

## United States Senate

WASHINGTON, DC 20510

American Council on Education  
One Dupont Circle NW  
Washington, DC 20036

Dear President Mitchell,

I understand that the American Council on Education is currently redeveloping its methodology for the 2024 Carnegie Classification of Institutions of Higher Education. As this process continues, I urge you to make changes to this methodology that reflect the importance of economic and social mobility in higher education and recognize the diverse institutions conducting groundbreaking research while educating students.

American doctoral universities view the very high research activity/high research activity (R1/R2) designation as an indication that their institution is at the forefront of academic research and innovation. Institutions use this status to attract graduate students and faculty, garner funding to improve their facilities and equipment, enhance their grant applications, and raise the reputation of their research. While the R1 designation is not meant to classify the best or worst research institutions, many use the classification this way. Moreover, these rankings, which are meant to help institutions identify their peers, have had the unintended consequence of pitting them against each other. There are many incredible research institutions, especially Minority-Serving Institutions (MSIs) and Historically Black Colleges and Universities (HBCUs), that do tremendous research, but are not recognized by the current methodology, which accounts for research dollars spent and the number of research faculty, but not research quality.

In the 2021 classification, 133 doctoral universities achieved high research activity, or R2, status and 146 doctoral universities achieved very high research activity, or R1, status. None of the R1 institutions are HBCUs. There are 11 HBCUs that are R2s, including Howard University, Clark Atlanta University, and Jackson State University.

In light of this situation, I wish to share three concerns with you. First, I am concerned that the existing methodology, which requires creating an index of seven metrics, is overly complex. The process to create such an index is not easily replicable, making it difficult for institutions to understand how to improve their standings. Without greater clarity, universities can struggle to strategically plan their research agenda, ultimately affecting the quality of their research and the education they provide to students. I encourage you to simplify the classification system and share the process with institutions so that there is more clarity on what they can do to improve.

Second, I am concerned that the current set of metrics fails to account for several factors critical to evaluating an institution's research. For example, the current methodology rewards and requires institutions to engage in comprehensive research in the humanities, social sciences, and STEM. Many agricultural, mechanical, and technical institutions like Florida A&M University and North Carolina A&T University conduct pivotal research, but their specialization means that

## United States Senate

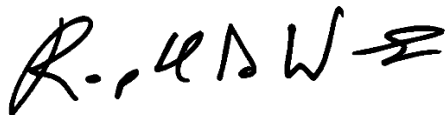
WASHINGTON, DC 20510

they do not rank highly in non-STEM expenditures and degree conferrals. The current methodology penalizes these institutions for a lack of education and research that may fall outside of their founding purpose and could drive institutions to change how they allocate resources to their students and faculty. I encourage you to update the methodology to recognize the crucial research that takes place at specialized institutions and allow them to continue serving their populations well.

Without addressing these concerns, the way the classification ranks institutions and uses these metrics to determine the cutoff point for R1 status can pit institutions against each other. While many HBCUs and MSIs prioritize research and innovation, many see their primary mission as educating the student body and preparing them for future success. The classification system is meant to group similar institutions, not pit them against each other to achieve a higher research status. If institutions continue to see the classification as a competition they must win, there is a chance that this will adversely impact their strategic planning. Institutions should not feel like they must compete against each other.

As the American Council on Education continues to develop its methodology ahead of the 2025 classification list, I implore you to consider these must-needed reforms to the current methodology and create a classification system that is simplified and acknowledges the holistic contributions of the plethora of institutions of higher education. Such changes would also help discourage competition in pursuit of a designation. There is value in specialized institutions and institutions that prioritize both the education of its student body and its innovative research. The classification should recognize institutions that value both education and research, while employing a broad array of faculty and staff. I look forward to keeping this conversation open as the new methodology progresses.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Warnock". The signature is stylized and written in a cursive-like font.

Senator Raphael Warnock