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House Committee on Education
and the Workforce
2181 Rayburn House Office Building
Washington, DC 20515

Via email: HEA.Reauth@mail.house.gov

Dear Chairman Kline, Ranking Member Miller, Chairwoman Foxx, and
Ranking Member Hinojosa:

On behalf of Boston University, thank you for providing the opportunity to offer feedback on the upcoming renewal of the Higher Education Act. We at BU appreciate your interest in empowering students and families to make informed college choices, increasing access to higher education, and finding a balance between accountability measures and regulatory burden. Boston University is a private, urban research university serving more than 33,000 students who share a common goal: embracing the unlimited possibilities that come with the vigorous pursuit of knowledge. Below you will find Boston University's views on those issues which you have identified as priorities.

Empower students as consumers in higher education

Measuring Student Success: Recognizing the diversity of American higher education, we urge the committee to provide institutions with flexibility in how we collect data on our students' post-graduation careers and how we measure success. For example, a BU engineering graduate might start a company, attend graduate school, work for a nonprofit organization in the developing world, or choose to teach in an elementary school classroom. We should be proud of any of those outcomes, some of which would not be measured if the federal government prescribes a salary metric as the sole determinant of success.

Consumer Disclosures: When assessing federal consumer disclosure and data-sharing requirements, we urge the Committee to utilize existing data sources and avoid redundant data requests whenever possible. We share your interest in giving students and parents the information they need to

make informed college choices and would like to ensure data is meaningful and easy to understand. Duplicating existing efforts, however, does not achieve this goal, and instead impedes timely responses from the university community.

Simplify and improve the student aid and loan programs

Pell Grants: We hope the Committee will continue its bipartisan support for Pell Grants, which are a cornerstone of college access. Nearly half of BU undergraduates utilize federal financial aid, and approximately 17% of BU students are Pell-eligible. Federal aid is a vital complement to the more than \$190 million in BU-provided aid we give to our students each year.

Federal Work Study: As you work to enhance college completion efforts, we encourage the Committee to pay special attention to the Federal Work-Study (FWS) program. We find that students with a campus job have deeper connections with the campus community, are more likely to persist in their studies, and on average earn a higher grade point average than their non-working peers. FWS is an under-appreciated yet major contributor to college completion and success.

Title IV Eligibility: We support efforts to toughen the student loan cohort default rate metric for universities to maintain Title IV student aid eligibility, and would also support the addition of a graduation rate metric. Many students (and parents) want the college experience to prepare them for future employment. We believe that the student loan cohort default rate is a useful proxy for this metric: whether students find jobs after graduation that allow them to repay their student loans. A meaningful graduation rate metric would be another way to demonstrate that Title IV-eligible institutions are good stewards of federal funding.

Graduate Education: Graduate and professional education is critical to the success and prosperity of the nation, and we are concerned about the erosion of federal support. BU educates more than 14,000 graduate and professional students annually who go on to careers as innovators, scientists, doctors, lawyers, artists, and business leaders. BU hopes the Committee will reinstate graduate and professional students' eligibility for subsidized student loans. We also urge you to maintain both the Javits and the Graduate Assistance in the Areas of National Need (GAANN) programs at the U.S. Department of Education as distinct entities with separate goals.

Stafford Loans: Boston University is concerned about the overall cost of borrowing for low-income students and supports continuation of in-school

and grace period interest subsidies for Stafford Loans. The promise of a loan that is interest-free while the student is enrolled lowers the overall cost of borrowing and is an important reassurance for first-generation, credit-averse students.

Perkins Loans: BU urges the committee to continue the federal Perkins Loan Program as a campus-based financial aid program. However, in the event that the Perkins program ends, institutional capital should be retained by the school, as appropriate, and a portion of the administrative cost allowance should be maintained as schools service remaining loans in the portfolio

Balance the need for accountability with the burden of federal requirements

Regulatory Requirements: We share the federal government's commitment to accountability, and value the important role of the HEA in ensuring that only outstanding stewards of federal funds may administer Title IV financial aid dollars. However, we are concerned that previous renewals of the act have added mandates that are unrelated to the goals of HEA, do not help students and families make informed college decisions, and do nothing to promote college access. As the committee weighs adding or removing regulatory requirements, we ask that you focus squarely on HEA's goals of promoting college access and preventing the fraudulent use of federal funds.

Accreditation: We urge the Committee to preserve the essential role of independent regional peer accreditors and maintain support for existing law, which requires universities to provide evidence of "success with respect to student achievement in relation to an institution's mission." The American system of accreditation is a proven method for institutions to assess educational quality and student success, and to make improvements, while allowing flexibility as to how progress is measured. Regional accreditation enables and preserves the diversity that has helped make U.S. higher education the best in the world and that offers students and parents the educational choices they expect.

State Authorization: We are pleased to offer online certificate and degree programs to students outside of Massachusetts, but the current process for obtaining different approvals in every state is daunting. We are encouraged by the nascent State Authorization Reciprocity Agreement, which should bolster consumer protections and rationalize the approval process for universities offering distance education, and would appreciate the Committee's continued support for removing barriers to innovation in education delivery.

Other issues

International Education: Boston University urges the Committee to continue support for the Title VI international education programs, which are still rebounding from a significant funding cut in 2011. We are proud to prepare BU students for an increasingly globally-connected world: we offer programs in some two-dozen modern languages (including critical languages for our ROTC students), more than 2,600 students participate in BU Study Abroad annually, and our educational and research opportunities span every region of the globe. BU's African Studies Center effectively uses a modest amount of Title VI National Resource Center funding to support work with elementary schools, undergraduates, and doctoral scholars. Recent Center graduates have successfully pursued national security careers with U.S. intelligence agencies and diplomatic endeavors with nongovernmental organizations. Research opportunities made possible through the Fulbright-Hays program have also been a critical support for BU students and scholars alike.

Teacher Education: As the Committee considers changes to federal support for teacher preparation, we urge you to recognize the importance of generating and using high-quality research to guide teacher education and professional development. Expanding federal grant programs that ensure collaborative research partnerships between universities and state and local education agencies will ensure that classroom curriculum relies on evidence-based practice and that effective support systems are in place so that all students have access to highly qualified teachers.

Thank you for your consideration of our suggestions. Boston University looks forward to working with the committee as the reauthorization of the Higher Education Act develops.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Brown". The signature is fluid and cursive, with the first name "Robert" being more prominent.

Robert A. Brown
President

cc: Massachusetts Congressional Delegation