



February 23, 2018

Honorable Lamar Alexander
Chairman
Committee on Health, Education, Labor
& Pensions
United States Senate
Washington, D.C. 20510

Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor &
Pensions
United States Senate
Washington, D.C. 20510

Dear Chairman Alexander and Ranking Member Murray:

We are writing to you as the presidents and chief executive officers of the American Indian Higher Education Consortium (AIHEC), the Asian American & Pacific Islander Association of Colleges and Universities (APIACU), the Hispanic Association of Colleges and Universities (HACU), and the National Association for Equal Opportunity in Higher Education (NAFEO), working collaboratively as The Alliance for Equity in Higher Education (The Alliance)¹ for more than two decades. We represent the 36 Tribal Colleges and Universities (TCUs), approximately 27 Asian American/Pacific Islander Colleges and Universities (AAPICUs), 500+ Hispanic-serving Institutions (HSIs), 106 Historically Black Colleges and Universities (HBCUs) and roughly 50 Predominantly Black Institutions (PBIs). Our member institutions represent 2- and 4-year colleges and universities across six Carnegie classifications. They are located in 40 states in the contiguous United States as well as Antigua & Barbuda, Brazil, Columbia, Costa Rica, Ecuador, El Salvador, Guatemala, Mexico, Nicaragua, Puerto Rico, Spain and the Virgin Islands. Our member institutions enroll and graduate more than one-third of all students from America's growing populations (Hispanic, African American, Asian American and Pacific Islander, and American Indian/Alaska Native). The histories and missions of AAPICUs, HBCUs, HSIs, PBIs, and TCUs differ substantially, however, collectively they are continuing to do the best job of providing access to high quality postsecondary education opportunities to the growing populations in America, disproportionate percentages of whom are low income and first-generation students. As the national organizations representing these institutions and the students they serve, we are united in our commitment to **educational excellence, access and success, affordability, accountability, and protecting the safety and rights of all students and members of our campus communities**, including DACA students who were brought to the United States by their parents when they were very young, have excelled in their formative years and are now making valuable contributions to our colleges and universities, our workforces, and communities. We eagerly

¹ The Alliance for Equity in Higher Education was established in 1999 as a first-of-its-kind partnership of the [American Indian Higher Education Consortium \(AIHEC\)](#), [Asian American & Pacific Islander Association of Colleges and Universities \(APIACU\)](#), [Hispanic Association of Colleges and Universities \(HACU\)](#), and the [National Association for Equal Opportunity in Higher Education \(NAFEO\)](#). The Alliance represents the shared interests of Tribal Colleges and Universities, Asian American, Native American, and Pacific Islander-serving Institutions, Hispanic-Serving Institutions, Historically Black Colleges and Universities and Predominantly Black Institutions. The institutions represented by AIHEC, APIACU, HACU, and NAFEO educate more than one-third of the nation's students of color.

anticipate working with each of you, your staffs, and colleagues on a bipartisan bill that will move the Nation closer to achieving these shared goals.

Before we outline our recommendations regarding each of the above referenced priorities for AIHEC, APIACU, HACU and NAFEO, we note our paramount and overarching commitment to working with you and your colleagues to ensure a continuation of vital capacity building funding for our collective institutions, which was added to *The Health Care and Education Affordability Reconciliation Act of 2010*, extending funding for Section 371(b) of the Higher Education Act under the College Cost Reduction and Access Act of 2007 through 2019. Without Congressional action, this sorely needed funding – known as Title III Part F -- will expire at the end of 2019. Through Title III Part F, AAPICUs, HBCUs, HSIs, PBIs, and TCUs have had access to the resources they need to help continue graduating disproportionate percentages of students in the sciences, technology, engineering and mathematics (STEM), upgrade outdated IT infrastructures, establish very modest endowments, and develop programs needed for 21st century jobs. Mandatory funding through Title III Part F is allocated to our member institutions as follows: \$100 million to Hispanic-Serving Institutions, \$85 million to Historically Black Colleges and Universities, \$15 million to Predominantly Black Institutions, \$30 million to Tribal Colleges and Universities, \$15 million to Alaska, Hawaiian Native Institutions, \$5 million to Asian American and Pacific Islander Institutions, and \$5 million to Native American non-tribal serving institutions. As stated earlier, without Congressional action, this funding will end in 2019.

A 2011 report by the National Academy of Sciences, National Academy of Engineering, and Institute of Medicine, *Expanding Underrepresented Minority Participation-America's Science and Technology Talent at the Crossroads*, makes clear the need for the continued investments in AAPICUs, HBCUs, HSIs, PBIs, and TCUs. Investments in these institutions are yielding tremendous affirmative outcomes. The report cites findings by leading STEM professionals that document that AAPICUs, HBCUs, HSIs, PBIs, and TCUs are graduating disproportionate percentages of the growing populations of the Nation. Should these institutions stop graduating disproportionate percentages of the growing populations of the Nation in STEM degrees, the Nation would likely not be able to sustain its capacity to conduct research and innovate. This “grow your own” approach will reduce the dependence on foreign STEM workers. Findings in a 2017 ETS report by Dr. Michael Nettles, *Challenges and Opportunities in Achieving the National Postsecondary Degree Attainment Goals*, suggests the need for continuing investments in AAPICUs, HBCUs, HSIs, PBIs, and TCUs STEM programs. The Nettles report finds that unless affirmative steps are taken to increase the graduation of African Americans, Hispanics, and Native Americans, the national goal of having 60% of Americans with a 2- or 4-year degree by 2020 will elude these populations at least through 2041, the last year for which Census data are available.

Because America cannot realize her higher education graduation goals or her STEM diversity goals without AAPICUs, HBCUs, HSIs, PBIs, and TCUs continuing and accelerating their graduation rates of minorities in STEM, **ensuring the continuation of Title III Part F (section 371(b) of the Higher Education Act of 1965) funding for our institutions** is a priority of highest order for The Alliance partners.

I. Affordability

Disproportionate percentages of the students who attend AAPICUs, HBCUs, HSIs, PBIs, and TCUs come from economically disadvantaged families. Disproportionate percentages of our students face financial and other obstacles that disrupt and too often derail their quest to enroll, persist and graduate from a 2- or 4-year college or university. Without the key federal grant and loan investments in AAPICU, HBCU, HSI, PBI, and TCU students, higher education degree attainment would be a dream deferred or derailed.

Because disproportionate percentages of AAPICUs, HBCUs, HSIs, PBIs, and TCUs students come from families of least advantage, they are forced to curb college costs. A 2014 UNCF report indicates that its member institutions—37 of the private HBCUs—maintain tuition and fees approximately 30 percent lower than that of all private postsecondary institutions (a difference of nearly \$12,000 a year). The College Board reports that public HBCUs, maintain their annual costs at approximately \$2,500 less than their HWCU counterparts. Average annual tuition at Tribal Colleges and Universities, for both 2- and 4-year degrees, is \$2937.

A. Protect and Strengthen Pell Grants & Work Study

AAPICUs, HBCUs, HSIs, PBIs, and TCUs are containing costs and implementing other cost reduction initiatives, such as reducing the number of years to degree completion through dual enrollment programs with local high schools, and in undergraduate, graduate and professional programs. They are offering increasing numbers of online and other place-based education options to reduce the cost of college. This is necessary for all colleges and universities, but especially AAPICUs, HBCUs, HSIs, PBIs, and TCUs whose students are disproportionately from low-income families and reliant on the Pell Grant Program. Pell scholarships enable college access, choice and completion for low-income students who struggle to find the resources for college. More than 70 percent of our students rely on Pell Grants to earn a college certificate or degree that will put them on the path to the middle class. Yet, the maximum Pell Grant currently pays the lowest percentage of college costs in the 40-year history of the program. Pell Grants support more than 7.5 million students with significant financial need, including one-third of all White students, two-thirds of all Black students, and half of all Latino students. At TCUs, 85 percent of all students are Pell eligible. The Pell Grant is in critical need of investments to restore its purchasing power, made all the more urgent because of the expiration of the grant's annual inflation adjustment after this year. This will result in the real value of the grant continuing to decline. The current maximum Pell Grant covers less than one-third of the cost of attending a four-year public college. Pell Grant students are already more than twice as likely as others to require student loans to cover the costs of college, and they graduate with an average of nearly \$5,000 more debt than their higher income peers. The expiration of the inflation adjustments to the Pell Grant will most assuredly result in our students graduating with more debt unless Congress takes action to reinstate the inflation adjustment. We urge Congress to take action to restore the purchasing power of the Pell Grant program and to make permanent the inflation adjustment provision in the program.

The Alliance partners urge and encourage adjusting other provisions of the Pell Grant provisions-- the foundation of our national investment in higher education-- to require that the **Pell Grant covers the average costs of a public four-year degree**. We also urge the *permanent* restoration of **year-round Pell Grants, which will** enable students to finish college faster and with less debt.

We propose modifications to the **Federal Work-Study Formula** to provide additional support for low-income students, while enhancing their employment skills.

B. Invest in at Alliance partner Facilities and Infrastructure

Many AAPICUs, HBCUs, HSIs, PBIs, and TCUs lack access to private capital financing at reasonable interest rates, even while they face significant funding needs to ensure up-to-date academic buildings, laboratories, technology and infrastructure. Significant federal investment is needed to renovate and preserve more than 700 HBCU and TCU buildings on the National Register of Historic Places. The HBCU Capital Financing Program should be strengthened to respond to the Dougal, Gao, Mayew, Parsons 2016 report, [*What's in a \(School\) Name? Racial Discrimination in Higher Education Bond Markets*](#), that indicates that HBCUs pay 20 percent more than other colleges and universities to finance facilities in the tax-exempt bond market, even when HBCUs and non-HBCUs have similar credit quality. Congress should specifically incentivize lenders in the college and university facilities and infrastructure market to invest equitably and without discrimination in HBCUs and other institutions educating disproportionate percentages of the growing populations of the states, with proportionately lower endowments, and impose severe sanctions on those who are caught doing so. In addition, the TCU Capital Improvement Authority, section 113 of the Tribally Controlled Colleges and Assistance Act the (25 U.S.C. 1813), should be reauthorized and funded for the first time in the Act's 40 year history.

C. Establish a New AAPICUs, HBCUs, HSIs, PBIs, and TCUs Pooled Endowment Fund in HEA

We propose the establishment in HEA of a new collaborative AAPICUs, HBCUs, HSIs, PBIs, and TCUs Fund, to be used to assist the institutions represented by The Alliance partners, in growing their endowments such that they reach a percentage of the average college or university endowment, or some other formula a bipartisan group of Members and/or the Secretary of Education would devise. The fund might also be used for reducing the debt burden on the low-income students at AAPICUs, HBCUs, HSIs, PBIs, and TCUs.

AAPICUs, HBCUs, HSIs, PBIs, and TCUs are doing the lion's share of graduating the fastest growing populations of the states, and of our nation, mostly in severely under-resourced institutions. They are continuing to "punch substantially above their weight" with favorable results.

The role of Minority-Serving Institutions (MSIs) in the higher education landscape is critical for the education of millions of students of color. If higher education is the vehicle for upward socio-economic mobility, we must increase investment in MSIs. Doing so will allow these institutions to strengthen their capacity to provide greater access to college and help their students succeed. Ensuring the success of students of color requires further investment in the very institutions that disproportionately educate them. The outcomes of MSIs provide the basis for the greater investment in the institutions.

HBCUs are just 3% of American colleges and universities, yet they are graduating 42% of African Americans in STEM, 60% of African American public health professionals, and 50% of African American public school teachers. Their endowments are just 1/8 the average American college or university endowment. AAPICUs, HBCUs, HSIs, PBIs, and TCUs must be strengthened to do a better job and expand their reach in doing that which they are doing today. HSIs are 13.8% of non-profit colleges and universities, yet, they enroll 23.4% of all students and 62.3% of all Hispanic students. And, completion rates for MSIs are higher than the federal rate suggests. See, <https://www.higheredtoday.org/2017/07/26/minority-serving-institutions-perform-better-federal-graduation-rates-suggest/>.

We are proposing the creation of a College Promise Fund for AAPICUs, HBCUs, HSIs, PBIs, and TCUs using funds from the tax on the endowments of the 70 higher education institutions with the largest endowments, included in the Tax Cuts and Jobs Act. The Secretary of the Treasury would establish a College Promise Fund for the benefit of congressionally designated AAPICUs, HBCUs, HSIs, PBIs, and TCUs, that serve a disproportionate percentage of low-income, minority, and first-generation students; whose endowments are 12.5% the average endowment for American colleges and universities; who have low full-time undergraduate student expenditures in comparison with other institutions offering similar instruction; or who enroll 50% or more of Pell-eligible full-time students. The College Promise Fund for AAPICUs, HBCUs, HSIs, PBIs, and TCUs could be modeled after the endowment program authorized in the Equity in Educational Land-grant Status Act of 1994.

II. Access Expansion & Accountability

The clarion call for accountability in higher education is reverberating throughout the nation's colleges and universities, creating even more pressure to accomplish more with less. The Alliance member institutions know firsthand that the fierce competition for high-demand programs and students can rival a high-stakes football game on the gridiron. The defense on the field are AAPICUs, HBCUs, HSIs, PBIs, and TCUs competing against an offense of well-endowed institutions with the financial resources to lure the best and the brightest students. The challenge in developing a higher education accountability system is reflected in a 2006 NCES finding:

*The United States “does **not** have one metric, or even a handful of common metrics, that could paint a picture of the accomplishments of its more than 2,500 four-year and 1,600 two-year institutions.” We concur with Dwyer, Millet & Payne (2006), “... there is no commonly used metric to determine effectiveness – defined in terms of student learning – of higher education in the United States.”*

The Alliance partners believe that the right type of data gathering and the strategic organizing of currently collected data can assist institutions in better realizing their missions, and can also assist in moving the nation to redouble its efforts to close the achievement and attainment gaps and find consensus on a comprehensive set of methodologies and performance metrics to level the education playing field.

A fair and equitable higher education accountability system should:

- include risk-adjusted metrics;
- assess institutions on expansion of access and closing the achievement and attainment gaps;
- take into account the socio-economic make-up of students on a campus and the wealth of the institutions;
- include critical domains that align with employer priorities for college student success;
- incentivize and reward “affordability” and preparation of large percentages of low-income students for growth and high need disciplines;
- respect and align with regional accrediting standards; and
- control for the vast differences between institutions, especially the mitigating and difficult barriers encountered by low-income, first generation students, and the fiscal challenges of the institutions that enroll disproportionate percentages of these students.

Studies that have measured the actual cost of educating low-income students reveal these costs to be significantly higher than educating more affluent students. A study by the New America Foundation found that at hundreds of well-endowed colleges, low-income students must still pay very high prices even after grant aid is applied. The paper, “Undermining Pell: How Colleges Compete for Wealthy Students and Leave the Low-Income Behind,” demonstrates this occurs because these institutions prioritize not on the basis of need-based aid, but on the ‘relentless pursuit of prestige and revenue.’” The Alliance partners believe that to reverse this trend, college accountability system would be to incentivize more colleges and universities to graduate low-income students. The community shares this goal to be sure, however, a ratings system must first reward those colleges and universities that enroll disproportionate percentages of low-income students and provide them with incentives and adequate resources to continue doing so and to graduate these students on time. A new ratings system must reward institutions, like AAPICUs, HBCUs, HSIs, PBIs, and TCUs that are graduating disproportionate percentages of low-income students, with cost-of-education grants.

The Advisory Committee on Student Financial Assistance, ETS, and other education research and assessment organizations have long affirmed that lower graduation rates at some institutions are directly correlated to the disproportionate percentages of low-income students enrolled. In *Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance* (July 2013), The Advisory Committee found a direct adverse impact on student 6-year graduation rates and the percentage of first-time students who are Pell recipients; the average test score of the student body; and level of endowment per student.

It is the tremendous diversity among higher education institutions that creates the conditions for greatest innovation and opportunity. The diversity of mission, resources, programs, institutional wealth and student socio- economic make-up inherent to all of higher education applies equally to The Alliance community of member institutions. The AAPICUs, HBCUs, HSIs, PBIs, and TCUs cohort of more than 700 richly diverse colleges and universities is neither well known nor understood. These institutions are public and private, 2 and 4-year, large and small, rural and urban.

The paradox within The Alliance community of colleges and universities, and most starkly reflected by HBCUs, is that the accomplishments of these institutions appear to contradict the corrosive effects that *de jure segregation* and impact the historic underfunding has exacted on these institutions. The Presidents and Chancellors who stand at the gates of AAPICUs, HBCUs, HSIs, PBIs, and TCUs have moved their institutions forward and continued to graduate disproportionate percentages of low-income students as well as others, including students of great advantage, despite the persistent gap in institutional resources and their wealth gap, as documented by the National Science Foundation, a number of think tanks, executive, congressional, judicial and administrative bodies. HBCUs have developed, tested and they are honing models to improve their ability to graduate more, and more diverse students, and to increase the numbers of the growing populations they are graduating, including their historic base of low-income students. AAPICUs, HBCUs, HSIs, PBIs, and TCUs offer the nation a profound vision of educational excellence and a model that has expanded equity, access, and success for diverse students that has stood the test of time. The successes of the AAPICUs, HBCUs, HSIs, PBIs, and TCUs model for educating disproportionate percentages of low-income students is demonstrated by a few highlights of the many contributions made by Alliance partners. For example:

- HBCUs represent only 3 percent of all colleges and universities, yet they enroll 16 percent of

- all African Americans in four-year degree granting institutions;
- HBCUs graduate 30 percent of African Americans receiving four-year degrees, and 40 percent of African Americans receiving four-year degrees in the sciences, technology, engineering and mathematics (STEM);
- Eighteen of the top 23 producers of African Americans who go on to receive science-related PhDs are HBCUs;
- Four of the top 10 producers of successful African American medical school applicants are HBCUs. These HBCUs produce 20 percent more African American applicants than the other six institutions combined;
- Eight of the top 10 producers of African American engineers are HBCUs.

A. An Accountability Framework Must Assess Institutions on Expansion of Access & Closing the Achievement & Attainment Gaps

Federal higher education policies and accountability frameworks or standards must focus on enhancing access to and success in postsecondary education to be sure, but equally, they must move the nation's diverse colleges and universities toward closing the achievement and college attainment gaps. While some progress has been made in this regard, closing access, achievement and attainment gaps between students from low- and high-income families and between students of color and white students, remains a significant issue for the nation. There is much work to be done and much more that the federal government can and must do. Only 19 percent of African Americans and 13 percent of Latinos, ages 25-34, have earned a bachelor's degree or higher, compared with 36 percent of whites and 55 percent of Asians in the same age group. Only about 1 in 10 of young adults from families in the bottom income quartile earn a college degree by age 24, compared with about 8 in 10 of young adults in the highest income quartile.

For millions of Americans, eliminating disparities in access, achievement and attainment is an essential, economic mobility pathway out of poverty and into the middle class. Without a college degree, children in families in the bottom income quartile have a 45 percent chance of remaining there as adults. With a degree, they have less than a 20 percent chance of staying in the bottom income quintile. Addressing the achievement and attainment gaps becomes even more critical considering that students from racial and ethnic backgrounds will represent the majority of the traditional college-seeking population in the years ahead. Many of these students will be the first in their families to attend college. The Census Bureau projects that minorities, now 37 percent of the U.S. population, will comprise 57 percent of the population by 2060, with the total minority population more than doubling, from 116.2 million to 241.3 million.

B. An Accountability System Must Foster and Reward Universities that Enroll and Graduate Disproportionate Percentages of Students from the Lowest Performing High Schools and Families of Least Advantage. It Should Not Measure Graduate Earnings or Student Loan Debt

An accountability framework must take into consideration the level of academic preparation of the general student body. Any metrics that might have a chilling and inhibitory impact on the colleges and universities that currently enroll a range of students, including or disproportionately those from the lowest performing high schools and from families of least advantage, must be avoided. An accountability system that rates institutions based on graduate earnings and student loan debt would most assuredly deter enrollment and retention of low income, first-generation, and minority students, the fastest growing student populations in the nation. A consideration of graduate earnings should not

be a measure of the quality of education. It would run counter to promoting and supporting public service and civic engagement, core American values. Using student loan debt as a criterion could be perceived as and might become a disincentive for low-income students to prepare for and aspire to attain a college certificate or degree. It would certainly lead colleges and universities to move away from educating the growing populations of this nation, disproportionate numbers of whom are low-income, first generation. Neither criterion should be included in an accountability framework.

C. An Accountability Framework Must Take into Account Key Factors

Key factors should be included in any accountability framework developed by the Committee, including: the Socio-Economic make-up of students (as measured by Pell Grant eligibility and other factors); the wealth of the institutions; the mission, vision, values of the institutions; State/Federal investment levels in higher education; the extent to which an institution enrolls and graduates veterans and non-traditional students; the geographic area of an institution; and factors to level the playing field. There is a direct and determinative correlation between each of these factors and student graduation rates. Unless each of these factors is controlled for in any accountability framework that is developed, the framework will yield false and inequitable results. Neither students nor institutions should be assessed using yardsticks that are not designed to measure the realities of the colleges, universities, and students being assessed.

The position of The Alliance is underscored and supported by data from The Advisory Committee on Student Financial Assistance. To demonstrate the impact that serving low-income students can have on raw measures of college performance, the Commission explored “the relationship between 6-year graduation rates and three inputs: the percentage of first-time students who are Pell recipients, average test score of the student body, and level of endowment per student.” They found and reported to Congress that these three inputs are powerful determinants of 6-year graduation rates at nonprofit 4-year public and private colleges. They found:

1. As the percentage of a college’s students who are Pell recipients (serving Pell recipients) rises, 6-year graduation rate declines from 80% to 25%, and average test score declines from 29 to 19.
2. Serving Pell recipients and average test score, combined, account for 76% of the observed variation in 6-year graduation rates of 4-year public and private colleges.
3. As endowment per student falls, serving Pell recipients lowers average 6-year graduation rate from 67% to 28% and from 85% to 33% at public and private colleges, respectively.
4. Serving very high percentages of Pell recipients, with very low endowment per student, reduces average 6-year graduation rate to 23% at public colleges and 19% at private colleges.
5. The more a 4-year college defines its mission as serving low-income students, and the more modest its endowment per student, the more its 6-year graduation rate will deviate from a valid and reliable assessment of its relative performance. Measure Twice: The Impact on Graduation Rates of Serving Pell Grant Recipients—A Policy Bulletin for HEA Reauthorization by the Advisory Committee on Student Financial Assistance (July 2013).

D. An Accountability Framework Must Incentivize and Reward “Affordability,” Preparation for Growth and High Need Disciplines, and Service in Areas of Highest Distress

The primary reason students give for leaving college without a college credential is that they cannot pay for their college expenses. At AAPICUs, HBCUs, HSIs, PBIs, and TCUs, many, low-income and first-generation college students who attend these institutions face significant financial challenges.

They are more likely to have lower levels of academic preparation and need remedial education and more time to earn their degrees. They are more likely to face unmet financial need, requiring work and loan assistance to pay their college expenses after receiving available grant aid. This is the case even though many AAPICUs, HBCUs, HSIs, PBIs, and TCUs are more affordable for students compared to other institutions. As an indicator of financial need, 70 percent of all AAPICUs, HBCUs, HSIs, PBIs, and TCUs students are Pell-eligible and more than 40 percent of Alliance institution students come from families earning less than \$25,000. At Tribal Colleges, for example, the average family income of students is \$20,260 per year. The economic recession, which disproportionately impacted low-income students, made it even more difficult for students at AAPICUs, HBCUs, HSIs, PBIs, and TCUs and their families to afford tuition, fees, books, room and board, and other college-related expenses.

The federal government must invest more strategically in student financial aid given the substantial return on investment in higher education not only to individuals, but to society as well. An accountability framework must reward institutions that keep costs low and prepare proportionately more under-represented students in growth and high need disciplines. AAPICUs, HBCUs, HSIs, PBIs, and TCUs have provided extraordinary rates of return in relation to the comparatively modest investments that have been (and continue to be) made by the funding sources.

In determining college affordability, consideration should be given to the impact of state (and federal) operating funding, which has been cut substantially in recent years. Consideration should also be given to the extent to which the colleges and universities maintain operational efficiencies; the extent to which they are graduating students in “debt relievable,” growth and high need disciplines and serving in underserved communities. Consideration should also be given to the percentage of an institution’s overall budget that is allocated to student financial aid.

E. An Accountability Framework Should Respect and Align with Regional Accrediting Standards

Accountability systems must respect and align to the extent possible, with the accountability measures of the regional accrediting bodies. Regional accrediting bodies serve as the common denominator for the accountability of the colleges and universities in its region. Each regional accrediting body reflects the core values, common practices, and quality controls for the institutions in its region. Their accreditation fosters a common yardstick, integrity, peer review, self-regulation and accountability. The regional accrediting bodies foster student learning outcomes and continuous improvement.

F. Begin A Dialogue in Earnest About the Access and Success Incentives and Rewards in The Bipartisan Access, Success, and Persistence in Reshaping Education (ASPIRE) ACT, A Promising Measure for Encouraging Greater Enrollment and Graduation of Low-Income Students and Students of Color

In response to concerns The Alliance for Equity in Higher Education has raised for several years regarding the incentivizing of a greater number of colleges and universities to educate the growing populations of this nation—low-income and racial and ethnic minority students, and the rewarding of those institutions that are graduating disproportionate **percentages** of the growing populations, a bipartisan group of Members of Congress has been working on a bill that will move the nation toward acknowledging and rewarding institutions like AAPICUs, HBCUs, HSIs, PBIs, and TCUs that are graduating disproportionate percentages of low-income students, first generation students, and students of color, and incentivizing institutions that are disengaging from enrolling and graduating these

students to do a better job.

The *ASPIRE Act* incentivizes four-year institutions to expand access to higher education for low-income students and increase graduation rates for all students. It does so by spurring some of our nation's wealthiest, most selective institutions to improve low-income student access and by devoting significant resources to boost completion rates at those under-resourced institutions that serve disproportionately high numbers of low-income students. These extensive resources are to be accompanied with new bare minimum access and completion standards, applicable to all four-year institutions choosing to participate in federal financial aid programs. The bill also rewards institutions that are already on the right track when it comes to access and completion by making additional competitive funding available for completion efforts, with priority for MSIs. Finally, it enables high-performing institutions on access and completion to apply for non-financial rewards, such as bonus points in federal competitive grants or a reduced regulatory burden.

G. Teacher Accountability and Preparation

Twenty-First Century American teacher education programs must not only prepare teachers to understand and clearly convey subject matter to diverse students in engaging and impactful ways, but they must also impart to those who will be teaching professionals, the practice of conveying to the students their greatness and worth to themselves, their family, their community and the world. Teachers must bring learning to life. They must not only teach for a living, but teach students how to live and thrive in our increasingly diverse, globally connected, and technologically driven world. They must *inspire* students for civic responsibility; and *stimulate* them to identify and dedicate their lives to the highest good and ideals they know without compromising their anchor principles or allowing their spirit, hopes, ambition, or dreams to be destroyed under the impact of trials and crisis. American teacher education programs must equip the teaching professionals of today and tomorrow to help students understand their relationship and responsibility to humanity. They must prepare teaching professionals to offer a quality academic experience in a challenging and stimulating environment that prods students to test their personal beliefs against those of others in a robust exchange of ideas; and encourages them to challenge universal truths and "objectivity" against their understandings and realities.²

More than any other cohort of American colleges and universities, the schools of education at AAPICUs, HBCUs, HSIs, PBIs, and TCUs are graduating excellent, culturally competent, profession-ready teachers who are masters of their disciplines, who bring diverse experiences, backgrounds, perspectives, races, ethnicities, cultures, languages and teaching approaches tailored to meet the known differing learning styles of the growing populations of the states. HBCUs, just 3% of American colleges, today graduate 50% of public school teachers at the PK-12 level despite documented disparities in public and private funding for HBCUs when compared to their historically White college counterparts. Hispanic-Serving Schools of Education at HSIs graduate the majority of Hispanic teachers, while Tribal Colleges lead the nation in producing American Indian K-12 teachers who serve in their reservation communities. For example, *one* Tribal College – Salish Kootenai College – graduated *half* of all the American Indian special education teachers in Montana in 2015. AAPICUs and PBIs also graduate disproportionate percentages of excellent, diverse teaching professionals, many

² Baskerville, Lezli et al. The Role of Historically Black Colleges and Universities in Faculty Diversity in American Federation of Teachers, [American Educator](http://www.aft.org), www.aft.org.

of whom teach in areas of highest need. Federal investments in all these institutions will be necessary in order to close the racial/ethnic disparity between the teaching force and the student population.

The teaching profession serves as a gateway to all other professions, and the path through which a literate democracy must tread. With the standards that have emerged since the landmark, *A Nation At Risk Report*, the United States is experiencing critical teacher shortages due to factors such as swelling numbers of immigrant and baby boomer children, as well as the “graying” teaching force. AAPICUs, HBCUs, HSIs, PBIs, and TCUs are essential to the United States for meeting the need for excellent, diverse teachers who will teach in urban and rural areas with a paucity of teachers and even fewer teaching professionals from the students’ racial, ethnic, and cultural backgrounds, factors that have been documented as being important for the success of students.

In recent years, the question of whether entities other than regional and discipline accrediting agencies should measure and rate/rank the effectiveness of colleges and universities and their schools of education. Diverse education professionals, Alliance partners and their schools of education embrace accountability. They fully understand the importance of having accurate data to measure the effectiveness of teacher preparation programs and having in place a system that will allow for fully and fairly gauging the effectiveness of the graduates of all education and training programs. We need accurate and relevant measures of the success for our schools of education and the education professionals who graduate from AAPICUs, HBCUs, HSIs, PBIs, and TCUs schools of education, because the graduates of these programs disproportionately serve in under-resourced communities, in challenged or failing schools, and in classrooms in which disproportionate percentages of the students are racial and ethnic minorities, many of whom come from families of least advantage. The education professionals graduating from these programs, thus, assume the tremendous responsibility of preparing to high academic and civic standards each child in their classrooms, modeling excellence and civility, as well as working aggressively toward the broader goals of closing the achievement, attainment, and wealth gaps.

On October 12, 2016, the U.S. Department of Education released final regulations for teacher preparation programs. The Congress set aside the teacher regulations, and the Department has since rescinded them. AIHEC, APIACU, HACU and NAFEO opposed the regulations. These regulations have since been rescinded. In the midst of a serious teacher shortage and a significant decline in enrollment in teacher preparation programs, The Alliance partners found that the 2016 regulations would likely decrease the chances of every student having access to a fully prepared teacher. They would not move the nation closer to having the excellent, diverse teacher corps required to meet the needs of the Nation and most especially the growing diverse populations and service areas of the nation.

The final regulations did not include assessment measures that would have taken into account factors such as diversity in race, ethnicity, and socio-economic strata, or excellence in pedagogical and content understanding, nor would they have measured progress toward closing the achievement and attainment gaps; yet, they appeared to “give a pass” to teacher education programs that have negligible student diversity and place few, if any, new teaching professionals in low-performing schools with students of high need.

The final Department of Education assessment approach presupposed that there is widely accepted agreement that skills required to increase student learning and achievement are consistent and uniform across students by race, ethnicity, gender, socio-economic status, wealth, cultures, generations, and

geography. This has been proven not to be the case. *See*, e.g., the research of Dr. Edmund Gordon, Dean Emeritus, and Richard March Hoe, Professor Emeritus of Psychology and Education, Columbia University, and one of the nation's foremost experts on student learning. Dr. Gordon and his colleagues, including Dr. Michael T. Nettles, Senior Vice President and the Edmund W. Gordon Chair of ETS's Policy Evaluation & Research Center (PERC), and a member of the NAFEO Board of Directors, have researched and published extensively their findings that every student has the ability to learn, can learn, and does so differently. Dr. Gordon developed and widely reported the concept of "affirmative development of academic ability" and "supplementary education" both of which focus on improving the quality of academic achievement in diverse learners, and provide not only proposed inputs and actions to improve student learning, but also accepted measures of success in teaching diverse learners that appear to have been overlooked or rejected outright by the Department. Assessments of teacher education programs should remain a responsibility of the state.

Despite the Alliance partner communities twice putting information before the Department about promising findings from use of the Equity Scorecard, the Department failed to incorporate into the assessment of teacher education programs, factors from the Equity Scorecard developed by researchers at Loyola Marymount University and widely accepted as meritorious. This is a tool for measuring institutional ethos and outcomes relative to preparing and graduating students from historically disenfranchised groups—the growing populations of America. Any assessment of teacher preparation program effectiveness that includes consideration of the extent to which the programs are closing the achievement and attainment gaps should reflect a consideration of the Equity Assessment Scorecard.

The approach to assessing teacher quality contained in the proposed regulations also relied heavily on student standardized test outcomes. The use of student standardized tests to determine teacher quality and the quality of teacher preparation programs has been called into question by leaders in the assessment field. So, too, have stakeholder surveys been widely questioned based on both cost and the value of such surveys. In the regulations, the Department concluded that colleague and administrator surveys would be most instructive in assessing teacher performance. In so doing it opted not to require surveys from students, families and other important frontline stakeholders and the most direct of the intended beneficiaries of the teaching.

The Department justified its reliance on teacher retention as opposed to other measures of equal or perhaps greater value in assessing teacher outcomes, by noting its belief that inadequately prepared teachers are less likely to remain in the classroom. This may be true, but so, too, are excellent teachers with a passion to serve in under-served schools and communities less likely to remain in a classroom if they find themselves in a teaching position without a “livable wage,” in schools with inadequate resources, an unreasonable teacher-pupil ratio, high crime, and an administration that has low-expectations of the students.

On a matter of particular concern to HBCUs, the Alliance notes that not until a determination is made as to whether the states are investing comparably in their public HBCUs, their public HWCUs, and their various departments, schools, centers of research and excellence, can a state reasonably assess the effectiveness of a teacher education program or other programs in the public colleges, universities, departments or schools. Central components of determining effectiveness of a program are cost of matriculation, cost of operating the program, institutional and program resources, wealth, and outcomes.

As the Senate considers Higher Education Act reauthorization proposals, if it should conclude that it would be prudent to include new provisions assessing teachers and schools of education, AIHEC, APIACU, HACU and NAFEO urge and encourage your consideration of the above recommendations.

Chairman Alexander and Ranking Member Murray, the above recommendations are by no means exhaustive. We are appreciative of the opportunity to submit this initial set of Higher Education Act reauthorization recommendations. The Alliance partners serve on the Secretariat of ACE, and we incorporate by reference the recommendations they are advancing on behalf of the broad community of American colleges and universities. We also incorporate by reference the recommendations being advanced by our partners the Council for Opportunity in Education, TMCF, UNCF and The Institute for College Access and Success. We eagerly anticipate working with you, your colleagues, and the legislative staff members who will support you in this effort.

Should you have questions or desire additional information, please do not hesitate to contact us through Lezli Baskerville, President, CEO & Counsel of NAFEO, at (202) 439-4704.

With appreciation,



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