



February 23, 2018

The Honorable Lamar Alexander  
Chairman, Senate Committee on Health, Education, Labor and Pensions  
428 Senate Dirksen Office Building  
Washington, DC 20510

The Honorable Patty Murray  
Ranking Member, Senate Committee on Health, Education, Labor and Pensions  
428 Senate Dirksen Office Building  
Washington, DC 20510

Dear Chairman Alexander & Ranking Member Murray,

We, the undersigned organizations, a consortium of associations representing professionals and students in various student affairs roles on college and university campuses, including on-campus housing, student conduct, recreation and wellness, and many areas in between, thank you for this opportunity to provide input on your work to craft a Higher Education Act reauthorization bill.

While we have input to provide in other areas, this letter mainly relates to accountability and the white paper, "Higher Education Accountability" that Chairman Alexander recently released. Although the white paper points out some of the weaknesses in the current accountability system, the strategy does not address these weaknesses, but rather appears to side step them, and in their stead offers fewer accountability protections for students.

The undersigned organizations support policies and government actions that advance positive student development and student success for today's students through:

- Out-of-classroom experiences, as intertwined with learning and inseparable elements of college student success; and
- Support for professionals responsible for such positive development.

To achieve that agenda, the undersigned organizations, working collectively, submit the following input:

We support:

- A thorough evaluation of the current accountability measures and implementation of appropriate fine-tuning improvements to address deficiencies, many of which are pointed out in the referenced white paper. For example:

- - The issue is not the 90-10 rule, but rather the lack of an appropriate quality indicator to accompany it.
  - Continuation of the use of Cohort Default Rates (CDR) – which is an appropriate lagging indicator of students’ ability to repay their debt before the widespread availability of income-based repayment options (which include loan forgiveness as a final borrower protection) until another alternative measure (e.g., repayment rates have been widely recommended by higher education researchers) can be developed and appropriately modeled. While these measures improve our ability to judge financial outcomes, they fail to help us determine the quality of an educational program, and thus need to be coupled with appropriate quality indicators, which will need to be developed and modeled.
- Modeling of any new or proposed measures using student-level data from the target population to ensure the effects are in fact those intended. Many metrics are proposed that, when put to actual data, don’t actually perform the way policymakers assume they will. Although there currently is a ban on the collection of student-level data at the federal level (see next point), many states now have comprehensive student-level data that could be used for modeling outcomes of proposed metrics prior to widespread, federal adoption.
- Removal of the ban on the collection of student-level data by the Department of Education in order to provide federal data sufficient to address shortfalls in existing accountability measures. While the Department has been able to get useful data<sup>1</sup>, removal of this ban will increase the efficiency and effectiveness of that process.
- An accountability system that takes into account outcomes and metrics in addition to those reliant on employment or earnings post-graduation. Market-value should never be the sole indicator of educational quality. The benefits to society of higher education are not always best reflected in market-value. There are many occupations that require a high degree of higher education and provide great public benefit, but the market-value does not necessarily reflect that benefit. We need to ensure that we do not penalize institutions for meeting the education needs for such professions.
- Measuring performance/outcomes of individual programs offered by an institution, although we still see value in providing at least some level of additional institution-wide accountability and not just relying on program-level evaluations.

We oppose:

- Expansion of the 90-10 Rule beyond for-profit institutions as the concern the rule is meant to address is appropriate investment of public funds in students rather than into profits for shareholders of those institutions.
- Reduction in the diversity of metrics or reliance on one or just a few measures to determine program or institutional quality.
- Exclusive or weighted accountability measures based on ability to pay without strong quality measures in place.

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<sup>1</sup> <https://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>

- Removing individual metrics without evaluating and implementing appropriate alternatives to address the failings of existing metrics.
- Looking at cost without providing federal oversight guiderails for quality. An education that is affordable, but of no quality to the student, employers, or society is not worth the investment of federal revenue. To this end, we oppose leaving quality assurance solely a purview of accreditors for many of the same concerns you raised in 2015 when looking at the accreditation process.<sup>2</sup>
- Elimination of loan forgiveness for public service professionals.
- Disincentivizing efforts by institutions to provide higher education opportunities to low-income individuals and those coming from groups with generally higher risks of default. There is an extra benefit to society in providing higher education to persons historically disadvantaged and working to close income and equity gaps that are worth absorbing a greater risk of default. Any federal accountability system must take these considerations into account, while ensuring that student higher education costs are affordable for all students and that they have access to an array of higher education options.

Thank you for your consideration and for your service to the country and the greater higher education community. We look forward to working with you to improve the Higher Education Act. Please feel free to contact us collectively through Jason Marmon at [jmarmon@activepolicysolutions.com](mailto:jmarmon@activepolicysolutions.com).

Sincerely,

Chris Moody, Active Executive Director  
**American College Personnel Association (ACPA)**

- Leading comprehensive student affairs association that advances student affairs and engages students for a lifetime of learning and discovery, and representing nearly 7,500 members from 1,200 public and private institutions internationally, including graduate and undergraduate students enrolled in student affairs/higher education administration programs, faculty, and student affairs educators from entry level to senior student affairs officers and organizations and companies that are engaged in the campus marketplace.



Jennifer Waller, Executive Director  
**Association for Student Conduct Administration (ASCA)**

- Leading voice for student conduct in higher education, with a membership of more than 3,000 higher education student conduct administrators at approximately 1,200 colleges and universities in all 50 states.




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<sup>2</sup> <https://www.help.senate.gov/imo/media/Accreditation.pdf>

Mary DeNiro, CEO/Executive Director

**Association of College and University Housing Officers – International (ACUHO-I)**

- Representing thousands of campus housing professionals who work at more than 1,000 campuses as well as more than 250 companies and organizations whose products and services support the profession's objectives of developing exceptional residential experiences at colleges, universities, and other post-secondary institutions around the world.



Kevin Kruger, President

**NASPA – Student Affairs Administrators in Higher Education**

- Leading association for the advancement, health, and sustainability of the student affairs profession with a membership comprised of over 15,000 members in all 50 states, 25 countries, and 8 U.S. Territories.



Pam Watts, Executive Director

**NIRSA: Leaders in Collegiate Recreation**

- Comprised of, and supports, higher education professionals in campus recreation and wellbeing with a membership of nearly 4,500 dedicated professionals, students, and businesses serving an estimated 10.6 million students.

