

February 23, 2018

The Honorable Lamar Alexander  
Chair  
Committee on Health, Education, Labor,  
and Pensions  
United States Senate  
428 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Patty Murray  
Ranking Member  
Committee on Health, Education, Labor  
and Pensions  
United States Senate  
428 Dirksen Senate Office Building  
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

On behalf of the American Council on Education (ACE) and the associations listed below, we submit the following principles regarding the upcoming reauthorization of the Higher Education Act, in response to your call for comments on February 13. The higher education community appreciates the opportunity to engage with the Committee as you begin the process of writing a reauthorization bill. A large number of individual associations and institutions of higher education will also weigh in with their specific priorities, but the following principles represent broad goals of the higher education community for reauthorization.

**Do no harm. Reauthorization of the Higher Education Act (HEA) should be used to clearly and unambiguously improve student aid for students.** 90 percent of funding under HEA goes to student aid in the form of vouchers that students can spend at whatever institution they wish to attend. Aid, in the form of Pell grants, and access to low cost federal loans should be maintained or increased. As our nation needs a highly-educated and skilled workforce, any changes to existing programs should be balanced with equivalent increases or the creation of new programs that expand and strengthen access for students with need. In addition, reauthorization should be used to make the process of applying for and receiving federal aid and repaying loans easier for students to understand and simpler to accomplish.

**The Higher Education Act should continue to promote access to postsecondary education and encourage completion.** We urge Congress to reaffirm the fundamental principle in the original Higher Education Act that providing access to higher education for all qualified students, regardless of their individual financial circumstances, benefits the entire nation. The goal of the HEA is to provide access to pursue a quality higher education, and that access should lead to a degree or a certificate. Federal policy should recognize and support institutional efforts already underway and encourage new ideas and practices to increase persistence and completion for all students.

**Terms, conditions, and loan limits for federal student loans matter for undergraduate, graduate, and parent borrowers.** If students have to borrow for college—as many do—federal student loans are almost always the best option. So the terms and conditions of loans—origination fees, interest rates, repayment options—can make a huge difference to students and their ability to manage and repay their debt. The Senate should not do anything that makes

federal student loans more expensive for student and parent borrowers. This includes not reducing current federal loan limits for students and parents—a move that could drive those who need to borrow into the more expensive private loan market. Loan servicing should be of the highest quality, which has not always been the case, with servicers rewarded or sanctioned accordingly.

**Institutions should be responsible for defining their mission and the nature of their academic programs.** Accrediting agencies recognized by the Department should determine if the schools they accredit are meeting their obligations and offering a high quality academic program. Put another way, the federal government has a legitimate interest in collecting and reporting a broad array of student outcomes such as completion rates, loan repayment, earnings, and defaults, but it should have no role in evaluating academic quality because it lacks the expertise and resources to do so. Accrediting agencies have traditionally served as an effective judge of academic quality in a way that states and federal bureaucracies cannot. That focus should be maintained.

**The bill should make efforts to reduce fraud and abuse where it exists, and should not take steps that will increase the likelihood of fraud or abuse.** We have learned the hard way that not all institutions participating in the federal student aid programs have the best interest of students at heart. We urge the committee to maintain proven gatekeeping provisions of current law and avoid taking steps that will make it easier for unscrupulous operators to take advantage of students and taxpayers. The best way to prevent waste, fraud, and abuse is to strengthen upfront gatekeeping, create transparency around outcomes, maintain appropriate accountability measures, and avoid incentivizing manipulation of the aid programs. While there are new opportunities, they must not become a pathway to defraud students. We encourage the Committee to incorporate appropriate federal controls in the creation of new programs.

**The federal government should encourage experimentation and expansion of new learning opportunities to promote quality and efficiency.** In the last decade we've seen a huge array of new learning modalities, often enacted by changes in information technology. Such development can increase the availability of high quality, low cost institutions and programs. While these new opportunities offer significant promise, especially to a college population that is increasingly diverse with increasingly diverse needs often extending over a lifetime, it is important that experimentation be balanced with appropriate oversight, so it does not become an open door for abuse.

**Streamline regulations and reduce regulatory burden in a manner that allows institutions to meet their obligations to students and taxpayers without imposing unnecessary cost or the diversion of resources.** Too many of the existing rules are unnecessarily voluminous and too often ambiguous, and the cost of compliance has become unreasonable. Moreover, many regulations are unrelated to education, student safety, or stewardship of federal funds, and others can be a barrier to college access and innovation in education. We specifically support streamlining and easing the FAFSA application process for students, as long as those efforts are done in a thoughtful manner that support institutional efforts to award aid and do not result in states that rely on FAFSA information developing independent applications that would make the process even more burdensome for students and families.

Reauthorization is long overdue. We appreciate the bipartisan nature of the Committee's efforts and we want to work with you to create legislation that will support the next generation of students and that we can enthusiastically endorse.

HEA Principles  
February 23, 2018

Sincerely,



Ted Mitchell  
President

On behalf of:

ACPA- College Student Educators International  
American Association of Colleges for Teacher 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 Association of University Professors  
American College Health Association  
American Council on Education  
American Dental Education Association  
American Indian Higher Education Consortium  
APPA- Leadership in Education Facilities  
Association of American Medical Colleges  
Association of American Universities  
Association of Catholic Colleges and Universities  
Association of College and University Housing Officers- International  
Association of College Unions International  
Association of Governing Boards of Universities and Colleges  
Association of Jesuit Colleges and Universities  
Association of Public and Land-grant Universities  
Association of Research Libraries  
Coalition of Urban and Metropolitan Universities  
Consortium of Universities of the Washington Metropolitan Area  
Council for Christian Colleges & Universities  
Council for Higher Education Accreditation  
Council for Opportunity in Education  
Council of Graduate Schools  
Council of Independent Colleges  
Council of Regional Accrediting Commissions  
Educational Testing Service  
EDUCAUSE  
Hispanic Association of Colleges and Universities  
NASPA- Student Affairs Administrators in Higher Education  
National Association for College Admission Counseling  
National Association of Colleges and Employers  
National Association of College and University Business Officers  
National Association of Independent Colleges and Universities

HEA Principles  
February 23, 2018

National Association of Student Financial Aid Administrators  
National Association of System Heads  
National Collegiate Athletic Association  
NIRSA: Leaders in Collegiate Recreation  
NODA- Association for Orientation, Transition & Retention in Higher Education  
Phi Beta Kappa Society  
The College Board  
The Common Application  
UNCF (United Negro College Fund)  
UPCEA