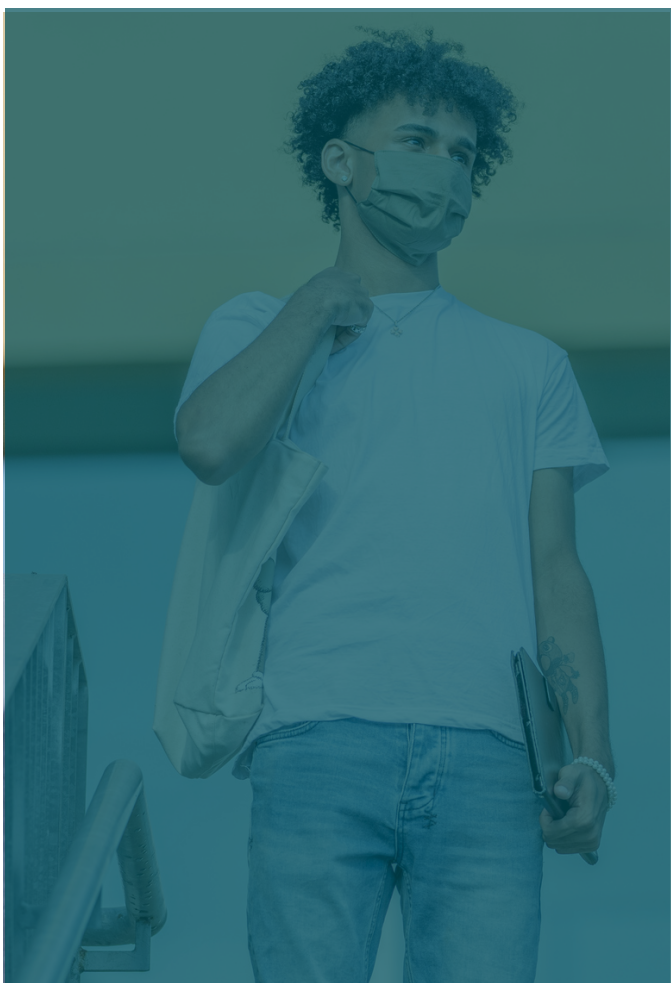


HIGHER EDUCATION POLICY & REGULATORY TRANSITION RECOMMENDATIONS





ABOUT TODAY'S STUDENTS

To recover from the COVID-19 pandemic and resulting economic uncertainty, supporting and encouraging the talent of all Americans will be critical in the next four years.

Today's students are more diverse than any previous generation of college students—they are more likely to be people of color, adults, first-generation, and low-income—and many have work and family responsibilities that extend beyond the classroom. Twenty-four percent of students are parents. Forty percent attend school part-time, and sixty-four percent work while in college. Unfortunately, our nation's higher education system currently fails too many of today's students. The system simply was not built for them. But, this must, and can, change—our recovery depends on it.

As new cases of COVID-19 rise every day, many of the nation's institutions of higher education have had to curtail or suspend in-person learning to do what's best for the public health. These campus closures—whether they are fully closing a campus or moving all classes to virtual and restricting campus access—are making it harder for many of today's students to succeed in postsecondary education. In recent surveys we conducted, 43 percent of student parents relied on their campus for child care and 30 percent of students had difficulty accessing course content online. Due to the lack of broadband or technology to access online learning, the loss of on-campus supports such as child care, and the economic difficulties from being laid off from a job, today's students are increasingly feeling the impact of the COVID-19 pandemic, which is putting their dreams of a degree or other postsecondary credential in jeopardy. Not all is lost, however; policy change can stem this tide.

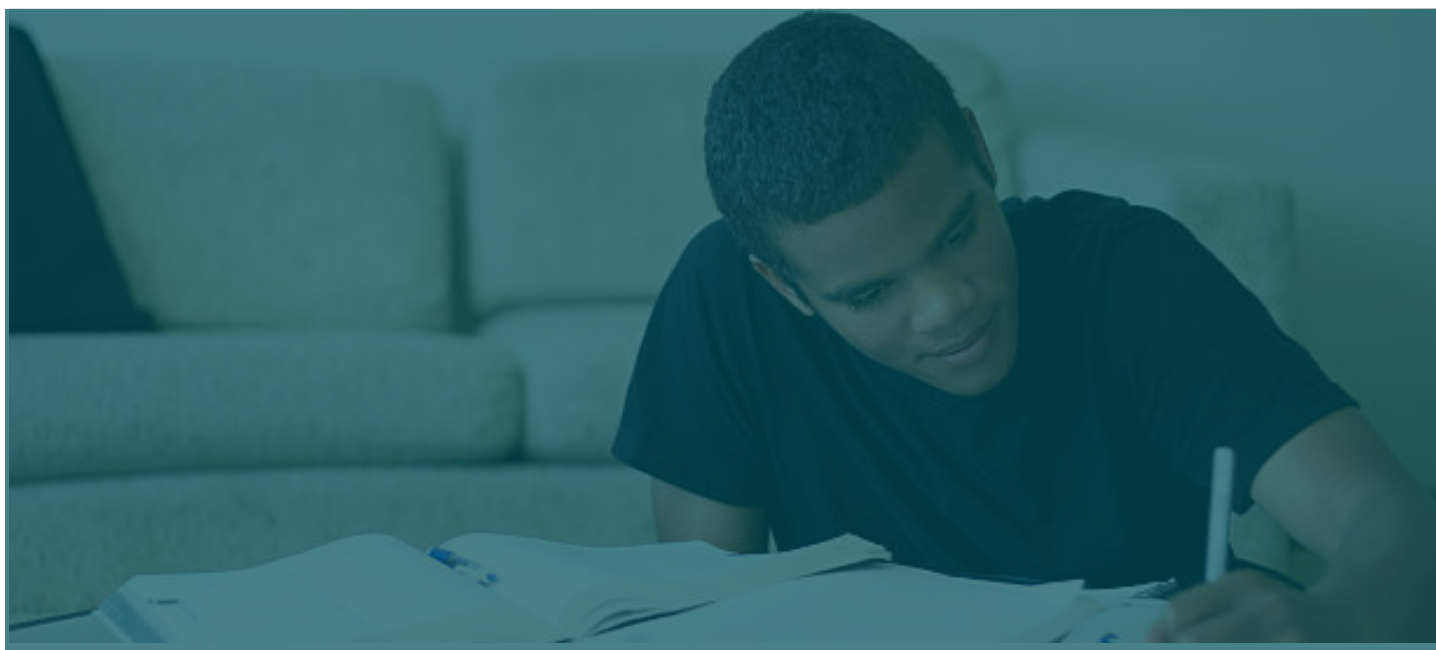
Through the federal student aid system, taxpayers and students are making a huge investment in student success. Additionally, students and taxpayers should expect that completion of a program at an institution that accepts their federal financial aid will leave them better off after leaving school than when entering; help them gain access to professions that reward having a college credential; and lead to earnings that are appropriate for their field and level of experience. Reforms are needed to be sure that this investment serves all of today's students, and that institutions are held accountable for student success.

HIGHER LEARNING ADVOCATES

Higher Learning Advocates (HLA) advocates for solutions that break down systemic barriers and support the success of today's students in their pursuit of education and skills development beyond high school. We advance federal policies that create transparent pathways to success, incentivize innovation, protect students and taxpayers, and improve student outcomes. We are committed to the change needed to support the success of today's students, and the student-centric approach to improving affordability, access, and success in higher education.

HIGHER EDUCATION POLICY & REGULATORY TRANSITION RECOMMENDATIONS

The below memorandum provides recommendations to advance higher education policy and regulations in key areas that will empower our nation's students to obtain the skills they need to gain employment and succeed in the 21st century, especially in light of the ongoing COVID-19 pandemic. We stand ready to collaborate and engage with you to implement these recommendations.



I.

Recommendations for Unilateral Action by the Incoming Administration

Distance Education

Professional Judgment for Financial Aid

II.

Recommendations for early action with Congress to address the needs of today's students in response to COVID-19

Ensure students can stay enrolled and succeed in the new college environment

Ensure that Students Whose Learning has been Disrupted Can Return

Support Students Parents So They Can Continue Learning

III.

Recommendations to reskill Americans through postsecondary education to re-enter the workforce

Create a demonstration program to certify quality and expand access and the use of federal student aid for multiple pathways of learning, including programs that are not currently eligible for federal aid.

Expand Pell Grant Eligibility to high-quality short-term programs.

I. RECOMMENDATIONS FOR UNILATERAL ACTION BY THE INCOMING ADMINISTRATION

The recommendations below may be accomplished by an administration through guidance, regulation, and other administrative actions that do not require action by Congress.

DISTANCE EDUCATION

As students and colleges face unexpected transitions to online learning, the quality of distance education has never been more important. The recent regulations released by the U.S. Department of Education (ED) offer too few protections against low-quality distance education programs. While flexibility has been granted by the current administration with respect to programs that had to go online suddenly in the spring, the lack of any need for approval when institutions add additional distance education programs is concerning. Therefore, we recommend that your administration:

- ▶ Initiate a new negotiated rulemaking on distance education requirements and related matters. Rethinking regulations represents an opportunity to strengthen and grow innovative delivery models—such as competency-based education—that can serve today’s students well, strengthen the workforce, and improve student outcomes. It is also an opportunity to ensure that quality and student success are at the center of policymaking, and that there are guardrails to protect the interests of today’s students. Specifically, we urge this effort to lead to ED retracting changes to eliminate the approval process for multiple distance education programs at an institution.
- ▶ Provide a regulatory on-ramp to distance education accreditation: In March of 2020, ED waived the requirement that an institution of higher education must be approved by its accreditor in order to offer distance learning. This allowed institutions to immediately implement online learning programs mid-semester without lengthy reviews from their accreditor and the Department of Education. While this was a necessary step as colleges rapidly moved instruction online, waivers cannot become the new normal. We must ensure that the distance education provided by these institutions is of high quality and remains a strong student and taxpayer investment. We recommend that your administration’s Department of Education immediately set a deadline for institutions to begin the process of meeting accreditation requirements for their online programs, and to set a deadline for their online program to be approved by their accreditor no later than summer of 2021. We also urge that your transition team be vocal and transparent about implementing these deadlines so that schools and accreditors will be able to start the process of coming into compliance as soon as possible.

PROFESSIONAL JUDGMENT FOR FINANCIAL AID

► Provide flexibility through financial aid professional judgement: After the 2008 recession, ED provided guidance to institutions on how they could use professional judgement, as well as the authority to make adjustments to the data elements on a student's Free Application for Federal Student Aid (FAFSA) and to adjust a student's income, in response to historic cautious use of the authority by financial aid administrators. ED also agreed to adjust its risk model to account for the increased use of professional judgement during this time. In the face of another period of economic uncertainty, ED should issue guidance similar to what was issued in 2009 to allow institutions to extend these professional judgement guidelines to students impacted by the COVID-19 pandemic.



II. RECOMMENDATIONS FOR EARLY ACTION WITH CONGRESS TO ADDRESS THE NEEDS OF TODAY'S STUDENTS IN RESPONSE TO COVID-19

To support today's students during and as a result of the COVID-19 pandemic, the federal government must take critical steps to remove outdated and burdensome barriers for those seeking a higher education to secure employment. Specifically, the administration and Congress must look to these areas where policy change can have the biggest impact in light of the COVID-19 pandemic:

ENSURE STUDENTS CAN STAY ENROLLED AND SUCCEED IN THE NEW COLLEGE ENVIRONMENT

- ▶ Expand Broadband Connectivity. Technology is crucial to accessing the college curriculum, now more than ever. Unfortunately, students who are low-income or living in rural areas are significantly less likely to have adequate access to the technology they need to succeed in college. An authority similar to the E-Rate program in K-12 education should be funded for postsecondary education to respond to this crisis and provide both devices and broadband service to today's students. In addition, policymakers should make changes to the federal Lifeline program to allow students who qualify for the Pell Grant program to also qualify for Lifeline. Together, these efforts will better connect postsecondary students to online courses, materials, and activities.
- ▶ Provide Emergency Aid: Emergency aid—grants provided to students to deal with unexpected costs—can help to stem the tide of uncertainty and help students persist in college during this national emergency. While emergency aid and the need for it existed prior to the COVID-19 pandemic, this mechanism became critical to millions of students this spring as campuses nationwide abruptly closed campuses. This past spring, Congress allocated \$6 billion in federal emergency aid for students through the CARES Act, but students still have unmet needs. The administration and Congress should support additional funding to colleges and universities for student emergency aid. To avoid repeating prior implementation issues, any additional funding must be accompanied by clear, unambiguous guidance from ED so institutions can be confident in delivering money to all students in need in a timely manner and with as little administrative burden as possible to students.

ENSURE THAT STUDENTS WHOSE LEARNING HAS BEEN DISRUPTED CAN RETURN

Additionally, millions of students' lives have been upended by the COVID-19 pandemic and we must act to add flexibility to our support systems. As nearly 22 million Americans have lost their jobs as the result of the COVID-19 pandemic, getting unemployed Americans back to work must be a top priority.

We are entering a period in which many students, or would-be-students, have had their education interrupted. Even prior to the pandemic, there were more than 36 million adults with some college, but no degree. Many of these Americans dropped- or stopped-out of school following a poor academic performance or not completing enough credits. And, an estimated 29 percent of households that had planned to have someone in college this fall have cancelled their plans due to the pandemic. Despite the demand for postsecondary education among adults seeking pathways to career and economic success, many students who have had their education disrupted by current events will face an obstacle to re-enrolling and receiving student aid. Additional financial support to low-income and middle-class individuals is vital for economic recovery.

Our recommendations below will allow individuals whose educational pathways were disrupted to return to higher education and get the skills they need to re-enter the workforce:

- ▶ Reset Satisfactory Academic Progress (SAP), (the minimum academic requirements necessary to continue receiving federal student aid) for students who have not been enrolled in any postsecondary education in the prior two years so that students who have had learning disruptions do not face this additional barrier to re-enrollment.
- ▶ Reset the Pell Lifetime Eligibility Usage (LEU) for students who have reached the maximum amount of their Pell Grant award, already hold a degree or credential, and have been employed in the workforce for the majority of the past ten years. Adult students who need to restart their postsecondary studies but have exhausted their Pell eligibility would be better able to access the credential or degree they need to succeed in the workplace.

SUPPORT STUDENT PARENTS SO THEY CAN CONTINUE LEARNING

While many students are struggling at this time, student parents are especially vulnerable. Parents who are college students themselves are currently dealing with the closing of colleges and universities, transitions to online learning, job loss, child care, and school closures, among other crises, as a result of the ongoing COVID-19 pandemic. As the effects of the pandemic reverberate throughout the country, student parents' vulnerabilities are rising to new heights, threatening their ability to keep their families healthy and secure on top of continuing their studies. For students, a degree or credential leads to increased earnings over one's lifetime, but for student parents, these increased wages have a double impact (on themselves and on their children), along with contributing to growth in the economy.

Even before the COVID-19 outbreak and subsequent campus closures, many students struggled to cover costs for food, housing, transportation, and child care. As we've seen, the recovery from this pandemic will not be immediate. During this time, it is crucial that the federal government keep the realities of today's student parents' experiences in mind while considering policy on how to adapt well. To respond to these present and future challenges we believe the following recommendations will build on your administration's vision:

- ▶ Amend the Child and Dependent Care Tax Credit (CDCTC). We recommend extending the CDCTC to provide a fully refundable, advanceable tax credit. Additionally, we believe that modifying the tax credit to benefit student parents by allowing an individual with a qualifying dependent to claim the tax credit for expenses while the taxpayer is a part-time student, in addition to full-time students is imperative. As 64 percent of student parents attend part time, this is a necessary step to increase access to a postsecondary degree or credential to student parents.
- ▶ Increase funding and flexibility of funds for CCAMPIS. The Child Care Access Means Parents In School (CCAMPIS) program provides vital support for the participation and success of low-income parents in postsecondary education through the provision of campus-based child care, which is widely recognized as one of the most important supports for parenting college students. First, there needs to be increased federal support for child care programs to meet a greater share of the child care needs of parenting students. Additionally, flexibility should be provided under the CCAMPIS program to address the closure or limited operation of on-campus child care facilities due to COVID-19. CCAMPIS funds should be allowed to support student parents selecting child care options in the area surrounding or near a campus, so long as such child care is high-quality and accredited, child care providers are under contracts with the student's institution to provide such care, and providers meet state licensing requirements.

- ▶ Expand access to child care providers. Institutions of higher education should be allowed to set aside a portion of funds under the Supplemental Education Opportunity Grant (SEOG) program to form relationships to provide care for student parents through local child care providers. The Strengthening Institutions Program (SIP) should be amended to allow such partnerships with child care providers as an allowable use of funds. Additionally, allowing partnerships with high-quality Head Start centers should be considered to further expand options for child care.
- ▶ Increase funding for the Child Care and Development Block Grant (CCDBG). We must continue to invest in programs such as CCDBG in order to ensure low-income parents, including student parents and individuals from underserved populations, are able to access and complete postsecondary education. Funding CCDBG sufficiently will allow states to provide child care services to the neediest families and student parents and provide low-income working families the opportunity for socioeconomic mobility and postsecondary success.



III. RECOMMENDATIONS TO RESKILL AMERICANS THROUGH POSTSECONDARY EDUCATION TO RE-ENTER THE WORKFORCE

In our 21st century global economy, continued education and training is required to ensure Americans are upwardly mobile and economically successful. More Americans are living outside city centers and away from traditional learning, and more people are learning skills in nontraditional settings that could translate directly to educational credentials. One in four Americans has a non-degree credential or certificate; one in three takes at least one course online; and more than thirty percent transfer courses between institutions. These multiple pathways make up a wide-ranging set of programs designed to meet today's students where they are and provide numerous entry and exit points to and through education and the workforce.

With the high number of jobs lost during the pandemic, millions of Americans will have to reskill or upskill to acquire their next job and the connections between higher learning and the workforce must be strengthened so that they are truly integrated pathways.

Federal policy should ensure it reflects the experiences of today's students who follow an enormous number of varied pathways into and through the American system of postsecondary education. We strongly support creating a seamless pathway between high school, job training, community college, and four-year programs to help students get their degrees and credentials faster and without repeating skills and knowledge they already have.

Additionally, HLA proposes the following policy recommendations:

CREATE A DEMONSTRATION PROGRAM TO CERTIFY QUALITY AND EXPAND ACCESS AND THE USE OF FEDERAL STUDENT AID FOR MULTIPLE PATHWAYS OF LEARNING, INCLUDING PROGRAMS THAT ARE NOT CURRENTLY ELIGIBLE FOR FEDERAL AID.

By taking a more comprehensive view of the multiple pathways today's students take, new federal policies can help create equitable access to high-quality learning opportunities that set today's students up for success in college, employment, and lifetime learning. In addition to providing grants to states that work to accelerate students' attainment of credentials, including bachelor's degrees, while still ensuring quality and accountability, we believe that this recommendation will complement your vision to expand on these accelerated pathways and create a seamless transition between multiple sectors and programs.

A new demonstration program for multiple pathways would offer the opportunity for policymakers to consider the proper guardrails and quality assurance mechanisms necessary to ensure today's students use federal student aid at programs that offer them career and economic opportunity while ensuring they are the highest-quality. As our workforce and learning models continue to evolve, meaningful reforms to facilitate multiple pathways to employment and further education are essential to equip today's students with the tools they need to be successful.

EXPAND PELL GRANT ELIGIBILITY TO HIGH-QUALITY SHORT-TERM PROGRAMS.

The current requirements to use Pell Grants prevents many of today's students from obtaining postsecondary education. Currently, the Pell Grant can only be used for programs that are 600 hours in length. However short-term programs, such as vocational or credential programs at community colleges, can help reskill students and improve their earning potential over time. Expanding Pell eligibility to high-quality, short-term programs would enable a broader range of students, including parents and working adults, to access high-value skills training programs that enable them to advance their careers and reskill for positions in new industries.