

January 16, 2014

**AASCU's Position on the Obama Administration's Proposed
Postsecondary Institutions Rating System (PIRS)**

AASCU supports federal efforts at better gatekeeping, improved accountability, and greater transparency for colleges and universities participating in federal student assistance. As public institutions, our members respect and understand the public's right to demand good educational and economic outcomes for students after they leave their institutions. AASCU believes that effective accountability metrics can be devised in a manner that provides meaningful information to the public and respects the heterogeneity of institutional missions.

The Administration's proposed Postsecondary Institution Rating System can be a component of a broader effort to promote accountability and transparency. It will, however, not be a substitute for good front-end monitoring and enforcement to weed out waste, fraud, and abuse.

Devising a rating system that can equitably and effectively capture the relevant attributes of a large and diverse universe of postsecondary institutions will be a daunting task. By its very nature, a rating system must simplify inherently complex qualities and measures it factors into account, and is thus susceptible to distortions that may prove prejudicial or problematic. Data issues, in terms of their availability, quality, reliability, and privacy consequences, represent a huge challenge in setting up any rating system, and deserve very careful consideration.

The inherent difficulties of constructing a meaningful ratings system need not, however, be fatal. It would be possible to capture a subset of the most essential attributes of institutions and combine them into a rating that involves minimal normative judgments.

The Administration's thinking on the configuration of the rating system has not been revealed, and little is known about the process and the timeline for the launch of the rating system. AASCU is actively engaged with the Administration and other stakeholders, and will attempt to be helpful to the effort as appropriate. While we are concerned about possible adverse consequences of the proposed system, we are willing to give the Administration a chance to produce a proposal, and will attempt to be helpful to the efforts as appropriate.