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ORAL TESTIMONY

Marc Jerome, President of Monroe College
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Good afternoon.

My name is Marc Jerome, and I am the President of Monroe College in the Bronx. We are located in the poorest congressional district in the country.

We educate close to 9,000 low-income Black and Hispanic students every year. We consistently rank among the top institutions in New York State and the nation for graduating the most full-time Black students.

Walk into any hospital, government office, or large employer in the Bronx and you will most likely find a Monroe College graduate working there.

The Problem of Data Invisibility

Dr. Michelle Cooper spoke about the systemic equity gap in higher ed.

We have to start by acknowledging the data invisibility that exists, especially for Black and Hispanic students.

It is currently much too difficult, if not impossible, for Black and Hispanic students to find the information necessary to make an informed decision about whether an institution will serve them well.

For example, On-time graduation rates for Black and Hispanic students at two-year institutions are not available. This should change.

Similarly, disaggregated earnings are not available. This should change.

Key student loan indicators, such as average borrowing, default and repayment are not available. This should change.

Despite all the discussion about protecting veterans, there is virtually no information available about which institutions serve veterans well and which don't.

There simply is no data on graduation rates, earnings, or borrowing for veterans. They deserve better.

I am formally asking the department to address this data invisibility issue so we can better address the very real systemic equity gap.

Dr. Cooper articulated the Department's goal of protecting students and borrowers from "harmful programs."

As a matter of social equity, I would urge the Department to first convene a negotiated rulemaking on the completion crisis. Too few students graduate – there are over 800 colleges with on-time graduation rates below 10%.

The data for Black students is even more alarming. It is a problem across all sectors.

I would also urge the Department to look at the lessons learned from the two sector-specific metrics -- Gainful Employment and the Repayment Rate Warning.

We have compiled data identifying the institutions with the weakest outcomes in both debt to earnings ratios and loan repayment efforts.

The data make clear that there are programs with very weak outcomes across all of higher ed that deserve attention.

High Debt to Earnings are Universally Problematic

With debt to earnings -- the metric the Department used for Gainful Employment -- 8% was the benchmark that defined quality.

High debt and low earnings are a problem that can be found across higher ed.

In fact, among the 200 degree-granting institutions with the highest debt to earnings, 70% of are public or non-profit. Close to 700 colleges have debt to earnings rates above the 8% threshold including almost all HBCU's.

Clearly, the 8% metric was not an accurate measure of quality.

Loan Repayment Metric Should Serve as Another Lesson

In 2016, the Department implemented a sector-specific 50% Repayment Rate Warning, which served as the benchmark for institutional quality.

Shockingly, almost 90% (2,495 out of 2,828) of degree-granting institutions would not pass this metric today.

In fact, among the 200 degree-granting institutions with the *weakest* repayment rates, 77% of them are public or non-profit.

Clearly, the 50% repayment rate was not an accurate measure of institutional quality.

ATB is an Issue of Equity

Too many students drop out of high school. They are disproportionately Black or Hispanic.

The Department should be supporting the Career Pathways program and it should be focusing on institutions that objectively advance equity in this area.

Monroe has had this program for over 40 years. Thousands of students have successfully earned their GED and College degrees through it.

We respectfully ask that the Department continue to support ethical institutions that have served these students well.

Suggested Pilot Program to Improve Institutional Outcomes

Finally, I am asking the Department to consider a Pilot Program that will identify institutions with the weakest outcomes on the major metrics and develop a program to improve their outcomes rather than pursuing high-stakes punitive rulemaking.

On behalf of Monroe College and all students, I thank the Department for its work and this opportunity to share my perspectives.