

## **AACRAO Public Policy and Education Agenda**

### **Introduction**

Founded in 1910, the American Association of Collegiate Registrars and Admissions Officers (AACRAO) is a nonprofit association of approximately 11,000 higher education admissions and registration professionals who represent more than 2,600 institutions and agencies in the United States and 33 other countries. The association seeks to serve and advance higher education through leadership in academic and enrollment services. It provides extensive resources to support its members in the practice of their profession, including programs, conferences, publications, consulting, and research services. At the same time, AACRAO offers a forum for discussion on policy initiation, development, interpretation, and implementation within institutions and in the global educational community.

### **Preamble**

As a member-based nonprofit advocacy association, AACRAO has the right – and the responsibility – to help shape public policies and programs that recognize and support higher education as a positive force in ensuring the nation’s economic competitiveness, its cultural and intellectual strength, and the quality of life of all of its citizens.

AACRAO is the public voice expressing the views and concerns of its members. It supports policies and practices that advance access to post-secondary education for students from all socio-economic and ethnic backgrounds, while also strongly asserting the primacy of each institution of higher education in defining its mission and governing itself in order to best serve the pursuit and promotion of learning.

AACRAO is a strictly non-partisan association that advocates for its members and higher education overall by:

- Working closely with policymakers, regardless of their political affiliation, to serve its members and help the nation’s students
- Taking positions on public policy issues, including those that may be or become contested issues among political groups
- Encouraging its members, as campus professionals who work with faculty, administrators and students every day, to share their valuable insights on policy issues related to their work with local, state and national policymakers.

AACRAO does not:

- Favor or oppose political candidates, groups of candidates, or political parties and, as a 501(c)(3) tax-exempt association, is legally prohibited from doing so
- Participate in fundraising for candidates or political parties
- Support, oppose, or participate in any candidate’s campaign
- Share contact information of its members with any political party or candidate.

The AACRAO Public Policy Agenda outlines major issues impacting AACRAO members and presents a framework for AACRAO's involvement in the public policy arena.

## **I. Federal Funding of Higher Education**

**AACRAO supports federal funding for financial aid to ensure that all qualified students have access to higher education, and for research to advance knowledge and innovation.** In an increasingly competitive global marketplace, a higher education infrastructure and a well-educated population are more important than ever to ensure economic innovation and competitiveness and a better quality of life for all.

### **Student financial aid –**

Federal funding has played a key role in increasing access to higher education, but for many students from underrepresented minorities and families with low and moderate income, that education is still a dream, not a reality. Recent cutbacks in federal funding programs pose an even greater threat to equal access, especially as the number of high school graduates without the resources to finance further education is set to increase dramatically during the next decade.

Pell Grants, in particular, are essential to college access and affordability for low- and moderate-income students. They make college possible for more than nine million Americans and enhance college completion rates. However, today the share of higher education costs covered by the maximum Pell Grant is approximately half of what it was three decades ago and next year the maximum grant will cover the smallest share of college costs in the history of the program.

AACRAO strongly urges maintenance of the current maximum Pell Grant Award and supports the improvement of gatekeeping for the Pell Grant program so that every dollar of federal support actually reaches students in need. However, AACRAO is concerned that changes wrought by Congress have negatively impacted students with authentic need. Specifically, AACRAO is concerned by the following actions:

- The removal of the year-round Pell Grant for low-cost community colleges and institutions with low default and high goal completion rates
- The adjustment of the calculation for the “automatic zero” expected family contribution to \$30,000 a year. The current reduction to \$23,000 a year applies to new students for the 2012-13 award year.
- The elimination of the eligibility for Pell Grants for students who qualify for an amount that is less than 10% of the maximum award to receive grants. Currently, the new rule means, for example, that about 3,000 students across California's various segments of higher education will not receive an average grant of \$506.
- The current status of the college work study program and its current matrix for eligibility. The metric to determine eligibility are not based on the current research regarding retention of students participating in work study. Additionally, the association recommends work study prior to loan application and distribution.

AACRAO supports federal assistance for early intervention programs that address college preparation and provide a bridge of support services to keep disadvantaged students on track for college, along with campus-based financial aid grant and loan programs. The association encourages Congress to engage with the academic community to consider the impact of particular populations.

#### **Student loans –**

Student loans were lucrative revenue generators for the student loan industry before the elimination of loan guarantees and, increasingly, they appear to be fulfilling that role for the federal government. The rates on PLUS (7.9%) and the unsubsidized Stafford Loans (6.8%) are especially high at a time when the general economy is experiencing historically low interest rates. Moreover, the subsidized Stafford Loan, now 3.4%, will double in July, 2013 unless Congress acts to maintain the lower rate.

The basic configuration of the loan programs should be re-examined. The current legislatively determined fixed interest rate, in particular, should be replaced with a more market-based mechanism that fluctuates with general interest rates in the economy. In addition, AACRAO endorses flexible and reasonable repayment options, tailored to individual circumstances that will help students manage their educational debt more responsibly.

#### **Research –**

Federal support of critical research initiatives at colleges and universities through such agencies as the National Institutes of Health and National Science Foundation has contributed significantly to the nation's global leadership in research and innovation. The prospect of critical cuts to funding for research could seriously jeopardize the economic and intellectual health of our nation and its citizens.

## **II. Accountability and Program Integrity**

**Maintaining the nation's system of top quality higher education relies upon ensuring the integrity of participating institutions as well as the integrity and accountability of the Higher Education Act's gatekeeping system of federal recognition, accreditation and state licensure policies.** At their own institutions, AACRAO members protect academic integrity by serving as admissions gatekeepers and as codifiers and enforcers of institutional academic policies that govern the awarding of credits and credentials. They also monitor threats to academic integrity across the spectrum of educational institutions, since they must make decisions based upon credits and credentials given to students by their high schools and previously attended colleges and universities. AACRAO is alarmed by threats to the reputation and integrity of all academic institutions posed by the rise of "diploma mills" and instances of uneven and lax standards for accreditation and state licensure.

#### **Federal recognition –**

AACRAO recognizes the responsibility of higher education to strengthen its own oversight and accountability and supports changes to the accreditation process and state licensure.

Overall, federal law can be most effective by focusing upon business practices in higher education rather than academic policies. Such areas may include:

- Requirements for diversification of funding sources to decrease reliance on federal resources
- Restrictions on excessive uses of federal funds for marketing, advertising, and recruitment activities relative to student services and faculty instruction
- Stricter requirements for language promoting programs that lead to licensed careers, including sanctions for misrepresentation of programmatic accreditation

#### **Accreditation –**

Academic freedom, institutional autonomy, and federal non-intervention in the academic affairs of colleges and universities are paramount to their ability to fulfill their missions of teaching and learning, research, and service. AACRAO is committed to institutions' ability to regulate their academic affairs without governmental interference. Thus, the accreditation process, based on institutional peer review, remains the best mechanism for quality assurance.

At the same time, AACRAO recognizes that documented shortcomings of the current system have resulted in growing public distrust of accreditation and calls for a complete “federalization” of the program integrity system. With billions of federal dollars and public trust at stake, it is critical that good stewards within the higher education community, who are by far in the majority, act in concert to reform and thus save non-governmental accreditation as a reliable, trustworthy, and effective mechanism for quality assurance. Elements of a plan to restore public trust would include such commonsense reforms as:

- Elimination of conflicts of interests for individuals serving as employees and volunteers with recognized accrediting bodies or appointees to the National Advisory Committee on Institutional Quality and Integrity (NACIQI),
- Creation of minimum standards of administrative capability and financial responsibility for recognized accrediting bodies, and
- Imposition of risk-sharing on accrediting bodies for losses attributable to their gross negligence or direct culpability for incidents of institutional malpractice.

AACRAO further urges that accrediting standards be connected to verifiable outcomes where practicable.

#### **State licensure –**

While state licensure, as a critical element in the Higher Education Act's triad, is designed to be a key protector of the integrity of Title IV programs, in reality the success of licensure varies greatly from state to state. Some states have devoted significant resources and attention to this responsibility. In others, licensure essentially involves the filing of paperwork. The result is a regulatory environment in some states that invites fraud and abuse, as Congressional hearings and other investigations have documented. For the protection of students and taxpayers, AACRAO supports substantive state licensure programs with oversight and consumer protection activities appropriate to the level of risk. Such alternative state regulatory frameworks, if designed carefully, can indeed be more

robust and effective in rooting out fraudulent or predatory practices while, at the same time, providing compliance relief to legitimate institutions.

### **State authorization—**

The rapid growth of distance education has further contributed to confusion regarding state licensing. A literal reading of Title IV indicates that institutions must get a license in every state where they may be delivering on-line educational services, even to one student. AACRAO endorses the concept of legislation ending this unworkable statutory requirement. At the same time, the current system warrants further examination. Some predatory institutions, seeking to evade the more robust licensure requirements of some states, have set up operations in states with the weakest licensure requirements and have been conducting business nationwide from these locations. These institutions often enroll the majority of students outside the state in which they are licensed, assuming that state authorities will be unlikely to expend local resources to protect the interests of students from other states.

### **Credit transfer –**

In an era where increasing numbers of students transfer at least once in their college careers, AACRAO supports college and university faculty-led initiatives to examine and improve the transfer process. However, attempts in recent years to impose federal rules governing the transfer of credits are ill-conceived and threaten to make what should be a collegial process into a political one. Many of these efforts have originated with career colleges that have accused traditional colleges of bias in refusing to award academic credit for what they claim is equivalent coursework. Academic judgment about equivalency of coursework from one institution to another must rightly be kept within academic institutions and governmental non-interference in such decisions should be preserved.

### **Diploma mills and credential fraud –**

The number of diploma mills – from fake “high schools” to “doctoral” institutions – has risen dramatically in the past decade, resulting in a proliferation of claims of educational attainment based upon fraudulent and questionable credentials. Credential fraud is a multibillion dollar industry, including sophisticated crime rings that provide transcripts and call centers to verify records and graduation information.

This fraud and abuse has become a significant international threat to the health and safety of individuals and a tremendous financial burden on colleges and universities as well as to employers and government. AACRAO members, as consumers and guardians of academic credentials, are at the forefront of the global fight against diploma mills and credential fraud and have been devoting ever-greater resources to its detection and eradication.

AACRAO supports international efforts to combat diploma mills and credential fraud, actively partnering with federal agencies, international counterparts, foreign ministries of education, and law enforcement to identify and expose it. It also advocates for improvements to federal laws and administrative practices relating to credential fraud, including:

- Better information gathering about diploma mills and regulation of the credential evaluation field
- Additional oversight of partnerships between U.S. institutions and foreign partners

### **III. Curricular Alignment between Higher Education and K-12**

**Academic alignment between K-12 programs and the colleges and universities that their graduates will attend is an important and desirable goal.** In achieving this alignment, however, it is critical that efforts to reform high school core curricula for college-bound students are pursued with the clear understanding that the faculty members of each college or university are responsible for setting its academic policies. Thus, the development of “college ready” high school curricula must be done in close consultation with college faculty and admission officers. Otherwise, these high school curricula may not, in fact, meet the academic policies set by varying institutions.

### **IV. Privacy and Data**

**AACRAO is deeply committed to promotion of privacy policies that maintain the confidentiality of the highly sensitive data that students willingly entrust to educational institutions.** In 1974, the passage of the Family Educational Rights and Privacy Act (FERPA) ushered in a new era for educational privacy rights through its application of fair information practices to educational records. The culture of privacy is so deep-rooted within the education community that there have been few violations of FERPA over the past four decades.

FERPA has provided individuals, or their parents in the case of minors prior to enrollment at postsecondary institutions, with the right to inspect and review their educational records, exercise significant control over the disclosure of information from those records, and correct or amend erroneous information in the records. The regulations included several “fair information practices” to provide for these rights.

With this background, AACRAO views the amendments to FERPA regulations published by the Department of Education in December 2011 as an abdication by the Department of its historical role as a protector of Americans' educational privacy rights. In fact, in some critical instances, the amended regulations run counter to legislative intent and plain language of the law.

Although the amendments purport to address the need to improve data on student outcomes by enabling student-level tracking, which is unavailable through the aggregated data on the IPEDS system, they in fact compromise basic fair information practices such as consent, choice, inspection, amendment, control or data minimization. They compromise the ability of families and students to control the collection, warehousing, and data-mining of their educational records for unspecified and open-ended purposes. AACRAO will work with Congress to rescind these amendments.

#### **State Longitudinal Data Systems (SLDS) –**

AACRAO is also concerned about the extent of legitimate individual privacy concerns manifested in another data-driven initiative, the federally-funded State Longitudinal Data

Systems (SLDS). These state-based data systems are designed to serve as data repositories of individual unit-level student records. As a result of regulatory modifications to FERPA in 2009 and 2012, the SLDS currently under development do not incorporate basic fair information practices—such as notice and choice, right of review, correction and amendment, and the right to control re-disclosure of unit-level data records—in their policies and operating procedures. AACRAO will work with its members and federal and state policymakers to ensure that the states engage in and encourage the development and adherence to best practices to protect student privacy while meeting their data needs.

## **V. Access and Equal Opportunity**

**AACRAO firmly supports the principle that the doors of higher education must be open to all qualified students regardless of their financial resources and that, in fact, access and equal opportunity for all are the bulwarks of a thriving democracy.**

AACRAO members represent the most diverse educational system in the world, from open-access community colleges to large research universities. Yet, all are united by a commitment to expand the number of qualified students who attend college, to increase completion and graduation rates for all students, and to support at-risk students so that they may have the tools and skills to succeed.

AACRAO and its members believe that improving access to higher education is one of the most important investments this nation can make. It has paid off in the development of a robust knowledge-based economy as well as in the ability of those who reap the benefits of higher education to reach their full potential. Now, these investments are more critical than ever. The nation's continued economic strength and security and the quality of life of its citizens depend upon increasing both access to and completion rates for college.

There is much to be done. Only 24 percent of first-generation students succeed in earning a bachelor's degree across all colleges and universities. Students from low and moderate income families graduate at lower rates, as do students from underrepresented groups. Federal and state cutbacks have made tuition more difficult to pay for many students from underrepresented minorities and families with low and moderate income. Meanwhile, the number of high school graduates without the resources to finance further education will increase dramatically in the next decade. AACRAO supports policies and practices that reduce the access and opportunity gap for the benefit of a better nation and a better world.

## **VI. Veterans' Issues**

**AACRAO recognizes and honors the sacrifices these men and women have made and its members are proud to assist them and meet their educational needs.**

Veterans and students on active military duty and their families face special circumstances and challenges. Active-duty students, who may be reassigned or activated with little notice, benefit from maximum administrative flexibility, such as providing full tuition refunds and

accommodate re-enrollment upon the student's return. Veterans receive administrative support to navigate VA eligibility and reporting issues, which can be both cumbersome and confusing.

Because veterans and those on active duty have often been the targets of unscrupulous providers who enroll them in sub-par programs and consume their hard-earned benefits, AACRAO is strongly supportive of improved efforts to safeguard these students. These include improved gatekeeping by the agencies of jurisdiction, consistency in language across legislation and branches of service, better counseling by competent advisors, and stepped-up disclosure requirements to ensure that veterans and active military can make well-informed choices. Agency oversight and enforcement should place primary emphasis on areas where military students and tax dollars are now disproportionately concentrated.

## **VII. Immigration Policy**

**AACRAO urges the passage of the Development, Relief and Education for Alien Minors Act of 2011.** Commonly referred to as the DREAM Act, the legislation would provide a path to legal status for young undocumented immigrants who were brought to the United States as children by their parents and are pursuing college degrees or serving in the military. It would remove barriers to higher education for students who have grown up in the United States, attended school here, and consider themselves American.

The bill has two major provisions to accomplish this. First, it would repeal Section 505 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 that penalizes states for providing in-state tuition to undocumented students, thus giving back to the states the right to make their own decisions on this matter. Second, it would set up six-year conditional permanent residency status for students who were brought into the country up to the age of 15, have been here at least five years by the bill's enactment date, graduated from a U.S. high school or received a GED test credential, and pass a background check. This status would make them eligible for Federal Work-Study funding and student loans, although not federal financial aid, such as Pell Grants. After six years, DREAM-eligible individuals could qualify for permanent residency by completing at least two years of higher education or two years of military service.

AACRAO firmly believes that this nation is best served – as it has been since its founding – by giving access to higher education to ambitious young men and women who can make a vital contribution to its economic strength and security. Indeed, if the United States is to achieve the goal of returning to world leadership in higher education attainment and to become more competitive in the global economy, it cannot afford to deny their aspirations and prevent them from reaching their potential.