



Federal Issues Committee Joint Position Summary - March 2013

Ability to Benefit (ATB)

CASFAA and CCCSFAAA support reinstating the ATB tests and/or the 6 degree-applicable units rule as a way for students who do not possess a high school diploma or its equivalent to establish eligibility for financial aid. If the current ATB tests are deemed unsuitable, alternate assessments should be standardized as a measure of college readiness. Blocking access to higher education for those attempting to retrain and re-enter the workforce seems contrary to the Administration's higher education initiatives, particularly at the community colleges that are recognized as key training centers for reinvigorating the economy. This is a high need population seeking to improve their life state and contribution to society. Data from the initial ATB Experimental Initiatives concluded that there was little risk to federal dollars due to current Satisfactory Academic Progress regulations. Please see the attached documentation for additional information on this needy group.

Student Loan Borrowing

Student loan debt is of concern to both CASFAA and CCCSFAAA. We support the ability for institutions to award lower loan amounts, such as addressing direct institutional costs, to help curb student loan indebtedness. This would allow institutions to better assist students in addressing their cost of attendance needs through the completion of their educational program. Current regulation permits students to request annual loan maximums, without regard to actual direct and indirect costs. Giving institutions flexibility in relationship to their actual costs and student demographics is an important tool for reducing student loan indebtedness. As schools are held accountable for default rates, we need to have the ability to address this at the beginning of borrowing. The proposed 150% program limit on subsidized loans is another positive way to encourage college completion and limit borrowing, though we are concerned that the tracking of such a limit may prove to be overly burdensome.

Gainful Employment

While CASFAA and CCCSFAAA understand and support the desire to maintain the Academic Integrity of higher education institutions, the current regulations and reporting requirements are not the solution. The complexity of these regulations – from identifying a Gainful Employment Program to compiling often incomplete data – results in inconclusive information. While dozens of additional clarifications have been made, questions remain. Because of the transient nature of students in both in-person and on-line academic environments, regional statistics do not provide a true picture of employment availability or capability. Instead, we suggest new legislation allowing the use of already compiled Federal and/or State employment categories with corresponding salary ranges. This existing data, in combination with measured academic knowledge, skills, and experience, can be used as indicators towards future success.

Questions or Need Additional Information? Please contact Melissa Moser, CASFAA President, at mmoser@mail.cccd.edu, Daniel Reed, CASFAA Federal Issues Chair at dreed@pointloma.edu, Margie Carrington, CCCSFAAA President, at carringtonm@smccd.edu, or Linda Williams, CCCSFAAA Federal Issues Chair at lwilliams@sierracollege.edu.

*Adopted by the CASFAA and CCCSFAAA Executive Councils and Federal Issues Committees
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