



RECOMMENDATIONS FROM AAUP, AFT AND NEA FOR THE REAUTHORIZATION OF THE HIGHER EDUCATION ACT

Together with our combined members—including more than 350,000 in the higher education workforce—the American Association of University Professors, the American Federation of Teachers and the National Education Association believe that higher education is a public good, and that it must provide a 21st-century education for all students, whatever their goals may be. It is critical that any changes to the Higher Education Act protect the interests of students, faculty and staff.

The disinvestment of states from higher education in the course of this generation has been dramatic. According to recent studies, state higher education funding per student remains 27 percent below pre-recession levels. Students and families—not public dollars—are now funding the majority of core educational expenses. This threatens the status of higher education as a benefit to the community and undermines the historic commitments embodied in the Higher Education Act.

The precipitous decline in state investment has resulted in higher costs for individual students and families while at the same time shrinking the educational support services that enable students to make appropriate choices of program and degree, to complete courses in a timely way, and to navigate the challenges that impede college completion. In this marketplace, desperate students are vulnerable to educational fraud and abuse.

2015 marks the 50th anniversary of the Higher Education Act. To celebrate this historic milestone, we must reclaim the promise of the Higher Education Act—that is, creating a real opportunity for students to graduate from high-quality institutions of higher education without burdensome debt.

Access, Affordability and Diversity

Since 1965, the HEA has embodied the nation's commitment to ensure, as a matter of basic fairness, that no one is denied a college education because of his or her financial circumstances. Millions of students have been able to attend higher education institutions because of the financial assistance programs offered by the HEA—a fact that both reflects and contributes to the growing diversity of the U.S. student population.

Today, however, the decreased purchasing power of grant-based federal student aid and the increasing reliance on loans rather than grants, particularly by financially disadvantaged students, is seriously undermining this 50-year commitment. This is due in large part to the ongoing disinvestment by states in public colleges and universities. As a result, the financial burden of higher education is being shifted to individuals and their families—a transition that is both financially unsustainable and destructive to the principle that higher education is a public good.

It is important to illustrate how this trend is negatively affecting students. As of the summer of 2015:

- The nation's collective student debt burden stands at \$1.2 trillion and exceeds total credit card debt and auto loan debt.
- Two out of three students must borrow money to attend college, and the average borrower shoulders \$28,400 at graduation.

The impact of the debt burden is not limited to borrowers, colleges and universities. It is also restraining economic growth, as borrowers cannot afford to buy homes or cars, start businesses, support families, invest, or contribute to economic growth in other ways. This reauthorization must address all of these issues.

Access and affordability

A new HEA should:

- Ensure, first and foremost, that students with the greatest financial need receive sufficient federal aid to attend college.
- Help students begin a pathway to a postsecondary degree by making community college free and reducing or eliminating costs for the first two years at all public higher education institutions, including minority-serving institutions.
- Provide incentive programs to spur state reinvestment in the institutional capacity of higher education, including instruction and student support services.
- Provide more grant aid to the lowest-income students and restore the lost purchasing power of the Pell Grant to 70 percent of tuition at public four-year colleges and universities.
- Make Pell Grant funding mandatory, which would ensure funds are provided to all eligible students and protect the program from the fluctuations of politicized annual funding battles.

- Restore year-round Pell Grants and a full 15 semesters of eligibility.
- Effectively address barriers to access for working and nontraditional students, such as by including child care and other costs in cost-of-attendance calculations that provide a more complete picture of student needs.
- Ensure that students in good standing who otherwise qualify for student financial aid are not excluded from the programs based on their immigration status or the status of their parents.
- Ensure that students who otherwise qualify for student financial aid are not excluded from the programs based on past criminal convictions.
- Allow federal student loans already disbursed to be refinanced to provide students with maximum savings. The government should not profit from student loans.
- Simplify the FAFSA in a way that eases the burden on students and families but also maintains the integrity of the financial aid system and ensures that federal dollars are targeted to support those with the greatest financial need.
- Affirm and encourage the exercise of the Department of Education's authority to protect students' financial aid from harmful college-bank marketing partnerships.
- Ensure that diverse federal student aid programs—grants, loans (including Perkins loans), work-study and repayment options—remain accessible and viable, to address the variety of student needs.
- Expand the work-study program to more institutions, especially those institutions serving low- and middle-income students.
- Support opportunities for students to acquire real-world work experiences while pursuing a degree.
- Expand and align public service loan forgiveness programs, for example by broadening them to include educators teaching all subject areas in high-need public schools, all contingent faculty in higher education, and other education job categories.

Diversity

- Increase funding for institutional aid programs currently authorized under Title III and Title V that provide aid to historically black colleges and universities, tribally controlled colleges, Hispanic-serving institutions and Asian-Pacific Islander-serving institutions.
- Ensure that students who face language and other barriers to higher education receive the extra supports necessary for them to succeed.
- Strengthen programs that seek to recruit and retain diverse undergraduate students, graduate students and faculty.
- Continue to provide support to the wide diversity of high-quality institutions with student-centered missions within the higher education system.

Quality, Accountability and Student Services

Federal aid dollars should finance only institutions that exhibit a basic level of quality and integrity, and that offer students the opportunity to receive the educational support they need to succeed. The following, we believe, are the building blocks of that obligation:

Quality

- Provide incentives for investment in instruction and student support services that lead to greater student success, including incentives for institutions that make progress in reversing harmful employment trends among faculty and that transition from a majority contingent instructional workforce to a well-supported, predominantly full-time and tenure-track faculty.
- Continue institutional accreditation as a condition for participation in federal financial aid programs.
- Require accrediting agencies to implement rigorous quality standards in the area of distance education, and require institutions to maintain a strong system of shared governance, a majority of full-time tenured faculty, and improved working conditions for contingent faculty, both full- and part-time, thus improving students' learning conditions as well.
- Oppose direct and indirect federal intervention to promote or impose standardization in curriculum, testing and academic materials in higher education. Given the tremendous diversity of higher education institutions and student educational goals, such standardization is very unlikely to expand and improve student learning. In fact, in an increasingly complex and interconnected global economy, a narrowing of curriculum and teaching protocols cannot help but have negative consequences.
- Support programs and initiatives that improve student persistence and success for nontraditional students by providing increased support, both financial and otherwise. Greater financial aid and more support services will help enable financially and educationally at-risk college students to complete their education successfully.
- Strengthen the accreditation system by supporting reforms that ensure integrity to help to protect quality; provide more intensive reviews at institutions where dangers are greatest; maintain current gradations in accreditation status, without dilution; avoid creating unnecessary and problematic new pathways to taxpayer funding; eliminate conflicts of interest within the National Advisory Committee on Institutional Quality and Integrity (and accrediting agencies themselves); and demand appropriate levels of transparency and capacity from accrediting agencies.

Financial accountability, fraud and abuse

- Provide additional controls to guard against fraud and abuse at institutions run for a profit, particularly distance education programs where the possibilities of abuse are multiplied, and provide additional tools to combat predatory actors in the higher education sector, such as the "gainful employment" rule, which begins to ensure educational quality in career education.

- Develop an efficient system to provide restitution to students victimized by institutions' fraudulent actions, including creating a student relief fund that may be funded through increased civil penalties and sanctions for violations of HEA and federal regulations.
- Close the 90-10 loophole by counting all federal funding, including GI Bill funds, in the share of federal funds for eligibility purposes for proprietary institutions, not just Title IV funding.
- Allow students' Pell Grant eligibility to be restored when a school closes or misconduct occurs.
- Increase the percentage of nonfederal revenue (including veterans' payments) that institutions must attract to ensure those participating in the student aid programs have a sound and independent financial base.
- Prohibit federal funds from being used for marketing, advertising or recruiting.
- Guard against manipulation of default rates and other accountability metrics.
- Support a centralized interdepartmental complaint-resolution and tracking system.
- Clarify that students who have been the victims of systemic fraud are eligible for classwide loan discharge and do not have to apply for loan discharge on an individual, case-by-case basis.

Student support services

- Expand campus-based educational support programs such as TRIO and GEAR UP to ensure that financially disadvantaged students and families have the support they need to succeed in postsecondary education.
- Increase support for the International Studies programs in Title VI, including those programs providing instruction in foreign languages.
- Provide increased support for faculty development by strengthening and supporting increased funding to graduate education programs under Title VII of the HEA.
- Fully support a range of student services, such as counseling, that help students persist in and graduate from college.
- Provide safe, secure and supportive learning environments on all college and university campuses.

Teacher Preparation

Every student deserves the right to be taught by a well-prepared, profession-ready teacher. The HEA offers an opportunity to further develop the professional teaching workforce by refining teacher preparation programs to ensure that prospective teaching candidates are properly trained and prepared for the classroom, including by maintaining Title II language and funding:

- Expand opportunities for teacher candidates—including, when applicable, early childhood educators—to access rigorous, comprehensive teacher preparation programs that include extensive clinical practice as well as theory, an in-depth test of subject and pedagogical knowledge, and a comprehensive pre-service teacher performance assessment. Such programs will ensure that teacher candidates are prepared in core teaching areas and can demonstrate subject-matter knowledge in those areas through a relevant academic major, and are also prepared in professional and pedagogical skills, knowledge and ability.
- Ensure that teacher candidates—including, when applicable, early childhood educators—participate in residencies that include supervised clinical practice via an internship, student teaching and/or a mentoring program, and participate in an induction program for new teachers that includes mentoring from a qualified teacher and other school and university personnel.
- Adequately fund teacher preparation programs.
- Support effective models in practice teaching, transition to the classroom and early career support services.
- Enhance the role of community colleges in providing a pathway to credentials for teachers and early childhood educators, and for ongoing teacher professional development.
- Promote accreditation of the entire school, college or department of education by entities committed to the profession itself, as well as reviews of individual programs based on professional standards set by practicing professionals. Standards should be set publicly, with the input of all stakeholders.
- Support strong, comprehensive approaches to teacher preparation and licensure. Discourage “testing-only” approaches to licensure that do not include structured clinical experiences, demonstration of pedagogical and content knowledge and skill, and participation in high-quality mentoring programs with experienced teachers for the entire period prior to receiving full state certification.
- Ensure that all teacher candidates, regardless of preparation route, meet equally high standards and demonstrate subject-matter knowledge, pedagogical skills and teaching abilities before receiving an initial license or becoming a teacher of record.
- Incentivize efforts to identify and recruit diverse teacher candidates with great potential to succeed, including by supporting initiatives that make teaching an attractive career option for such candidates.

- Support efforts to synthesize and streamline preparation, certification and licensure standards and procedures within states in a way that provides primary responsibility for setting and enforcing the standards of the profession and ensuring the quality and coherence of teacher preparation programs with members of the profession—practicing professionals in K-12 and higher education.

On behalf of our members and the students we serve, thank you for this opportunity to share our thoughts on the important issues of college access, the student debt crisis, educational quality, faculty support and other issues relating to higher education. We look forward to continuing to work with you as you move forward with reauthorizing the Higher Education Act.

The mission of the **American Association of University Professors (AAUP)** is to advance academic freedom and shared governance, to define fundamental professional values and standards for higher education, and to ensure higher education's contribution to the common good. Founded in 1915, the AAUP has helped to shape American higher education by developing the standards and procedures that maintain quality in education and academic freedom in this country's colleges and universities. The AAUP is a nonprofit professional association headquartered in Washington, DC.

The **American Federation of Teachers** is a union of 1.6 million professionals that champions fairness; democracy; economic opportunity; and high-quality public education, healthcare and public services for our students, their families and our communities. We are committed to advancing these principles through community engagement, organizing, collective bargaining and political activism, and especially through the work our members do.

The **National Education Association** is the nation's largest professional employee organization, representing more than 3 million elementary and secondary teachers, higher education faculty, education support professionals, school administrators, retired educators and students preparing to become teachers. Learn more at www.nea.org.