

February 23, 2018

Senator Lamar Alexander
Chair, Senate Health, Education, Labor &
Pensions Committee
United States Senate
428 Senate Dirksen Office Building
Washington, DC 20510

Senator Patty Murray
Ranking Member, Senate Health, Education,
Labor & Pensions Committee
United States Senate
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chair Alexander and Ranking Member Murray:

On behalf of NASPA - Student Affairs Administrators in Higher Education and the undersigned higher education associations, we write in response to your request for comments regarding the reauthorization of the Higher Education Act of 1965 (HEA). We appreciate the effort you have undertaken in considering this reauthorization as a bipartisan process and to engage with the higher education community to ensure legislation that will benefit today's students now and in the years to come.

The United States' higher education system is unprecedented world-wide in guaranteeing access to affordable post-secondary education and training to millions, producing world-class research, and preparing engaged citizens. While there is much to celebrate in our national landscape of colleges and universities, years of state disinvestment and the diminishing purchasing power of federal grant programs have resulted in noticeable signs of wear. Our federal policy has failed to keep up with today's more diverse student body, including many adults shouldering responsibility not only for their own education, but also that of their children, resulting in a system of financial aid and regulations that are ill-suited to meeting the needs of either today's students or the American taxpayer. The reauthorization of HEA presents an opportunity to correct that course and fulfill both the promise and the responsibility of the federal government as the only entity that can provide reliable information on key outcomes for all students.

The Higher Education Act covers every aspect of federal post-secondary education in this country. Such sweeping legislation offers many opportunities for tailoring and improving our colleges and universities, many of which have been covered in detail by other higher education associations. We will focus this letter on providing additional context and information on those issues we feel members of the student affairs profession are best situated to speak to, though this should not be taken to mean that we are not in full support of the issues raised in other association letters to which we have signed-on.

Federal Financial Aid

Applying for federal and state financial aid should be as simple as possible and yet also provide those administering financial aid enough information to be sure they can target aid to those most in need of financial support. We are supportive of Senator Alexander's efforts to simplify the Free Application for Federal Student Aid (FAFSA), especially those which would allow

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of the student affairs profession*

individuals to apply from a mobile device, use skip-logic to limit the number of questions asked of those without complicated financial situations, and otherwise make the application more accessible to current and prospective students. We echo the need identified by the Education Commission of the States¹ to include states in conversations to simplify the FAFSA, however, to avoid re-creating the requirement for students to complete separate applications for federal and state aid.

NASPA is also supportive of expanding access to federal Pell funds to more students, including incarcerated individuals through the Second-chance Pell Pilot Program and to those pursuing short-term certificate programs. Expanding pathways to successful completion of post-secondary credentials will only be in the nation's best interest, however, if the programs eligible for these funds have demonstrated that they provide value to students. Recent research² by Stephanie Riegg Cellini, associate professor of public policy and economics at George Washington University, and Nicholas Turner, senior economist at the Federal Reserve Board of Governors, suggests that students who seek certificates from for-profit institutions may be worse off than if they had not received the credential due to the debt incurred to complete their program. These findings suggest the need for continuing the gainful employment and borrower defense regulations governing these programs both for the protection of students and the responsible stewardship of federal student aid resources.

Similarly, the Pell bonus funding introduced in the House Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act (H.R. 4508) is a notable step to encourage student completion and success. While NASPA supports such efforts, and recognizes the importance of incentivizing full-time students to complete their intended programs of study, we would encourage Senators to consider how this benefit can be structured to similarly support those students who are attending part-time, who are disproportionately more likely to be students of color. Intentional action must be taken to close equity gaps in American higher education attainment, and consideration of the differential effects of policies like this can work to close those gaps instead of widen them. When combined with the elimination of the Supplemental Educational Opportunity Grant (SEOG) program, which serves 1.5 million students annually, the cost of college would increase drastically for millions of low-income students.

It is equally important to consider the effect of proposed changes to federal loan programs from an equity lens. Analysis from The Institute for College Access and Success (TICAS)³ suggests that the removal of the in-school subsidy for undergraduate Stafford loans, as done in the PROSPER Act, would increase the cost of student loans by thousands of dollars. At a time when student loan debt is increasing, and concerns about students defaulting on their loans are rising, removal of federal subsidies for those least able to afford more debt is counterintuitive. Rather than adding to student debt, federal resources should instead be directed to offset burden for low-income students. Continuation of loan forgiveness for all students who faithfully make

¹ <https://www.ecs.org/fafsa-simplification-more-can-be-done-while-still-protecting-state-aid-programs/>

² Paper forthcoming; described by Dr. Cellini here: <https://www.brookings.edu/blog/brown-center-chalkboard/2018/02/09/gainfully-employed-new-evidence-on-the-earnings-employment-and-debt-of-for-profit-certificate-students/>

³ <https://ticas.org/blog/prosper-acts-one-loan-proposal-would-increase-cost-federal-loans-and-increase-risks-private>

efforts to repay their loans, but especially for those students who choose to enter public service, should be maintained, if not strengthened.

Indeed, as a profession reliant on the skills developed during graduate studies, NASPA is especially concerned by proposals raised in the PROSPER Act that would limit the ability of students to pursue graduate education. In addition to the costs changes to SEOG and in-school loan subsidies would impose on them as undergraduates, the removal of graduate student eligibility for Federal Work Study (FWS) and limitations on the amounts they can borrow through federal loan programs would force graduate students to borrow more in the more expensive private market. Once again, the impact of these changes will fall most heavily on those historically underrepresented students. As noted by TICAS⁴, “private loans are one of the most dangerous ways to finance a college education” because they lack “fixed interest rates, flexible repayment plans, and other important consumer protections” that are guaranteed by federal loans. Our national knowledge economy relies on increasing the proportion of workers with post-secondary credentials, which itself relies on providing increasing numbers of low-income, first-generation students with the support they need to be successful. Student affairs professionals with graduate training are essential to this task.

Support for Minority-serving Institutions, Low-income students

Hispanic individuals are the largest and second-fastest growing demographic of minority and ethnic groups within all enrolled students in higher education, and yet Hispanic Association of Colleges and Universities (HACU) notes⁵ that “budgetary limitations in appropriated funding levels for HEA Title V programs has resulted in less than 50 percent of eligible HSIs receiving a grant. These capacity-building grants (both Part A - Undergraduate and Part B - Post-Baccalaureate) are a vital component of HSIs' ability to serve the disproportionate number of low-income and first generation students of all races and ethnicities. Many HSIs have relatively low enrollment, with 59 percent enrolling 2,000 or less total full-time students. These eligible colleges and universities need increased access, not less, to federal institutional-development grant funds.” NASPA urges Senators to consider the current need of these institutions, the documented growth in the number of future HSIs, and the impact that HSIs have on not just Hispanic students but also on African American, Native American and Asian American and Pacific Islander students and make efforts to increase support for Title V programs.

Support for TRIO programs should likewise be maintained, if not increased. TRIO programs have been proven to support low-income students, prepare students in high demand fields such as teaching, and support the strengthening of institutions supporting first-generation, low-income students. Several provisions introduced in the PROSPER Act would reduce funding and/or incentives for institutions to maintain TRIO programs. For instance, many entities that serve low-income, first-generation students and students with disabilities do not have the capacity to meet a matching requirement; they rely on TRIO funding to meet the needs of the youth and adult learners that they serve. This is particularly true of minority-serving institutions and community colleges, which traditionally are under-resourced, yet serve students with the greatest need for intervention and supportive services; and community-based, non-profit

⁴ <https://ticas.org/blog/prosper-acts-one-loan-proposal-would-increase-cost-federal-loans-and-increase-risks-private>

⁵ <https://cqrengage.com/hacu/file/r2XOSf8oPY1/HACU%20Reaction%20to%20PROSPER%20Act.pdf>

agencies, which have small budgets, yet provide direct services to low-income students and families in their local communities. Again, we urge Senators to consider the needs of our growing knowledge-based economy and work to ensure that institutions and programs proven to increase student success and completion are, at a minimum, maintained.

Civic Engagement

The role of colleges and universities in preparing engaged citizens has long been recognized. Having long served as incubators of young adult civic engagement, institutions of higher education can offer students a smooth entry into our democratic process by helping to reduce any ambiguity and uncertainty around registering and voting. Findings from the behavioral science nonprofit, ideas42⁶, show that a lack of understanding about the registration process can be one of the greatest deterrents for young voters. As new voters, many students attending college immediately after high school don't necessarily know how to vote, or what the voting experience will be like. NASPA has a long history of supporting our members in civic learning and democratic engagement efforts on their campuses and supports the continuation of language in HEA to promote and encourage voter registration efforts on all college campuses.

Thank you for the opportunity to share with you the thoughts and priorities of student affairs professionals as you consider reauthorizing HEA. We are happy to share any additional information with or other members of the HELP Committee to further your efforts to support not only students, but the strength of our nation's economy as a whole.

Sincerely,



Kevin Kruger
President

On behalf of:

NASPA - Student Affairs Administrators in Higher Education

ACPA-College Student Educators International

Association of College Unions International

Association of College and University Housing Officers-International

NIRSA: Leaders in Collegiate Recreation

NODA-Association for Orientation, Transition and Retention in Higher Education

⁶ https://www.ideas42.org/wp-content/uploads/2017/05/Students_into_Voters.pdf