



**TESTIMONY ON HIGHER EDUCATION REGULATIONS
U.S. DEPARTMENT OF EDUCATION
OCTOBER 4, 2017**

Higher Learning Advocates Executive Director Julie Peller delivered testimony at a public hearing of the U.S. Department of Education Office of Postsecondary Education on higher education regulations that may be appropriate for repeal, replacement, or modification.

Thank you for the opportunity to testify. My name is Julie Peller, and I am the Executive Director of Higher Learning Advocates, a new nonprofit organization launched in 2017. We work to advance policy changes to increase postsecondary attainment – specifically policies that support a system of higher learning that is student-centered, equitable, outcomes-based, and focused on educational quality.

As such, Higher Learning Advocates focuses on three key issues: high-quality outcomes, today's students, and the changing landscape of higher education. Higher Learning Advocates is a proponent of smart, efficient regulations that fit together to improve postsecondary outcomes for all of today's students – including completion, employment, equity, and value.

During this regulatory review, we ask that the Department of Education consider not only specific regulations but how the array of regulations and requirements can work together to advance outcomes for the students and institutions of today. Today's students are more diverse – in age, race, and income – many live off-campus, attend college part-time, are working while in school, and are parents. Regulations should be designed to recognize this reality, respond to the needs of today's students, and support institutions in modifying and evolving program offerings and student supports.

The Department should also use this opportunity to consider how different requirements and metrics work with one another. For example, the various federal reporting mechanisms for postsecondary education use different timeframes for completion inconsistently and interchangeably. Common metrics and definitions implemented across regulations would ease the process of reporting data to the federal government, promote greater transparency and enhance data quality.

We also believe this regulatory review is the appropriate time to consider ways to reduce the complexity and confusion created by some regulations. Streamlining regulations—such as simplifying the Free Application for Federal Student Aid (FAFSA) and timely loan forgiveness during Borrower Defense to Repayment claims—could reduce some challenges that may be facing today's students by increasing clarity in communication.

While we believe a holistic review could improve outcomes and oversight, Higher Learning Advocates also urges the Department of Education to consider some specific regulations in your conversations.

We support the original intent of the Gainful Employment regulations and believe the data required under these rules are an improvement upon existing data systems that provide useful information for today's students, institutions, and policymakers. Specifically, the earnings data collected and reported under Gainful Employment are a vast improvement over currently available earnings data and provide a useful example of how institutions of higher education can accurately communicate graduates' earnings – while providing data security – to inform current and prospective students and their families.

We also urge the Department to examine current accreditation regulations and the process for recognizing accreditors. Higher Learning Advocates recommends aligning the federal role in accreditation with quality, rather than compliance, and clearly defining a process for differentiated accreditation. This approach would ensure that accreditors are appropriately targeting time and resources in their reviews.

We recognize many higher education requirements are mandated by statute, and we urge the Department to work with Congress to focus requirements on student outcomes—specifically requirements that govern innovative delivery models, such as such as competency-based education, industry certifications, and digital credentials, to enable such models to become more widespread while maintaining quality protections for students and taxpayers.

To conclude, as the Department continues its review of regulations, we ask you to consider how regulations and any proposed changes will work together with the goals of advancing student outcomes, enabling high-quality higher learning, and supporting today's students.

Thank you for your time.

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