



National Association for
College Admission Counseling

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February 8, 2019

The Honorable Doug Jones
United States Senate
326 Russell Senate Office Building
Washington, DC 20002

The Honorable Elizabeth Warren
United States Senate
317 Hart Senate Office Building
Washington, DC 20510

The Honorable Kamala Harris
United States Senate
112 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Catherine Cortez Masto
United States Senate
204 Russell Senate Office Building
Washington DC 20510

Dear Senators Jones, Warren, Harris and Cortez Masto:

On behalf of the National Association for College Admission Counseling, thank you for the opportunity to provide our insight in to how to address racial disparities in student debt and the broader challenges faced by students of color in college and career training.

Founded in 1937, NACAC is an association of more than 15,000 members, including school counselors and college admission staff, who work with students making the transition from high school to postsecondary education (“college”). NACAC is committed to maintaining professional standards that foster ethical and social responsibility among those involved in the college application and enrollment process, as outlined in the NACAC’s SPGP: Code of Ethics and Professional Practices, which may be accessed on our [website](#). Through our

advocacy efforts, we are also dedicated to ensuring that all students have access to high quality school counseling to help them make informed decisions as they prepare for and pursue college or career.

Throughout NACAC's history, we have strongly advocated on behalf of underrepresented students. Many of our policy positions would help address your concerns. For example, we strongly support legislation that would help reduce the student to counselor ratio, which currently averages 1:464. The American School Counselor Association (ASCA) and NACAC support a ratio of 1:250, which would allow students to effectively work with their counselors to navigate the college search, application and financial aid process. Recent data from the Education Trust and ASCA illustrate that students of color, particularly in low-income settings, stand to benefit the most from strong counseling, but attend schools with the fewest counselors. Adequate training is also key to counselors' success. To this end, NACAC would support legislation and/or policies that help ensure that counselors are trained in all aspects of post-secondary counseling, including the viability of community colleges, the college search and application process and paying for college (which our own surveys suggest is where counselors feel least prepared to advise students and families).

We also urge Congress to continue to support and protect GEAR UP and TRIO programs that increase preparation for and access to postsecondary education for low-income students. These programs have proven to help students succeed but, unfortunately, the demand for them far outpaces supply and thousands of students are unable to benefit from them.

NACAC supports adequate funding for need-based financial aid, including the Pell Grant program, a critical foundation to increasing access to postsecondary education for students most in need. For far too many students, especially low-income and minority students, the opportunity to attend a post-secondary institution is cost prohibitive and unfortunately the maximum Pell Grant is losing purchasing power as it has failed to keep up with the rising costs of college. We believe that the shift in federal student aid policy from need-based grants to self-funded student loans over the life of the Higher Education Act (HEA) has had a disproportionately negative effect on low-income and minority students, further pricing them out of postsecondary education. We urge Congress to revisit the founding purpose of the federal student aid programs, and consider rededicating the Pell grant program with an objective of covering the full cost of a public, four-year college education, while de-emphasizing student loans for low-income students.

Similarly, the Work Study program is also a critical support designed to help students afford college costs, but demand far outstrips supply. Congress should increase funding for this important program. If Congress invests in federal financial aid programs, students benefiting from these programs will be able to attend college and graduate with little or no debt.



We support policies that promote transparent and improved financial aid and student loan counseling so that students are made aware of their full eligibility for federal student aid and are encouraged to exhaust these funds before turning to private student loans, which are riskier, more expensive, and contain few consumer protections. While financial aid counseling is required when a student enrolls in a college, it may be worth requiring additional counseling throughout the student's time on campus, offering counseling in smaller segments (rather than one long session) and/or in multiple languages, given English may be a second language for many first-generation students.

We also support improving the quality and content of financial aid award letters. In partnership with the National Student Financial Aid Administrators (NASFAA), we believe that colleges and universities can do a better job explaining the financial aid the student has been provided, including developing standard definitions of terms and using consistent terminology. These efforts should be consumer tested to ensure they achieve the intended results.

As long as federal student aid policy is dominated by borrowing, Income-Driven Repayment plans (IDR) are a lifeline for many low-income students. We encourage Congress to continue its commitment to these policies, and to closely monitor implementation by the Department of Education. One challenge that professionals and the students they advise face is that they are unaware of the availability of these plans. We would encourage Congress to provide targeted funding to the Department of Education for dissemination and outreach to the neediest students, schools, and districts, to make them aware of how IDR plans can open the doors to postsecondary education without unduly burdening students who are already at significant financial risk.

Similarly, the Public Service Loan Forgiveness program, which forgives federal financial aid loans after 10 years of qualified payments, has been a welcome addition to IBR. However, its implementation, especially as some borrowers are nearing 10 years of qualified payments, has been inconsistent. In the fiscal year 2019 Continuing Appropriations Act, Congress took steps to address the program's shortcoming, but we encourage Congress to strengthen the program so that individuals who pursue public service careers are not penalized when they act in good faith to comply with the terms of the program.

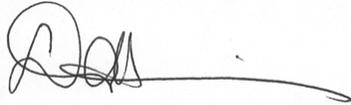
NACAC also believes that an informed consumer is an effective consumer and if students have access to current and accurate information, s/he will most likely earn a degree or certificate that will lead to lower debt. To this end, we encourage a strong commitment to program integrity statutes and regulations intended to protect students from unscrupulous colleges. For the past decade, and throughout the history of federal efforts to provide assistance to students seeking postsecondary education, unscrupulous institutions—many in the for-profit sector—have preyed



on students who are vulnerable to misleading, overly-aggressive sales tactics. The result, which has been repeated time and again over the past 70 years, involves entire cohorts of low-income students, targeted for their federal aid eligibility, enrolled in sub-prime education programs that leave them with crippling debt and an educational experience that amounts to nothing. We support a strong gainful employment rule that, before being crippled by Secretary DeVos, caused scores of colleges to eliminate or improve their programs to meet GE's requirement that in order to receive Title IV HEA funds, vocational programs of training at non-profit and for-profit institutions must prepare students for gainful employment in a recognized occupation. Since the current administration has gutted the rule, colleges and universities that fail its metrics are not required to provide disclosures to prospective and current students warning them that the program and/or institution may not lead to the education or credential they are seeking. This failure will certainly lead to students (and taxpayers) being harmed by unscrupulous colleges that put their own financial interests ahead of students.

Please contact [Michael Rose](#), Director of Government Relations, with any questions regarding NACAC's public policy positions or advocacy.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Hawkins', with a long horizontal line extending to the right.

David Hawkins
Executive Director for Educational Content and Policy

CC: The Honorable Patty Murray

