



SOCIETY FOR AMERICAN ARCHAEOLOGY

February 10, 2023

Mr. Jean-Didier Gaina
U.S. Department of Education
400 Maryland Ave. SW
Room 2C172
Washington, DC 20202

RE: ID ED–2022–OUS–0140

Dear Mr. Gaina:

The Society for American Archaeology (SAA) is pleased to provide the following information on how best to identify “low-value” postsecondary programs. We recognize the need for reform of the higher education system, especially with regard to prospective students being able to make more informed decisions on which programs to concentrate on. Nevertheless, a list of “low-value” programs would potentially have an enormous influence on students’ educational decisions. We consider “low-value” to be a loaded term that implies that only the economic return matters. The Department of Education (ED) must therefore proceed on this matter with the greatest care, so as not to dissuade young people from training for professions that are integral to both the nation’s economy and its social and cultural fabric. There are more benefits to a career than just economic ones.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

We will respond to the questions listed in the request for information:

Measures and Metrics

1. *What program-level data and metrics would be most helpful to students to understand the financial (and other) consequences of attending a program?* For salary purposes, it is crucial that the data reflect earnings over a career in archaeology, while also capturing the reality that different branches of the archaeological profession—such as academia, cultural resources management, museums and curation, and government service—have different pay scales, which in turn vary by region. Further, it will be very difficult to accurately reflect all of the career benefits that accrue to graduates of the myriad programs offered by colleges and universities. For individuals, the nonfinancial benefits of a career in archaeology include the gaining of knowledge of the past, satisfying public interest, and protecting our nation’s cultural heritage, among others,

and using past knowledge to address problems facing our nation today, such as climate change. For the nation as a whole, the benefits include a much greater and more detailed understanding of those who lived over the millennia in what is now the United States. This helps us better appreciate who we are as a people and how we got here. Other benefits that accrue to graduates of anthropology and archaeology programs include intangibles that are needed in most professions, including critical thinking, leadership, written and oral skills, interpersonal communication, quantitative assessment, and interdisciplinary teamwork. Therefore, training in anthropology and archaeology often leads to successful careers that are not directly in these fields. Employment outcomes for all graduates should be measured, not just those who continue in the discipline.

2. *What program-level data and metrics would be most helpful to understand whether public investments in the program are worthwhile? What data might be collected uniformly across all students who attend a program that would help assess the nonfinancial value created by the program?* As mentioned above, the nonfinancial value of a degree in archaeology is great and must be considered, not just the economic return. Students gain an appreciation for the depth, breadth, and diversity of American culture past and present, which makes them better citizens. Public investment in archaeological education in the forms of student loans, grants, and scholarships pay dividends to the individual students, the institutions that employ the eventual graduates, and the nation and communities in which these people work. Some of these data could include verbal and written communication skills, etc.
3. *In addition to the measures or metrics used to determine whether a program is placed on the low-financial value program list, what other measures and metrics should be disclosed to improve the information provided by the list?* The problem that the ED is trying to address with this list is a fundamental one—there is a substantial disconnect between student assumptions of the monetary benefits of higher education versus the reality of today’s economy. There is also a secondary disconnect between employer [expectations](#) and what skills graduates are bringing away from school. In formulating the list, or moving in a different policy direction, the ED needs to [explore](#) these and other underlying causes for the current reality. These disconnects are not limited to archaeology alone but pervade academia today.

List Structure

4. *The Department intends to use the 6-digit Classification of Instructional Program (CIP) code and the type of credential awarded to define programs at an institution. Should the Department publish information using the 4-digit CIP codes or some other type of aggregation in cases where we would not otherwise be able to report program data?* We have no comment on this issue at this time.
5. *Should the Department produce only a single low-financial-value program list, separate lists by credential level, or use some other breakdown, such as one for graduate and another for undergraduate programs?* There are substantial differences between undergraduate and graduate archaeological programs, both in terms of educational content and their significance to career tracks. There should be separate lists.

Data Elements

6. *What additional data could the Department collect that would substantially improve our ability to provide accurate data for the public to help understand the value being created by the program? Please comment on the value of the new metrics relative to the burden institutions would face in reporting information to the Department.* The list that the ED is contemplating would have a

major impact on how students decide to select courses of study, in addition to selecting educational institutions themselves. The reporting burden on institutions would be a significant one, but the real issue would be in the resources that the various schools will have available to comply with the requirement. For those that have substantial financial resources and personnel to assign to the issue, an additional federal reporting requirement would not be untenable. For those already dealing with many compliance issues and with far fewer, if any, resources to bring to bear, the burden could be too great unless sufficient support were provided to level the playing field.

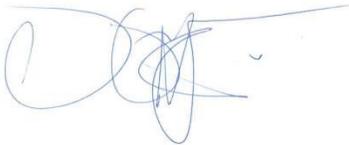
Public Dissemination

7. *What are the best ways to make sure that institutions and students are aware of this information?* Publication of the list on the ED website, with notices on the FAFSA web page, among other secondary education sites frequented by incoming college and graduate students, would effectively advertise the ratings.

Another factor that the ED must carefully consider is the role of the president or provost of institutions where bottom-line strategies are followed. Much of the support that departments and programs receive is contingent not only on enrollment but also on the reputation of the department in the minds of the president or provost. Administrations that are uninterested in anthropology or archaeology will not support these programs, and “low-value” ratings from the ED will only exacerbate this situation.

In closing, I would like to add that people do not go into archaeology with the idea of making a lot of money; it never has been nor will it ever be a high-paying profession. It is the same for people drawn to art, history, writing, or teaching. People go into it because they have a passion, a drive, and a keen interest in our past. I do not know how or even if you can quantify that. But such intangibles must be taken into consideration when evaluating a program’s “value.” These are only our Society’s initial reflections on this important matter. We look forward to contributing further as the discussion moves forward in the months ahead.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sandweiss', with a long horizontal line extending to the right.

Daniel H. Sandweiss, Ph.D., RPA
President