Innovative, Forward-Thinking Recommendations to Congress on Higher Education Policy

HEC 50

The Higher Education Committee of 50

ACKNOWLEDGEMENTS

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ABOUT NASFAA

The National Association of Student Financial Aid Administrators (NASFAA) is a nonprofit membership organization representing more than 20,000 financial aid professionals at nearly 3,000 colleges, universities, and career schools across the country. NASFAA member institutions serve nine out of every 10 undergraduates in the United States. Based in Washington, D.C., NASFAA is the only national association with a primary focus on student aid legislation, regulatory analysis, and training for financial aid administrators. For more information, visit https://www.nasfaa.org.

ABOUT THE BILL & MELINDA GATES FOUNDATION

Guided by the belief that every life has equal value, the Bill & Melinda Gates Foundation works to help all people lead healthy, productive lives. In developing countries, it focuses on improving people's health and giving them the chance to lift themselves out of hunger and extreme poverty. In the United States, it seeks to ensure that all people—especially those with the fewest resources—have access to the opportunities they need to succeed in school and life. Based in Seattle, Washington, the foundation is led by CEO Dr. Susan Desmond-Hellmann and Co-chair William H. Gates Sr., under the direction of Bill and Melinda Gates and Warren Buffett.

FOREWORD BY NASFAA

With the Higher Education Act (HEA) reauthorization process in full swing, proposals abound from various entities with a stake in higher education. As numerous voices weigh in on reauthorization discussions, there is a strong need for thoughtful, innovative ideas from institutional voices. Institutions of higher education are interested, invested, and believe in student equity, success, and outcomes. Given the new 116th Congress and potential for movement on HEA reauthorization, the time is ripe for innovative thought on the future of federal student aid.

In late 2017, the Bill & Melinda Gates Foundation awarded the National Association of Student Financial Aid Administrators (NASFAA) a grant to convene a group of forward-thinking campus leaders tasked with developing policy solutions to help students surmount the obstacles that prevent them from enrolling in, paying for, and graduating from college. NASFAA used the grant funding to facilitate the Higher Education Committee of 50, a group composed of college presidents, enrollment managers, admissions staff, financial aid and bursar leaders, members of governing boards, students, and other leaders from all postsecondary institution sectors. Combined, they hold memberships in more than 140 higher education-related professional associations, with many serving in multiple leadership roles.

To achieve the goals of this project, the grant charged the Higher Education Committee of 50 with the following:

- Identifying emerging policy issues that impact students and the higher education landscape with a focus on four specific policy areas: access, accountability, affordability, and transparency; and
- Creating practical solutions and recommendations for Congress and elevating those recommendations to relevant stakeholders.

The Higher Education Committee of 50 divided their work into four subgroups reflecting the four policy areas. Each subgroup reviewed relevant literature, heard from experts, and engaged in hours of discussion and debate before developing their respective recommendations. NASFAA released draft recommendations for public comment, and the subgroup members analyzed and reviewed all feedback. They incorporated much of this feedback into the final recommendations. This report reflects the culmination of the Committee's analysis and collaboration on this project, and the final recommendations to be presented to Congress and stakeholders.

HIGHER EDUCATION COMMITTEE OF 50 RECOMMENDATIONS

The Higher Education Committee of 50 offers the following 36 recommendations for consideration by Congress in the hope that they will foster discussion and guide future policy decisions for the reauthorization of the Higher Education Act of 1965, as amended. Details on the methodology and background of this project, as well as the rationale behind each recommendation, follow this list.

ACCESS RECOMMENDATIONS

Recommendation 1: Simplify and improve the current financial aid application process by implementing NASFAA's proposed three-level application process, expanding the functionality of the IRS Data Retrieval Tool, considering a multi-year FAFSA, and/or considering use of the federal tax return as the aid application.

Recommendation 2: Require Title IV institutions to adopt standardized elements in the financial aid award notification, including all costs, net price, grouping by types of awards, and common descriptors/language.

Recommendation 3: Require the U.S. Department of Education to provide more transparency on the verification selection process through the FAFSA with the goal of reducing the number of FAFSA applications selected for verification.

Recommendation 4: Support the expanded use of online instruction to enhance access and increase affordability.

Recommendation 5: Require the U.S. Department of Education to create and make available a federally recognized database of "virtual advisors" to provide general information to students that will ensure student success as it relates to the admissions and financial aid application processes.

Recommendation 6: Improve and prioritize broadband internet services for online education/digitally delivered education and training.

Recommendation 7: Provide financial incentives to graduate school counseling educator programs to place interns in high schools with some of the lowest college-going rates and/or in high schools that serve predominantly low-income students.

Recommendation 8: Allocate additional funding in a separate allocation for which schools could apply. Allowable uses of these funds would include, but would not be limited to, student mentors in summer bridge and other transition-to-college programs.

Recommendation 9: Include in federal student aid funding courses taken in summer bridge programs, English as a Second Language (ESL) courses, and other developmental coursework without affecting students' Federal Pell Grant lifetime eligibility. Under this recommendation, Congress should remove the current 30-credit-hour limit. Current satisfactory academic progress requirements, including rules on repeat coursework, would apply.

ACCOUNTABILITY RECOMMENDATIONS

Recommendation 1: Keep the following current accountability measures in place, unchanged: withdrawal rates, financial responsibility scores, program reviews, and financial and compliance audits.

Recommendation 2: Keep the following current accountability measures in place, but alter them as detailed in our report: cohort default rates, gainful employment, 90/10 rule, and accreditation.

Recommendation 3: Allow a Student Unit Record Data System (SURDS) for establishing an institutional accountability policy, as reflected in the Transparency Subgroup's recommendations. Use College Scorecard data and other sources to measure student experience, progression, and outcomes, and alumni success. When an institution places substantially lower than institutions with similar missions, require an additional, U.S. Department of Education-approved review by the regional accreditor.

AFFORDABILITY RECOMMENDATIONS

Recommendation 1: Require the U.S. Department of Education to enhance existing financial literacy tools, require consumer testing on all new or improved tools, and make them available to all students.

Recommendation 2: Require the U.S. Department of Education to develop and add a dynamic, user-tested truth-in-lending calculator and annual debt letter to entrance counseling/StudentLoans.gov. The Department should make this available at the time of loan disbursement but should not make it a requirement to students getting their loans. Require private lenders to report to the National Student Loan Data System (NSLDS).

Recommendation 3: Permit students to file a FAFSA that would allow financial aid consideration for multiple years (e.g., a one-time FAFSA).

Recommendation 4: Allow Federal Pell Grant-eligible students to use up to two semesters (100%) of Pell Grant funds while completing dual-enrollment programs, while in high school, or while completing remedial courses, without such usage counting toward their Pell Grant Lifetime Eligibility Usage (LEU) limit.

Recommendation 5: Allow federal student loan refinancing through a federal government program should the variable annual interest rates decline.

Recommendation 6: Restore the purchasing power of the Federal Pell Grant by changing its funding source to mandatory funds exclusively, making it a true entitlement program.

Recommendation 7: Exclude 529 savings plans from the Federal Methodology need analysis calculation.

Recommendation 8: Discontinue origination fees.

Recommendation 9: Reduce interest rates and set a flat add-on amount to the 10-year Treasury note, not to exceed 2% across the federal student loan programs.

Recommendation 10: Use Fund for the Improvement of Postsecondary Education (FIPSE) grant funds to move toward the goal of affordable textbooks and other course materials by 2030.

Recommendation 11: Eliminate higher education tax credits and put those funds into the Federal Pell Grant program.

Recommendation 12: Eliminate the taxability of certain financial aid.

Recommendation 13: Establish one standard 10-year repayment plan, one extended repayment plan, and one income-based repayment (IBR) plan. The IBR plan would allow borrowers to pay a monthly amount based on their income and family size. The total amount to be repaid under IBR would be capped at the total of the principal and interest the borrower would have paid under a standard 10-year plan, as calculated when they entered repayment. Under IBR, interest would continue to accrue over the life of the loan, and amounts above the standard 10-year repayment cap would be forgiven and exempt from taxation.

Recommendation 14: Establish a federal and state partnership to incentivize tuition-free community college as a first-dollar program, and consider imposing a cap on eligibility based on income.

Recommendation 15: Maintain the Public Service Loan Forgiveness (PSLF) program for current and future eligible borrowers. Cap amounts forgiven under the PSLF program at 100% of remaining loan balance up to $57,500, and half of any remaining balance up to $138,500.

Recommendation 16: Decouple eligibility for interest subsidy from cost of attendance and base it on the expected family contribution.

TRANSPARENCY RECOMMENDATIONS

Recommendation 1: Require the U.S. Department of Education to administer an optional continuous-improvement survey at the end of the FAFSA to determine which elements of the online application help students and families understand and interpret information accurately and with ease.

Recommendation 2: Require the U.S. Department of Education to conduct consumer testing to identify what terms, elements, and strategies would render financial aid educational materials easier for consumers to understand.

Recommendation 3: Mandate evaluation of all federally required disclosures directed toward consumers of postsecondary financial aid to understand each disclosure's intended message, use, and audience. This evaluation should inform and guide revision or elimination of these disclosures. It should also establish a framework for creating any future required disclosures, assuring they effectively communicate with their intended audiences and can be used to make meaningful decisions about higher education or financial aid.

Recommendation 4: Eliminate consumer information requirements or disclosures that are not accessed by consumers or used in higher education decision-making by a significant number of consumers or stakeholders (government, private sector financers, consumers, and educational institutions), or are duplicative or irrelevant.

Recommendation 5: Repeal the Subsidized Usage Limit Applies (SULA) requirement that limits students' subsidized borrowing to 150% of their program length (which would eliminate the subsequent regulation) OR limit the data required to be reported on the loan origination record to only those items necessary to determine usage.

Recommendation 6: Lift the ban on collecting student unit-record level data and develop a Student Unit Record Data System (SURDS).

Recommendation 7: Require the U.S. Department of Education to provide a user-friendly presentation of the SURDS data.

Recommendation 8: Require the U.S. Department of Education to issue guidance for publishers who administer guidebook surveys/external surveys in an effort to reduce the institutional reporting burden of multiple surveys and reduce the overwhelming amount of information derived from the surveys that stakeholders are expected to grasp.

COMMITTEE FORMATION

In November 2017, NASFAA opened the application period for membership in the Higher Education Committee of 50. To attract a large pool of highly qualified applicants, NASFAA sent emails to more than 50 institutional, state, and national associations and think tanks asking them to encourage their members to apply. NASFAA also sent personal emails to the presidents/CEOs of all postsecondary associations, policy groups, research organizations, and think tanks with which the association had a preexisting relationship. When the application period closed in December 2017, NASFAA had received 247 applications representing 20 different campus offices from all institutional sectors and geographic regions. After a thorough review of the applications, NASFAA selected applicants based on their qualifications with an eye toward ensuring all aspects of diversity among members as well as equal representation in office, sector, and geographic location. Selected applicants were invited to attend a mandatory, in-person convening in March 2018. Of the 50 individuals initially selected, three stepped down for various reasons, resulting in a final Committee size of 47 members.

COMMITTEE WORK

Committee members met in person for a two-day convening in March 2018. The first day of this convening consisted of four panels focused on one of the four predetermined policy areas: access, accountability, affordability, and transparency. Subject-matter experts, including scholars and representatives from national postsecondary associations and think tanks, composed the panels. An outside consulting company, McKinley Advisors, moderated the panels to ensure neutrality in the presented information and follow-up discussions. At the end of the first day, Committee members rank-ordered the topics they would prefer to work on for the remainder of the project. Guided by these rankings, NASFAA assigned Committee members to topic-based subgroups, ensuring sector and office diversity in each.

On the second day of the convening, each newly formed subgroup gathered for a working session, which McKinley Advisors also moderated. Subgroups defined the scope of their assigned topic and laid the foundation for the ideas they would explore. At the end of the second day, McKinley Advisors transitioned the facilitation responsibilities to the NASFAA Policy Team, who managed the Committee throughout the remainder of the project.

After the March 2018 in-person convening, the subgroups began their topic-specific work. Each subgroup chose its own approach, but all subgroups met at least twice per month from April through August by conference call to discuss and refine their recommendations. During this time, the full Committee met bi-monthly, also by conference call, to ensure that all members could weigh in on each subgroup's recommendations. Using shared documents (where members could leave written comments) and video conferences (where membership could share their thoughts in real-time) facilitated the full Committee's feedback. Each subgroup received a list of association and think tank staff members they could call upon if needed, and they were also offered funding to meet again in-person or contract out for any other consulting work they felt necessary. None of the subgroups chose to meet in-person and only one chose to hire an outside consultant for data analysis. Throughout the project, the NASFAA staff maintained an advisory role to ensure the work remained on track, manage the logistics, and provide Committee members with any resources they needed.

In September 2018, the Committee published their draft recommendations for public comment. During the 30-day public comment period, NASFAA's Communications and Policy and Federal Relations departments reached out to more than 3,900 colleagues at institutional, state, and federal associations and think tanks to solicit feedback and facilitate a social media campaign to generate comments. By the close of the comment period, the draft recommendations had received 125 comments, which NASFAA reviewed and synthesized before presenting to the topic-specific subgroups. The subgroups then spent the month of November 2018 reviewing and analyzing the comments and incorporating the feedback into their recommendations prior to the full Committee's review and final vote.

On December 11, 2018, the full Committee participated in a webinar to vote on the final recommendations. Representatives of the subgroups presented each recommendation, which was then voted on individually by all Committee members in attendance. NASFAA facilitated a separate electronic vote for those who were unable to attend or vote during the webinar. In total, 41 of the 47 Committee members voted.

Throughout the process, decisions made at the subgroup and full-Committee level required a simple majority to pass. However, voting on the final recommendation required a super majority, defined by the Higher Education Committee of 50 as two-thirds (i.e., 31 Committee members). This report presents each of the 36 recommendations approved by the Committee with a brief discussion of the rationale between the policy subgroups' decisions.

The Access Subgroup developed recommendations aimed at improving the ability of low-income, first-generation, and other underrepresented students to attend an institution of higher education. As a starting point, the subgroup defined ***access*** as the ways educational institutions and policies strive to ensure all prospective students have equal and equitable opportunities to take full advantage of postsecondary education.

Because the scope of access to higher education is expansive, this subgroup limited their efforts to the period beginning with the admissions process and culminating at the end of the first year of study. Although subgroup members strongly agreed that enhancements are necessary at the K-12 educational level to improve access to higher education, the Higher Education Committee of 50 consisted solely of postsecondary practitioners. Additional input and expertise from the K-12 community would have been necessary to develop thoughtful, forward-thinking recommendations in the sphere of K-12 education.

Access Subgroup members also agreed on the high importance of success and completion at the postsecondary level. The goal of improving access to higher education is not simply to enroll underrepresented students, but also to provide adequate support to enable them to achieve their educational goals. Because success and completion efforts can be distinct from access efforts, the subgroup chose to focus exclusively on access issues.

Within the broad category of access, the subgroup concentrated on three main areas: (1) reducing and removing structural barriers to higher education, (2) improving access to information and awareness of college options, and (3) improving the first-year experience.

RECOMMENDATIONS

Access Recommendation 1: Simplify and improve the current financial aid application process utilizing one or more of the following strategies:

A. Implement the NASFAA proposal for a three-level application process (NASFAA, 2015).

B. Expand the functionality of the IRS Data Retrieval Tool (DRT) to include (1) all line items of the IRS 1040 tax return used in the calculation of the applicant's EFC, (2) W-2 information, and (3) verification of non-filing status.

C. Consider allowing students to file a Free Application for Federal Student Aid (FAFSA) that would permit financial aid consideration for multiple years (e.g., a one-time FAFSA).

D. Consider allowing students to apply for financial aid via the federal tax return process.

- Rationale for A: The current FAFSA application has over 100 questions and must be submitted each year. Various electronic enhancements, including skip-logic, have improved the FAFSA application process in recent years, but some applicants still find FAFSA completion a challenge, and it creates a barrier for many low-income, first-generation, and disadvantaged populations.

  NASFAA proposed a three-level application process to reduce the amount of information needed from applicants in order to determine financial aid eligibility (NASFAA, 2015). Under the proposed process, after responding to some demographic and dependency status questions, applicants would be directed to one of three paths based on their responses to screening questions. Applicants who receive Supplemental Nutrition Assistance Program (SNAP), receive Supplemental Security Income (SSI) benefits, or do not file a tax return would fall into Path 1 and would not need to provide additional information. Applicants who complete a simpler tax return would fall into Path 2, and their information could be obtained by using the IRS DRT. Applicants who complete a more complicated tax form would fall into Path 3, and their information could be obtained by using an expanded IRS DRT. Simplifying the FAFSA to better match the financial situation of applicants would make the financial aid application process easier and less time-consuming.

- Rationale for B: The IRS DRT allows applicants to pull IRS data into the FAFSA form, which both simplifies the process for applicants and provides more accurate information. In most situations, it eliminates the need for verification because the IRS DRT obtains the information directly from the IRS. The current IRS DRT process remains limited, however, as it does not capture all 1040 information used in the calculation of the expected family contribution, which can result in additional information requests to applicants and additional processing workloads for institutions. The subgroup also recommends including information from W-2 forms in the IRS DRT, which would permit retrieval of income earned from work for non tax filers. No new questions should be added to the FAFSA as a result of having access to more IRS data.

- **Rationale for C:** See Affordability Recommendation #1.

- **Rationale for D:** Allowing students to check a box or supply additional information on a federal tax return could significantly simplify the financial aid application process. This recommendation would require integration of federal IRS and FAFSA processing systems and data. For instance, the federal income tax return uses exemptions based on the tax code while the FAFSA uses family size. This recommendation would also require new thinking on how to handle dependency status changes, special circumstances, and other adjustments currently allowed under professional judgment authority. Still, allowing an applicant to complete one form to file taxes and apply for financial aid should simplify these processes.

Access Recommendation 2: Require Title IV institutions to adopt standardized elements in the financial aid award notification, including all costs, net price, grouping by types of awards, and common descriptors/language.

- **Rationale:** Financial aid award notifications provide cost and financial aid award information to students. Too often, students find it difficult to understand financial aid award notifications and compare information from different institutions. A 2018 study reported that lack of consistency, jargon, unclear award descriptors, lack of differentiation between different types of aid, and omitted or incomplete cost of attendance information caused confusion for students comparing financial aid award notices (New America & uAspire, 2018). In some instances, award notices do not clearly distinguish gift aid from loans. The Committee recommends adopting standardized elements and common descriptors in financial aid award letters to better assist students in understanding their educational costs and the types and amounts of financial aid available to them. The Committee is not advocating for a standardized award letter, as schools have varying needs and some have developed enhanced features and processes to better serve their students.

Access Recommendation 3: Require the U.S. Department of Education to provide more transparency on the verification selection process through the FAFSA with the goal of reducing the number of FAFSA applications selected for verification. Specifically, the Department should treat students equitably with regard to the verification selection criteria and ensure potential Federal Pell Grant recipients are not disproportionately selected for verification compared to recipients of other federal need-based aid programs.

- **Rationale:** Verification is a significant and often complicated part of the financial aid process requiring institutions to collect tax returns and other documents to confirm the accuracy of data reported on the FAFSA. The verification process can be time consuming and challenging, and it creates an additional access barrier for many students (Advisory Committee on Student Financial Assistance, 2005; The Institute for College Access and Success, 2010; MacCallum, 2008; Mostafavi, 2010; Perez, 2010). Verification is troublesome and costly to schools and the federal government, and there is no clear evidence that it significantly benefits the student aid process (The Institute for College Access and Success, n.d.). Since verification is designed to ensure need-based federal student aid program funds are indeed distributed to eligible students, the Department of Education should provide archived annual statistics supporting the current selection criteria and items to be verified as well as data on the most error-prone FAFSA items corrected through the current verification process.

Access Recommendation 4:[1] Support the expanded use of online instruction to enhance access and increase affordability.

- **Rationale:** Each year, more than six million higher education students enroll in one or more online courses (Ginder, Kelly-Reid, & Mann, 2018). Online instruction increases access for students who are working, caring for young children, dealing with a disability, serving on active duty in the military, and/or traveling for work. The electronic delivery of all course content, often including an e-textbook or an Open Educational Resources (OER) textbook, greatly reduces related course costs. Online education also reduces or eliminates education-related transportation costs for students.

Access Recommendation 5: Require the U.S. Department of Education to create and make available a federally recognized database of "virtual advisors" to provide general information to students that will ensure student success as it relates to the admissions and financial aid application processes.

- **Rationale:** A network of artificial intelligence (AI) "counselors" would offer an interactive system that is both robust and precise in the delivery of routine information. AI is specifically designed to scan and process large amounts of data, recognize patterns, and learn from experience and interaction, so it becomes more accurate the more it is used. A majority of questions received by colleges and universities from incoming students and parents require only routine answers. A system that can scan entire databases for the

[1] Because the Access Subgroup finalized Recommendation 4 after the public comment period had ended, it was not subject to public comment. However, the entire Higher Education Committee of 50 reviewed this recommendation, and it passed with a super majority during the December 2018 final vote.

most accurate and complete information could provide answers to such questions at any time of the day or night. At the same time, it would free up scarce human resources for more individualized service when the AI or the user determines a routine answer is insufficient.

AI's interactive system uses technology that is both familiar and readily available to nearly all families of all socioeconomic levels. An AI virtual advisor system would necessarily require significant consumer testing, but it would also present an interesting public/private partnership opportunity with the technology industry. AI has already been piloted by the University of Arizona and Georgia State University (GSU). In its first summer of use, the AI software at GSU alone answered over 200,000 routine questions and improved retention of incoming students by 20% (Ryan, 2018; Gardener, 2018).

Access Recommendation 6: Improve and prioritize broadband internet services for online education/digitally delivered education and training.

- Rationale: The United States currently ranks 9th in the world in terms of broadband capacity and affordability and 20th in the world for broadband speed (Tech.Co, 2018). This represents a national average; inner cities and rural areas have substantially slower broadband speeds and are even more limited in broadband access, capacity, and affordability. The significant role of online education for U.S. colleges and universities, coupled with substandard broadband in many regions, adversely impacts access to higher education. The U.S. system of higher education is predicated on the principle of "equal access for all," and the current limitations and deficiencies of our national broadband network, in effect, serve as a barrier to higher education access as well as an impediment to using more sophisticated instructional technologies, such as artificial intelligence, adaptive learning, virtual labs, etc. Prioritized improvements to the national broadband network will greatly improve higher education access and will better position the United States as a global technology leader.

Access Recommendation 7: Provide financial incentives to graduate school counseling educator programs to place interns in high schools with some of the lowest college-going rates and/or in high schools that serve predominantly low-income students.

- Rationale: Although the American School Counselor Association recommends a student-to-counselor ratio of 250:1, the current national average ratio is 482:1 (Gewertz, 2018). Using interns from graduate school counseling educator programs could lower that ratio. The graduate students could use this experience as part of their required practicum and internship experiences, giving them on-the-job training in counseling students about postsecondary planning. It would be important to ensure student interns have taken an appropriate postsecondary planning course prior to their internship/practicum experience.

Access Recommendation 8:[2] Allocate additional funding in a separate allocation for which schools could apply. Allowable uses of these funds would include, but would not be limited to, student mentors in summer bridge and other transition-to-college programs.

- Rationale: In a review of 50 colleges' programs for serving first-generation students, Strand (2013) detailed 10 best practices for supporting these students during their transition from high school to college. The study described preparing first-generation students for the rigors of higher education, providing them with financial aid, and connecting them with the campus community as the biggest challenges institutions face in working with this population. Strand's best practices included bringing students to campus early (e.g., in summer bridge programs) and using mentors to provide guidance to students as they navigate campus offices and academic curriculums.

  Many underrepresented students do not have family support for their educational endeavors. Mentors provide a "go-to" person who can answer questions as they arise, serve as a support, and provide a degree of accountability. Since mentors are more knowledgeable of the campus, they are able to recommend ways in which the student can get additional support.

Access Recommendation 9:[3] Include in federal student aid funding courses taken in summer bridge programs, English as a Second Language (ESL) courses, and other developmental coursework without affecting students' Federal Pell Grant lifetime eligibility. Under this recommendation, Congress should remove the current 30-credit-hour limit. Current satisfactory academic progress requirements, including rules on repeat coursework, would apply.

[2] Because the Access Subgroup finalized Recommendation 8 after the public comment period had ended, this recommendation was not subject to public comment. However, the entire Higher Education Committee of 50 reviewed this recommendation, and it passed with a super majority during the December 2018 final vote.

[3] Because the Access Subgroup finalized Recommendation 9 after the public comment period had ended, this recommendation was not subject to public comment. However, the entire Higher Education Committee of 50 reviewed this recommendation, and it passed with a super majority during the December 2018 final vote.

- **Rationale:** Remedial coursework, ESL courses, and summer bridge programs prepare students—particularly those from first-generation, underrepresented minority, and low-income backgrounds—for success in postsecondary education. Forty-two percent of first-year students in public two-year institutions and 20% of first-year students in public four-year institutions enroll in remedial courses (Callahan & Chumney, 2009). Research shows that first-generation students are enrolled disproportionately in remedial coursework (Chen, 2005). Bettinger and Long (2004) found students who completed remedial courses were less likely to drop out compared to non-remedial students with similar characteristics.

  English learners (ELs) face numerous challenges in gaining access to higher education, and they often feel limited to two-year institutions (Kanno, 2018). Almost 50% of ELs do not enroll in any postsecondary education after high school (Kanno & Cromley, 2013, 2015), even though many ELs are otherwise college ready beyond needing additional English instruction.

  Summer bridge programs are generally provided to facilitate the high school-to-college transition of many first-generation, underrepresented minority, and low-income students, as well as those who require remedial coursework. These programs vary in length, focus, and type, as well as in the specific college readiness skills and courses included in the curriculum (Sablan, 2014).

  Pell Grant Lifetime Eligibility Used (LEU) tracking currently includes remedial coursework, eligible ESL courses, and eligible summer bridge coursework. Removing the credit/clock hour restrictions for remedial coursework (currently 30 semester or trimester hours, 45 quarter hours, or 900 clock hours), and excluding remedial, ESL, and summer bridge courses from tracking Pell LEU while continuing to enforce the current satisfactory academic progress requirements and rules on repeat coursework would serve to increase college access for students who historically have had difficulty participating in higher education.

AREAS FOR FUTURE WORK

The Access Subgroup's recommendations do not address all topic areas within the realm of access. In addition to the K-12 and success/completion issues, the subgroup also deliberately set aside ideas pertaining exclusively to states and/or institutions. Although states and institutions certainly play a role in ensuring access, the scope of this project was limited to developing federal policy recommendations.

During the subgroup's discussions, members also raised the following issues that, for various reasons, did not ultimately appear in the final recommendations:

- Credit transfer practices
- Standardized testing
- Engagement of active, adult learners
- Structure of academic calendars
- Structure of remediation and modes of entry for underprepared students
- Accommodations for students' learning needs
- First-year experience programs
- Improved use of the federal TRIO programs to support access initiatives

All of these issues are worthy of future work in projects similar to the Higher Education Committee of 50.

ACCOUNTABILITY

The Accountability Subgroup considered the many facets of accountability policy, including the current accountability landscape and options and principles for any future policymaking in this space. The subgroup defined ***accountability*** as the meaningful representation of useful information to (1) disclose measures of how postsecondary institutions, based on institutional mission, have been responsible stewards of education; (2) present, using a progress-based, non-punitive approach, postsecondary institutions' progress on performance measures as responsible stewards of education; and (3) equip citizens with these measures to make informed decisions and instill public trust.

The subgroup operated on four guiding principles:

1. Accountability measurements must take into account different institutional types and missions; one-size-fits-all does not work.
2. A data-informed approach should guide accountability policy.
3. Any changes to accountability policy should be implemented gradually to allow time to review their impact.
4. Institutions that meet or exceed certain accountability measures should be exempt from certain administrative and reporting requirements.

The subgroup felt any accountability policy should consider mission fulfillment within the context of the institution's goals; emphasize student success; serve to close the gap in public perception of the value of higher education; and use data to measure progress, not winners and losers. In its work, the subgroup opted to evaluate existing accountability measures and consider new options in three priority accountability categories: student loans, student experience and progression, and outcomes and alumni success.

The subgroup considered eight current accountability measures. For each, the subgroup debated keeping the measure in place, altering it, or eliminating it altogether. The Accountability Subgroup did not recommend eliminating any of the existing accountability measures but recognized that future accountability measures could make existing measures less useful.

RECOMMENDATIONS

Accountability Recommendation 1: Keep the following current accountability measures in place, unchanged:

- Withdrawal rates
- Financial responsibility scores
- Program reviews
- Financial and compliance audits

Accountability Recommendation 2: Keep the following current accountability measures in place, but alter them as follows:

- Cohort default rates (CDRs): Modify the CDR measure. (Option B in "Areas for Future Work" discusses one idea the subgroup considered.)
- Gainful employment: Retain gainful employment requirements and consider certain alterations to the current rule. (The subgroup recognized that the future of the regulation remains uncertain due to recent U.S. Department of Education rulemaking actions.)
- 90/10 rule: Return the 90/10 rule ratio to 85/15. Also, include U.S. Department of Defense (DOD) military tuition assistance benefits and veterans affairs (VA) benefits as part of the calculation of federal revenue (i.e., the 85%, from which these benefits are currently excluded).
- Accreditation: Require Title IV gatekeeper accreditors to develop and adopt common elements for the function of institutional reflection. This requirement would maintain institutional independence and identity while expecting a baseline of rigor in areas such as learning assessment, retention, graduation, and employment.

Accountability Recommendation 3: Allow a Student Unit Record Data System (SURDS) for establishing an institutional accountability policy, as reflected in the Transparency Subgroup's recommendations. Use College Scorecard data and other sources to measure student experience, progression, and outcomes, and alumni success. When an institution places substantially lower than institutions with similar missions, require an additional, Department of Education-approved review by the regional accreditor.

Using data that would be available through a SURDS, institutions should be accountable for the following:

1. Student progression, defined by mission
   A. Graduation rates
   B. Retention rates
   C. Transfer rates
   D. Program completion rates and/or course completion rates
2. Post-college outcomes
   A. Field-specific certification exam pass rates
   B. Employment rates within program field
   C. Employment rates outside of program field
   D. Time to employment within program field
   E. Field-specific earnings
3. College costs
   A. Average debt
   B. Borrowing rate
   C. Student loan repayment

▶ Rationale: Institutions should be accountable to their own missions. Regardless of mission, all institutions should be accountable for certain outcomes, such as program completion (graduation, certification, a series of courses toward a goal, etc.) and preparation for next steps (further education, employment, etc.). However, there should be some differences by mission. For example, some community colleges prepare students for transfer to a four-year institution and should be accountable for the number or percentage of students who transfer. Community colleges may also prepare students for specific careers, such as nursing, graphic design, or automotive technology. Liberal arts colleges prepare students for any number of careers and for lifelong learning. Institutions that offer graduate programs prepare students for careers in specific academic fields.

For these reasons, institutions should be held accountable to their own missions, with thresholds conforming with those of similar institutions. Similarly, institutions should be accountable for their students' post-college earnings compared to earnings in the field—teachers' earnings should be compared with those of other teachers, not doctors or engineers.

AREAS FOR FUTURE WORK

With the high level of student loan debt and number of students in default, the subgroup believes student loan accountability measures must be part of any accountability proposal. The subgroup drafted two options for consideration by the full Committee; however, neither option gained the requisite number of affirmative votes for adoption. These options could be refined further in future work.

Accountability Recommendation (not adopted): Apply one of the two following options (Option A or Option B) to improve student loan accountability.

▶ Rationale: As students are presented with an endless menu of higher education choices to best fit their career aspirations and educational needs, policymakers are concentrating their efforts on making sure students are set up for success as a result of their investment. One of the primary ways institutions are held accountable is through the cohort default rate (CDR). Colleges and universities with CDRs at or above 30% for three consecutive years or at or above 40% for a single year may lose eligibility to award federal student aid. Representatives at institutions spend many hours analyzing and reacting to CDRs, but few institutions actually lose eligibility. Between 1999 and 2015, only 11 colleges had lost access to all federal financial aid due to high CDRs (Kelchen, 2018). Due to the apparent loopholes in using the CDR as an accountability metric, many consider it to be ineffective.

Members of the Accountability Subgroup felt any shift from a CDR to another measure of accountability, such as repayment rates, must fairly recognize the institution's contribution to reducing student borrowing and prioritizing improved success and completion. For instance, if institutions are to share in the repayment risk when students enroll and obtain federal student loans, the proposed method or measurement should provide credit to institutions with program completion initiatives for at-risk students. Likewise, credit should be given for implementing programs such as financial literacy, focused advising, faculty mentoring, and freshman bridge classes, and engaging in financial aid best practices. Additionally, credit should be given to institutions providing initiatives designed to help students understand loan obligations. This would differentiate between institutions focused on student success and those concerned primarily with the use of federal aid program dollars to meet budgetary needs.

Proposed legislation has suggested moving to a review of repayment rates for individual programs, rather than the institution as a whole, for risk-sharing (PROSPER Act, 2017). This would require additional data modeling to avoid unintended consequences, such as limiting low-income students' access to certain academic programs. However, because academic programs vary between institutions and educational sectors, it is unclear how this change could be implemented without adding more complexity, uncertainty, and regulatory burden to the overall review process. A one-size-fits-all approach fails to take into consideration different institutional missions. A poorly designed risk-sharing model could negatively impact at-risk students and limit access (NASFAA, 2018). New accountability measures should identify institutions that do not provide a quality education and thus leave students unable to pay back their student loans.

Option A: Replace the CDR accountability measure, which establishes the share of borrowers who default on their loans within three years of entering repayment, with Loans in Positive Repayment Status (LPRS). LPRS would be used to calculate a non-repayment risk rate to better reflect how borrowers are repaying their student loans.

- **Details and Rationale:** Many institutions keep their CDR low by getting students to defer payments during the default rate calculation period. The CDR also fails to show that many students are not in default but also are not making payments on their student loans (Kelchen & Li, 2017). In addition, the CDR does not give incentives for colleges to lower default rates, since any rate below 30% does not result in sanctions (Senate Committee on Health, Education, Labor, & Pensions, 2018). The CDR can be misleading, especially for community colleges that do not have a high percentage of loan borrowers. For example, community colleges not only have lower borrower rates, but they also have much lower total loan amounts borrowed than many other types of institutions. The CDR does not use borrowing rates, distorting the overall risk of nonpayment (TICAS, 2016).

LPRS calculates a non-repayment risk rate using the following formula:

$$\frac{\textit{Borrowers in positive repayment status}}{\textit{All borrowers entering repayment three years after leaving the institution}}$$

The LPRS calculation reflects the following:

- Borrowers not in default (i.e., not 270 days past due)
- Borrowers in deferment for in-school, unemployment, or economic hardship
- Borrowers for whom forbearance has been granted to keep the borrower out of default for all of the three-year calculated repayment period, provided a minimum of $1 of principal has been paid toward the loan balance or the borrower makes six scheduled monthly payments
- The institution's borrowing rate from the TICAS College Accountability Proposal (TICAS, 2016)
- Exclusion from the numerator and denominator of borrowers on an income-driven repayment plan with a $0 monthly repayment

The LPRS rate, non-repayment rate (100% - LPRS), and borrowing rate would be used to calculate the non-repayment risk rate (non-repayment rate * borrowing rate). The non-repayment risk rate would be the metric for accountability.

	LPRS rate	Non-repayment rate	Borrowing rate	Non-repayment risk rate
SCHOOL A	40%	60%	80%	48%
SCHOOL B	40%	60%	20%	12%

Outcomes

- Institutions below their national peers in terms of students' non-repayment risk rates would be considered in good standing and would require no further review.
- For institutions above the national average in non-repayment risk rate for any year, other factors would be taken into consideration before any penalties would be assessed, including the following:
  - Six-year graduation rate compared to peers
  - The institution's percentage of Pell-eligible students (above a certain percentage)
  - Use of a U.S. Department of Education-approved loan management plan (financial literacy)

Institutions failing LPRS (and the risk of non-repayment measure) would be subject to penalties and/or suspension from the Title IV aid programs.

The Accountability Subgroup attempted to model this proposal using existing data sources. The modeling of data (excluding income-driven repayment plans where the payment is zero) showed an average range of 14% non-repayment risk rate for two-year public institutions to 46.7% for four-year for-profit institutions.

Option B: Keep the current CDR accountability measure but make adjustments to better reflect how students are making payments on their loans.

- **Details and Rationale:** The CDR accountability measure has been in place since 1990 and is well understood in the field. The adjustments proposed below would more accurately reflect the actual default rate. Adding the borrowing rate to the formula, as described in the "TICAS College Accountability Proposal" (TICAS, 2016), would better reflect overall risk of default.

Option B would adjust the CDR as follows:

- Borrowers for whom forbearance has been granted to keep the borrower out of default for all of the three-year calculated repayment period would be excluded, provided a minimum of $1 of principal is paid toward the loan balance or six monthly scheduled payments have been made.
- Borrowers on an income-driven repayment plan will be excluded if not in default during the calculation period.
- Borrowers on an income-driven repayment plan with a $0 monthly repayment would be excluded from both the numerator and the denominator.
- The institutions' borrowing rate would also be part of the calculation (from the TICAS College Accountability Proposal [TICAS, 2016]). The CDR rate would be subtracted from 100 to determine the nonrepayment rate.

The following additional factors would be reviewed for institutions above the CDRs determined acceptable:

- Comparison to peer institutions
- Six-year graduation rate compared to peers
- Non-financial accreditation measures of student success
- The institution's percentage of Pell-eligible students (above a certain percentage)
- Use of a U.S. Department of Education-approved loan management plan (financial literacy)

Institutions exceeding the established new CDR rates would be subject to risk-sharing payments and/or suspension from the Title IV programs.

The proposed changes to payments during forbearance and removal from the calculation for borrowers on an income-based repayment plan with a $0 payment could not be modeled. More data collection and modeling are needed to test and refine the adjusted CDR calculation.

AFFORDABILITY

For the purposes of these recommendations, the Affordability Subgroup defined postsecondary education ***affordability*** as the alignment between the student's desired educational credential, total net costs, funding mechanisms, and long-term improvement in that individual's quality of life attributable to their postsecondary education.

This subgroup acknowledged that postsecondary education has both individual and societal benefits and, as such, responsibility for the cost of higher education should be shared by the student and/or their parents; federal, state, and local governments; institutions of higher education; and private entities, including businesses. In addition to the source of funding, the funding mechanism itself matters. Affordability must take into account the merits and drawbacks of different types of education funding, like grants, loans, work, and savings, as well as other new and innovative funding models.

Using this definition as a guide, the subgroup derived three focus areas in which to develop the recommendations: financial literacy/financial wellness, improving existing aid programs, and keeping costs down. The scope of this project limited recommendations to undergraduate postsecondary education. However, the Affordability Subgroup identified as areas for future work early awareness about college costs and the importance of saving for college, which would take place during and, even possibly before, the K-12 years. Time constraints limited the subgroup from exploring other topics worthy of future consideration, including the elimination of student loan interest capitalization, how institutions of higher education can play a larger part in affordability, and HEA authorization of innovative learning models, like competency-based education.

RECOMMENDATIONS

Affordability Recommendation 1: Require the U.S. Department of Education to enhance existing financial literacy tools and require consumer testing on all new or improved tools. These products should be made available to all students, not just student borrowers.

- Rationale: A key component of affordability is ensuring students have access to accurate, transparent, and complete information about the total cost of attendance for their desired educational program, so they can make informed financing decisions. Current financial literacy tools have varying levels of ease of use for consumers, are not housed in a way that encourages a one-stop shop for students, and show information that may not be explained clearly enough for students and families who are not well versed in the details of funding higher education. Requiring the use of existing financial literacy tools would be a burden on students and institutions and would likely impede access to financial information. However, improving existing tools by increasing their usability would help students make good decisions about funding their educational program.

Affordability Recommendation 2: Require the U.S. Department of Education to develop and add a dynamic, user-tested truth-in-lending calculator and annual debt letter to entrance counseling/StudentLoans.gov. The annual debt letter would create a national standard to supplant any existing state requirements for debt letters. The Department should make this available at the time of loan disbursement but should not make it a requirement (i.e., roadblock) to students getting their loans. This would be something the Department would develop and distribute, not the school. Require private lenders to report to the National Student Loan Data System (NSLDS).

- Rationale: Students and families who take loans to pay for educational expenses do not always have a full idea of how this debt will affect them once they are no longer enrolled due to attrition or degree completion. While it may seem that loans make attending college "affordable," students and families may later need to delay major life milestones, such as the decision to purchase a home or a vehicle, because of their student loan obligations. These delayed life decisions may affect families in a variety of ways, impacting everything from the kinds of employment they seek to the geographic areas where they can afford to live. By receiving a true estimate of their future borrowing totals, students and their families can have a better understanding of the long-term impact of borrowing decisions.

Affordability Recommendation 3: Permit students to file a FAFSA that would allow financial aid consideration for multiple years (e.g., a one-time FAFSA).

- Rationale: Anecdotes and studies show the FAFSA to be an obstacle to the neediest students and families (Selingo, 2017). The FAFSA is overly complicated and confusing, and verification requirements—in which the lowest income students are specifically targeted—create a barrier to access for the students that Title IV programs are intended to help. For many, the requirement to file a FAFSA annually is accurately described as poor people being forced to prove repeatedly that they are poor. Preliminary results from a soon-to-be-published Center for American Progress study of over a quarter-million

FAFSA filers show that for more than half of filers, the expected family contribution (which is the result of the Federal Methodology formula that uses the FAFSA data) changes annually by only $2,000 or less. For students eligible for Pell Grants, this figure grows to 75%. For both Pell-eligible and non-Pell-eligible students, the largest group is those whose expected family contribution did not change by even so much as a dollar (Campbell, 2018).

Making these students submit a new FAFSA annually is an unnecessary exercise. A one-time FAFSA should lead to schools assessing a student's financial aid eligibility for multiple years—even the duration of their program—enabling long-term financial planning that is now nearly impossible for families. Most students entering college are asked to make an enrollment decision armed only with information about the cost of the first year; they must take a leap of faith that subsequent years will be similarly affordable. Sometimes they are similar, sometimes they are not, and what the expected family contribution formula recognizes as a change in eligibility is rarely an event that, in reality, gives the family more disposable income.

All changes to the FAFSA process would be contingent upon studying FAFSA filing data to ensure that this method would provide the most benefit to students. Such studies would help determine whether there are specific populations to target with a one-time or less-than-annual FAFSA, such as Pell recipients, applicants qualifying for simple need analysis, applicants with a zero expected family contribution, those on various forms of public assistance, and others. An optional renewal FAFSA should be available for students and families whose circumstances change, such as through a loss of income or change in dependency status. Nothing in this recommendation would prohibit schools from conducting subsequent annual reviews of student need or eligibility for institutional aid.

Affordability Recommendation 4: Allow Federal Pell Grant-eligible students to use up to two semesters (100%) of Pell Grant funds while completing dual-enrollment programs, while in high school, or while completing remedial courses, without such usage counting toward their Pell Grant Lifetime Eligibility Usage (LEU) limit.

- Rationale: The Pell Grant was established specifically for students with exceptional financial need. These same students often require remedial courses before beginning their college-level courses or would benefit from taking college-level courses while in high school to ensure they are well prepared to pursue their educational goals. Providing funding to these at-risk students without reducing their overall Pell Grant LEU provides them with an affordable option to gain the skill set needed to succeed in college-level courses.

Affordability Recommendation 5: Allow federal student loan refinancing through a federal government program should the variable annual interest rates decline.

- Rationale: This recommendation would increase affordability by permitting individual borrowers (students and parents) who took loans at higher interest rates to receive the same loan interest rates that benefit contemporary borrower cohorts. The federal student loan program offers generous and sometimes costly deferment, forbearance, forgiveness, cancellation, and death/disability discharge provisions as a safety net. However, many high earners with existing federal student loan debt take advantage of refinancing in the private market to lower monthly payments and the total cost of repayment, thereby destabilizing the federal loan portfolio. Retaining high-performing loans is necessary to offset low-performing loans and to balance the financial risk to taxpayers of diluting federal assets.

Affordability Recommendation 6: Restore the purchasing power of the Federal Pell Grant by changing its funding source to mandatory funds exclusively, making it a true entitlement program.

- Rationale: College cost increases have outpaced the general rate of inflation for decades, but Pell Grants have not kept up, causing a steady decrease in the purchasing power of the Pell Grant (Protopsaltis & Parrott, 2017). Congress should use this opportunity to demonstrate an unwavering commitment to higher education and absolutely reverse the downward trend of the Pell Grant's purchasing power for students now and in the years to come. This is a critical investment we can make in the human potential of our country's future. This recommendation would revive the spirit of the Pell Grant by mandating 100% funding for the greatest positive impact possible.

Affordability Recommendation 7: Exclude 529 savings plans from the Federal Methodology need analysis calculation to encourage parents to save for their children's education without worrying that these savings will raise their student's expected family contribution.

- Rationale: 529 plans provide a convenient way to save for college. These plans offer the advantage of saving over time; the option of low, flexible contribution levels; and the benefit of tax-free growth. Currently, the Federal Methodology needs analysis calculation includes the value of 529 plans, thus increasing the expected family contribution and ultimately discouraging use of these plans. Encouraging saving resources over time as opposed to borrowing money and paying interest is good public policy and will reduce the total cost of higher education for students.

Affordability Recommendation 8: Discontinue origination fees.

- Rationale: The HEA created origination fees when federal student loan programs were bank-based, which is no longer the case more than 50 years later. Today, origination fees essentially impose an unjust tax on student loan borrowers. Congress should eliminate origination fees to help improve college affordability.

Affordability Recommendation 9: Reduce interest rates and set a flat add-on amount across the federal student loan programs. This value should be set at the 10-year Treasury note with a flat add-on amount not to exceed 2%.

- Rationale: Many consumer loan products have lower interest rates than federal student loans. Federal student loans, intended to make college more affordable, should not have excessive interest rates. It is confusing and difficult to have disparate interest rates for different classes of loans. A single, lower interest rate will be easier to understand and more likely to be paid off. Uniform interest rates will also be easier to administer and collect. If an origination fee is used, it should likewise be uniform and stable, and it should not be used as a variable revenue source.

Affordability Recommendation 10: Use Fund for the Improvement of Postsecondary Education (FIPSE) grant funds to create new avenues for postsecondary institutions to move toward the goal of affordable textbooks and other course materials (such as digital textbooks, textbook rental programs, and open educational resources [OER]) by 2030 to support student learning, persistence, and completion.

- Rationale: *The National Student Financial Wellness Study* identified three "essential expenses of attending higher education": tuition, housing, and textbooks (Ohio State University, 2014, p. 3). According to a 2018 survey from Cengage Unlimited, rising textbook costs are limiting academic success and student persistence, as students must decide between spending hundreds of dollars on books, meal plans, and transportation, or seeking alternatives, such as textbook rentals or no books. OER resources are designed to help increase student-faculty engagement and lessen the burden of purchasing books and supplies. OpenStax, a nonprofit initiative created in 2012 to provide free textbooks and digital resources, is gaining traction at the community college level.

Affordability Recommendation 11: Eliminate higher education tax credits and put those funds into the Federal Pell Grant program.

- Rationale: Tax credits do not help anyone pay for college on the front end; they are available only after families have paid. The Pell Grant is the most effective and efficient way to advance access to higher education. Infusion of these dollars into the Pell program would expand eligibility to middle-class students, who might not now benefit from Pell.

Affordability Recommendation 12: Eliminate the taxability of certain financial aid.

- Rationale: Current federal tax law stipulates that scholarships or grants are tax-free if the expenses they covered were for (1) tuition and fees required to enroll at or attend an eligible educational institution, or (2) course-related expenses, such as fees, books, supplies, and equipment required for courses at an eligible educational institution. Scholarships and grants must be included in gross income if the student used the funds for other education-related expenses, such as room and board, travel, and optional equipment. However, the HEA defines the types of costs to be included in the cost of attendance used to establish each student's financial need. The law requires that costs reflected in the cost of attendance must be appropriate and reasonable amounts. Since financial assistance offered as scholarships and grants can be used to meet the financial needs of students, scholarship and grant amounts falling within the cost of attendance reflect necessary educational costs that should not be taxed.

  The issues of access to and affordability of postsecondary education are of great concern to legislators and the public. The taxability of scholarship and grant assistance is counterproductive to these two national objectives. Taxing student aid can impact students from all socioeconomic levels; however, lower-income students are most adversely affected as they have little ability to pay the resulting tax. For these reasons, although the recommendation proposes no changes to work-study taxability, the Affordability Subgroup recommends eliminating the taxability of scholarship and grant assistance.

Affordability Recommendation 13: Provide simplified and equitable federal student loan repayment by establishing one standard 10-year repayment plan, one extended repayment plan, and one income-based repayment (IBR) plan. The IBR plan would allow borrowers to pay a monthly amount based on their income and family size. The total amount to be repaid under IBR would be capped at the total of the principal and interest the borrower would have paid under a standard 10-year plan, as calculated when they entered repayment. Under IBR, interest would continue to accrue over the life of the loan, and amounts above the standard 10-year repayment cap would be forgiven and exempt from taxation.

- Rationale: Currently, there are eight available repayment plans for borrowers to choose from, five of which are income-driven plans. Reducing the number of plans to three causes less confusion for borrowers entering repayment. In addition, this subgroup believes it is unfair to tax loan forgiveness for borrowers who seek to repay under IBR because of low incomes that cannot support their debt. The one-time tax liability can cause a significant hardship for those already in difficult financial circumstances. However, making all loan forgiveness tax-free could encourage overborrowing and would provide little incentive for institutions to keep tuition low. Removing loan forgiveness taxability and capping the total amount to be repaid protects lower-income borrowers while still discouraging overborrowing.

Affordability Recommendation 14: Establish a federal and state partnership to incentivize tuition-free community college as a first-dollar program, and consider imposing a cap on eligibility based on income.

- Rationale: This model would pay students' tuition and required fees at an eligible community college before awarding other grant assistance, like Pell Grants or state need-based grants. In this first-dollar model, Pell and state grant awards could be used to pay non-tuition-related expenses including books, transportation, housing, and food. The principle argument in favor of first-dollar programs is that they allow low-income students to use Pell and state grants to address non-tuition-related costs, which increases the likelihood that recipients will be able to stay in school and have more time to focus on their studies. A potential outcome could be savings in student Pell Lifetime Eligibility Usage and state maximum eligibility, so students transferring to four-year colleges could continue to benefit from these programs as a way to avert loan indebtedness at that level.

  While some have expressed concerns that this model creates an additional expense to taxpayers, it would also produce an offset of significant savings in several aid programs. A tuition sticker price of zero would eliminate much of the need for student loans at these schools, and to a lesser extent, the need for Pell and state grants.

  In existing examples of such programs (e.g., Michigan and Arkansas), the requirements vary. Some programs pay based on the length of time the student has been attending K-12 public schools in a specific area and some are based on income. The subgroup discourages creating challenging obstacles, such as post-graduation in-state residence or employment requirements, as some states have instituted. Tuition-free pricing should also be available to all age groups (i.e., adult as well as traditional-age students) and to both full- and part-time students.

Affordability Recommendation 15: The Public Service Loan Forgiveness (PSLF) program should be maintained for current and future eligible borrowers for the Federal Direct Student Loan program and any successors to that program. Congress should set caps for the amounts forgiven under the PSLF program, such as those proposed by NASFAA: full forgiveness of up to $57,500, and half the amount borrowed between that limit and up to $138,500 (NASFAA, 2014).

- Rationale: PSLF was introduced in 2007 to encourage students to follow specific academic and career pursuits that are less likely to result in higher salaries. The partial forgiveness of their student loan debt makes the education they need for these careers more affordable. Qualifying borrowers include largely service-oriented professionals in education, law enforcement, medicine, counseling, the legal system, social work, the military, libraries, all levels and branches of government, museums, emergency response units, and more. These important jobs, found in virtually every community in the United States, help our society function and our culture flourish. They all require postsecondary education, including, in many cases, an advanced degree. It can be argued that a better solution would be to make the educational credentials necessary for these careers more affordable and less burdened by debt, but until we reach that point, losing the PSLF program would result in shortages of trained, educated professionals in some of the most important jobs in our economy, performing many of the most important services in our communities.

  PSLF requires 10 years of repayment before a borrower qualifies, so forgiveness only began in 2017. Between the time Congress passed the bill in 2007 and forgiveness began, many lawmakers and pundits expressed concerns about the total cost, although that "cost" is only a reduction in incoming revenue and profits for the student loan program. There is currently no cap on the amount a borrower can have forgiven under this program. Adding caps, as proposed by NASFAA, would help lower this revenue and profit reduction.

Affordability Recommendation 16: Decouple eligibility for interest subsidy from cost of attendance and base it on the expected family contribution.

- Rationale: Eligibility for a subsidized (interest-free) Federal Direct Loan is based on financial need as determined by taking the cost of attendance (specific to the school) and subtracting the expected family contribution and other financial aid. Students who demonstrate financial need qualify for a subsidized loan. Since the calculation is connected to the cost of attendance of the school, students who attend higher-cost schools are more likely to qualify for a subsidized loan. The following example illustrates this point:

	SCHOOL A	SCHOOL B
Published cost of attendance	$62,000	$22,000
Student's expected family contribution	$21,000	$21,000
Other financial aid	$1,000	$1,000
Financial need	$40,000	$0
Federal Direct Loan	Qualifies for subsidy	Does not qualify for subsidy

Students also frequently lose eligibility for some or all of the interest subsidy if they receive private scholarship assistance. Basing the interest subsidy on a student's expected family contribution would result in greater simplicity in the system, mitigate overawards, provide a predictable outcome for families, and offer greater equity by ensuring the lowest-income students receive the subsidy regardless of the institution they choose to attend or how much they receive in scholarship funding.

AREAS FOR FUTURE WORK

Due to time constraints, the Affordability Subgroup could not focus on several topics worthy of future consideration. One opportunity for future work is the authorization of innovative learning models, like competency-based education (CBE), in the Higher Education Act. Although CBE is not currently defined in law, many colleges and universities are implementing CBE programs. These programs show great potential to increase access and improve affordability. As these innovative learning models gain traction in the higher education community, they need to be recognized in law and guided by regulation.

In addition, the subgroup did not have time to address eliminating the practice of student loan interest capitalization. Student loan interest capitalization is not a statutory or regulatory requirement; it is a practice used previously with the Federal Family Education Loan Program, which ended in 2010, that has been continued in the Direct Loan program. Interest capitalization penalizes students who do not have the ability to pay interest while in school or during periods of deferment or forbearance. They end up paying interest on accumulated interest upon capitalization, which can translate into hundreds or even thousands of dollars over the life of the loan.

Finally, the subgroup recognizes that many of the proposed recommendations demand increased spending or subsidies by the federal government. As representatives of higher education institutions, the Affordability Subgroup members also accept the role of colleges and universities in making their product more affordable and recommend a deeper exploration into keeping college costs down as another area for future work.

TRANSPARENCY

The Transparency Subgroup focused on the broad question of how to provide more meaningful, relevant information to postsecondary students and families. While many factors inform decision-making about postsecondary education, this subgroup concentrated on the consumer information delivered to students and families with a particular eye toward the source of the information and data. To that end, the subgroup focused on the quality of the information over the quantity, acknowledging up front that too much information—as we have today—can be problematic.

To guide this work, the Transparency Subgroup determined that any recommendations put forth would be student-centered; actionable and feasible; creative; focused on the future; and focused on equity, diversity, and inclusion. All recommendations would take a holistic approach to success, challenge the status quo, and recognize the value of being good stewards of federal funds. In addition, the subgroup also identified four "visions of success" to use as a framework: recommendations should be consumer-centric and user friendly, take into consideration the burdens associated with data collection, meet informational needs, and focus on providing the right data at the right time.

Ultimately, the subgroup established three broad-issue areas to further refine the goals of each recommendation: (1) sourcing of and access to data, (2) effective communication to stakeholders, and (3) reducing reporting burden. Each of the subgroup's eight recommendations falls into one of these three issue areas.

RECOMMENDATIONS

Transparency Recommendation 1: Require the U.S. Department of Education to administer an optional continuous-improvement survey at the end of the FAFSA to determine which elements of the online application help students and families understand and interpret information accurately and with ease. If such a survey is not conducted on an annual basis, the Department should add a brief question, prior to the student and parent signature area of the FAFSA and other federal financial aid forms such as the Master Promissory Note (MPN), asking users to identify elements of the online application and other materials that create confusion and difficulty.

- Rationale: While FAFSA filers do not represent the entire stakeholder population, the subset does represent a large majority and their feedback is valuable. Such information gathering will allow for timely adjustments that support families as consumers.

Transparency Recommendation 2: Require the U.S. Department of Education to conduct consumer testing to identify what terms, elements, and strategies would render financial aid educational materials easier for consumers to understand.

- Rationale: The process of applying for financial aid for postsecondary education can be confusing because it involves industry-specific jargon that is unfamiliar, especially for first-time applicants. We believe students, parents, high school guidance counselors, and financial aid administrators can communicate most effectively if the Department of Education promotes the use of common terms with easy-to-understand definitions across postsecondary educational institutions, within government departments and agencies, and in publications discussing financial aid. In addition, we anticipate that using up-to-date, direct and indirect modes of education that appeal to a variety of learning styles will ease understanding.

Transparency Recommendation 3: Mandate evaluation of all federally required disclosures directed toward consumers of postsecondary financial aid to understand each disclosure's intended message, use, and audience. This evaluation should inform and guide revision or elimination of these disclosures. It should also establish a framework for creating any future required disclosures, assuring they effectively communicate with their intended audiences and can be used to make meaningful decisions about higher education or financial aid. Any such evaluation should employ evidence-based research methods.

- Rationale: Much of the disclosure information currently requested from postsecondary education institutions is not presented in a context that helps consumers understand its value for decision-making. Similarly, the information as currently presented does not always represent a clear narrative about the institutions that provide it. Evaluation is needed to determine the disclosure information all stakeholders (i.e., government, private sector financers, consumers, and educational institutions) require to make sound, informed decisions about the resources they each manage related to postsecondary education.

Transparency Recommendation 4: Eliminate consumer information requirements or disclosures that are not accessed by consumers or used in higher education decision-making by a significant number of consumers or stakeholders (government, private sector financers, consumers, and educational institutions), or are duplicative or irrelevant. Congress and the U.S. Department of Education should reduce the number of consumer information disclosures to include only those that are the most meaningful and have a direct impact on consumers.

- **Rationale:** Following evidence-based evaluation of consumer information, Congress and the Department of Education will be in a position to eliminate some of the duplicative reporting faced by postsecondary institutions and consumers. Institutions must now provide so many consumer information disclosures that consumers find it nearly impossible to identify what is meaningful and valuable in their decision-making. Information must be succinct and relevant in order to help students and families make smart choices.

  After studying each of the current consumer information requirements found in the U.S. Department of Education's "Consumer Information Disclosures At-A-Glance" document, the subgroup assigned each of the existing consumer disclosure requirements to one of three categories: eliminate, keep as is, or keep in place but alter the existing consumer information.

  Eliminate:

  A. Copyright infringement policies and sanctions (including computer use and file sharing)
  B. Vaccinations policy
  C. Accountability for programs that prepare teachers
  D. Voter registration forms
  E. Drug and alcohol abuse prevention program
  F. Completion/graduation and transfer-out rates for students receiving athletically related student aid, including disaggregated completion/graduation rates (Student Right-to-Know Act)
  G. Intercollegiate athletic program participation rates and financial support (Equity in Athletics Disclosure Act)
  H. Fire safety report
  I. Fire log
  J. Principles of excellence for educational institutions serving service members, veterans, spouses, and other family members
  K. Types of graduate and professional education in which the school's graduates enroll
  L. Retention rate
  M. State grant assistance
  N. Student loan information published by the U.S. Department of Education
  O. National Student Loan Data System (NSLDS)

  Keep as Is:

  A. Notice of availability of institutional and financial aid information
  B. Contact information for assistance in obtaining institutional or financial aid information
  C. Student financial aid information
  D. Facilities and services available to students with disabilities
  E. Price of attendance
  F. Refund policy, requirements for withdrawal, and return of Title IV financial aid
  G. Academic program (educational program, instructional facilities, and faculty)
  H. Transfer of credit policies and articulation agreements
  I. School and program accreditation, approval, or licensure
  J. Notice of federal student financial aid penalties for drug law violations
  K. Student body diversity
  L. Net price calculator
  M. Job placement rates
  N. Textbook information/information for students/ information for college bookstores
  O. Private education loan disclosures (including self-certification form)
  P. Code of conduct for education loans
  Q. Preferred lender lists
  R. Preferred lender arrangements
  S. Private education loans
  T. Annual report on preferred lender arrangements

  Keep in Place with Alterations:

  A. Constitution Day: Make disseminating the information on the U.S. Department of Education's website sufficient for compliance.
  B. Privacy of student records—Family Educational Rights and Privacy Act (FERPA): FERPA should address current privacy issues and the practicalities of operations.
  C. Entrance counseling for student loan borrowers: Make entrance counseling more user-friendly and interactive, and include required consumer testing.
  D. Exit counseling for student loan borrowers: Make exit counseling more user-friendly and interactive, and include required consumer testing.
  E. Completion/graduation and transfer-out rates, including disaggregated completion/graduation rates (Student Right-to-Know Act): Account for issues related to community colleges and transfer students in completion/graduation/transfer

rates. In particular, count students successfully transferring out of a community college to another institution as graduates if they complete at another institution.

F. Consumer information on the College Navigator website: Add consumer information disclosures to the existing College Navigator site.

G. Clery Act Annual Security Report: Streamline reporting requirements. For example, eliminate requirements that institutions restate policy language that is already required to be published elsewhere. Also, limit fines where institutions can demonstrate good faith, reasonable efforts to comply with regulatory and guidance requirements.

The subgroup could not reach consensus on recommendations for the following consumer disclosure requirements:

A. Information for crime victims about disciplinary proceedings
B. Institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking
C. Institutional eligibility
D. Self-certification form

Transparency Recommendation 5: Repeal the Subsidized Usage Limit Applies (SULA) requirement that limits students' subsidized borrowing to 150% of their program length (which would eliminate the subsequent regulation) OR limit the data required to be reported on the loan origination record to only those items necessary to determine usage. The regulation is overly burdensome and duplicative, in large part because the U.S. Department of Education collects more information than is necessary to determine subsidized loan usage.

▶ Rationale: The calculation of this percentage for every borrower (see U.S. Department of Education, n.d.) burdens schools and is difficult for students to understand. In addition, the regulations require schools to report much more information about students' enrollment levels/programs than is required by the law. Even if the law is not repealed, the reporting burden can be reduced. The intent of the law is clear: to limit the use of subsidized loans to six years for a student in a four-year program, and to three years for a student in a two-year program. This is a laudable goal that seems to encourage timely degree completion. However, other financial aid regulations, including the Pell Grant Lifetime Eligibility Usage (LEU) rules and satisfactory academic progress regulations, are already in place to meet this goal.

Transparency Recommendation 6: Lift the ban on collecting student unit-record level data and develop a Student Unit Record Data System (SURDS).

▶ Rationale: There are three primary reasons for creating a SURDS. First, the U.S. Department of Education asks schools to provide it with data that already exist, either at the Department or at another agency. For example, the Fiscal Operations Report and Application to Participate (known as FISAP) asks schools to report their Pell Grant volume, but the Department already collects Pell Grant amounts by student. Also, in the current gainful employment regulations, schools must create and report earnings data on graduates, but earnings data are already available in the Internal Revenue Service (IRS) systems. Second, current reporting of data elements, like graduation rate, is incomplete because schools do not have access to data on where their past enrollees attended after leaving their school. Third, a comprehensive SURDS would allow the Department to apply consistent definitions to all data metrics, which would allow for more consistent school comparisons for students.

The subgroup discussed the following considerations for developing a SURDS:

1. Data from SURDS should be merged with data from the IRS and the Bureau of Labor Statistics. In no case should a school be asked to develop, create, or report data already present in an existing federal database.
2. With the new information available in a SURDS, the U.S. Department of Education should focus on how these new data can relieve institutional reporting burden or how to change existing reporting requirements to use data that already exist but may not be exactly what is used currently.
3. Disaggregated data from the SURDS should be available to institutions for analysis with personally identifiable information removed.
4. Data from the SURDS should be used to compute new graduation and completion rates for schools, taking into account students who started at one school and finished at another.
5. Data from the SURDS should be used to calculate the following new items:
   a. Enrollment
   b. Credit accumulation
   c. Credit completion ratio
   d. Gateway course completion
   e. Retention rate/persistence rate
   f. Transfer rate
   g. Graduation rate

h. Completers/completions per student
i. Net price
j. Cumulative debt
k. Employment rate/median earnings/earnings threshold
l. Loan repayment
m. Time to credential
n. Credits to credential

6. Suggested unit-record data to be collected on a term-by-term basis would include the following:
   a. Current institution
      i. Institution Title IV code
      ii. Term
      iii. Length of term
      iv. Number of hours enrolled
      v. Full time/three-quarter time/half time/less than half time
   b. Demographic
      i. Gender
      ii. Race/ethnicity
      iii. Age
      iv. Military status
   c. Identifiers
      i. Social Security number
      ii. State residency status
   d. Degree information
      i. Degree awarded
      ii. Degree date
      iii. Cumulative credit hours earned
      iv. Cumulative GPA
      v. Graduation rate
      vi. Time to credential
      vii. Credits to credential
   e. Student metrics
      i. Prior college(s) attended
      ii. Retention by term or year
      iii. Enrollment status (first time, transfer, continuing)
      iv. Degree-seeking status
      v. Full-time/part-time status
      vi. Program/major
   f. Financial aid
      i. Dependency status
      ii. Federal financial aid
      iii. State financial aid
      iv. Institutional financial aid
      v. Other financial aid

Transparency Recommendation 7: Require the U.S. Department of Education to provide a user-friendly presentation of the SURDS data. As improvements evolve, the Department should review and update this presentation.

- Rationale: The Integrated Postsecondary Education Data System (IPEDS) has proven successful in presenting user-friendly aggregate data. The Department of Education should guide the use of similar summary data utilizing SURDS. Digestible summary data will reduce both the overwhelming amount of data and the uncertainty institutional offices currently deal with. SURDS summaries also have the ability to create transparency to stakeholders in an easily understood format. Consumer testing would be beneficial in determining what constitutes a user-friendly presentation.

Transparency Recommendation 8: Require the U.S. Department of Education to issue guidance for publishers who administer guidebook surveys/external surveys in an effort to reduce the institutional reporting burden of multiple surveys and reduce the overwhelming amount of information derived from the surveys that stakeholders are expected to grasp. As improvements evolve, the Department should review and update the guidance.

- Rationale: The primary goal of the Common Data Set (CDS) is "to improve the quality and accuracy of information provided to all involved in a student's transition into higher education, as well as to reduce the reporting burden on data providers" (Common Data Set Initiative, n.d., para. 4). The CDS is a data standard tool intended to be used in collaboration with CDS publishers (College Board, Peterson's, and *U.S. News and World Report*) that already request this information within their surveys; however, these publishers and others have few limitations. In addition, although these surveys are voluntary, there is a pressure and incentive for institutions to complete them. Congress should require the Department of Education to consider the following when issuing guidance: (1) publishers administer multiple surveys each year, which creates institutional reporting burden; (2) publishers often extract missing data from alternate sources or leave missing data fields blank, resulting in the publication of misleading data; and (3) publishers do not include a narrative behind the data; quantitative data are not and cannot be the whole picture.

AREAS FOR FUTURE WORK

These recommendations only scratch the surface in terms of improving the level and quality of transparency to students and families. Many of these recommendations require further research and refinement, as well as input from consumers. Feedback from the end user, the consumer, is an integral piece of improving transparency, and future work should include robust consumer testing of any new or modified pieces of information.

It is also clear that transparency and consumer information do not and should not begin only with postsecondary institutions. K-12 and postsecondary institutions should work together to improve transparency, and those stakeholders should take part in future work.

Finally, moving to a SURDS would be a large endeavor for the federal government. While the Transparency Subgroup formally recommended lifting the ban on SURDS, there is additional opportunity to further study and refine how such a database would be operationalized and utilized.

CONCLUSION

In a single year, the Higher Education Committee of 50 has accomplished work of extensive breadth and depth, addressing a wide range of topics while drilling down on practice and policy to develop thoughtful, innovative recommendations. Nonetheless, the Committee recognizes and deeply believes this work is just a starting point for future HEA reauthorization discussions and understands that many of the recommendations will require future work and refinement. The 116th Congress provides a fresh new policy window to explore HEA reauthorization, and Committee members will ensure their recommendations reach key stakeholders, inform related discussions, and lay the groundwork for further exploration.

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[4] Listed in order of the project charter. Titles reflect positions held as of February 1, 2019.

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