

# POLICY FRAMEWORK



# POLICY FRAMEWORK

*It's time to change the focus of federal policy from 'higher education' to 'higher learning.'*



Our 21<sup>st</sup> century workforce and economy demand an increase in the number of Americans who have high-quality degrees and credentials. Yet unfortunately, federal policies governing our postsecondary education system were designed during a time when many students graduating high school went directly to a four-year college or trade school. Federal policy needs to catch up with today's students and shift from a focus of 'higher education' to 'higher learning'—education or training beyond high school that leads to a degree, credential, or employment. For all Americans to be able to participate in higher learning in order to excel in skill attainment and career success, federal policy must undergo a shift, driving change through a new, inclusive, outcomes-focused way of thinking about higher learning.

## OUR SYSTEM OF HIGHER LEARNING MUST BE:



### HIGH-QUALITY

- ✓ Focus quality assurance on outcomes
- ✓ Produce smarter regulations
- ✓ Refine data & transparency



### FOR TODAY'S STUDENTS

- ✓ Increase completion
- ✓ Reform student aid
- ✓ Improve data systems and utilization



### AFFORDABLE & RESPONSIVE

- ✓ Pave pathways between higher education, training, & employment
- ✓ Integrate affordability benchmark
- ✓ Count all learning



**HIGHER  
LEARNING  
MUST BE HIGH  
QUALITY**

Our higher learning system is lacking a properly functioning quality assurance system. Current systems are too focused on what institutions are doing and measuring. Instead, our federal quality assurance system should be based on high quality learning and centered on students and outcomes. Such a shift—from inputs to outcomes—would establish a set of incentives and hold postsecondary providers accountable for student completion, employment, equity, and value.



**HIGHER  
LEARNING  
MUST BE HIGH  
QUALITY**

Federal postsecondary education policy is too singularly focused on institutional concerns such as access and compliance, neglects values like quality and outcomes. This perversely undermines the ability of postsecondary education to iterative, innovate, and advance equity. To address systemic problems that keep far too many students completing and finding success in the workforce, federal policy needs to be updated to focus on quality—broadly defined as success in student outcomes including completion, employment, equity, and value.



**HIGHER  
LEARNING  
MUST BE  
FOCUSED  
ON TODAY'S  
STUDENTS**

Today's students are nontraditional in many ways: they're diverse in age, race, and income level; they're more mobile and may not live on college campuses; and most participate in the workforce full-time or part-time. Policies that govern postsecondary education must support a system that works for *all* of today's students—a system where postsecondary providers provide an education that is in demand by employers, programs are flexible and support student success, and all types of learning—on campus, on-line, competency-based, and more—is recognized.



**HIGHER  
LEARNING MUST  
BE AFFORDABLE  
AND RESPONSIVE**

Our global economic marketplace now requires continued education and training throughout a person's career and life, and has made new models of higher learning delivery quite common. Federal policies should encourage a system of higher learning providers that are responsive, equitable, affordable, and valuable—where finances don't preclude someone from learning, where new types of credentials are vetted and recognized, and where existing financial aid programs improve and adapt to fit today's students and their needs.

**Higher Learning Advocates** will work to influence the national conversation surrounding postsecondary education to ensure all of today's students are afforded a high-quality, outcomes-focused higher learning experience. Success in embedding each of these goals into the national conversations around postsecondary learning and in federal policymaking will ensure a high quality, outcomes-focused degree or credential is within reach for all of today's students. Higher Learning Advocates is dedicated to bringing new voices—including today's students and employers throughout the country—to timely federal policy discussions to demonstrate how our policy goals are critical to a successful 21st century higher learning system and workforce. Our commitment to change the focus of federal policy from the status-quo of 'higher education' into a new, inclusive, outcomes-focused way of thinking about 'higher learning' will benefit American students—today's and tomorrow's—for generations to come.



**RETHINK AND  
EXPAND OUR QUALITY  
ASSURANCE SYSTEM  
IN POSTSECONDARY  
EDUCATION**

The federal government relies on accrediting bodies to recognize institutions of higher education and allow institutions' access to federal financial aid, but federal policy governing this oversight is not sufficiently focused on student outcomes. Accreditors, as gatekeepers to federal student aid, should continue to be held accountable for measuring student outcomes instead of primarily being accountable for compliance. Accreditation reform should also expand the federal government's quality assurance system by recognizing new validators—in addition to current ones—to assess new and innovative providers of higher learning.

**"OUR FEDERAL  
QUALITY ASSURANCE  
SYSTEM SHOULD  
BE CENTERED ON  
STUDENTS AND  
OUTCOMES"**

**Higher Learning Advocates believes there is a need to:**

1. Reform accreditation's federal recognition process to allow accreditors to integrate a differentiated approach. Such a system should be more focused on student outcomes and should come with the expectation that all institutions provide a high quality education to all students;
2. Allow new validators to assess provider quality—particularly for innovative delivery models that are driven by student outcomes—which could allow for access to federal financial aid; and
3. Update federal requirements for accreditors to ensure they are able to place a greater focus on student outcomes over compliance.



**USE SMART REGULATIONS  
TO ENSURE INSTITUTION  
AND STUDENT SUCCESS**

Just as the policies governing our higher education system are outdated, so, too, are some regulations and requirements asked of institutions of higher education. It is time to holistically reform the current maze of regulations and reporting in order to place greater emphasis on smart regulations that fit together and ensure institution and student success, while reforming and eliminating regulations that no longer serve a purpose.

**Higher Learning Advocates believes there is a need to:**

1. Update requirements and regulations to ensure they are in line with high-quality learning and student success; and
2. Streamline reporting requirements unrelated to student success and safety.



## HIGHER LEARNING MUST BE HIGH QUALITY



## HIGHER LEARNING MUST BE FOCUSED ON TODAY'S STUDENTS

Many of today's federal postsecondary education and job-training policies were developed in an era in which most students attending postsecondary education went immediately to a four-year or trade school upon graduation from high school. As a result, such policies are designed to benefit those types of students and institutions. But an increasing number of students are returning to college as adults.

Federal policies should better serve today's students by emphasizing completion, updating financial aid, and ensuring better information for students and taxpayers.



### HOLD INSTITUTIONS ACCOUNTABLE FOR STUDENT OUTCOMES

Federal policy needs a greater focus on student outcomes and should hold all institutions participating in federal student aid programs accountable for quality and outcomes, including completion, employment, equity, and value.

**Higher Learning Advocates believes there is a need to:**

1. Implement institutional accountability reforms that incent institutions to complete all students and measure success on student outcomes, without giving institutions disincentives to enroll low-income and minority students; and
2. Ensure institutional-based reporting on campus-based aid, Title III and V, and competitive programs accurately portray how students receiving aid perform in relation to completion and equity measures.



### IMPROVE STUDENT DATA SYSTEMS TO IMPROVE TRANSPARENCY

Higher education is plagued by a misaligned and incomplete constellation of federal data systems that do not capture or reflect demographics of today's students. The Integrated Postsecondary Data System (IPEDS) tracks only first-time, full-time students, and other workforce or state-based databases aren't working together in ways to improve student success. Several existing reporting mechanisms may report different graduation rates for the same school largely due to a lack of common understanding and agreement on a reasonable completion timeline. All of this limits the ability for institutions, policymakers, and others to measure the equity of outcomes in our system of postsecondary education providers and use outcomes data to improve student outcomes.

### "OUR DATA SYSTEMS NEED TO REFLECT ALL OF TODAY'S STUDENTS"

**Higher Learning Advocates believes there is a need to:**

1. Improve data systems and allow for a student level data system to reflect all of today's students;
2. Enable sharing of student data to evaluate student outcomes, while ensuring privacy of individual student information;
3. Create alignment of commonly used definitions and metrics across federal agency programs and regulations; and
4. Harmonize accountability measures across key federal laws and regulations, including the Higher Education Act, the Workforce Investment and Opportunity Act, career and technical education, and apprenticeships.



### INCREASE STUDENT COMPLETION

While 45 percent of white Americans hold at least a two-year degree, only 29 percent of African Americans, 24 percent of Native Americans, and 21 percent of Hispanics hold two year degrees. Our higher learning system must do better. There are currently several grant programs that directly support institutions and others to increase postsecondary student access and completion. Such support should be focused on student outcomes and should only go to providers that show clear evidence or improvement of high-quality outcomes for students. To ensure quality, all federal programs and providers should be evaluated based on their effectiveness at helping students obtain the degrees, certificate, and credentials they need to succeed.

38%

OF TODAY'S  
STUDENTS  
ARE OLDER  
THAN 25



**Higher Learning Advocates believes there is a need to:**

1. Support college access and completion programs with high levels of evidence;
2. Provide support for student-centered programs that offer non-academic support;
3. Update federal program requirements across-the-board to allow for consideration of educational attainment for today's students in regulations and reporting; and
4. Examine ways to improve student preparedness and efforts to reduce remedial enrollment.



### REFORM YESTERDAY'S STUDENT AID SYSTEM TO SERVE TODAY'S STUDENTS

Federal financial aid should be redesigned with a focus on the needs of today's students, especially those who are on their own financially and may need to attend class outside of the traditional two-semester approach. The act of applying for federal student aid should be rethought to remove process barriers and provide a quick and streamlined task for the lowest-income students and families. Additionally, the Federal Work Study program could be reformed to provide better support that today's students need in the education and careers they are seeking, and could be reformed to better meet their needs and further their educational and career goals.





## HIGHER LEARNING MUST BE FOCUSED ON TODAY'S STUDENTS



## HIGHER LEARNING MUST BE AFFORDABLE AND RESPONSIVE

**S**tudent success depends on all of today's students being able to access and complete a postsecondary education free of structural and financial barriers. This is especially important for low-income students and families, who often face insurmountable barriers to entering postsecondary education. According to Georgetown's Center on Education and the Workforce, the U.S. economy added 11.6 million jobs from 2010 to 2016—11.5 million of which went to workers with at least some postsecondary education. And for the first time, college graduates make up a larger share of the workforce than workers with a high school diploma or less.<sup>2</sup>

**58%**

OF TODAY'S  
STUDENTS  
WORK WHILE  
IN COLLEGE



**Higher Learning Advocates  
believes there is a need to:**

1. Reform Federal Work Study to incent completion, expand Job Location Development Programs, ease requirements for off-campus work, and incent relation to course of study;
2. Consider less than full-time attendance in time-intensity requirements and definition of cost of attendance;
3. Simplify the student aid application process and ensure financial aid information is presented to students in an easy to understand format; and
4. Identify and enact policies that are aimed at addressing challenges faced by students who are food and housing insecure, including improving coordination between state and federal programs.



## IMPROVE STUDENT DATA AND INFORMATION SYSTEMS TO INCLUDE TODAY'S STUDENTS

Data gathered about students—through IPEDS and other workforce and state data systems—should cover the full spectrum of today's students, not just first-time, full-time students. Students, their families, schools, and the public need clear information to make educational choices about programs and costs, including the likelihood of success of other students who are like them and their potential return on investment. Additionally, policymakers and institutions need to be able to assess institutional and programmatic success for the entire student population to make smart policy choices for all of today's students.

**26%**

OF TODAY'S  
STUDENTS  
ARE RAISING  
CHILDREN



**Higher Learning Advocates  
believes there is a need to:**

1. Improve data systems to reflect all of today's students and provide information about the value of a prospective student's education; and
2. Implement a consumer-friendly, easy-to-use system for students and their families to navigate postsecondary education choices.

**"STUDENTS AND  
FAMILIES NEED  
MORE COMPLETE  
AND ACCURATE  
INFORMATION  
ABOUT THE RETURN  
ON INVESTMENT  
FOR COLLEGE"**



## ENSURE A PATHWAY BETWEEN POSTSECONDARY, WORKFORCE AND JOB- TRAINING PROGRAMS

There is an increasing need for our postsecondary education system to offer comprehensive pathways that offer intersections and changeability between traditional higher education, workforce, and experiential learning. As more Americans move outside city centers and away from traditional learning, and as more groups of Americans—like military veterans—are learning skills that can translate into credentials, our federal system needs thoughtful policies that link different laws and systems together to provide valuable higher learning for all of today's students.

### The U.S. economy added

**+ 11.6 MILLION JOBS**

from 2010 to 2016

**+ 11.5 MILLION** of which went  
to workers with at least some  
postsecondary education.

**Higher Learning Advocates  
believes there is a need to:**

1. Expand upon common definitions, identification of state and regional goals and needs, and accountability encompassing federal education and workforce programs;
2. Incentivize businesses and other providers to create and grow registered apprenticeships or on-the-job training through a range of partnership, programmatic, and financial supports; and
3. Ensure federal infrastructure initiatives include considerations for lifelong job training and improved access to postsecondary credentials.



## INTEGRATE A COLLEGE AFFORDABILITY BENCHMARK

Concern around college affordability is nearly universal, and one barrier to progress is the lack of common agreement about what college affordability means or is in relation to. This stands in contrast to other social policy areas, such as housing and health care, which use standard benchmarks to gauge affordability.

**Higher Learning Advocates  
believes there is a need to:**

1. Amend federal college cost watch lists to integrate an affordability benchmark; and
2. Provide students with early aid awareness based on an affordability benchmark.

<sup>2</sup> <https://cew.georgetown.edu/cew-reports/americas-divided-recovery/#full-report>



## HIGHER LEARNING MUST BE AFFORDABLE AND RESPONSIVE



### RECOGNIZE AND ALLOW STUDENT AID TO BE USED FOR ALL HIGH- QUALITY LEARNING

Our current postsecondary system fails to recognize innovative means of gaining a degree, certificate, or credential that is focused on students' acquisition of knowledge and skills rather than sitting in a traditional classroom. Too often students are required to pay for courses by the credit hour rather than being able to learn in a competency-based environment that recognizes skill and knowledge attainment. Federal policy should adapt to allow the use of federal student aid to pay for competency-based and other learning models.

### "FEDERAL POLICIES SHOULD ENCOURAGE A SYSTEM OF HIGHER LEARNING PROVIDERS THAT ARE RESPONSIVE, EQUITABLE, AFFORDABLE, AND VALUABLE"

#### ***Higher Learning Advocates believes there is a need to:***

1. Reform federal student aid rules and oversight to better enable postsecondary education providers to employ new methods of learning delivery focused on outcomes such as competency-based education;
2. Allow students to receive student loans and Pell Grants for attendance at high-quality approved non-institutional providers of postsecondary training, including apprenticeships and employer-based training;
3. Amend Title IV to allow federal student aid to be used for payment of prior learning assessments;
4. Identify incentives for schools that enhance credit transferability; and
5. Enhance and incentive dual enrollment program participation and programs that enable students to graduate secondary school with college credit or industry certification.

**IT'S TIME TO  
CHANGE THE FOCUS  
OF FEDERAL POLICY  
FROM 'HIGHER  
EDUCATION' TO  
'HIGHER LEARNING.'**