January 27, 2014

Mr. Richard Reeves  
National Center for Education Statistics  
Attention: Postsecondary Institution Ratings System RFI  
U.S. Department of Education  
1990 K Street NW., 8th Floor  
Washington, DC 20006.  
Docket ID ED-2013-IES-0151

Dear Mr. Reeves,

Earlier this week you received comments from the Association of American Universities (AAU) in response to the Federal Register Request for Information (RFI) on the President’s proposal for a Postsecondary Institution Rating System (PIRS). Duke University supports and endorses many of the AAU’s suggestions (attached) and strongly encourages the Department of Education to incorporate this feedback, should the proposal move forward.

It isn’t clear that a federally promulgated rating system for colleges and universities is a realistic endeavor, nor is it something that is necessarily desired by students and families. While we believe many institutions would fare well under a number of the measurements envisioned and described, we believe that it is not sound policy to develop a system that would rely on data that may not be dependable, available or valid. Anything short of accurate and timely information is a disservice to students and families going through the process of identifying the right institution for postsecondary education.

We greatly appreciate your interest in identifying ways to increase college access and completion and, at the same time, applaud the importance you place on rigorous oversight of federal student aid. In our view, a federal rating system is not likely to have any significant impact in these areas, nor will it provide much new information beyond what is already readily available via the Department’s College Scorecard, College Navigator or other non-federal publications.

Thank you for your consideration,

Michael Schoenfeld  
Vice President for Public Affairs and Government Relations