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MEMORANDUM

TO:Interested PartiesFROM:Penn Hill GroupDATE:April 11, 2019SUBJECT:Senate HELP Hearing on Accountability

Senate Health, Education, Labor and Pensions Committee [List of Committee Members]

"Reauthorizing the Higher Education Act: Strengthening Accountability to Protect Students and Taxpayers"

Overview: On Wednesday, April 10, the Senate Health, Education, Labor and Pensions (HELP) Committee held a hearing on proposals to strengthen higher education institutional accountability systems to better serve students and taxpayers, in the context of reauthorizing the Higher Education Act (HEA). [*Webcast of the Hearing*]

Key Issues Discussed:

- Members and witnesses discussed the need to hold colleges and universities accountable for student outcomes and ways to improve the current accountability system.
- Members and witnesses discussed the importance of holding all schools accountable to all students and looking at repayment rate metrics to do so.
- Members and witnesses discussed the need to serve a diverse set of students including student veterans, low-income students, students of color, first generation students, adult students and students unable to find gainful employment.

<u>Witnesses</u>:

- **Dr. Tressie McMillan Cottom**, Assistant Professor of Sociology, Virginia Commonwealth University (VCU), Richmond, VA
- **Dr. Adam Looney**, Joseph A. Pechman Director of the Center on Regulation and Markets, Brookings Institute, Washington, DC
- **Dr. David Tandberg,** Vice President for Policy Research and Strategic Initiatives, State Higher Education Executive Officers Association (SHEEO), Boulder, CO
- **Dr. Belle Wheelan**, President, Southern Association of College and Schools Commission on Colleges, Decatur, GA

Opening Statements:

Chairman Lamar Alexander (R-TN) began his remarks by stating that as a former university president, autonomy, competition, choice and a commitment to excellence by institutional leaders and faculty leads to success in institutions of higher education (IHEs). He said that while IHEs are somewhat autonomous, they are required to report to numerous agencies and

individuals, such as students, boards, accrediting agencies, governors and State legislators. He added that this system of accountability has worked, for the most part, especially considering the United States has most of the world's best colleges and universities. He said that he thinks there are ways to make the higher education system more accountable.

Sen. Alexander stated that the committee has held hearings about simplifying the financial aid application process and creating a safe environment for students while enrolled at school. He added that this hearing would help determine how to ensure that students are earning degrees that are worth their time and money and that taxpayers are paid back the billions of dollars that they have loaned students to get degrees. He referenced the cohort default rate, which applies to all colleges and universities, as an example of what he views as a poor measure of accountability. He explained that this policy makes a college ineligible for Title IV funding if for three consecutive years, more than 30 percent of its borrowers are in default or if over 40 percent of students default in any one year. He said that because the cohort default rate does not account for the one-third of borrowers that are not yet in default, but are also not making their payments on time, it is a poor accountability metric. He then mentioned the two Federal accountability rules that only apply to for-profit institutions: (1) the 90-10 rule, which requires that 10 percent of revenue come from non-Federal sources and (2) the Gainful Employment rule, which looks at how much debt a graduate has compared to his or her salary. He noted that the Gainful Employment rule is an ineffective measure of accountability because it is too complex and does not account for students who take out loans or do not complete their degrees.

Sen. Alexander said that the higher education system needs more effective measures of accountability but noted that he does not want the Federal government to operate as a "national school board for colleges" telling States and accreditors, boards of directors and institutions how to manage their schools. He suggested that the government develop a new system of accountability which examines whether students are repaying their loans to ensure that taxpayers are not financing degrees that are priced so high and worth so little that students are unable to pay back their loans. He noted that and that this proposal is similar to the Gainful Employment rule, except that it would apply to every IHE. He said this program would incentivize schools to lower tuition and help their students to graduate and find jobs. He also stated that the higher education data collected by the Federal government from IHEs should be made more useful to students and families. To do so, he said that first, Congress needs to identify what information schools need to report and second, Congress needs to provide direction to the U.S. Department of Education (ED) to make that information useful to students. He added that third, Congress needs to strengthen the 44 recognized accrediting agencies which are relied upon to ensure that students receive a quality education. He continued that instead of requiring that accreditors have a standard of "student achievement," Congress could more clearly require that accreditors measure whether students are learning and succeeding. He concluded by stating that the committee's goals should be for students to know that their degrees will be worth their time and money and for taxpayers to know that they are providing funds for the Federal government to finance valuable educations. [Chairman Alexander's Full **Opening Statement**



Ranking Member Patty Murray (D-WA) stated that the witnesses should remember the other priorities for helping students as they move through the hearing, such as dealing with the rising costs of college and increasing student debt, increasing access for historically underrepresented students and creating safe learning environments. She said that accountability is important because of the investments that taxpayers, students and families are making in higher education. She stated that the accountability system needs to sharpen its focus on student outcomes and be as nuanced as IHEs and their students. She said that the role of higher education accountability, quality assurance and ongoing monitoring and oversight does not fall squarely on the Federal government, but that there should be a partnership among the Federal government, States and accrediting agencies.

Sen. Murray stated that she wants to maintain and strengthen the current and existing HEA, citing the risk-based accountability system that it uses to protect students and taxpayers from schools and programs that have traditionally showed more risk, such as, she said, those with profit motives or programs with alternative educational formats. She added that the reauthorization of HEA should not only protect students from predatory or ineffective actors but also examine broader educational outcomes to ensure that all schools are preparing all students for success. She continued that schools must enroll all types of students, including those from historically underrepresented backgrounds and that schools need to support students while they are in school so that they are able to complete their degrees. She said that students should be able to get a job with their degree or certificate that allows them to manage their student debt and thrive in the economy.

Sen. Murray said that an accountability system needs to lift up expectations for all schools and support less resourced schools. She added that schools need to be provided with the tools they need to help students succeed including, financial aid, the ability to identify when students are falling off track early, career counseling, mental health services and more. She concluded by saying that there needs to be a culture of accountability at all colleges and universities and voiced her discomfort and disapproval of Secretary DeVos' practices, of which she views as deregulatory. [*Ranking Member Murray's Full Opening Statement*]

Testimony:

Dr. Belle Wheelan began her testimony by discussing the Southern Association of College and Schools Commission on Colleges' (SACSCOC) role in overseeing and ensuring the quality of the IHEs it accredits. She explained that institutions must go through an application process when seeking to become accredited to show that they meet standards in areas such as student achievement and fiscal capacity. She added that if an institution becomes accredited, it is subject to ongoing review and robust oversight by the commission, including undergoing a comprehensive evaluation every ten years, submitting a formal report at the fifth year and providing annual reports with financial information and completion data. She stated that if an IHE, at any time, does not meet the agency's standards SACSCOC is obligated to assess the reasons for noncompliance and may leverage a sanction on the institution.



Dr. Wheelan said that she does not think that it would be effective for the Federal government to implement "bright lines" for IHEs that would result in the loss of accreditation and the ability to participate in Federal student aid if they do not meet certain standards. She stated that data about graduation rates often do not accurately reflect the true composition of the student body and may lead to inaccurate conclusions about the success of an institution because it fails to capture the many ways that students can reach graduation. She continued that Federal "bright lines" cannot account for the significant differences between institutions, ranging from highly selective universities to community colleges with open admissions policies. She added that although she does not support Federal "bright lines," she believes accreditors can and must hold institutions accountable for student outcomes such as graduation rates. She said that student performance levels are compared to baseline levels in her region and that peer evaluation committees are expected to use this information as contextual reference points to inform their reviews of institutional cases for compliance. She stated that SACSCOC also requires institutions to develop quality-enhancement plans to improve student outcomes and success. She concluded by saying that SACSCOC works to improve institutions and to protect students, taxpayers and parents. [Wheelan's Full Testimony]

Dr. David Tandberg began by stating that the government's central role in society is the provision of the public good(s), which he described as the goods and services that advance the broader public interest and welfare, and where the benefits of the goods and services are open to all. He said that higher education acts as a public good in some ways but in other ways it falls short of the definition. He added that although higher education serves as a critical access point to upward mobility, it also serves to regenerate existing wealth, status and privilege. He said that he is convinced that the higher education system is incapable of fulfilling its mission to advance the public good without proper government support and oversight. He cited existing inefficiencies within the higher education system, such as low graduation rates, which he attributed to race and income-based inequalities within the higher education system and the stratification and unequal distribution of resources within and between IHEs. He said that these inequalities keep "entire segments of society" out of higher education because of factors independent of desire or talent. He added that low-income students or students of color tend to be stratified toward low-resourced institutions and are far more likely to enroll in for-profit institutions than their white or upper-income counterparts. He noted that outcomes for students enrolled in for-profit institutions are often significantly worse compared to students in other sectors.

Dr. Tandberg referred to HEA's accountability triad that includes accreditors, the Federal government and States, and which works to ensure that institutions meet certain standards regarding quality and capacity before being eligible for Federal financial aid. He explained that accreditors mainly rely on peer reviews to ensure that IHEs meet standards of institutional quality, that the Federal government has mainly been concerned with consumer protection and consumer information, and that State authorization serves as the first and foundational formal act of the establishment of an IHE. He said that authorization varies significantly by State. He added that States also engage in program approval functions, consumer information and protection functions, oversight and outcomes-based funding. He stated that the triad has helped



the higher education system function in a better manner and protect many students as well as taxpayer dollars, but that it must function better to serve the public interest fully. Tandberg concluded that each part of the triad should act as a quality-assurance mechanism and that the system will not appropriately serve underrepresented students if it is left to function by itself without proper oversight. [*Tandberg's Full Testimony*]

Dr. Adam Looney stated that while Federal loans and grants play a central role in financing valuable investments in education, not all IHEs and programs lead to success. He said that lending money to students to attend an institution with a demonstrated record of failure is harmful. He added that unpayable loans cost taxpayers and haunt borrowers for years. He continued that poor student outcomes are caused by low-quality institutions and programs and not by the students themselves. He stated that the Federal government has a responsibility to students, families and taxpayers to direct aid to IHEs with records of success and to limit the amount of funding that goes to poor-performing institutions. He said that Federal accountability policies were effective in the past at protecting students from harm and increasing the value of the investment that taxpayers make into the higher education system, but that they are no longer effective due to legislative and regulatory changes, expansions in Federal aid that fall outside of the accountability framework and the unintended consequences of borrower protections.

Dr. Looney added that Federal accountability policies should focus on student outcomes, such as an institution's repayment rate, which he said summarizes a complex series of smaller achievements like graduating and finding a job. He stated that this would be a better indicator of student success, institutional program quality and the return on Federal investment than the measures currently used. He continued that the repayment rate could serve as the basis for today's metrics such as the cohort default rate or Gainful Employment rule in which IHEs are assessed relative to a threshold and lose eligibility for poor performance. He added that the repayment rate could be used as a basis for risk-sharing models. He said the rules should apply broadly, including to parent and graduate borrowers.

He said that outcome-based measures would complement other accountability rules, including the 90-10 rule. He also stated that Congress and the public should see the data underlying repayment rates before drawing "bright lines," and that the government should consider how to improve accountability for institutions that receive Federal funds but that do not participate in loan programs. He said that limiting access to poor-quality programs does not limit access to college generally, but rather only limits access to poor-quality colleges. He concluded by stating that redirecting funds to IHEs that can help students climb the socio-economic ladder would provide better outcomes for both students and taxpayers. [Looney's Full Testimony]

Dr. Tressie McMillian Cottom began by stating that demand for fast, flexible credentials, which many for-profit colleges specialize in, is really about millions of people who, despite doing everything right, cannot find decent work that affords them housing, the means to educate their children, or the ability to care for aging parents. She said that when asked about how they feel about their for-profit colleges, her research respondents tell her that if their schools were so bad,



"the government would not pay for it." She stated that student loans have become a measure of institutional quality. She continued that for-profit college students are vulnerable to thinking that high cost equals high quality. She added that regulations need tools for institutional differentiation if the regulation is going to matter at all to quality and student outcomes. She mentioned that there are three such tools of note, which are part of the Protect Students Act, and which would better clarify the definitions of non-profit and public institutions, afford the Federal government the ability to offer robust review processes when for-profit colleges attempt to convert to non-profit or public colleges and strengthen and expand the incentivize compensation ban.

Dr. Cottom cited data that show that many students are unaware that they attend a for-profit college. She added that the labor market treats these students differently because they attended a for-profit college. She stated that the accountability triad must adopt clear definitions of institutional difference because institutional differences exist and impact students. She said that each actor of the triad must recognize and respond to new forms of for-profit colleges, including those that convert to non-profit status. She continued that without strict regulation, new forms of for-profit institutions and partnerships can denigrate the integrity of higher education. She said when an institution fails a student, whether by misrepresenting the legality of their degree program or when fiduciary mismanagement puts them out of business, the students do not blame their for-profit college, they blame the very idea of higher education. She concluded and said that if college becomes conflated with a scam in the minds of vulnerable students, it will be difficult to reorient them to future education. [Cottom's Full Testimony]

Question and Answer:

Sen. Alexander asked if the student achievement standard, which holds accreditors responsible for the colleges that they accredit, should be strengthened and made more specific. He also asked whether Congress gives SACSCOC and other accreditors jobs to do, in the accrediting process, that take away from time that could be spent on educational quality.

Dr. Wheelan replied that as long as accreditors working with institutions can determine what achievement levels are, it is fine to strengthen the student achievement standard. She said that when determinations are made outside the higher education system and people are not sure which factors are being considered (such as family life and hunger), it is difficult to set specific numeral targets because all circumstances would not be considered.

Sen. Alexander asked how Congress can signal that student achievement is important to accreditors and asked how to reduce the duties imposed on accreditors.

Dr. Wheelan said that in the past her agency focused on student access and that it now understands the importance of focusing on student success. She added that when looking at student achievement, institutions identify a variety of outcomes to measure. She said that relief on some of the substantive change requirements would be helpful to ensure that accreditors



can participate with IHEs that need help. She stated that otherwise, she has the flexibility to operate.

Sen. Alexander asked Wheelan if she has the flexibility to spend more time focusing on a forprofit college that may be in trouble than say, Harvard or Emory.

Dr. Wheelan said yes, her agency has that flexibility and that she utilized this flexibility to start the small colleges initiative which supports small schools in helping them individually to look at accrediting requirements and best practices.

Sen. Alexander followed-up and asked about institutions that consistently have quality trouble, compared to institutions that persistently do not have these problems. He asked Wheelan whether her agency can spend significantly less time on the successful school and more time on the not-successful school.

Dr. Wheelan replied that her agency is already spending time on those institutions. She added that her agency does have this flexibility, however.

Sen. Alexander asked Dr. Looney to summarize whether low-income students would be hurt or helped if schools were held accountable by the measurement of their students' loan repayment rates.

Dr. Looney replied that no service is done to low-income students by sending them to programs with demonstrated records of failure. He added that, yes, using measures of repayment would provide a stronger signal as to how students are faring after graduation and that it is more reflective whether they get a job and their earnings.

Sen. Alexander asked if measuring whether students are actually repaying their loans is a better metric than the cohort default rate.

Dr. Looney said that there are students today not paying loans, but also not defaulting. He said that institutions with better repayment rates have stronger student outcomes, so the repayment rate metric could be a good signal to students about which schools to stay away from.

Sen. Murray asked Dr. Tandberg to elaborate on what actions Congress can take to strengthen the role of States in evaluating quality and in providing adequate oversight, particularly for online programs.

Dr. Tandberg said that there is significant variation between States and that there are baseline items that ought to be looked at when States authorize or reauthorize an IHE. He stated that there should be a focus on quality outcomes; whether the IHE has the resources to meet these outcomes; existence of consumer requirements; and whether the IHEs have themselves employed recourses for students. He said that the Federal government should encourage the



behavior laid out above and that accreditors should be involved in the conversation, especially when accrediting distance education programs.

Sen. Murray referenced Dr. Looney's testimony which highlighted the need for institution-level measures in a Federal accountability system and particularly stated how a program-level metric must have an institution-level backstop. She asked him to explain the incentives that IHEs might face to manipulate metrics if only conducted at a program level.

Dr. Looney stated that for instance, students who have not enrolled in a program or who have not completed a program might not be captured by a program-level metric, which has been a problem with the Gainful Employment rule. He also said that there should not be a system where measurements are taken at the program-level and IHEs close their drama program and open a theatre program, for example. He added that there could be a system where no programs fail, but many students fail. He concluded that a program-level measure for completers with an institutional backstop would make sure schools are not "gaming the rules."

Sen. Murray asked Dr. Looney to elaborate on his comment that policymakers should better understand repayment rate data before drawing "bright lines."

Dr. Looney said that it is a changing time for how students repay their loans, with incomebased repayment plans and public service loan forgiveness (PSLF). He stated his concern for IHEs that have low repayment rates because they have students who are in graduate school or are working in public service jobs or are in the wrong repayment plan but provide a good education.

Sen. Mike Braun (R-IN) asked Dr. Wheelan whether people are paying enough attention to career and technical education (CTE) programs, one- and two-year degrees and better high school curriculums and if accreditors are focusing on the accountability of these programs.

Dr. Wheelan said of course and mentioned her region's focus on credentialing programs. She said that IHEs understand the need of getting people into the workforce but highlighted the importance of general education courses as well.

Sen. Braun said that four-year degrees are over-emphasized and sometimes produce unmarketable degrees that are not needed in the current labor market.

Dr. Wheelan added that she is seeing dual enrollment programs growing in CTE areas because IHEs on the college side have come to understand the significance of getting people into the workforce.

Dr. Tandberg said that he is working to help match student-level data systems with workforcelevel data systems to ensure that programs lead to outcomes that benefit students when they



graduate. He said that many short-term certificates lead to higher pay but that some are no better than a high school diploma.

Sen. Chris Murphy (D-CT) said that simplifying the accountability system to focus on performance for every student would stimulate innovation. He asked Dr. Tandberg whether requiring schools to meet a stronger performance standard would allow innovation to be protected and channeled appropriately to ensure that IHEs are preparing students for the workforce.

Dr. Tandberg agreed and said that measuring repayment rates rather than the cohort default rate would be a better accountability system. He said that specific and explicit accounting for underrepresented students must be included in any accountability system.

Sen. Murphy pushed back on the idea that accountability should be left to accreditors and IHEs themselves. He asked why there should not be one national metric for student achievement, to allow students to compare schools and their outcomes.

Dr. Wheelan said she is concerned with the level of a standard performance metric because all IHEs are not the same and all students are not the same. She said that if there was a 40 percent graduation rate baseline implemented, half of SACSCOC IHEs would lose their accreditation because that number does not account for students that take longer to finish their degrees. She emphasized that many students go to school part-time and therefore require more time for completion. She said that a "bright line" graduation rate would end up harming institutions that the baseline was originally intended to help.

Sen. Murphy noted the importance of this distinction.

Sen. Bill Cassidy (R-LA) mentioned the College Transparency Act and its potential to act as a fourth part of the triad as it will arm students with information on program level and institutional level outcomes. He asked the panel for their thoughts on this concept.

Dr. Looney said that this product is needed and that students have too little information on their likelihood of success. He said that there are programs and institutions that provide opportunities for everyone. He said that sometimes people make poor choices because they are poorly informed.

Sen. Cassidy asked Dr. Cottom to elaborate on how more information could support lowincome students in making sound decisions about where to attend higher education.

Dr. Cottom said that information is good, but not sufficient. She said that in a highly differentiated field, information symmetry could not quite overcome practical issues with higher education. She said that knowing default or repayment rates do not always explain complexities



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behind labor market discrimination affecting the ability to repay, for example. She said that it is critical that information is pegged to student characteristics.

Sen. Tim Kaine (D-VA) asked Dr. Cottom for her broader thoughts on how the committee should work to reauthorize HEA to get to the root of the problem of people being unable to find gainful employment and being willing to foot any cost to attend an IHE with hopes of finding better employment.

Dr. Cottom said that accountability at any point in time must account for the current system of higher education but also for the changes that are emerging. She said that this is most important for the most vulnerable students. She said that a risk-based assessment is important because students can afford to take on different amounts of risk when choosing to attend and IHE, based on who the student is and the type of IHE they attend. She said that students are attending the programs that will accept them and the institutions that fit into their busy lives with work and childcare. She explained that sometimes the practical nature of a school overrides the intent of accountability metrics from a students' point of view. She said that revisiting the 90-10 rule and reconsidering investment in certain schools are important to think about as well. She added that clear language to make comparisons among IHEs would be beneficial to students making decisions under pressure and quickly.

Sen. Kaine asked if the 90-10 rule should be adjusted with respect to veterans that are being poorly served by predatory marketing practices by for-profit colleges. He specifically asked if GI bill benefits should be required to count as part of the 90 percent allotment of Federal funds.

Dr. Looney said that the original 85-15 ratio protected students and taxpayers in those circumstances.

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Sen. Elizabeth Warren (D-MA) asked Dr. Cottom whether she has seen evidence that for-profit colleges broadly reduce inequality or help women or people of color get ahead in the economy and build wealth.

Dr. Cottom said that data can always show an individual that benefits from a certain program at a certain school. She continued that however, data in educational outcomes are not measured on the individual level when talking about inequality. She said that for-profits are only beneficial in increasing access. She said that access is supposed to further completion and mobility but noted that for-profit schools are particularly ineffective in these areas.

Sen. Warren asked what market incentives for-profit universities have to deliver a high-quality education at a low price.



Dr. Cottom said that there is a market incentive in that students can "vote with their feet" and attend different IHEs. She said this takes for granted that students have other choices and that "voting with feet" is not practical. She said that there are few incentives to keep prices low.

Sen. Warren stated that this process is backward as billions of dollars are funneled into poor quality schools and then the government asks for money back from students with no regard to whether they got a return on their investment.

Sen. Tina Smith (D-MN) asked if the accountability system does enough to protect students from institutions like Argosy that are at high risk of closing abruptly.

Dr. Cottom said no, and that there should be discussions about how easy it is to close a school. She said that some IHEs should be closed, but that if accountability is done correctly, institutions will be stable. She said when schools fail, there are economic and opportunity costs which have large consequences.

Sen. Smith asked what accountability should look like for institutions that have different organizational structures such as CTE colleges.

Dr. Looney added that there was a failure in accountability for Argosy because their students had a negative repayment rate after five years, but the IHE was accredited up until the day it closed.

Dr. Tandberg said that States are big players when it comes to IHEs. He said that with community colleges and public IHEs for example, there is a large regulatory, policy and accountability framework that does not exist for for-profit institutions. He said that there should be special Federal attention spent on for-profit universities because States are focusing on other types of schools.

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Sen. Maggie Hassan (D-NH) mentioned the for-profit schools that convert to not-for-profit status and that the conversion process does not consider student outcomes. She asked Dr. Cottom why increased oversight on the conversion process is important and why Federal distinctions between public, non-profit, private, and for-profit colleges are important.

Dr. Cottom said that guidance and a framework to talk about institutions differently and to make meaningful comparisons among them is critical. She said that language must be codified to allow students and advocacy groups to learn about which institutions invest in students' educations.

Sen. Hassan asked Dr. Cottom to explain her experience with predatory admissions practices and how expanding the incentive compensation ban to other student servicers and third-party contractors would better protect students and taxpayers.



Dr. Cottom said that the incentive ban should be implemented across entire institutions. She continued that her experience in a for-profit school included incentives that were both direct and indirect (such as through promotions) and that she was told she was a salesperson, not a counselor.

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Sen. Jacky Rosen (D-NV) asked what standardized tools should be applied to all colleges to ensure that schools are held accountable, especially for veterans and military students.

Dr. Tandberg said that reauthorization and authorization practices and procedures at the State level should be reevaluated.

Sen. Rosen asked what ED can do to ensure that veterans' information is not targeted or sold false promises.

Dr. Cottom said that all the proposals mentioned today would benefit veterans. She mentioned having clear differentiation among IHEs, being transparent with student borrowers, reevaluating 90-10, and focusing on who students are as individuals.

Sen. Rosen asked how the Federal government can level the playing field for Hispanic serving institutions that are hard pressed on graduation rates.

Dr. Tandberg stated that resources matter for outcomes. He continued that for Stateappropriations dependent institutions, resources lead to increased completion rates. He said that resources are unequally distributed across institutions and that people must look at what it truly costs to educate different types of students and that resources should follow the students.

Sen. Alexander asked what can be done to give more opportunity to first-generation, Pell grant eligible students to succeed in higher education. He mentioned universities that use coaches to work with students to help them reach completion and align their course of study to career. He asked in what ways the Federal government can encourage four- and two-year institutions and States to coach or mentor the students that need it.

Dr. Tandberg said that he is inspired by the College Equity Act and stated that it encourages innovation. He said that in many cases, colleges know what they need to do and are trying to do it, but sometimes do not have the resources. He said that resources need to be driven toward universities providing coaches and supports as such.

Sen. Alexander asked if grants would help schools doing this work.

Dr. Tandberg said yes.



Dr. Cottom said that success-coaches are empirically positive and effective in improving outcomes for first-generation students. She said that colleges are incentivized when there is a competitive structure for them to apply for much-needed funds to provide resources. She said that programs work best with sustainable infrastructure that is partnered with States. She added that TRIO services could be revisited to add to these resources.

Dr. Wheelan said that hunger, housing and childcare issues all contribute to why students do not graduate. She said that working students need wrap-around services to support them in school. She stated that additional financial incentives for institutions to provide these services would be beneficial.

Dr. Looney said that success is not measured well, but that the Federal government can help to define institutional success. He added that steering students away from low-quality programs would improve students' outcomes.

Sen. Alexander asked Dr. Tandberg what States can do to improve accountability and asked why States do not shut down for-profit schools when they have the authority to do so.

Dr. Tandberg said that States can do a better job of monitoring financial viability of institutions and can do a better job of requiring teach-out plans at the point of authorization and teach-out agreements when institutions are nearing potential closure. He said that some changes in legislation would need to be made to give States further authority to do what needs to be done.

Sen. Alexander said that as he thinks about strengthening the accountability triad, it is a good time for States to improve their practices either by leading by example or by forming a consortium of States to do so. He stated that for the Federal government to encourage these actions, a spotlight should be put on this type of behavior. He added that he is "leery of "bright lines" from Washington, as Dr. Wheelan would say, because they often produce unintended consequences".

