January 23, 2020

The Honorable Bobby Scott                      The Honorable Virginia Foxx
Chair                                         Ranking Member
Committee on Education and Labor               Committee on Education and Labor
United States House of Representatives         United States House of Representatives
2176 Rayburn House Office Building            2101 Rayburn House Office Building
Washington, DC 20515                           Washington, DC 20515

Dear Chairman Scott and Ranking Member Foxx:

The National Association of Colleges and Employers (NACE) wishes to submit the following observations regarding the College Affordability Act.

Established in 1956, NACE is the leading source of information on the employment of the college educated. NACE counts among its membership more than 13,000 college career services professionals and HR/staffing professionals at nearly 2,000 colleges and universities nationwide and 1,000 employer organizations in a wide variety of industries.

The mission of NACE is to facilitate the employment of the college educated. In fulfilling this mission NACE is very interested in policies that could impact: the ability of individuals to obtain postsecondary education; the economy and in particular the future labor markets; the development of career readiness capacities in college graduates; and the development of outcomes information that can be used to better inform educational policy. In connection with these interests NACE wishes to focus on four aspects that are either addressed in or omitted from the College Affordability Act and can impact the effectiveness of American Higher Education in the near future.

First, we fully support the provisions in the bill that will improve financial access to higher education. In particular, the increased support for the Pell Grant Program – both the added dollar amount of the award and the extension of coverage to fourteen semesters – will assist the nation’s neediest students in obtaining the knowledge and skills necessary to become equitable participants in the economy.

Additionally, we support the increase for federally-subsidized Work-Study programs; the extension of Title IV aid to include Deferred Action for Childhood Arrivals (DACA) recipients; and the streamlining of the Free Application for Federal Student Aid (FAFSA) process. These will all advance opportunities for American students to complete the development of their full potential through higher education and thereby strengthen the long-term prospects for American industries and the American economy.
Second, NACE is generally supportive of the added transparency that will come through the inclusion of language from the College Transparency Act in the bill. NACE has traditionally supported greater openness regarding the outcomes connected with obtaining a postsecondary degree, but we have also expressed our concerns about the potential for abuse of confidential information through the initiation of a student unit record system. We are now inclined to believe that the benefits entailed in developing comprehensive information about graduate outcomes that covers all institutions, programs and extends beyond the period immediately following graduation outweigh the threats to individual privacy posed by the implementation of a student unit record system.

Third, while we see the benefits of developing comprehensive outcomes data for postsecondary institutions, we are extremely concerned with provisions in the College Affordability Act that would employ outcomes measures as standards for accrediting these institutions. Evaluating individual schools on strictly employment outcomes would be inappropriate and potentially harmful. Outcomes, whether they be employment or continuing education, are individual-level results determined by a multiplicity of factors (e.g. academic program, family education and income, work experience in an internship, gender). Outcomes data may be more a reflection of a school’s admissions process rather than a true measure of the school’s contribution to a student’s employability. Selective institutions can virtually determine their outcomes measures by admitting students with the academic skills and interests that will be attractive to employers and the family background that provides the graduate with the networking connections that are advantageous in finding a good job.

The result of an accreditation process focused on graduate employability, especially immediately after obtaining the degree, could undermine institutions focused on serving disadvantaged students or those with less career-focused academic programs. This could mean schools might avoid the admission of students with weaker academic credentials or those from poorer family backgrounds. It could also mean that schools with a philosophy of providing a broad-based liberal arts education would find it more difficult to maintain their existence. We believe that neither of these results would be socially or economically beneficial to the nation in the long-term.

Finally, we would like the committee to consider adding the provisions of the Classroom to Careers Act to its reauthorization of the Higher Education Act. The provisions of the Classroom to Careers Act will improve the rules regarding the use of federal work-study monies.

Specifically, the improvements will allow schools to support students engaged in cooperative education initiatives to use federal work-study funds to underwrite the compensation students receive from some private-sector firms. Under current federal work-study guidelines, a school may provide support to a student working for a private-sector firm only if that position is part-time. Students engaged in a cooperative education program work full-time for their employers during the period of their co-op. The current guidelines prevent colleges and universities operating cooperative education programs from using work-study monies to support students, particularly low-income students, who find it financially difficult to work for an employer of their choice because the employer has limited capacity to compensate students engaged in this type of “training.”
Cooperative education provides students with a valuable alternative educational program for completing a post-secondary degree program. It integrates experiential work requirements with academic study as integral elements of the degree program. NACE research has consistently shown that graduates who participated in experiential education opportunities fared better in terms of getting a job and in the compensation associated with the job upon graduation.

We wish to thank the committee for the opportunity to offer these comments. We will be happy to work with the committee as it continues to work through the process of reauthorizing the Higher Education Act.

Sincerely,

Marilyn Mackes
Executive Director