December 12, 2017

United States House of Representatives
Committee on Education and the Workforce
Washington, DC 20515

Dear Representative:

On behalf of the three million members of the National Education Association and the 50 million students they serve, we thank the committee for taking up the long overdue reauthorization of the Higher Education Act (HEA). But the proposed rewrite is unacceptable. We oppose the Promoting Real Opportunity, Success and Prosperity through Education Reform (PROSPER) Act (H.R. 4508) in its current form. Votes associated with this issue may be included in NEA’s Report Card for the 115th Congress.

We are especially concerned about provisions of the bill that would:

- **Eliminate loan-forgiveness for public service.** The Public Service Loan Forgiveness (PSLF) program encourages talented people to become educators, firefighters, nurses, public defenders, and pursue other forms of public service. Careers in these areas typically pay less than the private sector, so it can be difficult to attract qualified people, especially in underserved rural, urban, and tribal communities. Loan-forgiveness not only makes public service affordable, it demonstrates that America values the skills and commitment of the people who provide essential public services. Community life all across America would suffer without PSLF. Instead of eliminating this program, we need to build on its success and encourage more students to pursue careers in education and other forms of public service.

- **Consolidate repayment options.** The bill establishes a standard, 10-year loan repayment plan and single income-based repayment program that would continue to allow the U.S. government to profit from student loans. Instead of balancing the budget on the backs of our students, we need to make college affordable for more Americans — for example, by allowing borrowers to refinance federal student loans when interest rates drop.

- **Limit student loans.** The bill caps the amount of money students and families can borrow from the federal government to pay for college and graduate school — an approach that is likely to force borrowers into more expensive private loans and exacerbate the student debt crisis. It could also undermine America’s status as a leader in higher education and lower the rate of degree attainment. Instead, we need to provide incentives for states to invest in higher education, provide more grants for the lowest-
income students, and restore the lost purchasing power of Pell Grants to 70 percent of
tuition at public four-year colleges and universities.

- **Relax oversight of for-profit schools with a history of preying on at-risk students.**
The bill eliminates the gainful employment and borrower defense regulations that provide important protections for students, especially those most vulnerable to unscrupulous operators. It also repeals the 90-10 rule, which requires colleges and universities to get at least 10 percent of their revenue from sources other than federal student aid. Instead of repealing the 90-10 rule, we need to strengthen it — for example, by counting all federal funding, including the G.I. Bill, for eligibility purposes for proprietary institutions. The federal government has a responsibility to help ensure that students don’t end up with overwhelming debt and no prospect of employment.

- **Cause teacher preparation programs to lose more than $41 million in federal aid.**
The bill eliminates Title II of the law, which governs teacher preparation programs and provides teacher quality partnership grants to improve them. Instead of slashing support for teacher preparation, we need to increase it and expand opportunities for supervised clinical practice via internships, student teaching, and mentoring.

- **Permit poor quality distance education.** The bill redefines distance education, so that real interaction between qualified instructors and students is no longer necessary — an approach that will hurt students. Instead, accrediting agencies should be required to implement rigorous standards that recognize this fundamental truth: A good teacher is the most critical element in education. Adjunct or “contingent” faculty — non-tenure-track professors — now teach the majority of U.S. college and university students, often under near-impossible working conditions that limit opportunities for meaningful contact. The next HEA should provide incentives for institutions to invest in a predominantly full-time, tenure-track faculty and improve working conditions for contingent faculty.

On behalf of students and educators, the experts in education, we urge you to return to the drawing board and develop a new HEA guided by different principles. We need to make higher education affordable for all students, not just those from wealthy families. We need to improve access to higher education for all segments of America’s increasingly diverse student population, including adult learners. And we need to ensure that federal dollars go only to soundly managed colleges and universities with high educational standards.

NEA stands ready to work with the committee to fulfill these vitally important goals. We thank you for the opportunity to submit these comments and urge you to reject the PROSPER Act in its current form.

Sincerely,

Marc Egan
Director of Government Relations
National Education Association