



October 28, 2019

The Honorable Bobby Scott
Committee on Education and Labor
United States House of Representatives
Washington, DC 20515

The Honorable Virginia Foxx
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Dear Chairman Scott and Ranking Member Foxx,

On behalf of Higher Learning Advocates, I am writing to comment on specific aspects of the College Affordability Act (CAA). The approach taken by the CAA to comprehensively reauthorize the Higher Education Act, much like the PROSPER Act did last Congress, can provide the renewed outlook for federal policy that is needed to advance the postsecondary achievement of today's students. The CAA takes critical steps to achieve this goal, and this letter provides our thoughts on specific policy reforms.

Higher Learning Advocates is a bipartisan advocacy organization working to shift federal policy and accelerate the success of today's students. We are working toward bipartisan federal policies that create transparent pathways to success, incentivize innovation, protect students and taxpayers, and improve outcomes.

The CAA recognizes that postsecondary success for today's students includes making sure that their basic needs are met. Specifically, the bill takes steps to improve the connection between the Free Application for Federal Student Aid (FAFSA) and the Supplemental Nutrition Assistance Program (SNAP). With 18 percent of students eligible to receive SNAP benefits, but only three percent benefiting from the program, the bill includes an important provision to require the notification of students who have no expected family contribution that they may be SNAP eligible. This provision is vital to combating food insecurity in postsecondary education, which continues to be a barrier to today's students' success.

The bill also fosters innovation through a much-needed competency-based education demonstration program. The demonstration program would permit institutions to utilize competency-based approaches for five years and includes important quality components through benchmarks for graduation, employment, earnings, debt-to-earnings ratios and loan repayment rates. Another key innovation that will benefit students is the eligibility of 150 to 600 clock hour programs for Pell Grants. This Job Training Pell Grant program authority, which includes critical language to assure that students are in programs of value, would ensure that high-quality programs that lead to good jobs are Pell-eligible. Both provisions would enrich the pathways for today's students to attain a postsecondary education.

CAA also includes two critically important programs to support students to afford college. First, the bill establishes an emergency financial aid grant program with funds reserved from the Supplemental Educational Opportunity Grant program. This program would provide grants to

students for emergency costs, including child care, that would keep them focused on completing their education and reduce the chance of a student dropping out. Second, the bill authorizes a new grant program to expand the use of high-quality open educational resources. This effort will ensure that students have greater access to high quality open textbooks at no cost.

Another important priority addressed by the CAA are the changes made to the Child Care Access Means Parents in School (CCAMPIS) program. Access to high quality child care on campus is critical to ensuring that college students who are parents can attend and complete their postsecondary education. The bill improves this program by authorizing a performance bonus for programs meeting or exceeding their performance levels and increases the authorization to \$200 million annually, echoing the recent increases in appropriations for this vital program.

The bill also includes important quality and accountability provisions which will enhance the education today's students receive from colleges and universities. The bill requires the adoption of student outcome standards by accreditors related to completion and workforce outcomes. In addition, the bill improves how institutions are judged based on the default rates of their former students and establishes a new metric focused on tracking on-time repayment rates. Lastly, the bill strengthens protections pertaining to for-profit institutions in the 90-10 rule by increasing the amount of non-federal funds these institutions must receive and counting all federal funds as such rather than only Title IV-related revenue.

While the bill includes the provisions we highlight above that align with Higher Learning Advocates' priorities, there are several areas where the bill could be strengthened to improve the Higher Education Act for today's students.

First the bill should allow students who have been out of school for several years to have their satisfactory academic progress (SAP) reset if they struggled in a previous postsecondary experience. This would open federal aid to students who have been in the workforce and are better academically prepared for college than their first attempt.

Second, while the bill extends the lifetime limit on Pell eligibility to 14 semesters from 12, adult students would be better served by extending their eligibility an additional four semesters if they have reached the lifetime limits and been employed for most of the last 10 years.

Third, the bill should ease the verification requirements by streamlining the transfer of IRS taxpayer information to ED for the purposes of ensuring the accuracy of a student's financial information on their FAFSA. Too many students lose out on aid for which they are eligible due to the cumbersome and confusing process utilized presently to verify student information.

Fourth, the bill should permit students who have gone through the rehabilitation process for a defaulted student loan to use this authority for a second time in case of a subsequent default. This expansion of loan rehabilitation would ensure that borrowers who are financially struggling have every opportunity to get back on track to repaying their student loans.

Last, we appreciate the CAA's focus on an on-time repayment metric, and believe the bill would further benefit from a focus on program-level repayment metrics.

Thank you for your consideration of our views. While we strongly believe that an issue as critical as higher education reform must have bipartisan input and agreement, we sincerely appreciate and support the inclusion of the provisions in the College Affordability Act highlighted above which will have a positive impact on today's students. We look forward to continuing to work with the committee as the legislative process continues.

Sincerely,

Julie Peller
Executive Director
Higher Learning Advocates