



National Association
of Independent
Colleges and Universities

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August 27, 2014

Honorable Tom Harkin
United States Senate
Washington, DC 20110

Dear Senator Harkin:

On behalf of the National Association of Independent Colleges and Universities, I appreciate having the opportunity to comment on your proposed reauthorization of the Higher Education Act, the "Higher Education Affordability Act."

At the outset, we want to commend you for maintaining the student financial assistance and campus-based aid programs that are at the very heart of the Higher Education Act. These programs are critical to providing student access to postsecondary education at the institution that best meets their needs and interests.

Because the focus on students has been a hallmark of the Act for over 40 years, we are gravely concerned about the tilt towards institutional support reflected in the proposed State-Federal College Affordability Partnership program. This provision would provide funds to one sector of higher education based on student enrollment, without regard to the income of the enrolled students. All sectors of higher education are facing difficult funding challenges, but the solution is not to change the longstanding federal role of directly supporting low-income students instead of institutions. Many of the institutions who would most directly benefit from this new program are wealthier and serve a higher income, more selective student body than their peers in the non-profit sector. Above all, states could qualify for this new program by transferring funding from their state-based Pell Grant matching grants to institutional support for public colleges. We strongly urge you to delete this provision.

We also appreciate those Teacher Preparation provisions in your bill that support the substantial reform efforts many college-based programs have undergone. Our suggested edits to your bill would seek to emphasize this collaborative approach to Teacher Preparation program improvement, rather than seek to impose on programs reform ideas that are no longer cutting edge.

We want to express particular concern about the extensive amount of accreditation material you propose to make public. Our system of accreditation has made possible the existence of a diverse array of higher educational offerings. This diversity permits students to find their "best-fit" institutions and maintains the vitality of our system of higher education. Other means of external review—particularly if conducted by a government entity—cannot match this flexibility. The success of this approach is based on frank and candid peer review. Your proposal would substantially change the nature of the accreditation process and undermine the very elements that help make it successful.



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Finally, we ask you to consider including the recommendations from our November 2012 *Report of the NAICU Financial Responsibility Task Force*, which outlines the changes needed to improve the federal system of determining the financial stability of institutions. Current implementation problems have led many colleges to waste precious resources on securing needless letters of credit because the Department of Education is making routine accounting errors.

Our additional comments and suggestions about other provisions of your draft bill are attached. We are continuing to review the measure and to seek input from our member institutions with respect to the impact of various provisions on their students and program operations. As work proceeds on the measure, we look forward to a continued dialog on shaping a reauthorization proposal that will advance our mutual goal of assuring access to high-quality postsecondary education programs.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Warren", with a long horizontal flourish extending to the right.

David L. Warren
President

Attachment