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Senator Lamar Alexander
Chair, HELP Committee
455 Dirksen Senate Office Building
Washington, DC 20510

Senator Patty Murray
Ranking Member, HELP Committee
154 Russell Senate Office Building
Washington, DC 20510

Dear Senators Alexander and Murray:

Thank you for the opportunity to provide suggestions for the reauthorization of the Higher Education Act. The Consortium believes this is a time to consider making appropriate and necessary revisions to the Act, and to modernize several of its policies and provisions. We appreciate the care you are putting in the deliberations. We trust that the outcome will be truly bipartisan.

The following categories are not listed in priority order, but are ones considered most critical. Most important throughout this process is always remembering that each provision in the Act should improve the access to, affordability of, and quality of postsecondary education. This is about improving the lives of students.

Quality Assurance

Arguably, assuring that the education students receive is of the highest possible quality is the most important aspect of the Act. Simply **assuring access and affordability mean nothing if what the student can access and afford is of low quality.**

At present, such quality assurance is inextricably linked to accreditation. Because much has already been written about the existing premises of accreditation, the various groups officially approved by the U.S. Department of Education, and the various practices used by regional, national, and specialized accreditors, I will not reiterate that here. The point we wish to emphasize is that we believe that if the federal government is interested in ensuring that quality assurance is done with integrity and done appropriately, then it could **encourage (and perhaps require) that there be a common framework used by all accreditors.** Note that **we are *not* calling for a common set of indicators** in a one-size-fits-all approach. Rather, **we are calling for a consistent set or pool of indicators from which institutions could draw to assess and demonstrate quality.**

This approach would essentially create a menu of quality assurance indicators from which institutions could select some agreed upon number that are appropriate for that type of institution. So, for instance, institutions might select outcomes indicators related to core required courses (indicators developed, for instance, using the Association of American Colleges and Universities' LEAP methodology¹), pass rates on licensure exams, results of standardized assessments, employer surveys, and the like. The key to these quality assurance indicators is that they be reliable and valid indicators, as typically defined and evaluated in accepted assessment techniques. Such quality assurance indicators could and should be at both the individual program and institutional levels. An advantage to this approach is that both the general education courses that provide the key underlying skills in demand by business (e.g., clear writing and verbal expression, critical thinking, analytic skills, etc.) would be included as would the more specialized knowledge and skills in the major program of study.

Such an approach to quality assurance involving a menu of acceptable options is not novel. In fact, **this approach has been used by states in designing better performance funding models.**² Likewise, a range of outcomes measures is suggested by most accrediting groups. In the performance funding applications, the menu approach may combine some mandatory indicators and some discretionary indicators chosen by the institution. Either way, the key is that the diversity of institutions can be reflected in the menu, such that small, special focus institutions would have indicators as relevant to them as would large research intensive institutions. Within sector, institutions could be appropriately benchmarked.

I would be very happy to discuss these concepts in much more detail with you.

Access and Affordability

Data consistently show that students from financially advantaged backgrounds have a much higher likelihood of going to and completing college than even very talented students from financially challenged backgrounds. That access gap is not in the best interests of the country and must be closed. Ensuring that all students have access to a postsecondary education will require both vigilance and specific action.

First, we must ensure that **students in the P-12 pipeline graduate with college-ready skills.** Appropriate support of P-12 education as well as college access programs such as TRIO and GEAR UP are essential if we are to close the gap.

Second, we **must assure veterans and active duty service members that the training they received will accrue toward their credential.** Transfer barriers for any student not based on demonstrated competence are simply wrong and must be ended. Institutions

¹ Association of American Colleges and Universities. (n.d.). *Essential learning outcomes*. Retrieved from <https://www.aacu.org/leap/essential-learning-outcomes>.

² See, for example, Cavanaugh, J. C., & Garland, P. (2012). Performance funding in Pennsylvania. *Change: The Magazine of Higher Learning*, 44(3), 34-39. doi: 10.1080/00091383.2012.672913

should be required to demonstrate through assessment evidence why prior learning does not accrue; otherwise, the prior learning would count. And **reverse transfer must be the norm, not the exception.**

Third, **student financial aid programs must reflect the reality of most students**—they do not simply go to school. Rather, they are adults likely to be employed and/or have families. **Continued support of Pell grants and student loans is essential. Institutions should be incented for enrolling and completing students who have financial need,** perhaps by enabling them to have greater access to financial aid programs. Additionally, institutional success in enrolling, retaining, and completing Pell grant recipients should be part of any accountability reform.

Fourth, we believe that although there is room for simplification within the array of federal financial aid programs, **the elimination of institution-based aid (e.g., Supplemental Educational Opportunity Grant [SEOG]) is ill-advised.** The SEOG program is a critical tool for institutions to assist students who experience a financial crisis, or for the federal government to provide much-needed financial relief in the aftermath of a major natural disaster.

Fifth, we have previously commented on potential alterations to the student loan programs, so will only comment here that we believe the borrower should be the responsible party for any failure to repay, and we support certain revisions to the income-based repayment options. However, we believe that areas of direct benefit to the federal government, such as certain public health professions, should include loan forgiveness in a way similar to military service in certain circumstances.

Campus Safety and Protecting Rights

We strongly believe that the HEA reauthorization should make clear that campuses must do everything possible to create a safe environment and to protect the rights of all students.

Specifically, the **HEA should include clear guidelines for policies and procedures regarding sexual assault.** These guidelines should include: actions to prevent sexual assault; education programs for students, faculty, and staff; support services for survivors; appropriate procedures for responding to sexual assault; and fair adjudication processes.

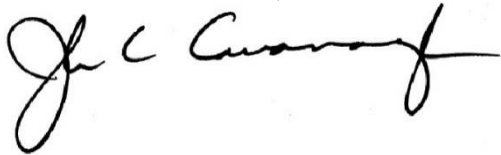
The HEA should also **ensure that free speech rights for all are protected.** Colleges and universities should be places that foster discussion of all ideas, especially speech protected by the First Amendment.

The HEA should include **explicit protections for LGBTQ students, students with disabilities (including stronger requirements for accessible online educational materials), and anti-bullying and anti-hazing provisions.**

I would welcome the opportunity to discuss any of these ideas with you or your staff. Additionally, the Consortium would be pleased to provide any additional background information you might find helpful.

Thank you again for providing this opportunity. I look forward to working with you on HEA reauthorization and exploring improvements to the Act.

With all best wishes,

A handwritten signature in black ink, appearing to read "John C. Cavanaugh". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Cavanaugh, Ph.D.
President & CEO