August 2, 2013

Dear Chairman Kline, Senior Democratic Member Miller, Chairwoman Foxx and Ranking Member Hinojosa:

On behalf of the Council of Graduate Schools (CGS), representing over 500 colleges and universities significantly engaged in graduate education, research and scholarship, culminating in the award of master’s or doctoral degrees, I am pleased to provide recommendations for the Committee as you prepare for the upcoming reauthorization of the Higher Education Act. Although CGS joined with other higher education associations in providing a community-wide set of recommendations, the Council is submitting this set of recommendations specifically focused on issues pertaining to graduate education for your consideration during the reauthorization process. We look forward to working with you to ensure that all students have the opportunity to earn the advanced degrees that are necessary to support American innovation and productivity in a global economy.

Sincerely,

Debra W. Stewart
President

AFFILIATES

Conference of Southern Graduate Schools
Northeastern Association of Graduate Schools
Midwestern Association of Graduate Schools
Western Association of Graduate Schools
COUNCIL OF GRADUATE SCHOOLS’ COMMENTS ON POLICIES & AMENDMENTS FOR INCLUSION IN THE REAUTHORIZATION OF THE HIGHER EDUCATION ACT

The Council of Graduate Schools recognizes that undergraduate education is important to the creation of a stable economy, providing students with foundational knowledge and work skills and offering college graduates a wide range of employment opportunities. Historically however, graduate education in the United States has played a critical role in the success of the U.S. workforce and economy. It contributes significantly to producing America’s most influential researchers, innovators, and leaders. U.S. graduate schools are environments in which students acquire the skills and knowledge needed to compete in the global economy, as well as to solve problems of national and global scope.

The Higher Education Act has had an inconsistent history of support for graduate education. Recent Congressional actions have reduced the financial support for graduate students, while other countries are strategically putting more resources into graduate education to grow their economy and compete in the global market.

The House Committee on Education and the Workforce is specifically interested in receiving recommendations that allow for examination of ways to:

- Empower students as consumers in higher education,
- Simplify and improve the student aid and loan programs,
- Increase college accessibility, affordability, and completion,
- Encourage institutions to reduce costs,
- Promote innovation to improve access to and delivery of higher education, and
- Balance the need for accountability with the burden of federal requirements.

Each topic is addressed separately. An effort was made to not duplicate recommendations across the six topics; however many of the recommendations are interrelated.

Empower students as consumers in higher education

- Students and their families need access to current, reliable and consistent information to use in deciding where to go to school, including cost, time to completion and what outcomes graduates achieve. A wealth of information is currently available on many websites and through the Department of Education and other related agency and department websites. However, a consistent complaint is that there is no way to compare across websites, there is too much information which is confusing, the information is not current or relevant, there is no connection to jobs, and for graduate students in particular, information regarding stipends, grants, fellowships, internships and assistantships is not available. Definitions are not the same across websites, and calculations of
outcomes utilize different data across websites. These changes could be incorporated into Title I, Part C, Sections 131 and 132.

- Following on the recommendation for better information above there is a need for a common taxonomy of terms across data bases, with the ability to crosswalk between Department of Education, National Science Foundation (NSF) and Department of Labor data, e.g. IPEDS, NPSAS, O-Net, National Survey of College Graduates. Changes could be included in Title 1, Part C, Section 132.

- Each academic year, as part of any loan agreement that undergraduate and graduate students enter into, students must be informed of the information available through the National Student Loan Data System (NSLDS). Students should be strongly encouraged to access their information at least once per year, and to participate in a required online tutorial (available through NSLDS) that includes items such as an explanation of loan terms and conditions, definitions of cost of attendance, and explanation of the debt and payment estimates the student will encumber, as well as the kinds of counseling they can receive regarding financial assistance. These changes could be included in Section 485B of the Higher Education Act.

- Students should have a full understanding of what institutional accreditation means and what program accreditation is. This information shall be made available on the institution’s webpage; it must also provide whether upon successful completion of the program the student would be eligible to sit for required professional certification or licensing examinations. These changes could be made to Section 114 or 132 of the Higher Education Act.

- Specify that at least one member of the National Advisory Committee on Institutional Quality and Integrity (or its successor) shall represent graduate schools. This would be included in Section 114(b)(2) of the Higher Education Act.

Simplify and improve the student aid and loan programs
The federal student loan program has become increasingly complex and outdated. It does not recognize that needs of students have changed, that the average student pursuing postsecondary education is more likely to be non-traditional, and that many students are not aware of how much debt they are taking on and the impact of these decisions on their financial futures.

Actions over the past two years have changed the student loan landscape for graduate students and created doubts about their ability to pursue a graduate education. As of July, 2012, graduate students no longer qualify for in-school interest subsidies, a policy that makes them eligible only for unsubsidized loans and Grad PLUS loans, each with an interest rate higher than the rate of subsidized loans. Unlike with subsidized loans, these loans begin to accrue interest immediately. Because most graduate student delay repayment of their loans until graduation, the interest on their loans compounds
throughout their graduate careers. The result is that for graduate students, debt grows faster and is significantly higher than undergraduates for every dollar borrowed.

Graduate students also carry the burden of accumulated debt in order to pursue their degrees. According to data drawn from the 2007-08 National Postsecondary Student Aid Study (NPSAS:08), 73% of master’s recipients had an average cumulative undergraduate and graduate debt of $41,000, while 67% of those who received doctoral degrees had an average cumulative debt of $60,000. However, it is worth noting that new debt acquired exclusively in graduate school is substantial and that graduate students must borrow to attend school. The rate of borrowing is highest for students from underrepresented populations and in those fields where underrepresented populations are most heavily enrolled. In the reauthorization of the Higher Education Act this unwarranted financial burden on graduate students must be alleviated:

- The interest subsidy needs to be reinstated for graduate students while they are pursuing their degrees, so that all Stafford loans carry the same interest rate, are capped at the same maximum interest rate and have the interest subsidized while the borrower is in school.

- The historic difference in interest rates of approximately one percent between Stafford loans and the PLUS loans should also be reinstated. The only loans not eligible for the in-school interest subsidy would be the PLUS loans for parents and graduate students.

- The number of repayment options for loans should be reduced or consolidated. Standard repayment plans (10 and 20 year) should be offered as well as a single income-sensitive repayment plan.

- Graduate degree holders should have the option of re-financing or consolidating their federal loans at the completion of their programs of study.

- Determine ways to simplify needs analysis so that the process is sensitive to the differences between traditional and non-traditional students, including graduate students in the category of non-traditional students (e.g. asset and income protections, on-campus and on-line programs of study).

- Include within the experimental sites program (Section 487A) support for collaborative efforts between university financial aid offices and graduate schools to improve counseling, debt management and special accommodation services for graduate students.

**Increase accessibility, affordability and completion**

- As mentioned previously, there is an overwhelming need for transparent, easily navigated, comparable institutional websites, with common definitions of terms and interconnectivity with other relevant websites such as O-Net and NSF.
• Provide for year-round Pell Grants for accelerated learning and accelerated master's degree programs (no penalty for full eligibility to Pell Grants and subsidized loans for students choosing this path). These changes would be included in Title IV, Subpart 1.

• Make grants to states for the development of debt management tools that provide undergraduate and graduate students with access, before acquiring student loan debt, to clear, simple information about (a) the average amount of loan debt in their field of study and (b) information about average entry-level and expert salaries typical of a range of career options in that field for their chosen degree. This will provide students with the information they need to understand the financial consequences of their choices of school and cost of attendance, program of study and occupational choices.

• Undergraduate and graduate students want to understand how their coursework connects to the workplace and careers. A recent Gallup workplace engagement survey suggests that factors that contribute to greater workplace engagement are better pipelines between campuses and the work place. More and better mentorships for students should be built into students’ course of study and included in supportive services offered by institutions of higher education. It also requires more career counseling and experiential learning. These provisions could be designed similarly to language in Section 402D, but included in the Fund for the Improvement of Postsecondary Education (FIPSE) to study the impact on completion in graduate programs. It could also be included in Graduate Assistance in Areas of National Need (GAANN) as an allowable activity under those grants.

• Place a requirement that the Advisory Committee on Student Financial Assistance (or its successor) will include impact on graduate students and graduate degree holders in the studies and reports they issue. This would require additional language to Section 491 of the Higher Education Act.

Encourage institutions to reduce costs
The Council of Graduate Schools understands that the House Committee on Education and the Workforce intends to have additional hearings on this issue. We encourage the Committee to include graduate school representation in these hearings. Because graduate schools are usually internal administrative and programmatic units within institutions of higher education, the perspective they provide would be informative as the Committee considers how to encourage institutions to reduce costs institutionally and for students.

Promote innovation to improve access to and delivery of higher education
• A successful model for innovative master’s programs is the Professional Science Master’s (PSM) degree. It combines scientific training blended with business skills. These are science-plus programs developed in concert with employers that combine study in mathematics or science with skills-based coursework in
management, policy or law. The PSM is a degree program with demonstrated results and should be authorized as a free-standing program within title VII of the Higher Education Act.

- Within the GAANN program, allow for the funding of interdisciplinary/multi-disciplinary programs, particularly in the STEM fields of study. Graduate education is advancing into fields of study that are no longer single-focused subject areas, and the GAANN programs should reflect this change.

- Support a separate Javits program that includes professional development, mentoring and career counseling to provide greater career pathway options for graduate degree holders.

- Under FIPSE include projects that explore ways to incorporate mentoring, traineeships, engagement with employers and other efforts to improve graduate education and connect it to career options for graduate students.

- Include in title VI, Part B, Business and International Education Programs, specific support for graduate students, including international internships. Allow for consortia of graduate schools to be an eligible entity to apply for grants.

**Balance the need for accountability with the burden of Federal requirements**

The higher education association community provided recommendations to the House Committee Education and the Workforce. In the document under section 2, *Better Information for Consumers*, is a detailed discussion of and recommendations for disclosures, consumer information, student outcome data, data system requirements, and college cost information. The Council of Graduate Schools is supportive of what is contained in the larger community set of recommendations and urges the Committee to also consider within those recommendations the impact on graduate schools and graduate students.