

Rep. Virginia Foxx
Chairwoman
Committee on Education and the Workforce
United States House of Representatives
2176 Rayburn House Office Building
Washington, DC 20515

Rep. Bobby Scott
Ranking Member
Committee on Education and the Workforce
United States House of Representatives
2101 Rayburn House Office Building
Washington, DC 20515

Rep. Brett Guthrie
Chairman
Committee on Education and the Workforce
Subcommittee on Higher Education and
Workforce Development
United States House of Representatives
2434 Rayburn House Office Building
Washington, DC 20515

Rep. Susan A. Davis
Ranking Member
Committee on Education and the Workforce
Subcommittee on Higher Education and
Workforce Development
United States House of Representatives
1214 Longworth House Office Building
Washington, DC 20515

Dear Chairs Foxx and Guthrie and Ranking Members Scott and Davis:

On behalf of the National Adult Learner Coalition, we write to you regarding H.R. 4508, the *Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act*, and the concerns we have. While there are promising changes signaled in this legislation reauthorizing the Higher Education Act, we have reason to believe this bill overall will hurt the 85% of students who are non-traditional students, and who largely are made up of working parents, veterans, and adults¹. This majority of students need the system to be changed to help, not hurt, them, which we believe this bill will do.

We are particularly concerned about this bill's major structural changes to federal financial aid, and how adult learners may be impacted by it. While all the details of the bill have yet to be realized by many inside and outside of Congress, we are seeing widespread elimination of federal loan programs and other benefits, immediately causing the cost of an education to increase for a large number of current, past, and future students. Coupled with the most recent tax bill (H.R. 1) that has gone to conference, the impact on low income, middle income, and adult learners would be extremely troubling.

In expanding access to federal financial aid dollars for a multitude of proprietary institutions that have not received it before, and while slashing the amount of overall dollars attainable for students, this bill will cause a simple mathematical dilemma. There will simply need to be a thinner distribution of those dollars. We appreciate and support the idea of a Pell bonus, which is included in the bill for those who wish to, and can, move through school more quickly. However, adult learners generally cannot take on a full-time credit-bearing schedule due to

¹ U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, 2011

other life obligations like family and work. In addition to looking more carefully at the overall realignment of federal financial aid dollars, which we see to be detrimental on the whole, we recommend that when doing so, you consider establishing a new form of Pell grant funding supporting the needs of lower-income working adults who may only be able to attend postsecondary education one or two courses at a time. In addition, we recommend that the reauthorized HEA index Pell support to inflation with a per person annual limit to keep up with the rising costs of college.

In addition, this bill has the potential of opening up adult learners and other students to a wide array of low-quality and poor performing institutions. The elimination of the 90-10 rule, which was created to protect students who use federal financial aid, is gone — instead, the elimination of the 90-10 rule, should be expanded to include GI Bill education benefits so that predatory institutions no longer view veterans as targets for unscrupulous marketing practices. The potential for organizations to now prey upon adult learners is greater with the removal of federal guardrails protecting students and consumers, coupled with a very wide opening of the field of who can be considered an institution of higher education, and collect federal dollars. The bill also restructures the federal loan repayment system, leaving students on the line for debts incurred while attending predatory institutions if they do not complete school.

While we appreciate the willingness to expand Title IV to cover new kinds of programs — notably competency based education (CBE) approaches, boot camp models, and short-term training — these changes are included without sufficient checks against potential fraud and abuse. Students need access to high quality innovations, and the federal government has a responsibility to both students and taxpayers to ensure financial aid dollars are only awarded for enrollment in programs adhering to clear quality requirements. We urge you to include better safeguards or to invest in more demonstrations and experiments testing out quality control measures. This bill also allows non-accredited organizations to partake in, and easily become part of, the landscape of Institutions of Higher Education (IHEs). We encourage you to limit permissible CBE activity to IHEs that can properly and accurately assess and then offer training and education that equip their students to develop meaningful skills for potential employers.

We encourage you to consider expansion of Title IV to cover the costs of prior learning assessments (PLA), which evaluate a student's prior learning (the college-level learning that results from work experience, life experience, military training, or self-study) for the purposes of awarding college credit. PLA helps to lower overall tuition costs and helps many students progress to degree completion more quickly. PLA has been associated with higher graduation rates and persistence, both important goals in today's education landscape. The U.S. Department of Education has conducted its own experiment for expanding Title IV to PLA methods in a responsible way. Early findings from the institutions in the experiment were described in a recent CAEL publication.²

² <https://www.cael.org/adult-learning/publication/financial-aid-redesign>

Providing self-paced and assessment-based education allows for great opportunities for adult learners, and supports their wants and needs as unique individuals who may have gained important knowledge and skills in the military, learned on the job, started and stopped school due to family and other demands with little to show for it (even if they still have knowledge on the issue). But doing it in a pilot manner, or in an approach confirming best use of federal dollars, upholding high standards of assessment, and providing successful student outcomes will certainly take time, and careful consideration.

We wish to see greater transparency for students, the government, and from institutions on issues of data and information. Adult learners should be given all information necessary to make a well informed decision about their education. Unfortunately, however, the data changes in the PROSPER Act fall short of expanding access to data on the adult learner's experience in higher education. We would like to see those improvements so that the adult learner's experience can be better understood and serve to inform adults in the decision-making about postsecondary opportunities.

The signals from Congress tell us that the legislation is moving forward on a fast-track approach. When working through some of the most complex issues, and with this bill providing some of the most sweeping changes the IHEs and adult learners have ever seen, moving forward in a meticulous and careful approach, with the inclusion of input from many stakeholders, is needed for the success of American higher education. We hope you will ensure HEA reauthorization will follow the regular process and allow for input from experts as well as a thorough analysis of the impact of proposed changes on students, employers, institutions, and our collective goals for college completion. The National Adult Learner Coalition stands ready and eager to work with you to figure out the best way to restructure this bill to support the majority of higher education students today, non-traditional and adult learners.

Sincerely,

The National Adult Learner Coalition

Pamela Tate
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Chief Executive Officer and Executive Director
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