



October 28, 2019

The Honorable Bobby Scott  
Chairman  
House Education and Labor Committee  
Washington, DC 20515

Dear Chairman Scott:

On behalf of Young Invincibles (YI), a national organization dedicated to amplifying the voice of young adults and expanding their economic opportunity, I write to thank you for proposing the College Affordability Act (CAA). I also write to share our priorities--which are informed by our young advocates across the country--and hopes for this important legislation as it moves forward through committee and toward a floor vote in the House of Representatives.

We are particularly encouraged by the bill's focus on affordability. At a time of state disinvestment in public higher education that has led to steady increases in cost burden shifting to students and families, we welcome the CAA's increase in the maximum Pell grant and tying Pell levels to inflation. Far too much of Pell's purchasing power has already been diluted, and this measure would restore some of that purchasing power for young adults from low-income backgrounds.

To encourage states to maintain investment in public higher education, we also welcome the federal-state cost-sharing model of the America's College Promise program. YI advocates for this kind of model, which would allow states to expand debt-free college for in-state public college students. We recognize community colleges are common points of entry into higher education for low-income students and students of color, and the America's College Promise program as now proposed should be seen as a foundation for future efforts to relieve students from the increasing costs of tuition and resulting debt. Primary issues we encourage pursuing to further strengthen affordability provisions in the legislation include:

- Move Pell to the mandatory spending portion of the federal budget to protect this bedrock affordability program from potential future cuts.
- Include public four-year institutions in the America's College Promise program to have maximum impact and open opportunity for all students.

We are encouraged by the CAA's provisions streamlining financial aid and the FAFSA application process, which can place a heavy enough burden on students and families to lead them to not seek available

funds at all. We are particularly enthused by the long-overdue prospect of simplifying the application process for federal financial aid.

As proposed, we applaud the CAA's attention to the financial constraints faced by many recent graduates as they begin to balance myriad financial responsibilities, including student loan payments. Expanding the income exemption to 250% of the federal poverty line will increase the ability of young adults to find sound financial footing after completing their programs of study. In addition, we believe capitalization of unpaid interest for borrowers enrolled in income-based repayment plans should be eliminated to simplify the system and make it easier for borrowers to pay off their balance. Borrowers should also be exempt from being charged loan origination fees.

YI supports the CAA's protection of public service loan forgiveness (PSLF), as well as the bill's inclusion of Americans working on farms and in veterans support services among those qualifying. We note that at least 35 servicemembers' organizations opposed previous legislation eliminating PSLF.<sup>1</sup> The CAA's requirement for clearer information to make students aware of PSLF programs and for the U.S. Department of Education to establish a formal appeals process for denied PSLF applicants are also welcome student protection measures. The need for such protections is especially apparent in light of recent findings of negligence on the part of the Department in denying applicants who should benefit from this important measure encouraging new professionals to enter fields of great need in our country.

The CAA makes important strides toward enhanced equity in our nation's higher education system, in keeping with HEA's origin as civil rights legislation. Among the equity provisions in the bill, we are particularly appreciative of the CAA's restoration of Pell eligibility for students who have been involved with the criminal justice system; expansion of aid eligibility to students whose immigration status has posed an undue burden to continuing education; and investment in the federal Child Care Access Means Parents In School (CCAMPIS) program to meet student parents' need for high-quality, affordable child care. *This CCAMPIS investment should be seen as one of many initiatives needed to support student parents*, as nearly one-fourth of college students today are also parents.

Several measures in the CAA align with YI's commitment to student-focused accountability for institutions and systems of higher education. Student protections including the gainful employment rule and borrower defense for students who have been defrauded are needed guardrails. These provisions would lead to students having better information to make the best choices for themselves in pursuing programs of study and ensure students who have been victimized by unscrupulous actors do not have their educational aspirations thwarted as a result. We believe the time has long come to close the 90/10 loophole and deter unscrupulous institutions from targeting military-connected students.

By incorporating language from the College Transparency Act, the CAA would make more data available to help students understand their likelihood of completing postsecondary programs and securing living-wage jobs. The data would also enable researchers to identify and policymakers to tailor programs

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<sup>1</sup> "Letter to House Leadership from Service Affiliated Community opposing the PROSPER Act," March 27, 2018, <http://studentveterans.org/images/pdf/will/Service-Affiliated-Community-Letter---HEA-Concerns.pdf>.

based on what works. Overturning the student-level data ban--coupled with appropriate protections for sensitive, individually identifiable data--would be a key step toward a deeper understanding of student pathways to, through, and beyond college.

*YI continues to support the federal Help Students Vote Act (HSVA), and we believe its provisions should be included in this HEA reauthorization.* The HSVA would direct colleges to take simple steps, including:

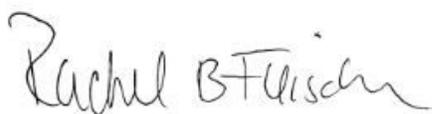
- Email students twice a year before voter registration deadlines for both general and primary elections
- Designate a campus vote coordinator to liaise directly with students about campus voting efforts

More than 500 institutions nationwide already designate a campus coordinator to inform students of important registration requirements and voting opportunities. The vote of college students is just as real as the efforts in many states, as reported recently in *The New York Times*,<sup>2</sup> to suppress it. Enacting the HSVA as part of HEA reauthorization would establish a baseline of support for empowering students with the information they need to participate in our democracy.

The College Affordability Act represents a historic opportunity to reimagine higher education in a way that better reflects the needs of students today and the anticipated needs of students tomorrow. We stand ready to support efforts to reauthorize the Higher Education Act in a comprehensive way, and we will continue to advocate for the best interests of young adults--especially young adults from low-income backgrounds, communities of color, and other historically marginalized populations.

We call on Members to report the College Affordability Act out of committee to a floor vote in the House, and for Congress to act on a comprehensive reauthorization of the Higher Education Act. Our country's students have waited too long already.

Sincerely,



Rachel Fleischer  
Executive Director

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<sup>2</sup> Michael Wines, "The Student Vote Is Surging. So Are Efforts to Suppress It." *The New York Times*. October 24, 2019, <https://www.nytimes.com/2019/10/24/us/voting-college-suppression.html>.