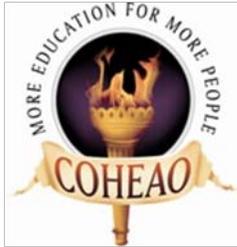


The



Torch

December 5, 2014

A bi-weekly report from the Coalition of Higher Education Assistance Organizations

COHEAO

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Attachments

- [**COHEAO Commercial Members**](#)
- [**COHEAO Board of Directors**](#)

COHEAO

Register Today for the COHEAO Annual Conference – Agenda Full of Important Topics

Registration is now available for the 2015 COHEAO Annual Conference—[sign up today!](#) Set for January 26-29 at the Ritz Carlton Pentagon City, just across the river from our nation’s capital, the COHEAO Annual Conference is one you won’t want to miss.

In addition to professional development and networking opportunities throughout the week, the COHEAO Annual Conference focuses on how Washington impacts those working on student financial services.

Multiple sessions will cover regulatory and legislative developments, and the conference provides attendees with the opportunity to visit Capitol Hill and advocate directly on issues affecting their office. New to visiting with your legislators? The COHEAO Annual Conference offers advocacy training and mentors to help guide you around the halls of Congress.

Though legislation and regulation are featured aspects of the conference, they are most definitely not the only focus. We will be posting the draft conference agenda in the coming days.

In addition to “Washington-based” sessions, the draft program currently includes sessions on:

- financial literacy
- cohort default management
- credit bureau reporting
- back office outsourcing
- the use of student workers, and more.

This is an incredibly affordable conference for multiple days of programming. For COHEAO institutional members, the rates are \$590 prior to January 7. For our commercial and organizational members, the rates are \$690. For non-members, the rates are \$690 for schools and \$1,540 for commercial organizations prior to January 7. After January 7, all rates increase by \$50.

The conference will be held at the Ritz-Carlton Pentagon City, a fabulous hotel in Arlington, VA, which is a very short metro or cab ride to Washington, DC. COHEAO has negotiated a special rate of \$228 per conference delegate, which is an outstanding rate in the DC area for any conference hotel. Space is limited, and conference attendees must register by January 7 to receive this rate, so reserve your room today.

To reserve your room at this special price, you may call 703-415-5000 and indicate you will be attending the COHEAO Annual Conference. A [website for hotel reservations is also available](#). The COHEAO group code is CEOCEOA

We will be providing further details in the coming days and weeks, but we urge you to go ahead and [sign up today](#) for the COHEAO Annual Conference. It is an event you will not want to miss.

December 11 COHEAO Webinar: Hot Legal Topics in Student Loans and Higher Education Collections

COHEAO is pleased to announce its latest webinar, "Hot Legal Topics in Student Loans and Higher Education Collections," which is scheduled for Thursday, December 11 from 2:00 PM-3:30 PM ET. [Sign up today!](#)

Chad Echols of The Echols Firm, LLC will offer his insights on bankruptcy and other issues in student loans and higher education collections. This is a webinar you will not want to miss, as Echols will review what makes an education related debt qualify as a "student loan" under the US Bankruptcy Code and what schools can do to further protect their debts from discharge. Chad's presentation will also cover other legal issues in collections of most interest to higher education professionals.

Please do not pass up this opportunity to learn more about legal issues impacting your campus or your clients. [Sign up today!](#)

Top News

ED Outlines Plans for Perkins Loans in AY 2015-2016

Speaking at this week's Education Department Federal Student Aid Conference, Lynn Mahaffie, Acting Assistant Secretary at the Department of Education's Office of Postsecondary Education (OPE), announced that institutions can make second disbursements of Perkins Loans for Academic Year 2015-2016 if the first disbursement is made before October 1, 2015. Mahaffie noted that unless Congress acts to extend the Perkins Loan Program, which Congress is considering, the Perkins Program expires at the end of the current federal fiscal year, September 30, 2015.

Mahaffie also indicated the Department is considering how it may be possible for continuing students who received Perkins Loans to receive loans in the future to help them complete their studies. She provided no other information on that aspect, but said that the Department will provide details in a Dear Colleague Letter they expect to publish by early January. The Perkins Loan Program is currently authorized through FY2015 via the Higher Education Act (HEA). Congress may extend the authorization of the program as soon as next year, which would render this guidance moot. However, Mahaffie's comments made clear that in the absence of Congressional action, schools will be able to award Perkins Loans at least for all of Academic Year 2015-2016, provided the first disbursement is made before October 1, 2015.

Congress

With Deadline to Avoid Shutdown Looming, Leadership Makes Push for "CROMINBUS"

The December 11th expiration date on the temporary bill that is funding the federal government is only days away and it is hard to measure any progress toward a compromise for the FY 2015 Federal budget, but most in the leadership are saying "no government shutdown" fairly often.

Despite that sentiment, House Speaker John Boehner (R-OH) recently sidestepped a direct question about how the Congress would respond to the President's Executive Action on immigration by saying, "All options are on the table." At the same time, it has been reported that the Speaker has spoken with

Minority Leader Nancy Pelosi (D-CA) about the Democratic votes needed to pass either an omnibus bill or a year-long continuing resolution.

The elephant in the room remains the cadre of very angry conservatives who want to punish the President for his immigration move and are still not certain how. They would like to defund the agency that oversees immigration—the Department of Homeland Security—but for the most part, fees that are paid by individuals pay for the immigration program. Boehner has floated the idea of passing a budget that funds everything for the rest of the fiscal year except Homeland Security, which would only receive funds through February or March, allowing more time for conservatives to come up with an effective “get even” scenario.

Even the White House and Majority Leader Harry Reid (D-NV) have hinted at agreeing to this if all else fails. Pelosi has not yet tipped her hand on whether or not she will produce a Democratic lifeline, hoping that the need for Democratic votes will mitigate some of the legislative riders that are being discussed for inclusion in the spending bill.

A new term has been coined to describe the legislative vehicle under development to find a way out of this budgetary crisis—Cromnibus. Get it? “CR” plus “Omnibus.”

Senate Appropriations Chair Barbara Mikulski (D-MD) says this hybrid spending bill will be ready in a day or so and her House counterpart, Chairman Hal Rogers (R-KY) agrees. It is unclear how the 12 appropriations bills will fall—either as negotiated parts of an omnibus or within a CR that resembles the FY 2014 bill, likely at a lower amount. The big question is how many Members will support the measure and what do the top appropriators mean when they refer to “a few outstanding items to be resolved by leadership” before the bill is ready for debate.

The 113th Congress is scheduled to adjourn next week. Absent a budget agreement—that President Obama will sign—all vacation plans go on hold and the lights remain on in the Nation’s Capitol.

White House & Administration

Mitchell Outlines ED’s Student Loan Priorities in Speech for FSA “Servicing Summit”

The Office of Federal Student Aid is holding its annual conference this week in Atlanta, including a “servicing summit” on student loans. To kick off the summit, Under Secretary Ted Mitchell gave a speech on the Department of Education’s efforts on student loans.

In reviewing the Department’s past, present, and future activities, Mitchell emphasized the Department’s efforts on financial literacy and FAFSA completion. Highlights from his prepared remarks on actions the Department is contemplating included below. Please note that Mitchell departed from his prepared remarks to emphasize initiatives on financial literacy and the FAFSA, he barely touched on loan servicing.

- *We are working with the First Lady's Reach Higher initiative engaging college counselors and working to promote FAFSA completion. Specifically, the Department has expanded the **FAFSA Completion Initiative** in which designated entities can receive information on the filing status of*

a student's FAFSA in order to encourage early FAFSA completion and more effectively counsel students during the college application process.

- *For both traditional and so called non traditional students, we regard the FAFSA as the beginning of a conversation about college going. Another thing that we are exploring right now is whether we can leverage the information a student provides on the FAFSA to proactively send them information about borrowing and selecting a college. Most first-time **FAFSA applicants** ask to have their FAFSA information sent to only one school and we know that, for many students, shopping around for college might provide a better option. By targeting information about college choice for these students, routing them to the College Navigator, for example, we might be able to improve outcomes.*
- *When students get to college, we know that **entrance counseling** provides important information about loan obligations. We are developing new guidance for institutions, through a Dear Colleague Letter, on strategies they might employ to improve their students' financial literacy and understanding of student debt. This guidance will clarify certain questions we have received concerning the flexibility institutions have when developing their Federal Direct Loan counseling policies.*
- *Which brings me to another important point I'd like to make - schools and institutions have a vital role in helping students understand and manage their finances, including student debt. My office has been working closely with the U.S. Department of Treasury on the Financial Literacy and Education Commission and the President's Advisory Council on **Financial Capability for Young Americans** to improve the financial capability of young Americans. A number of schools and institutions have already stepped up by providing financial literacy courses and integrating financial education into student life on campus. When these things are integrated, it can help set borrowers up to make more sound financial decisions as they relate to their student loans and other finances. Schools can also help smooth the handoff between in-school, grace, and repayment by letting students know that they have a student loan servicer, and to reinforce they idea that they should reach out and ask for help if they get in to trouble. One of our hopes for the day and beyond is to establish mechanisms for institutions to share best practices in this important set of activities.*
- *In addition to extending the President's **PAYE** plan, we are exploring the feasibility of creating a process whereby borrowers can authorize access to their future income information for the purposes of maintaining their IBR or PAYE enrollment. We are hearing that the current process is too cumbersome. Many borrowers may be failing to complete the annual recertification process and instead become delinquent, falling out of a program that was intended to avoid delinquency and default in the first place. There are a number of income sharing data and operational barriers to a process like this, but we are working with the Treasury Department to try to come up with a solution. It remains too early to tell whether we will be successful, but we are working hard on this.*
- *Significantly, we are also beginning our planning to conduct a new competitive procurement for loan servicing contracts. Just last week, on November 25th, FSA released a request for information seeking suggestions on how we can better manage our growing portfolio in a manner that will improve borrower outcomes. Given our extensive experience with the current multi-servicer, multi-system contract model, we are particularly interested in hearing about*

alternative approaches. One of things we are considering, for example, and that some here today have encouraged us to consider, is how servicers communicate with borrowers. Currently, Federal direct loan servicers are permitted to communicate with borrowers using their own corporate branding. We are considering moving away from that and more toward a DL branding strategy. I hope you will all take the time to share your thoughts with us through the RFI, in addition to other venues.

- We are also in the midst of recompeting our contracts with private collection agencies, and intend to improve the incentives in those contracts to lead to better borrower outcomes.
- Finally, we've heard from many of you that we need to update our complaint system at the Department, and I am proud to say that we will be establishing a **new system for consumer complaints**. However, we need your help. Over the next few months, I'd like to invite your comments and suggestions on the scope and development of this system. There are a number of policy questions to consider in establishing a new system. In creating the new system, we hope to:
 - Create a greater-level of transparency for customers and stakeholders;
 - Make it simple and easy to use for customers;
 - Identify trends to drive service improvements across the entire lifecycle; and,
 - Enhance metrics to better assist with vendor comparison and oversight.

Mitchell's prepared remarks are available online: <http://goo.gl/pfFb4P>

FSA Conference Features Many Presentations of Interest for Student Loan Professionals

In addition to the news on Perkins Loans, many of the presentations at this week's FSA conference are of interest to the broader student loan community. At a "servicing summit" FSA convened in conjunction with the conference, the Department released the most comprehensive performance information to date on the federal loan portfolio.

We highly recommend readers examine this data for themselves. The presentations, including those covering defaulted collections, servicer oversight, and outreach to borrowers are [available online](#). Below are some initial thoughts and figures on the "[Portfolio Overview](#)" and "[Income Driven Repayment](#)" presentations, which offer new data on loan repayment.

- **The Basics:** Federal loans outstanding now top \$1.1 trillion. There are now \$727 billion in Direct Loans and \$395 FFELP loans outstanding.
- **Delinquencies and Default:** Thirty-eight percent of Direct Loans are in active repayment, 27 percent are still in school, and eight percent are in default. Eight percent are in the grace period, 11 percent are in deferment, and eight percent in forbearance. The remaining FFELP portfolio obviously has many fewer loans for borrowers in school. Fifty-seven percent of FFELP borrowers are in active repayment, 21 percent are in default, nine percent in forbearance, and eight percent are in deferment.

In dollar terms, 48 percent of federal loans (\$539 billion) are in active repayment, 16 percent (\$159 billion) are in-school, and five percent (\$53 billion) are in the grace period. Nine percent

of all federal loans outstanding (\$103 billion) are in default, with 12 percent (\$132 billion) in deferment and nine percent (\$125 billion) are in forbearance.

- Income Driven Repayment: Seventeen percent of Direct Loans are an income-related repayment plan, meaning ICR, IBR, or PAYE. The Department intends to enter into negotiated rulemaking with affected stakeholders to move all loans in income-related plans to the more generous terms of PAYE—10 percent of discretionary income and 20 years of repayment prior to forgiveness.

\$132.8 billion of the \$463 billion in the Direct Loan portfolio in active repayment, or 30.4 percent, is an income-related plan. The Department also highlighted dramatic increases in the past year in IBR and PAYE enrollment, noting the standard repayment option decreased for the first time in the most recent quarter.

The average balance for Direct Loans in IBR is \$55,433 and \$38,275 for PAYE. Eighty-four percent of borrowers continue to receive partial financial hardship (PFH), or reduced payments from the 10-year plan, two years into repayment. Forty-eight percent of Grad PLUS loans and 47 percent of consolidation loans are in an income-related plan.

Second White House College Opportunity Day of Action Summit

Yesterday, more than 300 college presidents, foundation heads, & nonprofit executives attended the second White House College Opportunity Day of Action Summit to discuss ideas to expand college access and completion. While the first summit in January's big emphasis was on college access, the recent event brought together a broader range of college leaders, precollege educators, and organizations to focus in on college completion and collaborations, both among colleges and between pre-college and higher education.

With nearly twice as many participants as the previous summit, attendees listened to panels on innovation and collaboration, participated in breakout sessions, and heard speeches from leaders including President Obama, the First Lady, and the Vice President. Attendees indicated they saw some promising ideas, but a general wariness of the Administration's plans that exists within the higher education community permeated the event.

There were more than 600 pledges made to increase the number of college graduates, improve college readiness, better support school counselors, and strengthen STEM education. The Administration revealed that it would dedicate \$10 million over the next five years to expand research on successful college completion strategies.

One area of major emphasis throughout the summit was on data and technology. Speakers discussed ways institutions could use data to meet some of the goals of the summit and highlighted current successful examples of data integration. Although currently banned under federal law, the notion of a student unit record system was brought up as a way for leaders to use data to identify successful practices.

At an event so focused on college access and completion, it seemed impossible to avoid the topic of the cost of college. However, no one addressed the subject as bluntly as Vice President Biden, who called out the leaders of universities on tuition prices and excessive spending.

The summit comes as President Obama prepares to release his controversial college-ratings plan. On Thursday, the Administration also released a progress report on the status of the pledges taken during January's College Opportunity Summit.

To view the President and First Lady's Call to Action on College Opportunity, see: <http://goo.gl/BBeBdO>

To view the list of Commitments to Action on College Opportunity, see: <http://goo.gl/C6A0Bd>

To view the Progress Report on January Commitments, see: <http://goo.gl/D9YypK>

ED Releases Teacher Prep Regulations

On November 25, the Department of Education (ED) released a Notice of Proposed Rulemaking (NPRM) to strengthen teacher preparation programs. The announcement followed news from ED and the White House earlier this year that the agency intended to revive the regulatory package that had been abandoned in 2012.

The community has been expecting the package since this summer. As a reminder, the 2012 rulemaking on teacher preparation programs was required as a result of the enactment of the Higher Education and Opportunity Act of 2008 and the creation of the Teacher Education Assistance for College and Higher Education (TEACH) Grant program, which gives grant aid to students studying to be teachers who agree to teach certain high-need subjects in certain hard-to-staff schools.

The 2012 proposed rule sought to define a "high-quality program" in the TEACH grant statute. ED's proposal essentially required every state to rate its teacher preparation programs and allow only those with the highest rating to be considered high-quality, and thus eligible to offer TEACH grants. In the package, the state-mandated ratings would be based on four indicators: (1) surveys of principals who hire the graduates, (2) surveys of graduates of the program, (3) placement and retention rate of graduates, and (4) value-added scores of students taught by the graduates. Along with the indicators for each teacher preparation program, a State must rate each program based on four tiers: low performing; at-risk; effective; or exceptional. Teacher preparation programs rated below effective for two of the three previous years will be unable to offer TEACH grants to their students.

However, programs in science, technology, engineering and math (STEM) with a certificate component will not be held accountable to the same rating system and can continue to offer grants as long as 60 percent of recipients successfully complete one year of teaching within three years of finishing their programs. All ratings and reports are required to be posted on a state report card that must be uploaded to the institution's website to increase program transparency.

The K-12 and higher education communities are working together on responses to the proposal, with some groups issuing single statements of concern or opposition and others waiting to decide how and whether to respond. The American Association of Colleges of Teacher Education represents a constituency significantly affected by the proposal and will certainly be conveying concerns of teacher educators. Interested parties have an open comment period of 60 days to respond to the proposed regulations. Final regulations are scheduled to be announced in September 2015 with a pilot year beginning in spring of 2018 and full implementation by April of 2020.

For the official NPRM for teacher preparation programs, go to: <http://www.gpo.gov/fdsys/pkg/FR-2014-12-03/html/2014-28218.htm>. For more information and additional resources from ED, go to: <http://www.ed.gov/teacherprep>.

Industry

NYU and Microsoft discuss Student Privacy in Higher Education

On Tuesday, New York University's (NYU) Information Law Institute and the Microsoft Innovation & Policy Center hosted an event, "Symposium on Student Privacy in Higher Education: Building Privacy into Data-Driven Education." Providing the keynote address, Kathleen Styles, Chief Privacy Officer at the U.S. Department of Education, discussed the many ways that institutions gather student data and its variable uses that included: holding colleges and universities accountable for the value of a degree; maintaining student success systems to promote rates of retention; and as mechanisms to identify potential civil rights issues. Styles noted that students participating in Massive Open Online Courses (MOOCs) are not protected under the Family Educational Rights and Privacy Act (FERPA), though several MOOC providers have claimed to adhere to FERPA privacy policies on principle.

Helen Nissenbaum, director of the Information Law Institute at NYU, emphasized privacy as an issue of contextual integrity, stating that privacy concerns center not on control of secrecy, but on appropriate flow. Nissenbaum cited a few examples of privacy issues that are less technologically centered, such as the obligation of a librarian not to disclose the borrowing habits of one patron to another or the responsibility of a priest to keep a parishioners' confessions in confidence. Nissenbaum further argued the imperative nature of context, especially significant in light of MOOC providers positioning themselves as bastions of education rather than traditional businesses.

Panelist Khaliah Barnes, director of Electronic Privacy Information Center (EPIC) Student Privacy Project, discussed the tenets of her organization's student information bill of rights, which includes the ability to access and amend data that may be incorrect, heightened respect for context of given information and increased accountability for schools that violate FERPA regulations. EPIC published the student information bill of rights with the intent to frame policy priorities.

For more information on data privacy from EPIC, go to: <https://epic.org/2014/12/symposium-on-student-privacy-i.html>.

Complete College America Release New Report on "Four-Year Myth"

A new report from Complete College America shows that students at American public colleges are not graduating within the anticipated two years for associates degrees or four years for bachelors degrees. The report states that at most public universities only 19 percent of full-time students earn a bachelors degree in four years and that only 50 of more than 580 public institutions graduate a majority of their full-time students on time.

Extended time to graduate has become the status quo, with even the federal government and most two- and four-year colleges establishing benchmarks of six years to earn a bachelors degree and three for an associates. The report points to several reasons as to why students are staying in school for longer periods of time, including excessive credit requirements, too many course options and not enough guidance, inability to register for required courses, credit loss in transfer, and failed remediation sequences.

Longer paths to completion are costing students and their parents billions of extra dollars. The report found that student borrowers who do not graduate on time take on far more debt in their extra years-\$15,933 more in cost of attendance for every extra year of a public two-year college and \$22,826 for every extra year at a public college.

One of Complete College America's solutions to this trend is Guided Pathways to Success, or GPS, where every major is organized into a prescribed pathway of sequenced courses that allow students to graduate in two or four years. Critics of the report argue the GPS plan would place too many limits on students and note that many non-traditional students may be overwhelmed by a 15-hour+ course load.

To see the full report: <http://completecollege.org/wp-content/uploads/2014/11/4-Year-Myth.pdf>

New CAP Analysis Points to Decreasing State Spending as Culprit for Student Debt

On Wednesday, the Center for American Progress (CAP) released an issue brief that surveyed the students attending public institutions increased reliance on loans and provided state-by-state data on the rise of federal student borrowing since the start of the Great Recession.

The report drew on data gathered in another recent CAP publication, "A Great Recession, A Great Retreat," which showed decreasing state investments after the recession. At the same time, there was a 13.7% increase in enrollment at public colleges during the Great Recession. Consequently, so these cuts were more pronounced when measured on a per-student basis, with 44 of 50 states' governments decreasing their direct support of public colleges between FY 2008 and FY 2012.

Public institutions increased their reliance on tuition revenue to make up for funding cuts, in turn causing schools to become more unaffordable. According to the brief, "looking just at the students who borrowed federal student loans, the average amount borrowed each year increased by 42 percent over the period examined."

The brief compares data on the spike in federal student loans from 50 states, and found that annual federal student loan borrowing had increased by 54.6 percent from 2007-2008 to 2011-2012. CAP concluded that yearly federal student-loan borrowing at public institutions increased in all 50 states with varying magnitude. For example, yearly borrowing increased in North Dakota by only 19.6% while Utah saw borrowing increase by 102%.

Since student enrollment in public institutions of higher education increased, it is more appropriate to examine the change in per-student borrowing. In those terms, the median increase in annual borrowing was \$1,285 per student. States with the largest decreases in higher education spending since the onset of the Great Recession saw the greatest increase in student borrowing.

The "Public College Quality Compact" proposal is CAP's solution to this dilemma, which would create a direct tie between federal and state investments and encourage states to reinvest in public institutions of higher education. The compact would require states to:

- **Create reliable new streams of college funding.** *These new streams would need to provide at least as much as the maximum Pell Grant per student in indirect and direct support to public colleges and universities. Doing so would ensure that students and prospective students can prepare for and enroll in postsecondary education with certainty.*
- **Make college affordable.** *States should guarantee grant aid to cover enrollment at public institutions earmarked for low-income students who pursue an associate's or bachelor's degree.*
- **Improve institution and student performance.** *States must set outcome goals for institutions, such as increased graduation rates and the implementation of proven, successful strategies that improve student performance. Some of these proven strategies include learning communities*

that promote student engagement or summer bridge programs to put students on a path to academic success.

- **Remove barriers to degree attainment.** *State and institutional practices and policies that stand in the way of college completion should be eliminated. This can be accomplished in part by standardizing transfer-credit and admissions requirements and by raising K-12 learning standards to align with readiness for postsecondary entry-level courses.*

The Center for American Progress brief can be found here: <http://goo.gl/WXWdOD>

Hechinger Report Claims Colleges Pursuing Merit Aid at Expense of Low-Income Students and Families

As institutions compete against one another for income and prestige, they are focusing their financial aid towards merit, says the Hechinger Report in a newly released briefing. Schools' net prices- after discounts and financial aid- that they are charging their lowest-income students are rising faster on average than the net prices they're charging higher-income ones.

This trend includes the 100 higher-education institutions whose leaders made pledges to increase affordability for lower-income students while attending a White House "Improving College Opportunity" summit in January. In fact, according to the analysis by *The Dallas Morning News* and *The Hechinger Report*, the private universities in this group collectively raised the net price of what the poorest families pay by 10 percent, compared to 5 percent for higher income students.

Moreover, nearly a third of the White House pledge schools increased the actual dollar amount of their net prices more quickly for their lowest-income than their higher-income students. It is important to remember that students from lower-income backgrounds are still paying less than their higher-income peers, but their net prices are rising faster on a percentage basis than the net prices charged to their more affluent classmates.

However, there is debate among universities on how to calculate net prices, with many deciding to use their own calculations instead of the federal formula. These universities claim that because they are using their own formulas, the newly released federal data is skewed and showing a much higher percentage increase in net price than in actuality.

Some blame the situation on institutions' increased reliance on tuition and misaligned incentives. Richard Kahlenberg, senior fellow at The Century Foundation, stated, "There are powerful incentives for universities to avoid admitting and enrolling low-income students. The way that universities compete is on prestige and on the U.S. News & World Report rankings, and you get no credit for having a generous financial aid program that brings in more low-income students."

Kahlenberg posited that universities are giving merit aid to students who do not need it financially, and less financial aid to those who do. In response, some colleges argue that wealthier students whose families can afford to pay at least some of the tuition after merit scholarship actually help to subsidize financial aid for their lower-income classmates.

The Hechinger Report article can be found here: http://hechingerreport.org/content/colleges-continue-put-burden-price-hikes-poorest-new-figures-show_18230/

**COHEAO Would Like to Thank Our Commercial Members for Supporting
More Education for More People**



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Account Control Technology, Inc.	Key2 Recovery
ACSI, Inc.	Immediate Credit Recovery, Inc.
AMO Recoveries, Inc	National Credit Management
Automated Collection Systems, Inc.	National Enterprise Systems, Inc.
Campus Partners	National Recoveries
Ceannate, Inc.	NCC Business Services of America
Client Services, Inc.	NCO Financial Systems, Inc.
Coast Professional	Penn Credit Corp.
ConServe	Premiere Credit
Credit Adjustments, Inc.	Progressive Financial Services, Inc.
Credit World Services, Inc.	Recovery Management Services, Inc.
Delta Management Associates	Regional Adjustment Bureau, Inc.
Educational Computer Systems, Inc.	Reliant Capital Solutions, LLC
EOS-CCA	Security Credit Systems, Inc.
Enterprise Recovery Systems, Inc.	Todd, Bremer & Lawson, Inc.
General Revenue Corporation	Xerox, Inc.
Higher One	Williams & Fudge, Inc.
iGrad	Windham Professionals

