April 16, 2021

Dear Secretary Cardona:

The Today’s Students Coalition is a cross-cutting group of 30 policy, advocacy, and membership organizations who have joined forces to push for urgently-needed policy changes that will better serve today’s postsecondary students. The Coalition is forging new consensus across a diverse group of organizations focused on the needs of working adults, student parents, veterans, first-generation students and the professionals on campus who support them. We are thankful for the opportunity to share our thoughts with the incoming administration on steps to take both through administrative action and with Congress to improve equity in postsecondary education for today’s students.

Today’s students—of whom 34 percent are older than 25, a quarter are parents, 60 percent work while in college, and of whom 15 percent are Black, 20 percent are Hispanic, and 6 percent are Asian—lost more than access to lecture halls because of the coronavirus pandemic. They lost access to stable and secure housing, affordable and nutritious meals, on-campus child care, WiFi and connected devices, and other supports that enable them to succeed in postsecondary education. Recent reports of enrollment and persistence declines are troubling, especially at a time when higher education should remain an engine of economic growth and a steady connection to in-demand, high-wage jobs.

The Department of Education (ED) has important and urgent opportunities to make substantial changes to benefit today’s students, both immediately through regulatory actions and in the longer-term through partnership with other agencies and Congress. The Today’s Students Coalition believes that the policy recommendations below will change the course of higher education for today’s students. We look forward to assisting you as you work to make meaningful improvements for today’s students.

Immediate administrative actions

*Critical actions your administration can take to have a positive impact for today’s students.*

**Restore key data on the College Scorecard**

As today’s students begin to make decisions about where to attend college and which program to choose, ED’s College Scorecard can be an instrumental tool to compare colleges and universities and better understand what institutions might be right for them. The comprehensive data in the Scorecard provides students with an accessible snapshot of a college’s outcomes across numerous important metrics—like the graduation rate, cost of attendance, and
post-completion earnings. The Department should continue efforts to improve and provide greater contextualization of the data. In particular, the Today’s Students Coalition supports restoring key data measures that allowed for more nuanced views of institutions. Such data should include national medians for outcomes like graduation rates and loan repayment rates, as well as the percentage of graduates earning more than the median of adults with only a high school diploma.

Ensure all students are eligible for emergency aid
Emergency student aid has been a crucial support as students have navigated challenges related to the coronavirus pandemic. Even prior to the pandemic, however, millions of students were only an unexpected medical bill or car breakdown away from dropping out of college. Congress recently authorized an additional round of funds for the Higher Education Emergency Relief Fund (HEERF) to be used toward emergency aid. These funds are also more inclusive, opening opportunity to receive support regardless of predetermined Title IV eligibility. As such, the funds should be distributed to students without undue delays and ED should ensure that aid is not withheld based on arbitrary restrictions or requirements.

 Seamlessly verify Pell Grant receipts for FCC emergency broadband benefit
The shift to remote instruction due to the coronavirus pandemic has highlighted striking gaps in access to reliable and high-speed internet connection among today’s students. Many of today’s students face challenges with broadband access to complete coursework and affording high-speed internet when broadband is available. The Emergency Broadband Benefit (EBB) created in the Consolidated Appropriations Act of 2021 includes students who have received a Pell Grant in the eligibility categories. As the FCC implements this new program, ED should enter into discussions with the FCC on how to use a computer matching agreement to seamlessly verify that a student has received a Pell Grant in a current award year and promote awareness of the benefit so students can quickly and easily access the EBB.

Legislative solutions through partnership with Congress

Ensure that Pell Grants meet the needs of today’s students
The Pell Grant has opened the door to a college degree for millions of students. Pell provides low-income students with the financial support they need to pay for and be successful in postsecondary education. However, the financial assistance Pell provides has not kept pace with the rising costs of college. The current maximum Pell Grant only covers about 30 percent of average college costs and this amount changes very little year-to-year. To better fulfill its aim of increasing college access, Congress should double the maximum Pell Grant amount that eligible students can receive and index the maximum grant amount to the rate of inflation so that its purchasing power remains high enough to cover a majority of college costs.

Create Robust Student Supports
Today’s students require policies that support their needs, both inside and outside the classroom.
Provide permanent funding for improved broadband access for today’s students
Broadband and internet-connected devices are essential to student success and ensuring access for students who lack them must be prioritized. Low-income students; Black, Latinx, Indigenous, and students of color; and rural students report significant gaps in broadband access. While the Emergency Broadband Benefit is a good first step, Congress should provide permanent funding to colleges and universities to allow them to provide high-speed internet service and internet-connected devices to students in need. This funding should prioritize institutions that largely enroll historically underserved students.

Create a permanent emergency aid structure
Today’s students face numerous challenges outside of the classroom that can make success in the classroom more difficult. From health care to transportation, students must find ways to meet everyday needs while pursuing postsecondary education. Unexpected costs and emergencies can often derail students’ plans and ability to complete coursework. To help students when these issues arise, states and individual institutions have increasingly begun to offer emergency aid to students in need, aided by federal funds through the HEERF. A permanent emergency aid program would build off of these initiatives to make this critical funding available to more students, and awareness of eligibility and access to information would be essential components of such a program.

Make a transformative investment in CCAMPIS to meet the needs of today’s student parents
To successfully pursue postsecondary education, today’s student parents need access to affordable child care. Nearly one in four students has children, with women and students of color making up a disproportionate share of student parents. Accessible and affordable child care for student parents would allow them to more readily juggle raising kids while attending class and completing school work. The program gives colleges money to assist low-income students with child care costs, but current funding only serves about one percent of those who could benefit from the program. To assist student parents with child care costs, Congress should increase appropriations to the Child Care Access Means Parents in School (CCAMPIS) program to $500 million in order to significantly increase its reach and ease the challenges of child care for a greater number of student parents.

Make federal student aid work for returning adult students
Too often, adults wishing to return to college to complete or start a postsecondary program run into administrative hurdles to re-enrolling. Eligibility for federal financial aid requires students to maintain Satisfactory Academic Progress (SAP)—but if a student fails SAP, this requirement can exclude returning students from accessing financial aid their first semester back or discourage re-enrollment altogether. Further, even if a returning student is eligible for financial aid, they could be denied access to the Pell Grant if they previously used the maximum number—the Pell Lifetime Eligibility Usage (LEU)—allowed by the federal government. Congress should reset SAP requirements and Pell Lifetime Eligibility Usage limits for returning students. These changes would remove barriers resulting from returning students’ previous academic
experience and give them a clean slate from which to restart their postsecondary journey on the path to completing their degree or credential.

**Student-level data network**
Accurate, complete, and transparent data about student outcomes is critical to help students choose the right postsecondary path for them. Currently, the effectiveness of federal student data is limited and gives students, administrators, and policymakers an incomplete picture of institutional outcomes like student progress, graduation rates, and post-completion earnings. Congress could improve data transparency by implementing a student-level data network (SLDN). A federal SLDN would allow for better data-informed decision-making about higher education choices and policy priorities for today’s students and their families.

**Connect Learning Opportunities:**
*Today’s students require flexible learning opportunities and connected pathways to and through education and employment.*

**Promote flexible learner pathways**
Today’s students face many challenges in accessing and succeeding in postsecondary education. To ensure all students have the opportunity to obtain a postsecondary credential that is valued by employers, federal policymakers and institutions must build accelerated and efficient pathways that provide all learners, especially members of underserved and underrepresented populations, with opportunities to acquire skills and credentials that are valued in the labor market. This means offering flexible learning schedules; multiple entry points to ensure access for all learners; evidence-based approaches to accelerating completion—such as concurrent and prior learning approaches, competency-based education models, prior learning assessments, apprenticeships, and dual enrollment; skills development and certificate programs that meet labor market demand; and counseling and wraparound supports.

**Incentivize partnerships between educators, community organizations, and local businesses.**
The pandemic brought certain industries to a halt while dramatically increasing demand for workers trained with specific skills in pandemic response industries. Industry recovery will be similarly uneven and will vary sector by sector. Industry partnerships are an evidence-based training strategy that center business demand and worker need by helping local stakeholders efficiently leverage public funding, share information and best practices, and better serve workers and employers. Eighty-eight percent of voters want public investment in these critical partnerships, but currently there is no federal investment to support them. Congress should invest in industry partnerships as part of any response to the current crisis.

Thank you for your consideration of these policy priorities. The Today’s Students Coalition looks forward to working with you and your colleagues at the Department of Education to pursue these important reforms for today’s students.
Sincerely,

The Today’s Students Coalition

Association of Big Ten Students
Higher Learning Advocates
Jobs for the Future
NASPA - Student Affairs Administrators in Higher Education
National College Attainment Network
National Skills Coalition
Student Veterans of America
UPCEA
Veterans Education Success
Young Invincibles
Advance Vermont
American Association of University Women (AAUW)
Center for First-generation Student Success
Cornell Student Assembly
Institute for Higher Education Policy (IHEP)
Student Basic Needs Coalition
The Association of Young Americans
University of California Student Association
U.S. Public Interest Research Group