Association of Public and Land-grant Universities

August 2, 2013

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

The Honorable George Miller
Senior Democratic Member
U.S. House of Representatives
Committee on Education and the Workforce
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:

The Association of Public and Land-grant Universities (APLU) greatly appreciates the Committee's interest in seeking the community's feedback on important issues affecting higher education in the upcoming reauthorization of the Higher Education Act (HEA). This request for comments has spurred us to start the discussion among our campuses about the priorities for public universities in the upcoming reauthorization, and we hope this is the beginning of an important dialogue with the Committee.

In addition to the comments the American Council for Education (ACE) submitted on behalf of the broader higher education community, including APLU, we submit the following comments and recommendations.

We look forward to working with the Committee as this important authorization moves forward. Please feel free to contact us with any questions.

Sincerely,

Peter McPherson
President
Association of Public and Land-grant Universities

# APLU Comments on HEA Reauthorization for The House Committee on Education and the Workforce

The higher education system in the U.S. is entering a period of extraordinary change with technological innovations offering exciting possibilities for the future of education delivery, management, and accountability.  Yet, public higher education institutions continue to face a grave fiscal climate as states have significantly reduced their level of support from just a few years ago.  This is exacerbated as federal budget restrictions take hold and as the budget sequester looms over the coming eight years. Further straining the system is that student debt nationally has surpassed $1 trillion. Most concerning is that too many students fail to complete college, leaving them with debt, but no degree. This is of no benefit to these students or the nation.

As President Abraham Lincoln recognized in the midst of the Civil War, the promise of a higher education for all citizens is one of the most worthy goals of our nation.  And thus with Lincoln's signing of the Morrill Land-Grant Colleges Act over 150 years ago, began the partnership between the federal government, the states, and public research universities.  It is a partnership that has been extraordinarily successful, but it is one that needs renewed support through thoughtful policy and strategic investments that ensure taxpayer dollars are used wisely.

APLU was guided by the following principles in developing our priorities for the upcoming Higher Education Act (HEA) Reauthorization:

1. Sufficient and sustainable federal funding and support is needed for student financial aid programs.
2. Federal financial aid programs should provide access and encourage completion.
3. Institutions should be held accountable for their quality, as well as be partners in student progress and completion.
4. Institutions should be recognized, compared, and evaluated according to the diverse student populations they serve.
5. Institutional eligibility for Title IV funds and departmental enforcement of eligibility needs to be strengthened.
6. Current institutional reporting and disclosure requirements should be reduced and simplified to those that are really important to students and families.
7. There are programs authorized within the HEA beyond Title IV that should be supported such as graduate education, international education, and targeted programs assisting underrepresented students.

While our recommendations for the reauthorization of the Higher Education Act are arranged following the Committee's specific questions listed below, the questions and our recommendations are just as interrelated as the complex system of higher education itself.

- *Empower students as consumers in higher education,*
- *Simplify and improve the student aid and loan programs,*
- *Increase college accessibility, affordability, and completion,*
- *Encourage institutions to reduce costs,*
- *Promote innovation to improve access to and delivery of higher education, and*
- *Balance the need for accountability with the burden of federal requirements.*

## ***Empower students as consumers in higher education***

As public entities, APLU institutions are accustomed to and in favor of transparency. However, more information, in multiple formats, to students and families is not always better and can create confusion and uncertainty. The conflicting and often overwhelming data supplied under the College Scorecard, the Cost Affordability and Transparency Center, the College Navigator, the Shopping Sheet, and the numerous mandated consumer information disclosures, have reached the point of diminishing returns. Congress should work with the Department of Education (hereafter referred to as "the Department"), students, institutions, and public to reassess what is being collected and displayed.

APLU supports H.R. 1949, *Improving Postsecondary Education Data for Students Act*, which the House passed in May of this year. Working with the stakeholder community, the legislation requires the Department to identify, reduce, and simplify institutional reporting requirements to those that are really important to students and families. In some instances, it may be best to rely on institutions and their associations to encourage and facilitate the reporting of information that is more institution or sector specific.

Further, there should be serious consideration of eliminating the non-financial aid related consumer information disclosure requirements as such disclosures have become so numerous, duplicative, and overwhelming that students are failing to fully comprehend them. These disclosure requirements also divert staff resources away from counseling students on understanding aid options and other financial aid activities.

### The Student Right to Know Before You Go Act

We not only urge a consolidation and simplification of current data, but also better information. APLU is supportive of many of the concepts behind *The Student Right to Know Before You Go Act*, introduced by Senators Ron Wyden, Marco Rubio, and Mark Warner (S.915) and Representatives Duncan Hunter and Rob Andrews (HR. 1937). We do have some concerns with the post-graduation earnings metrics proposed in the legislation but the bill is a useful starting point and includes some concepts worth inclusion in HEA reauthorization legislation.

### Re-examination of the Unit Record Data Systems

During the last reauthorization, Congress and the administration considered and rejected the idea of a "unit record data system" to track students. We believe this issue should be reexamined in the upcoming reauthorization. Many of our member institutions already participate in statewide longitudinal data systems, which can provide best practices regarding the collection of data and sharing of information across the K-12/postsecondary education community. To obtain the accurate picture of student progress that policymakers, students and parents seek, Congress should consider the development of a limited student unit record data system with appropriate privacy safeguards. We know such data systems are controversial among some in the higher education sector. However, given the experience in many states with student level data systems we believe many of the concerns from earlier reauthorizations have been addressed or nullified. Without a national data system, it is very difficult, if not impossible, to have a reliable and accurate picture of student progress, completion, and post-graduation outcomes that crosses institutional and state boundaries.

### Student Achievement Measure (SAM)

In the absence of a federal student data system, APLU and the five other presidential higher education associations developed a website for students, families, and policymakers that will offer a better picture of student success and completion that can be compared across institutions. As you know, the federal completion metric often underreports student achievement as it only accounts for students who enroll full-time and then start and finish at their first college or university. Nationally, more than one in five students who complete a degree do so at an institution other than the one where they started, and 15 percent of students had previously attended college in at least one other state, according to a recent study by the National Student Clearinghouse Research Center. The joint initiative, the Student Achievement Measure (SAM)[1], uses the National Student Clearinghouse data to track student movement across postsecondary institutions to provide a more complete picture of undergraduate student progress and completion. Since the announcement of SAM's launch in late June, over 164 institutions from two-year, four-year public and private institutions have joined the SAM project. Participating colleges and universities will begin to post their institution's individual Student Achievement Measure on this website in fall 2013. Congress should consider SAM as a potential alternative model of what could be done to put better information into the hands of students, parents, and policymakers.

**Voluntary System of Accountability and the College Portraits**

Much of the methodology behind the bachelor's degree model in SAM comes from the Voluntary System of Accountability (VSA). The VSA is an initiative by public 4-year universities to supply clear, accessible, and comparable information on the undergraduate student experience through a common web report – the College Portrait.[2] The VSA is sponsored by APLU and the American Association of State Colleges and Universities (AASCU), with nearly 300 public universities participants.

The College Portrait is a tool for prospective students, families, school counselors, and policy-makers with each institution's College Portrait listing a variety of information, including the characteristics of students and faculty, admissions requirements, popular majors, average class sizes, campus safety, the future plans of graduates, and more. Every Portrait provides cost of attendance and financial aid information and a net price calculator for users to estimate their own costs at a particular institution. An essential and unique element of the College Portrait is the reporting of student learning outcomes in broad skill areas such as critical thinking, problem-solving and written communication.

## ***Simplify and improve the student aid and loan programs***

Students should be confident in the quality of their educational experience and have access to appropriate, institutional information during their college search process. As such, we have outlined several recommendations aimed at strengthening the assurance of institutional quality through Title IV eligibility.

With the increased federal investment in the Pell grant program over the last decade and $1 trillion in national student debt accumulated, policymakers and higher education must look closely at the alignment of federal aid policy with national goals and seek to enhance the effectiveness of federal student aid programs. These programs are critical for improved educational attainment, particularly among low-income and under-represented students who are slated to make up an increasing proportion of college students.

Federal student aid should support and reward students who demonstrate the motivation, work

[1] Student Achievement Measure (SAM): http://studentachievementmeasure.org
[2] The College Portrait: http://www.collegeportraits.org/

ethic, and perseverance to reach meaningful learning milestones along a path to success. It should similarly support and reward institutions that successfully help their students stay on track and complete their degree.

### Provide Sufficient Funding for Pell Grants

First and foremost, even in these times of fiscal constraint, APLU urges Congress to provide no less that automatic inflation adjusted increases in federal funding for the annual maximum Pell award and prevent any further erosion of related benefits.

Beyond the benefits to an individual, there is tremendous public benefit to our nation having a highly educated citizenry. Higher education attainment increases income and the tax base; generates employment; rebuilds the middle class; provides greater economic well-being and resilience; improves overall quality of life; and makes the United States stronger and more globally competitive. Further, citizens with postsecondary degrees are more likely to engage in their community and tend to lead healthier lifestyles that contribute to reduced health care costs.[3] Investing sufficiently in higher education is more than worth the initial outlays of the federal government.

### Restore Year-round Eligibility for Pell

While we understand the considerable budget hurdles to do so, APLU strongly encourages Congress to restore year-round Pell grant eligibility, which would provide grants to help cover summer attendance by Pell-eligible students. Doing so would allow students to move to completion as quickly as possible. Such action would encourage timely degree completion, decrease the student debt burden, and allow students to enter the labor force more quickly. Congress may want to consider making summer Pell grant eligibility contingent on a student's satisfactory completion of the two previous semesters. Such an approach might cost substantially less than full restoration.

### Retain and Support the Suite of Campus-Based Aid Programs

We urge Congress to maintain the suite of campus-based aid programs as they are an important element to the aid portfolio, providing flexibility to institutional financial aid officers and additional funds for the neediest students. We urge that Supplemental Educational Opportunity Grant (SEOG), Work Study, and the Perkins Loan program are maintained at sufficient levels.

### Reinvigorate the Perkins Loans Program

The long-term viability of the Perkins Loans program is crucial as it offers a financial bridge to students before they seek private loans or turn to credit cards. It is in the best interests of students to keep the need-based Perkins Loans program available and have it remain part of the campus-based programs. We urge Congress to work with stakeholders to strengthen the Perkins Loan program and ensure its continuance.

### Incentivize Completion in Student Aid, But Carefully

Federal aid reform, over time, should encourage increasing numbers of students to complete a quality degree or credential and Congress should consider incentives for completion, in addition to access, as part of federal programs. We support Satisfactory Academic Progress (SAP) measures as academic achievement is the responsibility of both students and institutions. We urge Congress to consider a more extensive use of SAP while also assuring a more active oversight of SAP.

---

[3] Garmise, Shari USU/APLU Office of Urban Initiatives; *Project Degree Completion: Building our Future* http://www.aplu.org/document.doc?id=4138

The recent limitation on Pell grant eligibility to 12 semesters has created some unanticipated problems. Some additional flexibility should be created for those students already in school when the limit was put in place. Also, we have heard from campuses that some students transferring into 4-year programs from 2-year institutions have already used up so much of their eligibility that they lack sufficient eligibility to complete a 4-year degree. We have not fully explored the implications of putting a separate limit for eligibility on two-year degrees e.g. six semesters, but consideration should be given to how to deal with this problem.

**Lower the Graduate Loan Interest Rates**

We appreciate that Congress was able to come to a bipartisan agreement and create a sustainable solution to the recent increase in interest rates for subsidized federal student loans. We supported the passage of the Senate modified version of H.R. 1911, the *Smarter Solutions for Students Act.* However, we remain concerned with the unbalanced treatment of graduate student loan borrowers. Over the last few years, graduate loan rates and graduate education benefits have been reduced to shore up undergraduate programs and loans. In today's globally competitive economy, it is unwise to place additional burden on students pursuing graduate education. We urge Congress to carefully examine the cumulative impacts of these changes to graduate students across the board and work to lower the current rate of graduate PLUS loans from the 10 year Treasury plus 3.6 percent rate established under the *Smarter Solutions for Students Act*.

**Increase Stafford Loan Limits & Allow Institutions Flexibility to Protect from Over-borrowing**

In the upcoming reauthorization, we urge Congress to increase the maximum limits for federal undergraduate Stafford and graduate PLUS loans as they are better option for students than private student loans. However, we do not want students to over-borrow and increase unnecessary debt burden. We strongly support proposals to grant higher education institutions and their financial aid administrators the authority and the flexibility to set loan borrowing at lower limits based on academic and program factors as outlined in the National Association of Student Financial Aid Administrators (NASFAA) Reauthorization Task Force Report.[4]

**Reassess Criteria for Parent PLUS Loans**

The recent increase in denials of parent PLUS loans by the Department of Education came after a stricter interpretation of existing rules was applied to PLUS loan applicants, moving from a 90 day credit history to a consideration of a five year credit history of applicants. We hope the Department consults with the broader community of institutions and parents before enacting such consequential changes in the future. The change had a substantial negative impact on the parents of lower-income students. We urge Congress, working with affected stakeholders, to reexamine the existing evaluation criteria and seek a better methodology to judge applicants based on their current capacity for repayment.

**Adjust the 90/10 Rule to Include Military and Veteran Education Benefits**

We urge Congress to include the whole suite of military and veterans' educational benefits under the 90/10 rule so it captures the full compilation of taxpayer funds supporting an institution. The 90/10 rule was developed to be a quality assurance indicator for an institution through its accountability to the free market. We understand these programs differ in character and standing from the Title IV programs and are generally considered entitlements provided to active military service personnel and to military veterans; however, with some institutions

[4] *Preliminary Report of the NASFAA Reauthorization Task Force* (July 2013) http://www.nasfaa.org/reauth/

receiving nearly 100 percent of their funding from federal sources, that quality assurance metric is invalidated. This change will assist in protecting veterans and other students by offering a more comprehensive assertion of educational institutional quality. Unfortunately, the current practice makes veterans targets of aggressive recruitment campaigns by institutions which may specifically seek to offset their Title IV 90/10 balance. It is time for Congress to revisit and adjust this provision.

**Strengthen Institutional Eligibility Test for Pell Grants and Student Loans**
The current test for institutional eligibility to receive Title IV funds is remarkably lenient with an institution only losing eligibility if the cohort default rate (CDR) exceeds 30 percent for three successive years. In 2010, only five schools lost their eligibility out of almost 7,000 eligible institutions, while the average default rate rose to 8.9 percent, far below 30 percent. Taking into consideration the "student risk index" concept described below, we support efforts for Congress to consider adjusting this default rate to tighten Title IV eligibility for institutions. Additionally, we are concerned that some institutions may intentionally guide students into forbearance or deferment to lower their reported CDR. Congress should consider expanding or replacing loan default as the sole institutional eligibility test, particularly if there are a significant number of students participating in Income-Based Repayment (IBR). The CDR is an insufficient metric for monitoring institutional accountability and quality outcomes for IBR programs.

We propose that Congress consider the repayment rate as another variable correlated with successful post-graduation employment. Former students stop repaying their loan debts long before they are declared in default, and excessively low repayment rates in a student cohort are a precursor to later defaults. The Department could use the student cohort repayment rate in conjunction with the new three-year student-cohort default rate (CDR) criteria to trigger loss of institutional eligibility.

**Adjust for Student Risk in Assessing Institutional Performance**
While we believe that aid eligibility guidelines should be strengthened to ensure students are receiving a quality education, there is legitimate concern that institutions serving more students from disadvantaged backgrounds could be harmed from such rule changes. To address this, APLU has proposed a method to adjust for an institution's student portfolio. This "student risk index" would provide a method to better determine which institutions are producing the desired outcomes while accounting for the fact that students enter postsecondary education with different levels of preparation or educational "inputs." The student risk index is described in more detail in the APLU white paper, *Federal Student Aid: Access and Completion*, which was part of the Bill & Melinda Gates Foundation Reimagining Aid Design and Delivery initiative.[5] Congress may wish to consider developing such a formula to evaluate institutions while accounting for the variability in student populations among institutions.

**Encourage the Department to More Effectively Address Fraud and Abuse**
We urge Congress and support and urge the Department to take a greater role in detecting fraud and abuse and to take appropriate action to address such fraudulent practices. Too often, loss of institutional eligibility for Title IV is seen as an "all or nothing" proposition, which results in far too little corrective action. Congress should strongly encourage the Department to use "intermediate sanctions" when an accreditation or Department review finds serious institutional deficiencies by partially restricting the Title IV funding the institution can received relative to a previous "baseline" levels. The "full eligibility or no eligibility" option has often meant full eligibility when in fact something should have been done. An intermediate sanction would be

[5] APLU's RADD Paper: *Federal Student Aid: Access and Completion* http://www.aplu.org/RADD

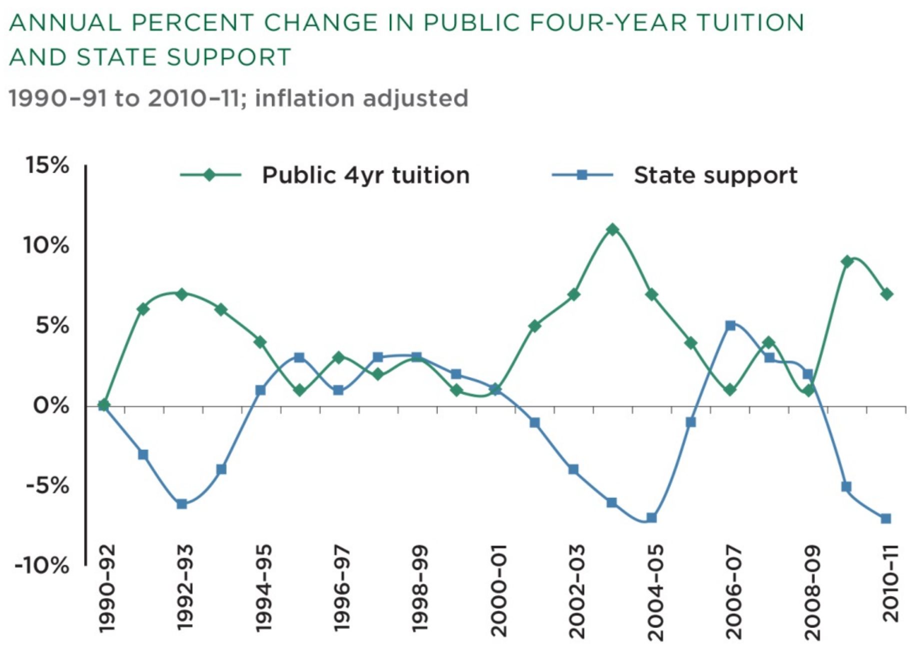
potent and would impact the revenue stream of an institution, but not in such a dire way as to threaten the very existence of the institution.

## ***Increase college accessibility, affordability, completion***

Student aid programs should be about access, retention and completion, not just about access. This approach has implications throughout the legislation. As stated above, student federal aid programs should be sufficiently funded and that funding should be associated with student success requirements, such as SAP. Financial aid programs have substantial influence on access, affordability, and completion.

**Encourage States to Reverse their Disinvestment in Public Higher Education**
Steep declines in state support are the driving force behind increases in tuition at public universities. In fact, over the past decade public university net tuition revenue increases have not offset the decline in state funding per student funding in many states. A decade ago, state governments paid about two-thirds of the cost of education at public universities per full-time in-state student. But since then, the revenue picture has flipped: the states now pay about one-third of the costs and students and families have assumed two-thirds of the costs.

*As seen in the chart below, when state support for public higher education institutions drops, schools are forced to make up the difference in tuition.*




Data reported by the states in the latest Grapevine survey from the Center for the Study of Education Policy at Illinois State University indicate that total state fiscal support for higher education nationwide declined by 0.4% from fiscal year 2011-2012 (FY12) to fiscal year 2012-2013 (FY13). The overall decline of 0.4% is significantly smaller than the 7.5% decline in FY12, which was the largest annual decline in state appropriations to colleges in 50 years. Longer-term trends highlight the lingering effects of the recession and its impact on the capacity of states to increase funding for higher education. Even factoring in federal stimulus monies allocated to higher education in FY11, total state support for higher education in FY13 is 8.3% lower than the total 2 years ago and 10.8% lower than the total five years ago. Higher education systems in 38 states are now operating with levels of state support that are as much as 36.6% lower than the levels of support available 5 years ago.

For public research universities, the fiscal situation is even more restrictive as these institutions have been squeezed from both the loss of state appropriations and the recent reduced federal funding of research and student aid programs due to the Budget Control Act and related budget sequester. As the National Research Council 2012 report, *Research Universities and the Future of America*, recommended, the federal government should "provide further incentives for state actions to protect the quality of public research universities as both a state and a national asset."[6] We urge Congress to include where applicable maintenance of effort language to encourage states to prioritize funding for higher education.

**Universities Working to Control Cost and Raise New Revenue**

Though much more needs to be done and is underway, university leaders have worked diligently to control educational costs and seek new sources of revenue. Faculty and staff healthcare and campus energy costs are among the expenses that have increased faster than inflation. Public university leaders, who must balance their budgets annually, absorbed much of the increases through cost reductions, donations, and new sources of revenue.

According to a 2011 survey by APLU, most institutions are implementing multiple strategies to control or reduce costs. Institutions have focused on streamlining administrative processes and structures, including outsourcing services such as bookstores, cafeterias, housekeeping and some maintenance services. Some universities in the same state have worked together to process admissions applications, purchase supplies, and manage information technology. While most universities attempt to protect the academic core, some necessary strategies directly affect academic programming such as consolidating classes, cutting instructors, and eliminating academic programs.

For the longer term, public universities have been emphasizing student retention and graduation through stronger student support services; streamlining departments, programs and administrative services to better manage costs; encouraging and incentivizing entrepreneurship by faculty and staff to expand online course delivery options and seek grant and contract funding.

**Institutional Support for Student Completion**

As noted in the improving student aid section, federal aid should support and reward students who demonstrate the motivation, work ethic, and perseverance to make progress and reach meaningful learning milestones along a path to success. It should similarly support and reward institutions that successfully help their students reach those goals.

In October 2012, nearly 500 public universities and colleges joined APLU and AASCU in a pledge to boost college completion by 3.8 million students by 2025. The goal is to increase degree attainment by U.S. adults to 60 percent by 2025. Through *Project Degree Completion: A Public University Initiative*, the institutions plan to increase the number of college degrees they

[6] National Research Council, *Research Universities and the Future of America* http://sites.nationalacademies.org/PGA/bhew/researchuniversities/index.htm

award over the next 14 years from an estimated 14.6 million to 18.4 million.[7]

There are also numerous efforts occurring at the state and institutional level to encourage completion. Several public university campuses, such as Arizona State University and Georgia State University, have invested in web-based technology platforms, using data and predictive analytics to assist in advising students to keep them on a path toward completion. And Florida State University has built a network of high-quality, proactive advisors and coaches to support student success. While each of these campuses has its own unique strategy for advising activities, all of them are showing tremendous results in retention and initial graduation outcomes.

## ***Promote innovation to improve access to and delivery of higher education***

### Employ Greater Use of FIPSE Grants to Develop and Expand Innovative Ideas

As the examples highlighted above illustrate, there are impressive efforts taking place on campuses around the country in terms of increasing access, innovating new delivery methods and promoting completion. We urge Congress to sufficiently support the Fund for the Improvement of Postsecondary Education (FIPSE) grants and pilot programs to institutions and non-profit organizations to continue to develop and scale innovative practices.

### Encourage States to Adopt Interstate Reciprocity Agreements for Distance Education

Distance education programs have exploded in the last several years and potential for these programs is even greater. Nearly 7 million students are using online technology to access postsecondary education today. Unfortunately, state and federal laws and policies have not kept up with the rapid growth of distance education programs and left institutions facing a checkerboard of varied and expensive individual state regulations with which to comply. This is why in May 2012, APLU joined with the State Higher Education Executive Officers (SHEEO) to create the Commission on the Regulation of Postsecondary Distance Education, with the purpose of addressing the costs and inefficiencies faced by postsecondary institutions that must comply with multiple, and often inconsistent, state laws because they serve students in multiple state jurisdictions.

The Commission's final report, *Advancing Access through Regulatory Reform: Findings, Principles, and Recommendations for the State Authorization Reciprocity Agreement (SARA)*, also known as the "Riley Report" after former U.S. Education Secretary Richard Riley who chaired the Commission, recommended an interstate reciprocity system that calls for a single set of baseline standards and procedures to regulate distance education programs.[8] The home state of an institution would be responsible for regulating and overseeing that institution's work nationwide. Each state would assure that its institutions meet a set of agreed upon national baseline standards, but could require additional oversight and regulation of its schools as it sees fit. Other states in which the institution in question would offer distance education programs could not regulate that institution unless the institution has a "physical presence" in the state. Institutions with a physical presence in another state, however, would be subject to regulations of that other state, but only for work done within that state.

---

[7] Project Degree Completion: A Public University Initiative http://www.aplu.org/projectdegreecompletion

[8] The Riley Report http://www.aplu.org/rileyreport

While much of the work will require state legislatures to enact and modify state laws, we urge Congress to encourage, as opposed to require, states to adopt interstate reciprocity agreements for distance education.

**Cautiously Support New Developments in Online Education Delivery**

Online delivery of education, hybrid online/in-class courses, Massive Open Online Courses (MOOCs), and other innovations in improving learning with advanced technology have tremendous potential, but we caution that massive computerized classes will not address all the challenges of higher education in succeeding with a diverse student population and growing numbers of first-generation students. Technological advances have begun to and will continue to offer new solutions for remedial education, increasing quality, reducing time to degree, and should eventually reduce costs per student while achieving improved learning outcomes.

To reach this goal will require sustained investment and further research and development. We encourage Congress to allow these experiments in educational delivery to evolve and stabilize while supporting them through grants such as FIPSE.

## ***Balance the need for accountability with the burden of federal requirements***

Many higher education institutions face enormous burdens in meeting a wide array of reporting requirements that are often redundant. Adding to the reporting burden are the variations in definitions used by federal agencies, in many cases stipulated by legislation. Consistent definitions, endorsed by a national professional organization like the Association for Institutional Research (AIR) and accepted by all levels of government, would reduce the reporting and accountability burden.

The numerous and varied reporting requirements also substantially increase an institution's reporting burden when the same basic information is reported with only slight variations in definition. Not only do public institutions respond to federal requirements, but to state and local requirements as well. The U.S. Department of Education has several tools on their National Center for Education Statistics website instead of one consolidated tool; state governments likewise have a mix of tools; private organizations like college guidebook publishers have tools; and for-profit institutional research organizations are also producing more tools. Through collaboration, we need to work toward fewer reporting tools to simply access information about higher education.

**Specific Suggestions to Reduce Burdens on Institutions**

For student notification matters, the Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act (HIPAA), and Higher Education Opportunity Act (HEOA) provisions all stipulate similar student notifications. Often institutions are not comfortable discontinuing an existing notification (e.g. for FERPA/HIPPA) though HEOA covers the same ground. Instead institutions end up sending student notifications about the availability of student right to know information twice in a relatively short time span. There are similar issues with the Clery Act and fire safety reports where students get the same notification twice. It would be better if the regulations matched up in terms of dates to avoid the duplications.

For student athletes, the HEOA regulations differed only slightly with how the athletics departments must report to the National Association of Intercollegiate Athletics (NAIA). We urge Congress to consider the practicality of adopting the NAIA and National Collegiate Athletic Association (NCAA) terms and definitions since the differences between these terms and those that were in HEOA appear very minor.

In sum, more coordination across agencies to reduce duplicative reporting and to minimize slight variations is recommended as well as a greater awareness of information already reported by institutions before new requirements are added.

### Assist the Department in Improving the Management of its Data

We urge Congress to encourage and assist the Department in taking the necessary steps to gain a greater and ongoing understanding of the trillion-dollar student loan portfolio directly administered or overseen by the Department. This understanding is critical for the Department to adequately manage its growing portfolio and to make data/information-based recommendations on possible changes to loan policies. Strong stewardship and management of such assets requires quick access to an extensive trove of related data, particularly for the Department, as lawmakers regularly debate possible policy changes within the student loan programs. In developing a better loan information system, it is critical to be very clear as to what this data/information system should achieve; including identifying what type information policymakers may want. This effort should include the involvement of the pertinent players at the Department.

### Allow Risk-based Accreditation

The institutional accreditation process has become incredibly burdensome in terms of time and resources. Not all institutions pose the same level of risk in terms of academic quality and needed improvements. We concur with the ACE-submitted community comments on this issue and with the concept outlined in the ACE Commission report, *Assuring Quality in the 21st Century: Self-Regulation in a New Era*, which calls for the consideration of differentiated levels of review based on the level of institutional risk. This could be achieved either through having differential procedures or in a two-phased process where every institution would adhere to a first level of review and those institutions with a history of concern or with additional flags would require a second and more thorough level of review.

We urge Congress to expressly provide the authority and flexibility to accreditors to design and implement such a multi-phased or risk-based system. Such an approach would allow accreditors to focus on institutions that present the greatest potential risk with respect to academic quality. Further, it will decrease some of the current burden for institutions and accreditors as well as allow accreditors to devote greater attention to institutions which have had difficulties in the past.

## ***Additional Areas Deserving Support in HEA Reauthorization***

### Support For Institutions Serving Under-Represented and Low-Income Populations

APLU urges Congress to continue to support institutions of higher education that serve high percentages of low-income and minority students as outlined under Title III and Title V of the HEA Act. The American Indian Tribally-Controlled Colleges and Universities, the Historically Black Colleges and Universities, and Hispanic-Serving Institutions continue to serve an important role in providing access and opportunity to these at-risk students. With the coming projected shifts in racial and ethnic demographics of the student population, it is essential to sufficiently support these institutions.

## Strengthen Graduate Assistance Programs and Fellowships

We urge Congress to sufficiently support the Javits Fellowships and Graduate Assistance in the Areas of National Need (GAANN) programs, the only graduate education programs funded by the Department, which provide much-needed support for important fields, such as STEM. As federal financial assistance for graduate students has eroded, it is crucial that these programs are reinvigorated to enable our nation's brightest graduate students to focus on their studies in critical areas of national and international need. Further, we urge Congress to continue authorizing Javits and GAANN as separate programs rather than as part of a consolidated GAANN program, which they have been since FY2012. The programs are 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.

## Sustain the International Education Programs

The Department's International Education and Foreign Language Studies programs are critical to ensuring our nation prepares students to enter a world that becomes more interconnected with each generation while also ensuring capacities of excellence in less commonly taught languages and culture.

We strongly believe it is a shared responsibility of both the federal government and universities to ensure no student graduates without the opportunity for exposure to foreign language and culture. Students with global competencies are prepared to contribute to U.S. economic competitiveness, address global challenges that have no borders, enhance national security and diplomacy, and respect the value of multiculturalism. Similarly, universities and government must work together to ensure capacities of deep expertise exists so our nation is prepared to meet expanding diplomatic and national security needs.

## Support the Title VI Centers

We urge increased support for the essential Title VI programs, which are vital to connecting U.S. campuses and students to the world. The Title VI programs accomplish the goals of global competencies for students while also ensuring capacities of excellence in less commonly taught languages and culture. As an example, the National Resource Centers' (NRCs) focus on languages and cultures is critical to U.S. economic, national security, and social interests. This effort inspires and trains students, expands opportunities for scholars to perform research, creates important links to students of all ages and levels, and establishes bridges between institutions of higher education, government, and the private sector. The NRCs share the unique resources and capabilities of many of our nation's top universities that help develop programs at other institutions and therefore expand the impact of the federal investment. For example, Indiana University has partnered with the 30 community colleges within Indiana's Ivy Tech system to internationalize the system's curriculum, offering a Global Learning Certificate and developing Arabic language courses.

## Authorize a Study Abroad Grant Program

Along with the continued investment in the successful Title VI programs, it is also important to recognize that no international education experience is as transformative for students as study abroad. Study abroad programs provide a significant means of producing foreign language speakers by immersing a student directly within a culture. There is simply no match for inspiring students to think globally than an opportunity to study abroad. Regretfully though, only 1 percent of all U.S. students study abroad and 54% of those students choose to study in Europe.

Consistent with the goals of the study abroad commission established by Congress, known as the Commission on the Abraham Lincoln Study Abroad Fellowship Program, the Higher Education Act should authorize a grant program similar to the Simon Study Abroad Foundation legislation. Such grants would help support institutions of higher education that remove barriers to participation in study abroad and create lasting change on campus. Preference should be given to institutions that increase the diversity of study abroad participants and promote non-traditional study abroad locations. This leveraging of resources would have a significant impact on the number of U.S. students studying abroad for relatively low level of funding.

We urge the Committee to authorize a comprehensive study abroad program within the Higher Education Act and would welcome the opportunity to work together to develop this section.

---

**About APLU**
Serving 218 public research universities, land-grant institutions, state university systems, and education-related organizations in all 50 states, U.S. territories and the District of Columbia, the Association of Public and Land-grant Universities (APLU) is the nation's oldest higher education association. Member campuses enroll more than 3.6 million undergraduate and 1.1 million graduate students, employ more than 670,000 faculty and administrators, and conduct nearly two-thirds of all university-based research, totaling more than $37 billion annually.