled with the inability to replicate the published figures and the lack of a universal repayment rate formula, makes clear that the metric should be abandoned as a punitive yardstick.

We respectfully submit the above comments, concerns and observations to the Department in the spirit of collegiality and with the hope that they will be carefully considered as it finalizes its Borrower Defense to Repayment Rule.

Regards,

Marc M Jerome

Marc M. Jerome
Executive Vice President

Appendix A: Multiple Repayment Rate Formulas

2011 Gainful Employment Regulation

Methodology: Based on 3-4 years after entering repayment. Calculation utilized full dollar of loans being repaid.

Negatives: By utilizing the full dollar amount of loans being repaid in the numerator, the repayment rate could be skewed by the size of the loans being repaid. Time period of 3-4 years was too short, given that many borrowers opt for plans with reduced payments early in the repayment period.

Positives: Repayment Rate was expressed as a percentage, which made it both measurable and intuitive. Limited consideration was given to Income Driven Repayment Plans.

2014 Gainful Employment Regulation

Methodology: Based on 3-4 years after entering repayment. Calculation was based on numbers of students repaying loans.

Negatives: Time period of 3-4 years was too short, given that many borrowers opt for plans with reduced payments early in the repayment period. No consideration was given to students in Income Driven Repayment Plans.

Positives: Repayment rate was expressed as a percentage, which made it both measurable and intuitive.

College Scorecard

Methodology: Based on three years after entering repayment. Calculation based on numbers of students "who have repaid at least $1 of the principal balance on their federal loans within three years of leaving school."

Negatives: Time period of 3-4 years is too short, given that many borrowers opt for plans that reduce payments early in the repayment period. No consideration was given to students in Income Driven Repayment Plans.

Positives: Repayment rate was expressed as a percentage, which made it both measurable and intuitive.

Borrower Defense NPRM

Methodology: Based on five years after entering repayment. Calculation based on dollars, being repaid, using a Median percentage.

Negatives: The rate calculation is not intuitive, not easily replicated and almost impossible for the institution to monitor and predict. It is not consumer friendly. Medians could cause many scenarios where the outcome is misleading. No consideration was given to students in Income Driven Repayment Plans. 5 year rates often decline from 3 year rates.

Positives: Longer time period than other methodologies.

Appendix B: HBCUs with Repayment Rates 50% or Less

Institution	Scorecard % of Borrowers Repaying After 5 Yrs (FY08 & FY09 cohorts)
Arkansas Baptist College	20%
Lane College	22%
Texas College	24%
Central State University	28%
Livingstone College	29%
Miles College	29%
Harris-Stowe State University	30%
Paul Quinn College	31%
Benedict College	32%
Morris College	32%
Southern University at Shreveport	33%
Jarvis Christian College	33%
Stillman College	34%
Florida Memorial University	35%
Rust College	35%
Le Moyne-Owen College	36%
Philander Smith College	36%
Denmark Technical College	36%
Cheyney University of Pennsylvania	36%
Mississippi Valley State University	38%
Alabama State University	39%
Shaw University	39%
Allen University	39%
Bethune-Cookman University	39%
Texas Southern University	40%
Grambling State University	40%
Edward Waters College	40%
Paine College	40%
Johnson C Smith University	41%
Hinds Community College	41%
Huston-Tillotson University	41%
Alcorn State University	42%
University of Arkansas at Pine Bluff	43%
North Carolina Central University	43%
Kentucky State University	45%
Tougaloo College	45%
Jackson State University	46%
Southern University at New Orleans	47%
Virginia Union University	47%
Morgan State University	47%
Savannah State University	47%
Elizabeth City State University	48%
Albany State University	48%
Fort Valley State University	49%
Coppin State University	49%
Alabama A & M University	49%
Oakwood University	49%
Claflin University	49%
Average of failing institutions	**39%**
Average of passing institutions	**61%**

Note: This group of 49 institutions represents 57% of all HBCU's

Appendix C: Public Colleges with Repayment Rates 50% or Less

Institution	College Scorecard Repayment Rates
Albany Technical College	24%
Lake Michigan College	27%
Central State University	28%
Harris-Stowe State University	30%
Wayne County Community College District	30%
Southern University at Shreveport	33%
Applied Technology Services	34%
Antelope Valley College	34%
Richard Bland College of the College of William and Mary	36%
Denmark Technical College	36%
Cheyney University of Pennsylvania	36%
Bainbridge State College	36%
Paris Junior College	37%
Mohave Community College	37%
Mountain View College	37%
Victor Valley College	38%
Berkeley City College	38%
Langston University	38%
East Mississippi Community College	38%
Solano Community College	38%
Mississippi Valley State University	38%
San Joaquin Delta College	39%
Alabama State University	39%
Atlanta Metropolitan State College	39%
Scioto County Career Technical Center	39%
Wood County School of Practical Nursing	39%
West Hills College-Lemoore	39%
College of the Siskiyous	39%
Western Texas College	40%
Texas Southern University	40%
Morton College	40%
Grambling State University	40%
Kilgore College	41%
Hinds Community College	41%
Pulaski Technical College	41%
Eastfield College	41%
Holmes Community College	41%
West Hills College-Coalinga	41%
Mt San Jacinto Community College District	42%
City Colleges of Chicago-Harold Washington College	42%
Lassen Community College	42%
Alcorn State University	42%
Otero Junior College	42%
Navarro College	42%
Cerro Coso Community College	43%
Allan Hancock College	43%
Itawamba Community College	43%
Klamath Community College	43%
University of Arkansas at Pine Bluff	43%
New River Community and Technical College	43%

Note: There are 85 additonal schools in this sector that have repayment rates <=50%.

Appendix D: Private Colleges with Repayment Rates 50% or Less

Institution	College Scorecard Repayment Rates
Centro de Estudios Multidisciplinarios-San Juan	19%
Arkansas Baptist College	20%
College America-Flagstaff	20%
Lane College	22%
Wright Career College	22%
Talladega College	22%
Texas College	24%
Metropolitan Career Center Computer Technology Institute	26%
Clinton College	26%
Concordia College Alabama	26%
Donnelly College	27%
Livingstone College	29%
Southwestern Christian College	29%
Miles College	29%
Remington College-Tampa Campus	29%
Martin University	30%
East-West University	30%
Expertise Cosmetology Institute	31%
Paul Quinn College	31%
Benedict College	32%
Morris College	32%
College America-Denver	32%
Chatfield College	33%
Jarvis Christian College	33%
CET-San Diego	34%
Stillman College	34%
Northwest HVAC/R Training Center	34%
Florida Memorial University	35%
Rust College	35%
Le Moyne-Owen College	36%
Philander Smith College	36%
Shaw University	39%
Caribbean University-Bayamon	39%
Allen University	39%
Saint Augustine's University	39%
Beulah Heights University	39%
Virginia University of Lynchburg	39%
Bethune-Cookman University	39%
Orleans Technical Institute	39%
Wiley College	39%
Edward Waters College	40%
Paine College	40%
Johnson C Smith University	41%
City College-Fort Lauderdale	41%
Hallmark College	41%
Huston-Tillotson University	41%
EDP University of Puerto Rico Inc-San Sebastian	41%
Metropolitan College of New York	41%
NTMA Training Centers of Southern California	42%
Marygrove College	42%

Note: There are 26 additonal schools in this sector that have repayment rates <=50%.

Appendix E: HBCU Repayment Rate Comparison

Institution	FY 2009 GE 3YR Repayment Rate	Scorecard 3YR Repayment Rate
Alabama A & M University	21%	44%
Alabama State Univerity	14%	33%
Albany State University	18%	36%
Alcorn State University	15%	36%
Allen University	10%	24%
University of Arkansas for Pine Bluff	14%	41%
Arkansas Baptist College	6%	12%
Barber-Scotia College	15%	—
Benedict College	8%	17%
Bennett College	14%	43%
Bethune Cookman College	15%	38%
Bishop State Community College - Main Campus	0%	—
Bluefield State College	32%	50%
Bowie State University	22%	49%
Central State University	9%	20%
Cheyney University of Pennsylvania	14%	31%
Claflin University	12%	51%
Clark Atlanta University	19%	53%
Clinton Junior College	2%	27%
Coahoma Community College	33%	—
Concordia College--Alabama	7%	25%
Coppin State University	23%	41%
Delaware State University	21%	54%
Denmark Technical College	10%	28%
Dillard University	23%	59%
University of the District of Columbia	29%	51%
Edward Waters College	8%	27%
Elizabeth City State University	25%	37%
Fayetteville State University	25%	46%
Fisk University	18%	63%
Florida A & M University	32%	57%
Florida Memorial University	12%	29%
Fort ValleyState University	28%	35%
Gadsden Business College	30%	—
Grambling State University	12%	35%
Hampton University	42%	68%
Harris-Stowe State University	16%	26%
Howard University	32%	59%
Huston-Tillotson	14%	40%
Interdenominational Theological Center	12%	—
Jackson State University	12%	42%
Jarvis Christian College	15%	28%
Johnson C. Smith University	17%	35%
Kentucky State University	19%	43%
Lane College	10%	17%
Lemoyne-Owen College	11%	26%
Lincoln University--PA	—	40%
Lincoln University--MO	19%	43%
Livingstone College	8%	17%
Meharry Medical College	27%	—
Miles College	11%	22%

Appendix E: HBCU Repayment Rates *(continued)*

Institution	FY 2009 GE 3YR Repayment Rate	FY 2009 GE 3YR Repayment Rate
Mississippi Valley State University	8%	30%
Morehouse School of Medicine	16%	—
Morgan State University	23%	38%
Morris Brown College	19%	—
Morris College	12%	27%
Norfolk State University	24%	45%
North Carolina Agricultural & Technical State University	27%	49%
North Carolina Central University	22%	41%
Oakwood University	19%	44%
Paine College	16%	27%
Paul Quinn College	13%	37%
Philander Smith College	14%	32%
Prairie View Agricultural & Mechanical University	20%	43%
Rust College	15%	23%
Saint Paul's College	19%	41%
Savannah State University	20%	34%
Shaw University	13%	31%
Southern University and A & M College at Baton Rouge	18%	50%
Southern University at New Orleans	15%	37%
Southern University at Shreveport - Bossier City	13%	35%
Southwestern Christian College	21%	18%
Spelman College	35%	67%
Stillman College	12%	29%
Tennessee State University	22%	53%
Texas College	10%	24%
Texas Southern University	23%	37%
Tougaloo College	11%	36%
Tuskegee University	38%	62%
Virginia State University	25%	47%
Virginia Union University	21%	29%

Appendix F: Public Colleges With Institutional D/E Rates Above 8%

Institution	Debt-to Earnings-Ratio
Grambling State University	14.9%
Mississippi Valley State University	14.1%
Jackson State University	13.0%
Lincoln University of Pennsylvania	12.2%
Southern University and A & M College	11.2%
Southern University Law Center	11.2%
Alabama State University	10.8%
South Carolina State University	10.7%
Albany State University	10.6%
Central State University	10.6%
Massachusetts College of Art and Design	10.4%
Alabama A & M University	10.2%
Texas Southern University	9.5%
Langston University	9.4%
Southern University at New Orleans	9.4%
Norfolk State University	9.3%
North Carolina Central University	9.2%
Savannah State University	8.9%
University of North Carolina School of the Arts	8.9%
SUNY at Purchase College	8.8%
Francis Marion University	8.7%
Winthrop University	8.6%
Elizabeth City State University	8.4%
Johnson State College	8.2%
Winston-Salem State University	8.2%
North Carolina A & T State University	8.1%
Edinboro University of Pennsylvania	8.1%
Fayetteville State University	8.0%

Appendix G: Non-Profit Colleges with Institutional D/E Rates Above 8%

Institution	Debt-to Earnings-Ratio
The Boston Conservatory	14.5%
Naropa University	13.5%
Manhattan School of Music	13.2%
Florida Memorial University	13.2%
Pennsylvania Academy of the Fine Arts	13.1%
Beulah Heights University	12.8%
The University of the Arts	12.8%
Claflin University	12.7%
Johnson C Smith University	12.7%
The Juilliard School	12.5%
Fisk University	12.3%
Tougaloo College	12.1%
Goddard College	11.9%
Columbia College	11.8%
Columbus College of Art and Design	11.8%
Bennett College for Women	11.7%
Berklee College of Music	11.6%
Memphis College of Art	11.5%
California Institute of the Arts	11.5%
Marlboro College	11.4%
Marlboro College Graduate School	11.4%
Marygrove College	11.4%
Maine College of Art	11.3%
Oakwood University	11.1%
Minneapolis College of Art and Design	10.9%
Kansas City Art Institute	10.9%
Bennington College	10.8%
Coker College	10.8%
Moore College of Art and Design	10.8%
The New England Conservatory of Music	10.8%
Cleveland Institute of Art	10.7%
Ringling College of Art and Design	10.6%
Chester College of New England	10.6%
Benedict College	10.5%
Earlham College	10.5%
Clark Atlanta University	10.5%
Bethune-Cookman University	10.5%
Valley Forge Christian College	10.4%
Jones College-Jacksonville	10.3%
Pacific Northwest College of Art	10.2%
Hampshire College	10.2%
Milwaukee Institute of Art & Design	10.2%
Montserrat College of Art	10.1%
CBD College	10.1%
Talladega College	10.1%
Unity College	10.1%
School of the Art Institute of Chicago	10.0%
California College of the Arts	10.0%
Saint Augustines College	10.0%
Lawrence University	10.0%
Olivet College	10.0%

Appendix G: Non-Profit Colleges with Institutional D/E Rates Above 8% *(continued)*

Institution	Debt-to Earnings-Ratio
Art Academy of Cincinnati	9.9%
Maryland Institute College of Art	9.9%
Beloit College	9.9%
Burlington College	9.9%
College of the Atlantic	9.9%
Paine College	9.9%
Warren Wilson College	9.9%
College of Visual Arts	9.8%
Oberlin College	9.7%
Wright Career College	9.7%
Woodbury University	9.7%
Cornish College of the Arts	9.7%
Knox College	9.6%
Hollins University	9.6%
Green Mountain College	9.6%
Philander Smith College	9.6%
Lincoln Christian University	9.6%
Savannah College of Art and Design	9.5%
Lycoming College	9.5%
Marylhurst University	9.4%
Wells College	9.4%
Cleveland Institute of Music	9.3%
Northland College	9.3%
Bard College	9.3%
Oral Roberts University	9.3%
Transylvania University	9.2%
Fontbonne University	9.2%
Southern Wesleyan University	9.2%
Marywood University	9.1%
Point Park University	9.1%
Ohio Wesleyan University	9.1%
Alma College	9.1%
Columbia International University	9.1%
Alverno College	9.1%
Allegheny College	9.1%
Antioch University-New England	9.0%
Antioch University-Los Angeles	9.0%
Antioch University-Midwest	9.0%
Antioch University-Santa Barbara	9.0%
Antioch University-Seattle	9.0%
Shaw University	9.0%
Tuskegee University	9.0%
Sojourner-Douglass College	9.0%
Columbia College-Chicago	9.0%
City College-Fort Lauderdale	8.9%
City College-Gainesville	8.9%
City College-Miami	8.9%
Limestone College	8.9%
Cornell College	8.8%
Art Center College of Design	8.8%
Otis College of Art and Design	8.8%