



National Association for
College Admission Counseling

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September 28, 2018

The Higher Education Committee of 50
1801 Pennsylvania Avenue, NW
Suite 850
Washington, DC 20006-3606

Dear Higher Education Committee of 50:

On behalf of the National Association for College Admission Counseling ([NACAC](#)), I write to offer our support for the Higher Education Committee of 50 (“Forward50”) Draft Recommendations. We congratulate the committee on a strong, equitable, and future-focused set of recommendations. In addition to conveying our gratitude for the committee's work, we have included comments to add NACAC members’ perspectives on a small number of the recommendations. NACAC appreciates the thoroughness, attention to equity, and emphasis given to practitioners’ voices that are evident in the final recommendations.

Founded in 1937, NACAC is an association of more than 16,000 members, including school counselors and college admission staff, who work with students making the transition from high school to postsecondary education (“college”). NACAC is committed to maintaining professional standards that foster ethical and social responsibility among those involved in the college application and enrollment process, as outlined in the NACAC’s SPGP: Code of Ethics and Professional Practices, which may be accessed on our [website](#). Through our advocacy efforts, we are also dedicated to ensuring that all students have access to high quality school counseling to help them make informed decisions as they prepare for and pursue college or career.

NACAC supports the direction and focus of all recommendations in the draft report and believes that, if implemented, these recommendations would improve college access for millions of students. Among the report’s recommendations that we would like to emphasize our agreement with are its calls to make Pell Grants funding mandatory to help ensure that the maximum Pell grant keeps up with inflation and truly helps make college affordable for all students



National Association for
College Admission Counseling

(Affordability, Recommendation 7). We also strongly support the development of a Student Unit Record Data System (Transparency, Recommendation 6). The development of such a system would help colleges, policymakers, researchers, and others better understand a student's path through college. It would also provide information about the student's ability to find an adequate job after completing their degree. NACAC believes that this system would be invaluable and can be done in a manner that protects students' privacy. NACAC also supports Forward50's call to reduce the number of students required to complete the FAFSA verification process (Access, Recommendation 3). As the document alludes, this process is particularly burdensome for low-income students – the very students who are disproportionately selected for verification – and creates yet another barrier to access. For FAFSA to serve its purpose of assisting low-income students in pursuing a college degree, NACAC agrees that the verification process must be made more transparent and less complex. Lastly, NACAC supports the preservation of the Public Loan Forgiveness Program (Affordability, Recommendation 16), which forgives a student's federal debt after working in a public-sector job for 10 years and making monthly, qualified payments during that time.

Recommendations that we offer NACAC's additional perspectives include:

- Access, Recommendation 4 (virtual advisors): The school counseling and college admission experience with artificial intelligence has been mixed. As the Forward50 report correctly notes, institutions have had success in automating answers to basic questions that are often buried on web sites or in extensive instructions manuals that are difficult for many students to navigate. Too often, though, we have seen efforts to automate the counseling and college advising process end in failure on more personalized questions, where low-income students often need the most assistance. Policymakers are also quick to point to automation and web resources in making arguments against hiring, training, and equipping those, like school counselors, who can help students navigate the most difficult questions about the transition to postsecondary education. Overall, we agree with this recommendation, particularly given the examples the committee provides of successes in the field. We believe policymakers and others might benefit from understanding the limitations of such technology, and that a "supplement, not supplant" orientation might assist their understanding of its proper application.
- Access, Recommendation 6 (place graduate school interns in high schools to provide counseling): We are strongly supportive of this recommendation, as it closely parallels a legislative initiative championed by NACAC. Our proposal would similarly provide "seed" funding to institutions of higher education to provide valuable pre-service training



National Association for
College Admission Counseling

for future school counselors in college advising, including financial aid advising. NACAC's legislative proposed is attached below for reference in case it is useful to the committee. A copy of this legislation will be sent separately.

- Accountability, Recommendation 1 (90/10 rates): NACAC is supportive of the committee's attention to program integrity issues, as we believe protecting students and taxpayers from waste, fraud, and abuse represents a critical quality assurance concept to preserve the long-term health of federal student aid programs. Recently, NACAC has supported strengthening current law that prohibits for-profit colleges from receiving more than 90 percent of their revenue from the Title IV programs by changing the ratio to 85/15, and by expanding the equation to include all federal financial aid dollars, including Department of Defense and Department of Veterans Affairs tuition benefits, which currently do not count as federal dollars when calculating 90/10.
- Accountability, Recommendation 2 (gainful employment): We also urge that the Forward50 recommend preserving (and possibly strengthening) gainful employment regulations. These regulations are meant to protect students and taxpayers from unscrupulous colleges. NACAC initially supported the gainful employment disclosures to prospective students when this rule was proposed in 2010 but have since observed that the rule overall has been effective in identifying the lowest performing institutions and protecting students from waste, fraud, and abuse.

Thank you again for the opportunity to weigh in on the recommendations. Please contact [Michael Rose](#), Director of Government Relations, with any questions regarding NACAC's public policy or any of the suggestions listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hawkins", with a long horizontal flourish extending to the right.

David Hawkins
Executive Director for Educational Content and Policy