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August 2, 2013

The Honorable John Kline
Chairman
Committee on Education and the Workforce
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable George Miller
Senior Democratic Member
Committee on Education and the Workforce
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable Virginia Foxx
Chairwoman
Subcommittee on Higher Education and
Workforce Training
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable Ruben Hinojosa
Ranking Member
Subcommittee on Higher Education and
Workforce Training
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Kline, Senior Democratic Member Miller, Chairwoman Foxx and Ranking Member Hinojosa:

On behalf of the higher education associations listed below, representing two- and four-year, public and private colleges and research universities, enclosed please find recommendations for the Committee as you prepare for the upcoming reauthorization of the Higher Education Act. We look forward to working with you to ensure that this vital legislation continues to support our nation's colleges and universities and the students they serve.

Sincerely,

Molly Corbett Broad

On behalf of:
ACPA-College Student Educators International
American Association of Colleges for Teachers Education
American Association of Colleges of Nursing
American Association of Colleges of Osteopathic Medicine
American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
American Dental Education Association

American Indian Higher Education Consortium
Association of American Medical Colleges
Association of American Universities
Association of Catholic Colleges and Universities
Association of Community College Trustees
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Council for Christian Colleges & Universities
Council for Higher Education Accreditation
Council for Opportunity in Education
Council of Graduate Schools
Council of Independent Colleges
Educational Testing Service
EDUCAUSE
Hispanic Association of Colleges and Universities
NASPA – Students Affairs Administrators in Higher Education
National Association for Equal Opportunity in Higher Education
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
Thurgood Marshall College Fund
UNCF

<u>Accreditation Organizations</u>
Council of Regional Accrediting Commissions
Association of Advanced Rabbinical and Talmudic Schools
Commission on Accreditation of Allied Health Education Programs
Commission on Accrediting of the Association of Theological Schools
Distance Education and Training Council
Joint Review Committee on Educational Programs in Nuclear Medicine Technology
Transnational Association of Christian Colleges and Schools

RECOMMENDATIONS FROM 39 HIGHER EDUCATION ASSOCIATIONS FOR THE REAUTHORIZATION OF THE HIGHER EDUCATION ACT

We are pleased to respond to the Committee's invitation to share our views about key issues that should be the focus of reauthorization. Reauthorization offers a unique opportunity to assess how well the programs encompassed by the Higher Education Act (HEA) are meeting national needs, what improvements are needed, whether some programs have outlived their purpose or are failing to live up to their potential, whether others should be expanded or reconfigured, and whether national needs have shifted so as to require new strategies and new approaches to solving contemporary problems.

Recently, a handful of critics have questioned whether college is "worth it," arguing that college is not for everyone and that we should not encourage everyone to attend. While provocative, this sort of speculation sends a dangerous message to the millions of individuals who stand to benefit from higher education, but need support and encouragement to do so. We have never maintained that everyone should go to college, only that the opportunity to do so should be universal. For some individuals, postsecondary education may not be the right choice, but the overwhelming evidence should not be discounted that for most people, postsecondary education leaves them far better off, providing greater prosperity, job security and upward social mobility. Even more important than increased earnings are the profoundly positive effects a college education has on individuals and society in terms of increased participation in civic and public service, the decline in dependence on social services for both college graduates and their children and the enrichment to the arts and cultural life of our nation, among many other benefits.

The Title IV student aid programs that comprise the core of the HEA form an interactive and interlocking tapestry designed to work together to help students enter and succeed in postsecondary education. Since the previous reauthorization bill was passed five years ago, other legislation has been enacted amending some elements of the student financial aid programs and many of these changes have had far-reaching consequences for the programs and the students who rely on them or have created a certain budget brinksmanship that has the potential to destabilize the programs. However necessary or well-intentioned, legislation enacted outside of the parameters of reauthorization is never able to fully account for the interactive effects that changes to one program may have on the net effect or the potential of Title IV to live up to its promise of meeting national access and success mandates.

To begin our comments, we wish to reference some of the enduring precepts that underlie the HEA. Over time, various other programs have been added to and subtracted from the HEA, experiments have been tried and abandoned, and many modifications to the current array of programs have been made. But the twin goals of access and success have remained constant; the critical focus on need-based aid that strives to level the field between low-income students and their better off counterparts and the wisdom of student-centered grants, work and loans have helped deliver access and some degree of choice to ensure students can attend the institution that best serves their needs. Other elements of the HEA also have stood the test of time. For example, students have always been regarded as adults who are expected to bear some of the responsibility for their success or lack thereof. This concept has only gained currency as the majority of enrolled students transition from a predominantly 18 to 22-year-old population to the current enrollment trends, where only about a quarter of all students are in this age cohort.

Those aspects of the origins of the HEA are still valid, although other assumptions must be questioned, among them the place that states occupy in helping to finance postsecondary education. Federal financial aid was built around the presumption that state aid would keep the price of college affordable, allowing the federal aid dollar to cover a majority of the tuition bill. Because states have proven to be unpredictable or even unreliable partners, this presumption needs to be examined with an eye to re-engaging the states in a positive way.

While many factors will contribute to HEA policy formulation, the current economic and social climate is likely to play an outsized role in shaping the kinds of policies that will be adopted. But because reauthorization needs to be forward looking to anticipate and meet national needs through 2020 and beyond, extrapolating policy from today's trends is challenging. Will the U.S. economy—the weakest the nation has faced in decades—rebound and become robust over the next several years? Will new jobs, some in fields yet to be known, become plentiful? Will colleges and universities find ways, perhaps through new delivery modalities and ongoing cost reduction initiatives, to halt the price spiral that threatens to put college out of reach for some? Will states assume more responsibility for keeping higher education affordable? Will demand for a college degree lessen if the labor market improves? Will progress in the K-12 realm boost the number of students coming to campus who are ready to succeed? All of these and a thousand other factors will inform the reauthorization dialogue and influence the choices that are made. But in the long history of the HEA and its successive renewals, there may never have been such a tumultuous environment for making consequential policy decisions.

Against this backdrop, we would like to share our initial thoughts about the issues that should play a prominent role in the upcoming reauthorization. We are at still at an early stage of formulating complete, detailed recommendations for your consideration. As we continue to consult with our institutions and association colleagues, we look forward to working with you throughout all stages of the reauthorization process and delivering specific recommendations in time to help you to develop your bill. For the time being, we offer these thoughts on the issues we believe will be key considerations for the upcoming reauthorization discussions:

1. College access, persistence and completion;
2. Better information for consumers;
3. Student loan programs;
4. Accreditation and appropriate oversight;
5. College affordability and cost reduction;
6. Innovation to benefit students;

7. Federal regulatory burden; and

8. Special focus programs.

1. College Access, Persistence and Completion

In recent years, policy makers have increasingly focused on issues related to student persistence and graduation. We support this focus and agree that institutions of higher education must step up their efforts to promote completion. This is especially true in regard to low-income students who may acquire debt early in their pursuit of postsecondary education and who will face daunting challenges in discharging the debt if they leave without acquiring their certificate or degree. But there is no single solution or silver bullet that will yield a dramatic increase in graduation rates. Care must be taken to ensure the goal of improving completion does not compete with the equally critical goals of maintaining access and safeguarding academic quality. In short, in rewriting the HEA to accommodate this vitally important new goal, we must be particularly attuned to the possibility that changes will have unintended and undesired consequences.

For more than 40 years, the federal Pell Grant has been the cornerstone of efforts to increase college access. Today, Pell Grants have never been more important to lowering financial barriers to college access and success. In the future—given demographic trends that increasing numbers of students seeking postsecondary education will be from minority families and economic trends placing a premium on postsecondary education—Pell Grants will become even more essential. We strongly encourage Congress to ensure that the next authorization for the maximum Pell Grant is robust and supports the nation's need for additional college graduates from minority and low-income families.

Over the past five years, the program has undergone more rapid change than at any other time in its history, much of which has occurred outside of reauthorization. Because Pell is counter-cyclical, demand increases when the economy shrinks and costs go up. However, the economic headwinds of this period have brought demand to warp speed, as those who lost jobs sought re-training, and those whose parents lost jobs or homes found themselves newly eligible for aid.

Increases in the size of the maximum award over this period also contributed to program growth, causing many to say that the program was on an "unsustainable" path. But as is always the case, an improving economy lessens demand, and growth in the program has declined. As Congress begins its work on reauthorization, we strongly urge that you position Pell Grants to meet the demands of future students. ***Specifically, we urge Congress to include not less than an automatic inflation adjustment to the annual maximum Pell award.*** The value of this foundation grant cannot be allowed to erode. In addition, appropriations limitations have forced the adoption of eligibility restrictions that have cut the costs of the program at the expense of access. Particularly notable are the elimination of the year-round Pell Grant and sharply reduced eligibility for ability-to-benefit students. ***We strongly encourage Congress to restore these benefits as part of reauthorization and/or to examine whether the National Association of Student Financial Aid Administrator's (NASFAA) Pell Well***

or the National Association of Independent Colleges and Universities' Pell Flex proposal could provide incentives to persist and complete in a manner that is administratively efficient. These proposals, while not identical, are based on the concept of creating a Pell account from which students can draw down to facilitate degree completion and/or accommodate non-traditional enrollment patterns.

Similarly, last year Congress imposed a 12-semester limit on Pell Grant eligibility. This change has made it harder for some students to complete their education by immediately eliminating student aid just as they are on the verge of finishing their program. We ask Congress to revisit this policy decision. If an arbitrary limit is to remain, Congress should incorporate a provision to protect students who had already used up significant eligibility before the change took effect.

The campus-based aid programs, which include the Supplemental Education Opportunity Grant (SEOG), Federal Work-Study (FWS), and Perkins Loan programs, serve as important components of the strategies campuses employ to boost access and completion. Because of the limitations in Pell Grant aid, campus-based aid is a helpful and flexible component for rounding out an aid package for many needy students. More generally, these programs help build a bond of trust between a student and the institution. Finally, there is ample evidence that those students who receive work-study funds are more likely to persist and complete because they are more engaged in the campus community and better able to access the support services available to them.

Unfortunately, these programs have been plagued by modest funding levels for many years and far too few institutions are able to meaningfully participate in them. However, their relatively meager appropriations mask the multiplier effects derived from institutional matching funds requirements. ***We recommend Congress expand funding for these important programs and consider modifications to allow this new funding to better support persistence and completion for low- and middle-income students.***

Targeted Support

Titles III and V contain programs that provide targeted assistance to institutions with exceptional need, including support to Historically Black Colleges and Universities (HBCUs), Tribal Colleges, Hispanic-Serving Institutions (HSIs) and other minority-serving institutions. Likewise, Title III-A helps under-resourced institutions better serve their large numbers of high-need students. All of these programs are designed to strengthen and enhance the commitment to need-based student aid through Title IV.

HBCUs, HSIs, Tribal Colleges and other minority serving institutions play a unique and vital role in serving at-risk students. Very often, these institutions have limited financial resources and yet manage to effectively educate large numbers of low-income, high-need students. They also graduate disproportionate percentages of such students in STEM fields and the teaching profession. During HEA reauthorization, consideration should be given to this important role and the necessity of providing sufficient resources to strengthen these institutions.

Supporting Persistence and Completion

Many institutions have already implemented strategies to increase student persistence and completion. Two years ago, when faced with a piecemeal approach to advising and a high percentage of high-risk students, Georgia State University, a campus where more than 50 percent of students get Pell Grants, launched a promising new initiative to centralize advising and bring in additional academic advisors. Critical to this project were the implementation of a new web-based advising platform and the use of predictive analytics to identify when students have gone off the path to graduation. This allows academic advisors to proactively intervene to get students back on track. Austin Peay State University (TN) has had success with a similar initiative. ***Since no single approach will work at every campus, federal policy should encourage and support these different approaches. This could easily be done through the Fund for the Improvement of Postsecondary Education (FIPSE) and/or the experimental sites program.***

While colleges can and should do more to facilitate college completion, the substantial role that students themselves play in meeting their academic goals cannot be underestimated. No institutional programs can guarantee success if students fail to attend classes and complete their work, or leave school altogether for periods of time. One key consideration in student success is the extent to which students are prepared and ready to do college level work when they enroll in postsecondary education. Simply put: Students who are academically prepared for college are far more likely to complete postsecondary education than those who are not college ready. ***We believe federal policy should support cooperative efforts between elementary/secondary schools and postsecondary institutions that increase the number of college-prepared students.*** For example, the A-through-H testing program developed by California State University and used by California high schools helps students assess their readiness to do college-level work upon enrollment while they are still in high school, thus giving them time to address deficiencies before they enroll in college. Harper College, a two-year public institution in Illinois, has adopted a similar model in mathematics to help eliminate the need for remedial education once students get to college. Such locally- or state-developed initiatives have the potential to make the transition from high school to college seamless and to improve student success.

Another invaluable tool in efforts to enhance access and completion are the TRIO Programs and GEAR UP, which are critical to encouraging and supporting low-income and first-generation students in their efforts to pursue and succeed in postsecondary education. For these individuals, financial aid alone is insufficient to provide access to higher education. They also need supportive services such as the college awareness counseling, academic tutoring and mentoring that TRIO and GEAR UP provide. TRIO Programs also provide important support services for first-generation and low-income students once they have enrolled in college to help them persist and succeed in reaching their postsecondary goals.

Despite the undiminished need of students for the services provided by TRIO Programs, they remain chronically underfunded. By the end of the 2013-14 program year, the effect of reduced funding, compounded by sequestration, will mean that 128,000 students, including adult learners, military veterans

and students with disabilities, will have lost access to the services they require to help them succeed in college. Congress should stop the erosion that is hindering these programs.

Co-operative Education

Because the college to career connection has acquired even greater significance in recent years, we believe Congress should reinstate or create a new co-operative education (co-op) initiative to help students connect work and learning. The benefits for students include deepening their commitment to their academic preparation, career clarity and enhanced employability, while employers gain access to employees who are highly motivated and ready to work. Northeastern University (MA) has the largest and second-oldest co-op education program in the United States. A student graduating from Northeastern with a five-year bachelor's degree (paid for with eight semesters of tuition) typically has a total of 18 months of internships with up to three different companies, including some that are international.

FAFSA Simplification and Early Notification

We strongly support efforts to simplify and streamline the Free Application for Federal Student Aid (FAFSA). Technological advances have enabled significant progress in this area already. Further improvements are undoubtedly possible. However, taken to an extreme—e.g., a postcard FAFSA—these efforts may drive many institutions and states to create or use supplemental forms to gather additional information. We must be careful that further simplification does not result in the unintended consequence of harming the very students we are trying to help.

Another idea worth exploring would be early notification to students of Pell Grant eligibility. Informing students as early as the seventh or eighth grade of their likely eligibility for Pell would increase postsecondary aspirations and facilitate academic and financial planning.

2. Better Information for Consumers

All students should have appropriate information to help them make an informed decision about whether and where to pursue a postsecondary education. In recent years, however, a point seems to have been reached where information for information's sake has become the goal rather than information that is needed or has value for a student. The recent "Improving the College Scorecard" report by the Center for American Progress reaffirmed that well-intentioned information often confuses. In the words of one student upon reviewing a sample college scorecard, "What am I looking at? It looks like a bill or something but I'm not sure what it is. This is why I hate college stuff."

Consumer Disclosures

Between the last reauthorization and the upcoming one, there has been a surge in the number of consumer disclosures given to all students. At present, for example, federal law requires colleges and universities to post at least 62 different types of consumer information on their websites. A notebook holding the detailed requirements is six inches thick. Some of these individual requirements are exceptionally complex—campus crime reports, for example, count as a single item in the total. Even the Department of Education's ironically named "Consumer Information Disclosures At-A-Glance," which simply enumerates the required disclosures, covers 31 pages and identifies multiples categories of requirements and sub-requirements. While many of the disclosures are of broad interest, at least some are of little or no interest to students, such as foreign gifts to the campus in excess of $250,000.

Such a large amount of disclosures has several undesirable effects. First, it means students are hit with a tidal wave of information and are likely to be overwhelmed by the sheer volume of materials they are receiving. Second, given the complexity and detail of the required disclosures, there is no way that even the most careful institution can be confident it is in complete compliance with every requirement. And when an institution fails to make a disclosure properly, the immediate assumption is that the institution is trying to hide something. The cost of collecting and maintaining this information is enormous and, as has been widely acknowledged, these compliance costs are passed on to students in the form of increased tuition. In 2010, NASFAA found that 82 percent of financial aid administrators cited greater regulatory/compliance workload as a major cause of resource shortages in financial aid offices nationwide, which significantly undermined their ability to counsel students. Therefore, ***we urge Congress to adopt a zero-sum approach to additional consumer information. Proposals to add new disclosure requirements ought to be accompanied by an elimination of less valuable mandates. Further, information should be disclosed once and in the same format.***

We also urge Congress to reject calls for consumer information that duplicates existing requirements. For example, the so-called "Truth in Tuition" bill (H.R. 2020) calls for the provision of information that is virtually identical to information already required under Section 132(j) of the HEA and is currently available on College Navigator. This is an example of a completely redundant requirement, but other less obvious examples can be found that generally overlap existing requirements, and they should be discarded. Finally, ***Congress should require that all current and new consumer disclosures be validated through focus groups or other tests on the ultimate users to ensure the intended users want and will actually use the proposed information.***

Even when consumer information requirements are generated centrally, they can be duplicative and conflicting. We believe, for example, it is important students and families have access to accurate and meaningful information about the percentage of students who borrow to finance their education and the average indebtedness such students incur. However, the Department's College Navigator, the Shopping Sheet, the White House's College Scorecard and the Consumer Financial Protection Bureau's (CFPB) Comparison Tool all provide different information. Even within the federal government, information on student borrowing is calculated differently for each disclosure and uses varying data sources. College Navigator shows average annual borrowing for all undergraduates from the Integrated Postsecondary Education Data System (IPEDS), whereas the Scorecard and Shopping Sheet show median indebtedness for undergraduates who have left the institution (regardless of completion) from the National Student Loan Data System (NSLDS). To reiterate, we think it essential the federal government require that students be given clear and accurate information. But giving them very different data on important questions that varies considerably depending upon the federal website they visit makes no sense.

Before new disclosure requirements are imposed, Congress should require the Government Accountability Office (GAO) to ensure the new disclosure does not duplicate, substantially overlap or contradict existing disclosures. This is all the more necessary because increasingly a large number of disclosures emanate from agencies other than the Department of Education, such as the Department of Veterans Affairs and the CFPB.

Information on Student Outcomes

An essential part of providing better data for consumers is the need for accurate information on student outcomes. Colleges and universities are currently engaged in a number of voluntary efforts to provide more transparency and accountability about student outcomes. These efforts allow participating institutions to provide a fuller picture of completion and persistence at their institutions and make use of currently available data. See, for example, the Student Achievement Measure project (SAM), the Voluntary System of Accountability (VSA), the Voluntary Framework of Accountability (VFA) and the University and College Accountability Network (UCAN).[1] In some cases, such as SAM, the student outcome information is for all types of postsecondary institutions and in other cases, such as VFA, the data are keyed to different sectors of postsecondary education (in this case, two-year colleges).

The federal government also collects information on student outcomes, most notably graduation rates that are calculated under the Student Right-to-Know Act of 1990. Unfortunately, this data is very incomplete and therefore misleading. It applies only to students who enter an institution on a first-time, full-time basis, counts many students who transfer out of an institution as dropouts, does not include any student who transfers into a school as a graduate, and excludes any student who takes more than six years to complete a four-year degree (three years for students at a two-year school). Such a calculation is particularly inaccurate at schools with large numbers of low-income and non-traditional students. According to analysis conducted by the American Council on Education (ACE) and the National Student Clearinghouse, simply including transfer students would increase the federal six-year graduation rate from 54 percent to 63 percent at public, four-year institutions and from 63 percent to 73 percent at private, non-profit, four-year institutions. If students who are still enrolled and persisting toward a degree are included in the analysis, the "success rate" would increase to 77 percent and 82 percent respectively. For two-year institutions, simply including transfer students would increase the three-year rate from 19 percent to 68 percent.

We support efforts to improve the federal data on completion. For example, ***there are several proposals to create a federal unit record database. These proposals embrace complex and controversial ideas; indeed, within the higher education community there continues to be a range of divergent views about the desirability of a unit record system. Nonetheless, such ideas ought to and will receive a full and careful***

[1] For more information, access these links about the various voluntary measures: SAM, http://studentachievementmeasure.org; VSA, http://collegeportraits.org; UCAN, http://UCAN-network.org; VFA, http://vfa.aacc.nche.edu.

consideration as part of reauthorization. We will continue to work with you to consider ways to best improve student success and graduation data available to students, families and the public.

Under current law, institutional completion rates are calculated and/or disclosed for 100 percent, 150 percent and 200 percent of program length. These measuring periods should be retained and reported annually in a clear and consistent format.

Many institutions would like to be able to access the average earnings of students who complete particular programs, so long as the identity of individual program completers is protected. Increasingly, this information is being expected as one dimension of gauging the impact of postsecondary programs, particularly in the technical area. Congress should examine ways to facilitate the provision of this data without violating individual privacy.

It is also important to note that while surveys show that most students enroll in college to increase their employment prospects, this is only one of education's key functions. In fact, many students enroll in college because for them, college provides benefits that transcend the economic.

One shortcoming of the gainful employment regulations is they require the collection and disclosure of information on individual programs that is somewhat similar to, but different than, other data that must be provided under Title IV. ***We urge Congress to ensure the gainful employment disclosures are well integrated into other information that institutions must report and/or disclose.***

Comparable Information on College Cost

Prospective students must have clear and accurate information about the price of the education at any institution they are considering. Federal regulations require institutions to provide a substantial amount of data on their websites to help students and families understand this critical information. The 2008 reauthorization added a requirement that institutions provide data on "net price." Unfortunately, College Navigator, the Department's chief shopping and comparison tool for prospective students, is unable to provide accurate cost comparisons between institutions that are organized around an "academic year" and those that report on a "program" basis. ***This is a major shortcoming in providing a meaningful comparison and one that should be addressed promptly.***

The college tuition watch lists that were created in the Higher Education Opportunity Act are an example of a good idea that provides so much information to students that it simply overwhelms them. According to the New America Foundation, the 54 separate watch lists have created a "morass of lists of limited consumer utility." Among other shortcomings, these lists draw undue attention to institutions that have had recent, relatively large increases in tuition without providing any useful information to prospective students.

Improving Student Financial Aid Award Letters

In recent years there have been multiple proposals at the federal level to improve and standardize financial aid award letters. We strongly agree that financial aid award letters should be clear, concise and relevant to students and their families. At the same time, we caution against overly prescriptive attempts to standardize financial aid information. Rather than requiring complete standardization, we believe there is a better approach toward ensuring students are given the best information possible and a consistent method for comparing multiple aid offers while also affording schools the flexibility to customize a letter that best fits their student population.

We ask Congress to require all institutions to include in their award letters certain common elements, terminology and definitions as recommended by NASFAA's Award Letter and Consumer Notification Task Force. These common elements should include: federally defined cost of attendance, scholarship and grant awards (gift aid), net costs after gift aid, self-help options including student loans and work-study awards, assumptions used to determine aid awards, financial aid office contact information and deadlines and next steps. The utilization of these common elements will provide a more meaningful way of allowing students and families to compare items such as overall costs, out-of-pocket costs and requirements they must meet to earn the aid awarded.

As a further step, we support the recommendation by the NASFAA Task Force that in addition to common terminology and definitions, standardized financial aid award letters should also contain a link to a total loan and debt calculator, a link to consumer information disclosures and a link to a public glossary of standard terms and definitions. Importantly, the Task Force also recommended that award letters provide students with a link to the NSLDS as a single point of contact for all their educational loans.

Integrated Postsecondary Education Data System (IPEDS) Burden

All colleges and universities that receive federal student aid are required to complete the Department's IPEDS survey. While we strongly support the need for accurate and complete information about institutions receiving federal student aid, IPEDS has become an exceptionally complex survey instrument that now includes 13 separate surveys encompassing 350 pages of data. Many institutions have a staff member whose sole responsibility is collecting and submitting the IPEDS data to the Department. A 2010 GAO study found that the actual time burdens associated with IPEDS reporting were more than twice the Department's estimates. This burden is about to increase: next year the Department will add a fourteenth survey to IPEDS.

Unfortunately, much of the data currently collected through IPEDS is of limited relevance in our rapidly changing postsecondary education universe. And, while the Department often adds new requirements in an attempt to capture new information, it rarely, if ever, eliminates anything. As noted above, we support IPEDS. However, we believe IPEDS would benefit extensively from common sense reforms and streamlining. The Department convened a panel of researchers to identify potential data that are no longer useful and could potentially be eliminated or streamlined. For example, tenure status (particularly for non-instructional staff) is collected at a level of detail that is burdensome and not applicable at a significant number of institutions. ***As part of reauthorization, Congress should seek ways to maintain information that is relevant and useful while looking for concrete steps to streamline this complex set of surveys. We believe H.R. 1949, the Improving Postsecondary Education Data for Students Act, which would create a commission to study ways to increase transparency for consumers and streamline data collection for institutions, merits careful and detailed attention.***

3. Student Loan Programs

Congress should use reauthorization to examine the federal student loan programs as a whole, with the goal of minimizing costs to borrowers, simplifying repayment options and protecting students from over-borrowing. Today, 63 percent of Pell recipients take out federal student loans, as opposed to just 53 percent in 2000. As the volume of student loans has grown, so have concerns about student debt burden, over-borrowing and default. Reauthorization provides Congress with the opportunity to examine the complex and interactive pieces of the federal loan programs to ensure a thoughtful framework that is consistent with broader policy goals.

Minimizing Cost and Preventing Over-borrowing

Recently, the amount of student debt passed the $1 trillion mark. This astonishing number adds to the growing concern about student indebtedness, over-borrowing, what level of debt is manageable and what effect debt has on access and completion. Our institutions remain staunchly committed to helping students understand the dangers of over-borrowing through appropriate counseling. This is helpful and necessary, but not sufficient.

We believe reauthorization should put more tools at the disposal of institutions to assist them in discouraging excess borrowing. For example, institutions currently have no way to prevent unnecessary borrowing. Unlike Pell Grants, a student is entitled to borrow up to the maximum annual loan limit for as little as half-time enrollment. Financial aid administrators need more flexibility to protect against over-borrowing. ***Congress should grant institutions the authority to set borrowing limits at lower levels for groups of students based on factors such as the particular program of study, course load or level of academic preparation, while maintaining the use of professional judgment to adjust loan levels in individual circumstances.***

Similarly, important benefits that keep the cost of borrowing manageable should be preserved. Most importantly, ***we strongly support continuation of the in-school interest exemption for all borrowers. The elimination of graduate and professional student eligibility for subsidized Stafford loans has significantly increased the cost to these students, as has the recent practice of charging them a higher interest rate. These policies ought to be re-examined as part of reauthorization.*** There are additional benefits that ease the transition into repayment. For example, the grace period and deferment policies give students time to evaluate repayment options and to find employment before they start repaying their loans. Long-standing deferment policies provide flexibility to borrowers who pursue public service opportunities or have trouble making payments and therefore help keep their debt manageable. ***To limit debt, Congress should eliminate origination fees, which serve only as a tax on student borrowing.***

The availability of Parental Loans for Undergraduate Students (PLUS) and Grad PLUS is vital for both graduate students and parents. With their current ineligibility to receive subsidized loans, many graduate students are increasingly reliant on PLUS loans for the financing of their education. For parents, the recent tightening of eligibility for these loans has led to massive confusion and uncertainty for families and campuses, particularly among institutions that serve historically underrepresented populations. While institutions and the government have a vested interest in ensuring responsible borrowing, PLUS loans are often the only affordable borrowing option with real protections available to low-income parents and, increasingly, graduate students. ***We urge Congress to consider setting clear, transparent standards for borrowing that meet the needs of parents seeking to finance their children's education and graduate students pursuing their advanced degrees.***

Loan Repayment and Income-Based Repayment

Students are best served by a loan program with simple, beneficial repayment terms that minimizes the costs of financing their education. Unfortunately, the current system offers a complex and confusing set of repayment options that overwhelm many borrowers. There are currently seven different repayment options, including four income-related plans: Income-Based Repayment, Pay As You Earn, Income-Contingent Repayment and Income-Sensitive Repayment. Some of these plans are not open to all borrowers. ***Congress should consolidate these income-related plans into a single income-based option open to all borrowers.***

While streamlining repayment options is necessary, the standard 10-year plan can often be the best choice for borrowers because it can represent the lowest total repayment cost. However, research indicates the most significant reason why students do not repay their loans is lack of income; they simply do not have the money to repay. For such individuals, the availability of a universal income-based repayment plan opens the door to greater opportunities to help borrowers struggling with repayment avoid default altogether. Once borrowers become delinquent on their payments, action by the Department to offer them the income-based repayment plan will help avoid the devastating financial consequences of a default. To keep income information up-to-date, the Department and the Internal Revenue Service (IRS) are working to streamline the application process to (1) allow borrowers to directly import IRS income data into the application and (2) dispense with any requirement that Direct Loan borrowers contact their servicer as a first step of applying. ***To make this income verification available to very low-income borrowers who do not file an IRS Form 1040, borrowers should be able to give the Department advance permission to access their IRS Form W-2 for some period of time to reduce the risk of inadvertently missing a deadline.*** We note that greater use of income-based repayment could camouflage institutions at which borrowers are not able to retire their loans at a reasonable rate. The cohort default rate can be a useful indicator of the strength of institutional programs, particularly at institutions with a high percentage of student borrowers. While the use of income-related repayment options holds the potential to minimize or even eliminate default, ***we should continue to capture information about the percentage of borrowers from a given institution struggling to repay the full amount of their loans. If cohort default rates become a less reliable barometer for student repayment, it may be necessary to consider moving toward a concept such as a "loan repayment rate."***

Institutional penalties for a high default rate can be mitigated by a "participation rate index" (PRI) appeal. The PRI is designed to acknowledge the fact that when relatively few eligible students borrow under the federal loan programs, the default rate of the college does not accurately reflect institutional performance. ***The PRI needs to be modified to reflect the reality of much greater loan availability that has occurred since it was last addressed by Congress and set at .0875. In addition,***

institutions must be permitted to file a PRI appeal on the basis of data for any single year, which the Department has refused to allow institutions to do. This change will protect students from having the specter of a loss of eligibility hanging over their educational aspirations.

Debt Collection

One unexpected and unwelcome aspect of the evolution from bank-based lending to the Direct Loan program is that information on debt collection activities commissioned by the Department is difficult to come by. With defaults on the rise, this information is an important part of the picture of what is happening to borrowers. ***We urge Congress to inject transparency into the collection picture, including requiring the Department to establish and make available policies for collection contracts that do not cost the government excessive fees or add excessive penalties to borrower debt. Finally, Congress should ensure that efforts to move more students into income-related repayment plans do not inadvertently mask the warning signs of potential fraud and abuse.***

Improving Servicing for Borrowers

Currently, 5 million borrowers have four or more servicers handling their federal loans, and borrowers are assigned to different servicers with minimal advance notice. The 16 servicers currently contracted by the Department often follow different processes and procedures; for example, the process for signing up for an income-related repayment plan often varies by servicer. As a result, the transfer of loans to different servicers presents challenges for borrowers, such as delays in accessing online account information and seemingly inexplicable changes in monthly payment amounts.

Congress should require the Department to develop a comprehensive loan management portal. Through this portal, borrowers would be able to access information about their federal loans and repayment options, apply for deferments, change their repayment plan, consolidate their loans and make a single monthly payment to satisfy all their obligations. Borrowers should not have to navigate different servicers' websites or make multiple payments to different servicers every month.

4. Accreditation and Appropriate Oversight

A key component of the success and diversity that characterizes American higher education has been the maintenance of an appropriate balance between the government's need to assure accountability for federal expenditures and institutions' need to retain control over, and responsibility for, their academic activities. With respect to the Title IV programs, this balance has largely been achieved through a combination of federal program review and enforcement activities and private accreditation review and approval of academic offerings.

Maintaining an appropriate division of responsibility in this area is a challenging but critical task. But these roles have not been fixed or static. Over the last decade, accreditors have been assigned an increasing number of roles to compensate for the inability or unwillingness of other actors to accept responsibility. In many cases, accreditors are not well suited for these added assignments. Furthermore, over time, the Department has come to control a great deal of what accreditors do. We recognize and accept that accreditors have a central role to play in determining eligibility for federal student aid, but they should not be used or regarded—as they increasingly are—as regulatory extensions of the Department. Reauthorization offers a much-needed opportunity to adjust the imbalances that have emerged and to ensure that all actors—the federal government, the states and accreditors—have clearly defined responsibilities.

The central purpose of accreditation is to provide a rigorous, peer-reviewed process of quality assurance and self-improvement for colleges and universities. In doing this, accreditors can and should give students and the public valuable information about institutional quality. But this does not mean that accreditors should be regarded primarily as consumer protection agencies. Unfortunately in recent years, the Department has come to treat the agencies in this manner.

The federal oversight and micromanagement of accreditors has also increased in recent years because, through the National Advisory Committee on Institutional Quality and Integrity (NACIQI), the Department has used the accreditation agency recognition process as a lever to exert greater control over accreditors and, in turn, institutions. Currently, the Department reviews accreditors for 90 separate items as part of the recognition process. The Department's 82-page accreditation handbook has become a compliance checklist. This level of involvement in the recognition process places the Department dangerously close to becoming a co-accreditor and positions the Department to intrude into academic affairs that ought to be left to campus officials and accreditors. The recent regulation defining a "credit hour" and requiring accreditors to monitor institutional compliance is one clear example of this regrettable development.

We ask Congress not to impose additional consumer protection or regulatory functions on accreditors. We recommend that the Title IV recognition process be streamlined so that accreditors can return to their primary focus of providing quality assurance.

At the same time, Congress should determine if there are statutory impediments that stand in the way of the Department's own institutional monitoring efforts to assure federal dollars are being used appropriately and to good effect. In successive reauthorizations, Congress has supplied the Department with numerous oversight tools, including the authority to close a school immediately, but the Department uses this authority irregularly and idiosyncratically. Earlier this year, for example, the Department announced it would levy fines on institutions for alleged violations that occurred in 1995—nearly two decades prior. ***We ask Congress to review the Department's oversight of institutions: the process by which institutions are identified for review, the review process itself, the decision-making process that defines what steps will be taken against violators and the equity and consistency of the sanctions that are applied. The Department itself should be encouraged to propose alterations to the HEA that will enhance its enforcement capabilities.***

"Risk-based" Review

Flexibility to consider institutional mission is a core characteristic of accreditation. This means accreditors will evaluate the academic quality of individual institutions based on the mission and characteristics of each school. Unfortunately the Department has interpreted the statutory language more rigidly and expansively than Congress intended. This has had the effect of stifling flexibility and promoting uniformity with respect to institutional accreditation. Not all institutions pose the same levels of risk to students and taxpayers. Even among institutions accredited by the same agency, the level of risk with respect to academic quality varies. Put simply, some institutions require less oversight while others require more extensive and more frequent scrutiny.

For this reason, we believe it is critical to have an accreditation system with sufficient flexibility that allows more or less oversight by accreditors based on the risk different institutions present. The ACE task force report *Assuring Quality in the 21st Century: Self-Regulation in a New Era* has called attention to the need to consider differentiated levels of review based on the level of institutional risk.

However, the Department's interpretation of the HEA does not permit accreditors the flexibility to design and implement "differential review" based on levels of risk to students and the public. ***Consequently, we ask Congress to include clear and unambiguous authority to allow accreditors to design and implement such a system.***

5. College Affordability and Cost Reduction

Federal student aid policy is built upon an assumption of shared responsibility among the federal government, states, institutions and students. All of these partners have an obligation to provide a quality, affordable postsecondary education. In regard to quality assurance, the substantial role that states still play in directly financing higher education carries with it implicit safeguards for the federal government that those institutions meet basic standards of quality. States do still retain substantial "skin in the game" when it comes to ensuring that minimum standards of performance are attained. This continues to be the case even though the states have been walking away from their financial commitment and their historic role in ensuring low-cost higher education, leaving the federal government, institutions and students to make up the difference.

All too often, these cuts in state support are transferred directly onto the backs of students and families in the form of higher tuition at public institutions and reduced grant aid for students. In many states, public institutions have no control over their own tuition rates, which are instead set by the legislature that slashed state support.

Over the last five years, states have divested in higher education to the tune of $8.7 billion. During this same period, state appropriations per student at public institutions have declined 24 percent in constant dollars. States have also cut their support for grant programs serving students at both public and private institutions: Connecticut by 24 percent, Georgia by 10 percent, Maryland by 25 percent and Texas by 20 percent, to name a few. Institutions have responded by trying to fill this gap. In academic year (AY) 2001-02, institutions provided $22 billion (constant dollars) in grant aid to students, but by AY 2011-12, that had climbed to $42 billion (constant dollars), representing 37 percent of all grant aid to students. At the same time, the federal government eliminated funding for the Leveraging Educational Assistance Partnership Program, which provided important federal matching funds to states that maintained their efforts on state grant programs. Without this small incentive fund, some states have eliminated their state grant programs, placing even greater funding demands on institutions and the federal government. ***Congress should continue to require states to maintain support through the use of maintenance of effort provisions and other appropriate mechanisms. Finally, given the states' recent track record on higher education funding, Congress should strenuously oppose proposals to convert the Pell Grant Program or other student aid resources into block grants to states.***

Higher education is among the most labor- and skill-intensive sectors of the economy, with college graduates comprising almost 70 percent of its employees. Higher education institutions typically spend 60 percent or more of their budgets on human resource costs. In recent years, institutions had sharp increases in benefit expenses that now comprise nearly 25 percent of total human resource costs. Over the last seven years, health care insurance premiums have continued to increase each year, with an average increase of 5.8 percent for individual coverage and 6.4 percent for family coverage.

Institutions recognize that they must do their part to control costs and keep college within reach for students and families. In response, campuses have adopted a diverse set of cost control strategies in an effort to keep college affordable. For example, cooperative purchasing agreements to reduce expenses have become commonplace. Many institutions have adopted Leadership in Energy and Environmental Design (LEED) standards and other energy efficiency initiatives to address sustainability concerns and reduce costs. Other schools have worked to streamline departments and programs, including in some cases eliminating particular programs. Finally, some institutions have adopted differential tuition and fees pricing to more accurately reflect the true costs of specific academic programs. ***To encourage further experimentation and implementation of effective strategies to control costs, Congress should use FIPSE to develop and disseminate scalable cost reduction approaches.***

6. Innovation to Benefit Students

Higher education is undergoing a period of rapid change with the rise of new learning modalities and technologies. We should find ways to safely explore the potential of these new approaches while ensuring that adequate safeguards and quality controls are in place.

The past several years have been characterized by experimentation and rapid innovation in higher education, encompassing massive open online courses (MOOCs), open educational resources, technology-enhanced pedagogy, competency-based learning and expanded use of prior learning assessments. Traditional higher education has led the way in developing these innovations, most notably in the creation of MOOCs, which have been generating considerable interest for their potential to transform the college experience. For example, Brown University has created the first of its kind massive open online engineering course tailored to high school students to familiarize them with the merits and challenges of the field. This could pave the way toward other initiatives aimed at better preparing high school students for the rigors of college. But clearly the potential and promise they represent has yet to be fully discovered. While it is far too early to know what the lasting impact of these initiatives will be or how they will ultimately reshape the higher education landscape, they hold real promise for addressing pressing issues, such as reducing price, increasing college preparedness, shortening time to degree or enhancing completion.

These and other initiatives are already being adopted and often customized by campuses across the country. As with any new educational model though, they should be tested to ensure they provide quality and that adequate safeguards are in place before opening the student aid system to them in a way that does not impede innovation. ***Congress could support these initiatives through pilot programs or competitive FIPSE grants. The HEA "experimental sites" authority also provides a good model to test these innovative approaches.***

The regulation creating a federal definition of a credit hour should be eliminated. The definition's emphasis on seat time is outdated, and efforts to artificially inject flexibility into the definition have only increased confusion about its requirements. This lack of clarity creates significant uncertainty for institutions and accreditors and stifles innovative approaches to measuring learning.

Competency-based learning models have recently become an area of considerable interest. This approach allows credentials to be awarded based on a student's ability to demonstrate that a level of mastery has been acquired, regardless of how, where or when it occurred. Several highly respected institutions have recently launched such programs. While promising in potentially increasing postsecondary attainment, this represents a dramatic departure from traditional learning models, where learning is acquired only after a significant interaction between students and faculty. ***Congress should consider how current federal aid eligibility rules might be modified to encompass such programs, ensuring the level of aid provided is warranted. Given the recent surge of interest in this model, Congress should mandate a high level assessment of the strengths and weaknesses of this approach and its implications for federal policy.***

7. Federal Regulatory Burden

Excessive regulatory burden is a key driver of college costs. In addition to raising tuition, it diverts campus resources away from educational programs and services for students. Congress needs to look for ways to rein in and simplify this regulatory morass.

Because regulation is seen as a free good, the Department has no incentive to minimize regulatory burden on institutions. We support regulation necessary to safeguard taxpayer investment and protect against waste, fraud and abuse. However, simply piling on more regulation is no guarantee of better protection of federal funds and adds significant cost and complexity to the system. Instead of more regulation, we need smarter regulation.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act provides one illustrative example. Ensuring student safety is of the utmost importance to colleges and universities, and institutions invest millions of dollars to make their campuses safer for students. The Clery Act provides important safeguards and information for students. At the same time, since its enactment in 1990, the law has been amended six times, most recently in 2013. Each amendment has brought additional requirements and complexity, and it can be argued that many of these changes have little to no bearing on student safety. In 2011, the Department's handbook included nearly 70 new interpretations on how to comply with the law, and provided 21 pages of guidance related solely to identifying the geographic location where a crime occurs. The constant churning and complexity of the statute, regulations and guidance has made compliance challenging, to say the least. According to one campus security consultant, since enactment, only one institution has made it through a comprehensive Clery audit without a finding. Several independent experts estimate that most institutions are no better than 50 percent compliant.

Congress should look for ways to slow and limit the all-too-common practice of issuing excessive amounts of sub-regulatory guidance. In 2012 alone, through electronic announcements and Dear Colleague letters, the Department issued no less than 270 regulatory updates or modifications—more than one change per work day. The gainful employment regulations spawned 43 separate Dear Colleague letters and electronic announcements further detailing institutional reporting and disclosure requirements. In addition, institutions often receive only limited time to comply with new departmental guidance. For example, the Department published interim regulations for the recent change limiting subsidized loans to 150 percent of program time only six weeks before the rules took effect. Webinars providing additional guidance on these requirements were scheduled for a little more than two weeks before the implementation date.

Sub-regulatory guidance should be limited to instances where established regulation needs clarification or where relief from unintended consequences is needed. Too often, the Department blurs these lines and uses sub-regulatory guidance as a way to regulate by decree. ***Congress should take a number of steps to rein in the tidal wave of regulations and sub-regulatory guidance impacting institutions. For example, Congress should require the Department to implement the compliance calendar mandated in HEOA and create a master calendar for reporting and disclosure requirements stemming from regulations or sub-regulatory guidance. In addition, Congress should establish standards to ensure accurate regulatory burden assessments from the Department and strengthen current cost-benefit analysis requirements.***

Congress should consider whether the costs of specific regulations outweigh the benefits they provide. The previously mentioned amendment limiting subsidized loan eligibility to 150 percent of program time is an example of a requirement that generates little in savings and has resulted in enormous complexity for campus administrators.

Finally, Congress should take legislative action to force the Department to ensure it treats private, non-profit colleges fairly under the federal Financial Responsibility Standards system. Independent accounting experts have found serious flaws in the methods used by the Department and even worse, institutions that have been inaccurately assessed penalties have no clear recourse. ***At the least, Congress should establish a formal appeals process for affected institutions, create an advisory board of independent accounting experts to assist the Department in its processes, and strengthen the current legal requirement under Section 498(c)(3)C) of the HEA to ensure the Secretary of Education steps back and examines the "total financial circumstances" of institutions that fail the ratios test before assessing penalties.***

8. Special Focus Programs

In the nearly 1,000 pages that comprise the HEA as amended, the vast majority of provisions contained within them pertain to the Title IV student financial aid programs and issues related to them. The prominence accorded these vital components of the HEA should not detract from the fact that the statute extends to cover a number of other important titles and programs that complement and support our higher education policy goals. We refer to some of them below:

Teacher Preparation

During the past decade, teacher preparation programs at colleges have undergone revolutionary change. At institutions with state-of-the-art programs, almost nothing that was being done a decade ago is being done in the same way today. Key changes include restructuring practicum time so teacher education students are in the classroom throughout their training (not just at the end); increasing the amount of time in classrooms (on average, programs require 480-586 hours of student teaching[2]); working more closely with local education agencies (LEAs); and integrating some of the newest, most exciting information on the variety of ways students learn into practical methods for teaching diverse populations. Preparation programs are also intensely engaged in developing ways to measure the effectiveness of their candidates. Almost a third of preparation programs utilize performance assessments to evaluate the readiness of their candidates to be successful in the classroom and that number grows monthly. One such performance assessment, edTPA, is being used in more than 400 preparation programs across the country and is resulting in better prepared new teachers and strong preparation programs. Colleges of education are continuing to evolve and are eager to be partners with the states and the federal government to meet our common goal of ensuring a qualified teacher in every classroom.

The profession's efforts to reform its programs are paying off. Data from various national surveys show strong teacher satisfaction with their preparation programs and with how well prepared graduates feel on key aspects of teaching. According to the latest teachers' survey conducted by the American Federation of Teachers, 72 percent of respondents said teacher preparation programs prepared them to be able to set high expectations for students. More than 84 percent of new teachers felt completely or mostly prepared on content, and 70 percent felt completely or mostly prepared on pedagogy. On a 2010 Educational Testing Service internal survey of 7,700 Praxis II takers on how well prepared new teachers feel to develop and use assessments, over 90 percent felt well prepared by their programs to use assessments to determine student strengths and needs and to understand and use student achievement data to modify and differentiate instruction accordingly.

To reach our common goal, it is essential that colleges and states, who hold ultimate accountability for assessing institutional performance, are partners with the federal government. Top down, prescriptive metrics from Washington will not only weaken institutional and state commitments to program improvement, but will hinder institutions' and states' ability to respond to

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[2] Data from *The Changing Teacher Preparation Profession: A Report from AACTE's Professional Education Data System [PEDS].* American Association of Colleges for Teacher Education (March, 2013).

the promising new evidence available in such diverse areas as brain science, instructional technology and pedagogical methods as they emerge and continue to change the field.

We urge you to consider changes to the Teacher Quality Partnership Grant Program and institutional and state report cards in accordance with the Educator Preparation Reform Act (H. R. 2172), model legislation which supports preparation programs incorporating cutting edge professional practices and holds preparation providers accountable for the quality of their candidates. This bill reauthorizes Title II of the HEA and represents a consensus from the higher education community about the appropriate federal role in supporting innovation in preparation programs and in ensuring that the federal investment in teacher preparation results in high quality programs.

The HEA is the proper place for strong funding incentives for college partnerships with school districts and local classrooms through Teacher Quality Partnership grants and appropriate accountability through institutional and state report cards. ***Proposals to move funding and accountability to the Elementary and Secondary Education Act should be rejected, as they would dilute the emphasis on teacher preparation at institutions of higher education, which train 90 percent of the nation's public school teachers.*** Colleges need to be called upon to make their teacher preparation programs the pride of their institutions. Only by reaching out to colleges directly will you create the ownership and partnerships needed for success in this important national goal.

International Education

The Title VI programs address critical national needs in foreign language and regional expertise, as well as fostering cultural and historical understanding more generally. The programs are complementary in meeting our country's diverse global interests. They not only educate U.S. experts to work in, or on issues related to, varied and strategic regions of the world and prepare future students for cultural exchange and participation in worldwide business enterprises, but also serve to ensure a repository of knowledge and teachers for future generations. The programs enable the nation to maintain and enhance expertise on more than 200 less commonly taught languages necessary to respond to unanticipated global situations. The documented shortage of American personnel with the requisite expertise and knowledge in key areas and language fluency underscores the continued national need for these programs.

We ask Congress to reaffirm its historical support for these collegiate level programs, which in 2007 the National Academies of Sciences recognized as the foundation for international and foreign language education in the United States.

Graduate Assistance

The Javits Fellowships and Graduate Assistance in the Areas of National Need (GAANN) programs are the only graduate education programs funded by the Department. Although authorized as a separate program, both Congress and the administration have funded Javits as part of a consolidated GAANN program since fiscal year 2012. Both programs support some of our nation's brightest graduate students who are focused on critical areas of national need, as well as on many of the biggest global challenges in energy, health and engineering. The importance of these programs has grown over the past several years, as federal financial assistance for graduate students has been eroded. The federal support these programs provide is essential for enabling graduate students to pursue and complete their degrees. At the same time, they are separate and distinct, as the Javits Program is the only federal graduate education fellowship program that directly funds students in the arts and the humanities, while GAANN is awarded to institutions to administer.

At a time when a more educated citizenry is needed for both individual advancement and societal progress, we believe that Javits and GAANN should be reauthorized as separate programs and will work with Congress to increase the funding for these critical programs.