



National Association
of Independent
Colleges and Universities

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January 31, 2014

Richard Reeves
National Center for Education Statistics
U. S. Department of Education
1990 K Street, NW, 8th Floor
Washington, DC 20006

Dear Mr. Reeves:

The more than 1,000 private, non-profit, institutional and association members that comprise the National Association of Independent Colleges and Universities (NAICU) welcome the president's commitment to the broad issues of access, affordability, and transparency. These are the ultimate goals that the Administration seeks to advance with its current set of proposals for higher education. We also welcome the open invitation from the president for colleges and universities to work in common purpose with the Administration to reach these goals.

We share the president's concern about the negative effects of commercial rankings on consumer choice, and we agree that there is a role for the federal government in making better information available to help students and their families find a college or university that fits their varied needs.

However, we strongly believe that adding a federal rating system to the existing private commercial rankings will not solve the problem, but—rather—will exacerbate it. The strong expression of concern with a single metric by college leaders, across sectors, throughout the nation is founded in the belief that the two approaches offer a distinction without a difference.

The belief that a single rating metric is harmful to American higher education and the students we serve, is grounded in many factors, but several rise to the top. First, private, independent college leaders do not believe it is possible to create a single metric that can successfully compare the broad array of American higher education institutions without creating serious unintended consequences. For example, low-income students are most likely to bear the brunt of the financial penalties anticipated under the plan. Also, it is simply implausible to believe that a one-size-fits-all rating system could possibly take into account the diversity of missions, student populations, and communities of the nation's colleges and universities.

Second, any metric will be value-weighted with measures that policy makers might believe are important, but that might not be related to the values or needs of the student who is doing the college search. Third, by its nature, a metric is quantitative; whereas finding a "best-fit" college has qualitative

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aspects that are equally as, or even more important, than the quantitative aspects. Last, and perhaps most striking, is the fact that such a rating—especially if tied to student aid—will end up negatively impacting the very students the president sought to lift up when he issued the 2020 graduation challenge.

We believe a better approach would be to develop a federal consumer information tool that helps make the college selection process more comprehensive, and more responsive to the interests and priorities of the individual student and their family. Such a resource should:

- **Ask consumers what they want.** *When you do, what is discovered may be different from what policy analysts want to know or use to judge schools.*
- **Be both long and short enough.** *Too little information can be misleading, too much can be overwhelming.*
- **Include both quantitative and qualitative information.** *Beyond facts and data points, work in partnership with colleges and universities to provide information that prospective students want to know about the nature of the institution so they can determine “fit.” This can be done by allowing institutions to tell their own stories through links on individual college profiles, available via the resource, so students can learn more about what each school is really like.*
- **Look Inward.** *The Department of Education already has a valuable storehouse of information posted on its College Navigator site, and through other sources, that could be made more useable to consumers.*

NAICU has pioneered this general approach with our own University and College Accountability Network (U-CAN), which includes information identified by policy makers as being important for accountability. Perhaps more importantly, based on focus group findings, U-CAN includes the very information and data that parents and students told us they needed to make more informed college choices. U-CAN could certainly serve as a model to help inform the development of such a tool or resource.

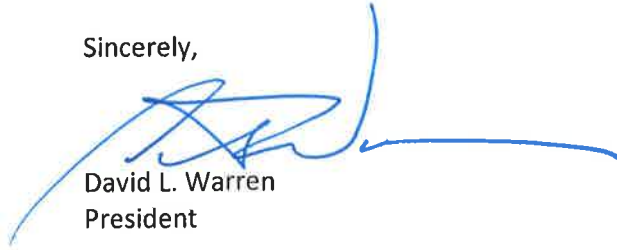
By working together with colleges and universities, the Administration can promote the importance of a college education, and inspire a collaborative approach to helping our nation reach the fast approaching 2020 goal.



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We strongly encourage the Administration to consider the overwhelming consensus among higher education practitioners that a metric is not a solution. Rather, it is more likely to be another hurdle in the road to realizing the president's higher education goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Warren", with a long horizontal flourish extending to the right.

David L. Warren
President