

February 28, 2003

Jeffrey R. Andrade,
Deputy Assistant Secretary for Policy, Planning and Innovation
Office of Postsecondary Education
1990 K St., NW Room 80046
Washington, DC 20006

Dear Mr. Andrade:

The National Association of Student Personnel Administrators (NASPA) appreciates this opportunity to submit comments for the reauthorization of the Higher Education Act (HEA). NASPA's membership consists of over 8000 members and 1,175 institutional members. NASPA helps senior student affairs/services officers and administrators, student affairs professionals, faculty, and other educators enhance student learning and development.

NASPA provides the comments below to address several specific concerns and priorities for our individual and institutional members. NASPA strongly supports the emphasis on improving access to post secondary education recognizing the greatest barrier is that of financial assistance. As the reauthorization process proceeds, our association looks forward to working with you and your staff for a more effective, accessible higher education community.

Record Keeping and Federal Reporting Requirements

Our membership includes administrators and other officials at colleges and universities who are actively involved in the record keeping, reporting and monitoring process required under various federal laws. Over the last few years, well-intentioned new rules or laws affecting higher education have led to additional costs, personnel and paperwork burdens for individual institutions that seem out of proportion to the benefits gained from the new regulations. One particular issue that has been difficult for campuses has been the collection and reporting of campus security data. Our associations have worked to provide the most comprehensive information for students and their families concerning campus security issues. Federal campus crime reporting requirements have changed four times since they were enacted in 1990. Both the statute and the regulations are now mind-numbingly complex. Due to the complexity of the regulations, neither the agency that oversees the law nor the colleges charged with implementing it have a clear understanding of exactly what is required. The regulation is a collection of requirements that frustrates the most diligent campus compliance efforts.

Over the last few years, Congress has considered a number of proposals calling for mandatory federal reporting by institutions of higher education on issues such as missing students, sexual predators and fire safety. We understand and value the need for information to provide to the public and more importantly our own campus communities and do that in a number of ways,

however, would do not support the addition of new, mandatory federal reporting without providing institutions with additional funding to pay for the implementation of that reporting. As Congress looks at the reporting requirements for institutions of higher education, we would also strongly encourage a simplification of the notification requirements to students, parents and the broader campus community. It would be a great help to the schools to have a uniform notification method, such as posting information on a school's website, rather than a variety of notification methods.

In short, we believe that by emphasizing detailed reporting requirements, those reporting requirements impose significant financial costs on institutions and yield data that is often too difficult for students and the campus community to interpret in a meaningful way. We believe that the reporting requirements force institutions of higher education to spend an extraordinary amount of time and money that might otherwise be available to fund improvements in campus security or safety awareness. The goal should be reporting requirements that provide students and the public with solid, accurate information without the complexity and confusion that makes compliance so difficult. If reports are a necessity within legislations or a mandate, then it clearly needs to be outlined how the Department of Education or the Office of Research and Statistics will be utilizing that data to benefit the higher education community with clearly marked objectives. Mandates that simply state report to the Department of Education are not supported.

Alcohol and Drug Abuse Issues

As an association of professionals, faculty and students who work tirelessly with students in their co-curricular activities, we continually search for new and effective methods to combat the alcohol and drug abuse issue. We have seen a number of creative and innovative programs address these issues on college campuses. It should be noted that each campus with its unique demographics and campus culture have to address these issues in a variety of ways. We strongly oppose any measure that attempts to use a federal, all-encompassing legislative solution to address the issue. It is a complex issue with many layers and a "one size fits all" approach to curbing the problems is not an effective approach.

Increased Access to Higher Education

NASPA strongly supports increased access to higher education and reemphasizes the commitment of the federal government to assist students seeking a college education as demonstrated in the original Higher Education Act of 1965. The federal need-based program provides opportunities to diverse student populations seeking to find better paths and create more life long career options through higher education. NASPA supports the increase of the Pell grant to the maximum level and asks that it be increased over the duration of the act. With an increase in under-represented populations entering our institutions, their ability to have access to the needed funds to continue their education is limited. They are continually having to turn to private-market loans with less favorable terms. This leads to an overwhelming debt load from which many have difficulty recovering. We also support raising the limits on subsidized and unsubsidized loans for undergraduates and graduates. We strongly urge the annual subsidized loan limit for first-year students be increased to at least \$4,200. On the aggregate limit, we join with our colleagues at other associations and speak for our members in asking for a new loan limit of \$30,000, up from the current limit of \$23,000. We ask that the limits on the

unsubsidized loans for the first two years of a student's undergraduate career be increased to \$5,500, with the annual limit for the remaining undergraduate years increasing to \$7,000. NASPA also asks that all up front fees for borrowers with student loans be eliminated, these costs do not contribute to their educational opportunities.

NASPA also encourages the Committee to look at repealing a controversial ban on federal financial aid for students who have been convicted of drug related offenses. Since the provision went into effect in 2000, the Department of Education has interpreted it to apply to all convictions for possessing or selling drugs, including any convictions as an adult in the years preceding a student's application for federal aid.

The provision's original sponsor, Rep. Mark Souder (R-IN), has maintained that the provision was aimed only at students who have bought drugs while receiving federal aid, whereas the Department has been interpreting the legislation in a much broader manner. This has had the unintended consequence of preventing young people, with a conviction in their teens, from getting financial aid for college, and it has also prevented non-traditional students attempting to go to college later in life, from being able to do so.

NASPA hosts a program, the Minority Undergraduate Fellows Program, a program which recruits students who are under-represented and disabled in graduate education and as professionals on college campuses. Our goal through this program is to mentor students, provide leadership opportunities and enrichment programs to encourage them to remain in higher education and to actively pursue graduate degrees in higher education and student affairs so they will return to our campuses and serve as role models for others to create a truly more diverse community. Through this program we have seen the extreme need for students who are under-represented (minorities and disabled students) to have greater access to aid for graduate education. We support increasing those loan limits and the creation and continued operation of any grant/aid based programs available to this community of students.

Access - Immigration Status

NASPA strongly supports legislative action whether separate or attached to HEA that will permit immigrant students who have grown up in our communities to go to college and obtain permanent legal residency in the U.S. This is another clear statement of access to those who have commitments to this country; to become more educated and contributing citizens at all levels. It has already been addressed by many states and we believe that if it is not addressed on the national level, each state, one by one will address the issue outdating any federal policy.

Community Service and Work Study Rules

NASPA is opposed to attempts to increase the community service requirement in the Federal Work Study (FWS) program from the current seven percent.

Campus Preparedness

Along with the rest of the country, campus communities met high anxieties on September 11, 2001. Campus communities managed many fears and uncertainties with students being away from home, tensions within the diverse cultural communities and questions of what was to happen next. Those first responders on a university campus outside of law enforcement officers are student affairs staff. These are the staff in the health centers, the counseling centers, the residence halls, the on call emergency staff who respond to issues not only with on campus residents but in many cases, off campus incidents that involve university students. They are now still dealing with effects of stress and anxieties as possibly being “soft targets” for terrorism and with increased scrutiny of the international communities on campus. The tremendous affects on students have taken an impact and continue to do so. The student affairs divisions on university campuses are comprised of professionals, who respond to students needs, create programs to provide support and respond to the deluge of parental calls and questions. When a campus is evacuated or incidents occur, it is the student affairs professionals who remain on campus to assist students and serve their needs. The increased need for training as first responders is critical.

NASPA strongly supports universities access to funding for in depth training for student staff in residence halls and professional staff in the division who are considered responders. The campus and local medical and police officials cannot manage the immense responsibilities alone, nor should they have to. We feel it is imperative that universities have access to specific funds for training and preparedness.

As Congress begins to study the various issues with the Higher Education Act, we would respectfully encourage you and your colleagues to attempt to minimize additional costs and paperwork to our schools and colleges as much as possible. We look forward to working with your Committee in the coming year and would be pleased to provide any information that would assist you in this task.

Sincerely,



Barbara Snyder, Chair
NASPA Public Policy Division
Vice President for Student Affairs, University of Utah