



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

December 19, 2017

Rep. Virginia Foxx
Chair
Education and the Workforce Committee
U.S. House of Representatives
Washington, DC 20515

Rep. Bobby Scott
Ranking Member
Education and the Workforce Committee
U.S. House of Representatives
Washington, DC 20510

Rep. Brett Guthrie
Chair
Higher Education and Workforce
Development Subcommittee
U.S. House of Representatives
Washington, DC 20515

Rep. Susan Davis
Ranking Member
Higher Education and Workforce
Development Subcommittee
U.S. House of Representatives
Washington, DC 20515

Dear Representatives Foxx, Scott, Guthrie and Davis:

On behalf of the American Psychological Association (APA), I would like to provide you with some comments on the “Promoting Real Opportunity, Success and Prosperity through Education Reform (PROSPER)” Act (HR 4508) that was approved by the House Education and the Workforce Committee on December 13th. Based on our initial analysis of the PROSPER Act, we have concerns about the potential impact of the bill on federal investment in post-secondary study. We have outlined some of our key concerns by title in the attached document.

As you may know, APA is the leading scientific and professional organization representing psychology in the United States, with more than 115,700 researchers, educators, clinicians, consultants and students as its members and affiliates. APA’s mission is to advance the creation, communication, and application of psychological knowledge to benefit society and improve people's lives.

In general, we fear that the bill falls short on increasing access to, and affordability of, post-secondary study, in particular graduate study for individuals with demonstrated financial need. Our APA Education Government Relations staff will continue to work with our members to review H.R. 4508 and prepare amendments for your staff’s consideration that seek to address important goals that are in the national interest. These goals include increasing the federal support available for graduate study, making campuses safer, and investing in our future teacher workforce.

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Arthur C. Evans, Jr., PhD
*Chief Executive Officer and
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The value of our federal higher education programs must not be underestimated, and efforts to reauthorize and redesign them should be inclusive, collaborative, and increase our investment in higher education, not retreat from it. According to the Georgetown University Center for Education and the Workforce, “More education still pays on average.” Over a career, an individual with a high school diploma will earn \$1.3 million versus \$2.3 million with a bachelor’s degree, or \$3.3 to \$3.7 million with a doctoral or professional degree. The investment our nation makes in the education of our next generation is one that yields significant returns for those individuals and for our society. Federal support for graduate study will help our nation meet strategic workforce needs in critical areas, such as behavioral health, science, and technology.

We hope to work with all members of the House Education and the Workforce Committee to improve this legislation before it is considered by the full U.S. House of Representatives. Any reauthorization bill must pave a way for all young people, especially those with demonstrated financial need, to pursue their highest educational goals. According to the Bureau of Labor Statistics, the need for psychologists is projected to grow over the next decade at a faster rate than other occupations. To ensure that we have a diverse psychology workforce ready to meet the behavioral health needs of our nation, federal student financial aid must support individuals seeking doctoral degrees in psychology.

If you have any questions or need additional information from the APA, please have your staff contact Jennifer Smulson, Senior Legislative and Federal Affairs Officer in the Education Government Relations Office at jmulson@apa.org or at (202) 336-5945.

Sincerely,



Arthur C. Evans, Jr., PhD
Chief Executive Officer

Attachment

ATTACHMENT

Promoting Real Opportunity, Success and Prosperity through Education Reform (PROSPER) Act (HR 4508)

Title I – General Provisions

Part C: Cost of Higher Education

APA appreciates the addition of language directing the “College Dashboard” to include graduate program and student data. APA will seek input from our members to determine if the data required in the “College Dashboard” will yield the most useful information for doctoral students in psychology and if there are additional changes needed to the “Dashboard” contents to best inform potential graduate students.

Part F: Addressing Sexual Assault

Regular, ongoing measurement of campus climate is essential to effective administration of sexual assault services and the prevention of stalking, sexual assault, harassment, dating violence, and domestic violence. We encourage you to consider the following changes to the proposed amendments in Part F: 1) a minimum standard set of questions to measure incidence; 2) questions that measure both victimization and perpetration; and 3) language regarding incident reporting that fosters safety and prevention of further trauma. Finally, we request the term “good faith” be struck given its vague meaning.

Many campuses do not have the resources to develop or to outsource development of an effective, evidence-based campus climate survey. If created without valid and reliable questions and a clear definition of the problem, these surveys will not yield the information necessary to make campuses safer and will not allow institutions to create or implement model programs or best practices designed to prevent campus sexual assault. Campus climate surveys and definitions should be created with input from experts, and with a basis in existing guidelines that have already been shown to be reliable and valid measures. There are existing surveys, such as the one developed by Administrator-Researcher Campus Climate Collaborative (ARC3), that measure campus attitudes toward sexual assault and are geared towards improving a diverse array of institutions’ abilities to prevent and respond to sexual assault. This survey is the result of ongoing efforts by campus administrators, researchers, advocates, victims, and national professional and service organizations. It is comprehensive and free of charge and available to institutions who might choose to use it. We request that the legislative language convey authority to the Secretary to make available existing surveys that may be used by institutions of higher education to meet the requirements under the law.

The optional questions included in Section 162 focus largely on victimization and do not include questions about perpetration. Focusing on victimization diminishes the victims and diverts focus from the cause of the problem. This results in missed opportunities to create prevention programs that reduce perpetration.

Partnerships in addressing issues of campus violence and sexual assault are important. However, the language in the proposed legislation might have the effect of prioritizing the criminal justice

response at the expense of campus proceedings. At its worst, it could delay an investigation, causing exhaustion, further trauma, and decreased cooperation with the victim. We would like the opportunity to review this language closely and offer suggestions to ensure that this language helps foster safety and prevent incidence of campus sexual assault.

Title II – Expanding Access to In Demand Apprenticeship

APA strongly disagrees with the elimination of the Teacher Quality Enhancement provisions in the Higher Education Act (previously Title II). This title, dedicated to improving the preservice education and training of teachers, plays an instrumental role in the academic growth and success of our nation's elementary and secondary students. There is ample evidence that effective teachers are the most important in-school contributors to student learning in classrooms (Glazerman et al., 2010; Harris, 2012; Hattie, 2009; met Project, 2012b; Weisberg, Sexton, Mulhern, & Keeling, 2009). Given the importance of teachers in the learning equation, it is shortsighted to roll back the federal role in the preservice education of teachers.

Title IV – Student Assistance

The impact of the changes to the federal student loan programs on students pursuing doctoral degrees in psychology is not easily determined. APA does have initial concerns that the elimination of the GRAD PLUS program, the Public Service Loan Forgiveness Program (PSLF), and the annual and aggregate loan caps in the Federal ONE Loan program may disadvantage students with limited financial means who are otherwise motivated and prepared to pursue advanced degrees. The elimination of the GRAD PLUS program will put graduate study in psychology and in other graduate and professional fields further out of reach for those students with the greatest financial need, especially those that may have to borrow to meet cost of attendance needs beyond tuition. Many of these students will be driven to the private market where they will not have the protections afforded students under the federal education loan program (like a cap on interest rates and a capped repayment amount). Students from low-income backgrounds with the greatest need for support may receive the least favorable terms from private lenders.

While students in clinical psychology programs are eligible for higher loan limits in section 465(b)(2)(E)(i)(II), doctoral students in counseling and school psychology, both clinical practice fields, are not. We have asked the committee to extend this provision to include other doctoral programs in psychology leading to clinical practice (clinical, counseling and school). These degrees demand years of education and training, as well as practical internship experience. These psychologists complete their degrees with the highest levels of debt compared to other doctoral degree recipients given the years of training required and the lack of institutional aid provided to these degree seekers. Yet, it is our health service psychologists who are meeting the documented mental health needs in local communities throughout the nation. They deserve the same federal support available to other health care providers.

We are deeply concerned that HR 4508 eliminates the PSLF program for new borrowers. PSLF is a critical tool for helping early career psychologists manage their federal educational debt while dedicating themselves to meeting national needs by pursuing careers in public service.

Psychologists, on average, spend approximately six years successfully completing their doctoral degrees and often accumulate on average \$110,000 of graduate school debt. Many of these early career psychologists are serving rural communities, the working poor, unemployed, homeless, and Veteran populations in increasing number, all of which are populations with unmet mental health needs. Without the support provided from PSLF, many psychologists would be forced to make different career choices and would no longer be able, because of student loan debt, to pursue their primary interest in serving those vulnerable and at-risk populations.

Part C - Federal Work-Study Programs

APA strongly objects to the elimination of graduate students' eligibility for the Federal Work Study program. This program provides modest but important support to graduate students with the greatest financial need.

The cumulative impact of these Title IV policy changes included in HR 4508 is not entirely clear. APA continues to analyze the legislation language and will look forward to reviewing information from the Committee report and the Congressional Budget Office for a better understanding of how the PROSPER Act will impact students' access to education beyond high school. While not directly affecting programs that support graduate students, the impact of the elimination of the loan subsidy for undergraduates, Perkins Loans, and Supplemental Education Opportunity Grants may have a significant bearing on the overall debt load carried by students who do choose to study at advanced levels.

Part F - Amendments to the Clery Act

When institutions of higher education are left to defer to the criminal justice system, this can cause major delays in completing sexual assault and harassment investigations and in protecting victims from their assailants. The criminal justice system is notoriously slow, with average times from report to prosecutor decisions spanning from six months to several years in some jurisdictions. If institutions of higher education had to defer the investigations of their own police officers to wait for the criminal justice system, this would leave room for accused assailants to graduate, complete the athletic season, or worse, perpetrate other sexual crimes and misconduct.

The Uniform Crime Reporting (UCR) program of the Department of Justice does not lend itself easily to supporting the reporting proposed in the PROSPER Act, as it only keeps track of completed rape and does not include any reports on other types of sexual assault and harassment. Additionally, it is unclear from the proposed legislation whether the institution of higher education and/or the law enforcement agency are required to report. Adding institutions of higher education as reporters to UCR could create unnecessary duplication and confusion. Any surveys/reporting completed should be on a national scale, with a standard form (not developed by each individual institution) and a national data repository created with the input of experts in test development and sexual assault, including psychologists. This is the only way to ensure meaningful, valid data, as well as to greatly reduce expenditures in creating measures and in reporting.

Additionally, there are already standards of evidence in place recommended by legal experts for these types of policies for institutions of higher education—there is no need for a replacement. Using a one-size-fits-all approach to training for officials conducting investigations and

institutional disciplinary proceedings would mean inadequate training for all types of employees at the many varied institutions across the country.

Part H - Accreditation

APA continues to consult with the Association of Specialized and Professional Accreditors (ASPA) to determine the effect of the changes on the accreditation work provided by APA's Committee on Accreditation.

Title VII – Graduate and Postsecondary Improvement Programs

Section 701 – Graduate education programs

While APA is pleased to see the Graduate Assistance in Areas of National Need (GAANN) program extended, we are concerned that the authorization level is capped and will not allow future growth in this vital program.