

THE
NEW ENGLAND
COUNCIL

February 17, 2015

The Honorable Arne Duncan
Secretary of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary Duncan,

Thank you very much for your continued efforts to strengthen the higher education system in the United States. Our country has led the world in education, innovation and creating opportunities. With continued hard work, we can ensure that we continue to do so, expanding education opportunities and strengthening America's workforce. The New England Council represents a variety of institutions of higher education throughout the region, as well as businesses that rely on access to an educated workforce. As such, we are particularly interested in the success of efforts to strengthen our talent pipeline.

The New England Council supports increased transparency in higher education, and appreciates the Administration's efforts to enhance transparency, to help students compare the value offered by colleges and to empower students with the best information. In an effort to achieve these goals, however, we must be mindful of the impact the proposed Postsecondary Institution Ratings System (PIRS) could have, particularly if it is not implemented carefully and thoughtfully. As the Administration develops this system, the Council offers the following principles that our members believe are critical for this process.

Careful Design and Testing - A sector-wide rating system should not be rushed into place until it is thoroughly tested and its impact on a variety of institutions is assessed. The model must be fully developed and tested before it is implemented as it will likely become the standard for consumers assessing colleges and will have immense impact on the sector. The consequences of the current proposal have not been adequately considered and the system is not ready for implementation. Furthermore, federal financial aid should not be tied to a ratings system unless the system has been carefully tested to assess its impact on a range of institutions.

Use of Accurate Data - The greatest challenge in developing the system is ensuring the accuracy of the data used. The Integrated Post-Secondary Education Data System (IPEDS) data currently used is grossly inaccurate and should not be the basis for comparison. Without significant improvement to the collect and definition of IPEDS measurement, the data is not only misdirected but inaccurate. This data cannot reliable be used to compare institutions. Graduation rates as they are currently measured are

inaccurate as they do not include students who transfer between institutions before graduation. Net price is similarly difficult to use as a comparison tool.

Recognizing Different Types of Institutions - Any rating system implemented by the federal government must recognize that all institutions do not share the same goals, nor do they serve the same populations. This makes it particularly difficult to determine a set of measurements that can be used across the board, applied to all institutions, and be informative to students. At this point, we do not see a measurement that can be used at the many various institutions in an equitable manner. Measurements of graduation rates should not be used to compare research universities to community colleges.

Access to quality, affordable education and the development of a skilled workforce are critical to our economic growth and global competitiveness. The New England Council is eager to continue to work constructively with our leaders in government and in higher education toward these goals. We would be happy to further discuss these recommendations and our members' concerns with you as you continue to develop this new system. Taylor Pichette, Federal Affairs Manager in our Washington Office, is the best point of contact on this issue and can be reached at 202-547-0048 or tpichette@newenglandcouncil.com.

Sincerely,



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