October 31, 2013

The Honorable Tom Harkin  
Chairman, Committee on Health, Education, Labor, and Pensions  
U.S. Senate  
Washington, D.C. 20510

The Honorable Lamar Alexander  
Ranking Member, Committee on Health, Education, Labor, and Pensions  
U.S. Senate  
Washington, D.C. 20510


Dear Senators Harkin and Alexander,

Thank you for the opportunity to present comments regarding the reauthorization of the Higher Education Act (HEA). On behalf of CLASP’s Center for Postsecondary and Economic Success (C-PES), we respectfully submit these recommendations for your consideration and further exploration. C-PES promotes policies and investments to increase career advancement and economic mobility for low-income adults and youth. C-PES has in-depth knowledge of federal higher education, workforce development, youth development, and human services policies and also provides technical assistance to states and colleges on postsecondary access and completion as well as on career pathways and performance measurement.

Today’s students traverse many pathways to a postsecondary degree, and far too many of them face daunting prospects for completion. Only 54 percent of students complete a college degree within six years. These rates are even lower among underprepared students, low-income students, and students at community colleges. Faced with rising college costs; growing levels of responsibilities that include balancing school, work and family; and complex federal and institutional processes, it is no surprise that many students struggle to persist long enough to earn a degree.

Financial Pressures Can Drive Down College Completion. Though students fail to complete postsecondary programs for a variety of reasons, financial pressures appear to be the single largest factor. Over the last three decades, college costs have increased nearly four times faster than median family income. Financial aid has not filled the growing gap, and “unmet financial need”—the share of college costs not covered by financial aid or what the family is expected to contribute—has risen sharply. Half of community college students had unmet financial need in 2007-08, averaging $4,500, as did 43 percent of students at public four-year colleges, with their unmet need averaging $6,400. Rising unmet need means students must work more or borrow more to stay enrolled. Forty-three percent of undergraduate students work part-time to cover college and family costs; 32 percent work full-time. And while working a modest amount during college can increase performance, working too many hours can negatively affect academic performance.

Furthermore, students of color, particularly African Americans, are more likely to depend on financial aid and have less success in postsecondary experiences if financial aid is not adequate. In a study of the educational experience of young men of color, young men cited “money problems” as a chief distraction and roadblock to college success. These men are often heads of households, parents and caregivers responsible for contributing financially to their families in addition to paying for the cost of their education.

Lack of Adequate Student Supports Can Threaten Student Success and Completion. Since the last reauthorization of HEA, the face of higher education has changed dramatically. The vast majority (75 percent) of students have at least one barrier to student success; they do not fit the “traditional” student profile of a full-time student transitioning directly from high school to a four-year college or university. Forty-seven percent of undergraduates are independent, thirty-six percent of undergraduates are adults age 25 or over; 32 percent work full-time, and 23 percent are parents. Over their college careers, more than half of undergraduates now attend part-time for some semesters. These students bring life experience, which enhances their educational
experience and, at some institutions, contributes to higher completion rates as compared to their younger peers. At the same time, they require more flexible schedules and service delivery modes to accommodate their multiple responsibilities. Their needs are often not met by what many traditional colleges currently offer.

For these students, non-financial barriers, such as logistical challenges, poor academic preparation for college, and lack of information on how to navigate college processes can threaten student success and completion. Young men of color, in particular, cite “feeling like an outsider” and having intense pressure to succeed from family members and peers as challenges they need to navigate and overcome in order to achieve success.

**What Works to Improve Student Success?** Lack of financial resources is—in itself—a significant and often insurmountable barrier. Recent research supports this; low-income students who received “no strings attached” need-based grant aid were found to be more likely than their peers to stay continuously enrolled in college, graduate within six years, and accumulate credits at a quicker pace. Financial student aid should be designed to meet the costs of college while reducing the need for students to work too many hours or take out unmanageable levels of debt. It should also be flexible enough to accommodate the reality that a majority of undergraduates now attend a mix of full- and part-time over the course of their college careers.

Federal higher education policies should also be designed to help students overcome non-financial barriers to student success. Some financial aid programs have coupled grant aid with interventions designed to mitigate these barriers (e.g. innovations in course delivery, curriculum or instruction, learning communities, extra academic support and advising, emergency transportation or child care assistance). Early research on these approaches suggests that these more comprehensive strategies may be even more effective than grant aid alone.

Lastly, research supports a variety of strategies to impact college access, persistence, and completion among youth of color, including having supportive faculty, campus environments and peers that promote a sense of belonging, culturally-appropriate services and supports that emphasize mentoring and connections with family, and on-campus employment. Minority-serving institutions can play a role in improving college access, building capacity to understand culture and family and creating a supportive environment in which young men of color can thrive.

**CLASP Recommendations.** Despite the immediate challenges facing students, we believe that reforms to HEA should not be undertaken without careful consideration. Accordingly, CLASP has developed principles for guiding choices in reauthorization of the Higher Education Act. *First,* the goal of federal higher education policy should be to increase educational and economic opportunity for all students—with a priority for low-income, underrepresented populations who cannot access and afford postsecondary education without federal assistance. *Second,* federal student financial aid reforms should preserve—and even enhance—the original purpose of these programs: to increase access and affordability. Student success and completion are worthy additions but should be pursued in ways that do not undermine access. *Third,* reform proposals should be evidence-based, with data backing the need for change and showing that proposed changes will help, not hurt, needy students. In cases where limited evidence exists, proposals should be piloted or modeled to best understand the impact on students, especially low-income students and their families.

Our proposals for responding to the needs of students and reducing barriers to student success focus on ways to 1) reform student aid to support flexible and continuous enrollment and incentivize college completion; and 2) promote innovation to increase student completion. The recommendations below are preliminary; in the coming months, we will be developing a more detailed set of proposals.

If you have any questions about these proposals, please contact Marcie Foster (mwmfoster@clasp.org).

Sincerely,

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REFORMING STUDENT AID TO SUPPORT FLEXIBLE AND CONTINUOUS ENROLLMENT; INCENTIVIZE COLLEGE COMPLETION

1) Preserve continuous student aid eligibility for students who mix enrollment over the course of their college program, including when they attend less-than-half-time.

Congress should preserve student aid for those who attend a mix of full and part-time while in school, thereby supporting national college attainment goals and helping more low-income, working students earn postsecondary credentials.

A growing proportion of undergraduate students must work while they are in college; 64 percent of dependent students and 88 percent of independent students work 20 hours or more per week. Working while in school may require periods of reduced enrollment, including mixing enrollment over the course of a student’s college career. More than half of undergraduate students mix full and part-time enrollment attendance over the course of their program; only 7 percent attend exclusively part-time. Grants during periods of lower enrollment intensity help students keep momentum and avoid dropping out entirely due to financial circumstances. Research from the Community College Research Center supports this conclusion, finding that community college students who maintain “consecutive enrollment” are more likely to complete a credential. Importantly, the report also finds that the frequency with which a student switches between part-time and full-time enrollment “does not appear to be detrimental.”

2) Allow students to receive aid more flexibly for year-round study, enabling them to respond to changing family and life circumstances or accelerate their studies.

Through passage of the Consolidated Appropriations Act of Fiscal Year 2012, Congress eliminated the ability to award two scheduled Pell grants in one academic year (commonly referred to as “summer Pell”). This provision previously allowed students to use their financial aid awards more flexibly and continuously throughout their program, even if they chose to take courses over the summer term. Removing the option for a more flexible Pell grant had a significant impact on students who must work while in school, who must adapt to changing family and life circumstances, or who may be interested in accelerating their course of study and obtaining employment more quickly.

Enrolling in a summer term improves a student’s ability to complete their program and enter or advance in the labor market more quickly, yet low-income, working students are rarely able to cover the cost of a summer term without access to grant aid. As we noted previously, research has shown that continuous enrollment is associated with higher degree completion. We recommend restoring access to year-round Pell, without the administrative complexity of the original provision, and thus enabling more low-income and working students to earn credentials quickly and on a schedule that can accommodate family responsibilities and changing life circumstances. Congress should also explore eliminating the need to re-file the FAFSA annually for recipients who enroll continuously at the same institution.

3) Increase the semester cap on Pell Grants to ensure students have access to Pell throughout the entire course of their program of study and to better align with Satisfactory Academic Progress (SAP) requirements.

Another damaging cut made as part of the Consolidated Appropriations Act of Fiscal Year 2012 was a reduction in the lifetime limit for Pell Grant receipt was reduced from 18 semesters (9 years) to 12 semesters (6 years). This has a detrimental effect on all students, but particularly low-income students seeking four-year degrees. While many low-income students attend shorter-term certificate or associate degree programs, this may not be their terminal point. Over one-quarter (26 percent) of students who begin at two-year colleges transfer to a four-year institution within five years.

The 12 semester cap on Pell Grants does not currently align with Satisfactory Academic Progress (SAP) requirements, which students are required to meet throughout their enrollment as a condition of receiving
federal financial aid. Satisfactory academic progress guidelines allow for aid eligibility up to 150 percent of program length. For a student in a full-time program taking 12 credits per semester, this equates to 7.5 years. Under the newly-instated Pell semester cap, a full-time, low-income student would only be eligible for 6 years, leaving significant unmet need in their final years of study and threatening their completion. CLASP recommends increasing the semester cap on Pell Grants to ensure students have access to the financial resources they need throughout their entire course of study, while aligning with the existing SAP requirements.

4) Require that students who submit a FAFSA are made aware of public benefits and tax credits for which they may be eligible through college financial aid award letters. Over 98 percent of independent community college students with incomes in the bottom three quintiles had unmet need in 2007-2008. Moreover, a growing proportion of undergraduate students are either independent (47 percent), parents (23 percent), or low-income (40 percent) and may be eligible for other benefits to help them meet this unmet need. Studies show that some public benefits and tax credit programs are not being used by all of those who are eligible to receive them, and institutions could play an instrumental role in helping students learn about these benefits.

Congress should explore proposals that encourage institutions and the federal government to make students aware of the benefits and tax credits for which they may be eligible. Such efforts could improve college completion and reduce unmet need among the most vulnerable students. Strategies to increase awareness could include requiring that federal aid award letters include a sentence that encourages students to apply for any public benefits for which they may be eligible, including the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Child Care Assistance, Medicaid or the Children’s Health Insurance Program (CHIP), Individual Training Accounts through the Workforce Investment Act, Unemployment Insurance, and Trade Adjustment Assistance. Institutions could also provide or refer students to sites that offer free tax preparation and ensure they receive the Earned Income Tax Credit (EITC), the Child Tax Credit, and appropriate education tax credits including the American Opportunity Tax Credit or Lifetime Learning Credit, if eligible.

PRoMOTING INNOVATION TO INCREASE STUDENT COMPLETION

5) Support the growth of educational models that help low-skilled, working students complete postsecondary credentials and secure good jobs.

More than 60 percent of community college students are referred to at least one developmental education course upon enrolling in college, with many students being referred to a full sequence of three to five courses. Yet recent research shows that prescribing long sequences of developmental education may actually be hindering student progress rather than successfully preparing students to transition to college-level work. For students in college occupational programs, evidence from the Community College Research Center (CCRC) points to promising models that “bridge” directly to specific occupational certificates and degree programs through contextualized curriculum and intensive counseling and advising for students. Students in these programs are able to begin their credit-bearing course of study while simultaneously brushing up on basic reading, writing, and math skills. The use of these “bridge” models has also grown in the adult education system. Washington State’s Integrated Basic Education and Skills Training model, I-BEST, has received national acclaim, with evaluation results finding that that I-BEST students are 56 percent more likely to earn college credit than regular adult education students and 26 percent more likely to earn a certificate or degree. We recommend requiring the Department of Education provide technical assistance and grants to institutions to encourage wider experimentation with these innovative models designed specifically to transition low-skilled students to postsecondary education and help them complete certificates and degrees.
6) **Pilot a national, voluntary Compact for College Completion for students and colleges.**

An ever-growing body of research has found that need-based grant aid increases access and persistence among undergraduate students. But financial aid combined with other interventions—such as innovations in course delivery, curriculum or instruction, learning communities, financial incentives, extra academic support and advising, emergency transportation or child care aid, and others—may have an even larger effect.\(^{18}\)

Congress should support a national, voluntary pilot program, *The Compact for College Completion*, designed to maximize the impact of these promising strategies that have been shown to contribute to higher completion rates. The Compact would provide additional funds and national recognition to students and colleges that agree to partner with the federal government on increasing completion. While the scope of the initiative would depend on available funding, the intent is to pilot the Compact for College Completion with a large number of students within selected colleges to increase the impact on each institution as a whole. Only students at Compact colleges would be eligible.

Compact partner roles and responsibilities would be as follows:

- **The federal government** would provide grants to students—Compact Scholars—and funding to colleges. It would also facilitate technical assistance to share research and promising practices among Compact colleges. The Department of Education would monitor the success of Compact institutions and explore the feasibility of a rigorous evaluation of the program design.
- **Students** (College Compact Scholars) would receive national recognition and a $500 per semester Compact Scholarship, as long as they remained continuously enrolled in college (whether full-time or part-time and excluding summers) and meet satisfactory standards for academic progress. Students who make progress in a program of study within the first two years of college could receive an additional Success Bonus of $500. Scholars must be enrolled in a Compact college, be income-eligible for Pell Grants, and have unmet financial need.
- **Colleges** that join the Compact would receive $500 each semester for every Compact Scholar enrolled at the institution and an additional $500 completion bonus for every Scholar who ultimately completes. As a condition of receiving funds, colleges would implement evidence-based approaches to improving completion for Scholars. This funding structure rewards colleges for keeping Scholars continuously enrolled, for their progress, and for their completions.

Funding for the Compact could be found in revenue savings that result from simplifying existing tax-based student aid, as proposed in CLASP’s 2013 report *Reforming Student Aid* and the scope of the pilot could be adjusted to fit available funding. For more information on *The Compact for College Completion*, see *Reforming Student Aid: How to Simplify Tax Aid and Use Performance Metrics to Improve College Choices and Completion.*

7) **Create culturally appropriate programs that provide wraparound services and other supports to increase college access and completion for young men of color.**

Findings from higher education literature suggest a wide range of factors that impede college access, participation, and achievement of young men of color. For example, African Americans often lack of teacher and counselor encouragement to enroll in college. And across African-American, Native American, and Latino student groups, issues of overpopulation in special education and low academic achievement negatively impact post-secondary participation. While there is limited higher education research on Asian American student experiences, emerging literature suggests perceptions of campus climate affect mental health and depression and Asian American males are more likely than women to be depressed and the least likely to seek help.\(^{19}\) There are several successful state and campus-based innovations underway that have demonstrated signs of progress toward post-secondary access and achievement for communities of color, including young men. Federal higher education policy should encourage and fund the expansion of these types of approaches to address racial and gender inequality in higher education. (See examples of model programs in Appendix A.)
Appendix A

- **University System of Georgia’s African-American Male Initiative (AAMI)** – After data revealed the college-going rates for African American males was far below white counterparts and African American females, the Board of Regents of the University System of Georgia (USG) launched the AAMI in 2002. A statewide model for enhancing the matriculation and graduation of African American males, the AAMI has 36 programs on 26 of the USG’s 35 campuses, engaging and supporting young black men in college life. Since its inception, the USG has seen the African-American male enrollment climb by over 80 percent. Significant improvements have also been made in college graduation rates and the number of bachelor’s degrees conferred annually to black males at USG institutions.

- **Todd A. Bell National Resource Center on the African American Male at Ohio State University (OSU)** – Established in 2005 as an outgrowth of a campus initiative to improve retention rates among black men, the Center helps to create a sense of community and connectedness for OSU’s African American male students, offering opportunities for leadership and civic engagement, mentorship, rites of passage experiences to engage with peers and gain positive recognition. Significant improvements in student satisfaction, performance and retention are seen as contributors of the recent increase in graduation rates among the university’s black male students – which rose 24 percentage points to 67 percent in the past five years.

- **The Puente Project** – Employing both college preparatory, transition and campus support strategies, the Puente Project has motivating and supported thousands of students (primarily Latino) in Californian to thrive academically in high schools and on community college campuses. While not exclusively focused on males, its tenets support recognized approaches to positively impact Latino male postsecondary success – including a focus on multicultural and Latino culture and literature; preparing academic plans and professional goals; and mentoring and leadership development. Evaluations findings of the project reveal positive impacts on Puente participants’ college-going rates and persistence in school.

- **Tribal Colleges Breaking Through Initiative** - A partnership of Jobs for the Future, the National Council for Workforce Education, and the American Indian Higher Education Consortium, was an 18-month initiative focused on piloting workforce and education strategies to better serve low-skilled students at tribal colleges and universities. The initiative integrated widely-used accelerated and contextualized learning approaches (i.e. I-BEST, bridge programs, stackable credentials) with recognized culturally appropriate methods. These methods included utilizing tribal members as faculty and mentors and understanding implications and challenges of off-reservation employment.

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1 Shapiro, Doug; Dundar, Afet; Chen, Jin; Ziskin, Mary; Park, Eunkyoung; Torres, Vasti; and Yi-chen Chiang. *Completing College: A National View of Student Attainment Rates*. National Student Clearinghouse Research Center, National Student Clearinghouse, 2012.
7 Bailey, Thomas, Shanna Smith Jaggers, and Davis Jenkins. Introduction to the CCRC Assessment of Evidence Series. Community College Research Center, Columbia University, 2011.


19 Todd A. Bell National Resource Center on the African American Male at Ohio State University, website, [http://odi.osu.edu/current-students/bell-national-resource-center/](http://odi.osu.edu/current-students/bell-national-resource-center/)


21 The Puente Project, website, [http://www.puente.net/index.html](http://www.puente.net/index.html)

22 José F. Moreno, “The Long-Term Outcomes of Puente”, Educational Policy 2002; 16; 572, [http://epx.sagepub.com/content/16/4/572.abstract](http://epx.sagepub.com/content/16/4/572.abstract)