

Stony Brook University (SBU) is committed to the fundamental guiding principle that a student's financial status should not be a barrier to higher education. We also believe that access to high quality higher education should be coupled with program and degree completion. As federal resources have grown scarce over the last several years, legitimate concern about fraud and abuse in the federal student aid programs has increased. We believe Congress should promote policies that lead to greater levels of access and student success, as well as ensure the integrity of student aid programs as it reauthorizes the Higher Education Act.

### Access to Higher Education — Federal Grants, Work-Study, and Student Loans

- **Maintain Pell Grant Aid for Those with the Highest Need:** For over 40 years, the Pell Grant program has served as the cornerstone upon which the federal financial aid system has been built. We support maintaining mandatory and discretionary funding for the Pell Grant, including the year-round Pell Grant. We also support restoring the inflationary increases to the Pell Grant maximum grant.
- **Support of SEOG and Federal Work-Study:** In addition to Pell, two campus-based programs – the Supplemental Education Opportunity Grants and Federal Work-Study, are also designed to increase access to higher education. Both programs require campus contributions or “skin-in-the-game” to supplement federal dollars. Research shows that these programs positively impact a student's ability to afford college and improve their chances of graduating. With respect to Federal Work-Study, we support preserving meaningful opportunities to expose both undergraduate and graduate students to community-serving careers through placements with community-based organizations.
- **Subsidized Undergraduate Student Loans:** We strongly support maintaining subsidized loans for undergraduate students. Eliminating subsidized loans would increase the cost of college by thousands of dollars for many of the six million undergraduates who receive those loans each year. Subsidized Stafford loans aid those with the highest need. For example, 82 percent of independent students (and almost half of dependent students) currently receiving subsidized loans have a family income of less than \$40,000 per year. Additionally, these loans provide students with significant savings. Estimates show that without subsidized loans, students would pay \$39 billion over the next 10 years, which is equivalent to them paying 20 percent more each month. We also support the elimination of origination fees which saves students millions of dollars a year.
- **Financial Support for Graduate Students, including Graduate Assistance in Areas of National Need (GAANN) program:** Graduate and professional education are vital elements of the nation's higher education and innovation ecosystems that empower U.S. economic competitiveness and contribute to our nation's security.
  - We urge Congress to expand the GAANN program to ensure a strong pipeline of talented experts and educators who will help to meet the demands of our 21st century workforce. We support including Computer Science + “x”, the arts, humanities, and social disciplines as eligible fields for grant competition.
  - We encourage Congress to maintain graduate student loan options, strong repayment terms, and loan forgiveness benefits that put graduate and professional studies within reach for all interested students. Specifically, we support the reauthorization of GRADPLUS loans and allowing borrowing up to the cost of attendance. We also support maintaining graduate and professional students' eligibility for unsubsidized

Stafford loans. Under current loan terms, graduate student borrowing generates revenue for the federal government and these students repay their loans at significantly higher rates than other borrowers.

- We also support strong loan forgiveness plans, particularly for graduate and professional students who are most at-risk. Reducing income-based repayment plans would have adverse effects on the lowest earning graduates as more than 70 percent of those enrolled in these plans earn below \$20,000 per year.
- Additionally, we view the Public Service Loan Forgiveness program as an important incentive for students to pursue vital service careers such as educators, firefighters, nurses, military service, and public defenders. Reducing PSLF benefits would disproportionately impact rural, urban, and tribal communities that are underserved.

### College Affordability

- SBU is committed to providing high quality, affordable education and demonstrate this commitment through a range of cost-saving measures, substantial institutional financial aid programs for low-and-middle-income students, and effective uses of technology.
- With prestigious rankings and international recognition that place us among the Top 1% of higher education institutions worldwide, SBU is invested in undergraduate education. SBU is one of the most affordable top-ranked universities in the nation, ranked in the **top 20 of Best Value Public Colleges** by *Forbes Magazine* and ranked among the **top 100 universities** and **top 50 public universities** by *U.S. News & World Report*. Nearly 95% of our recent graduates are either employed or continuing their education. Stony Brook's affordable tuition means less future debt and real savings that can help you pay for your graduate studies or any number of life passages yet to come.
- **We believe that any federal policies pertaining to college affordability should consider the appropriate federal and state roles and acknowledge the steps institutions have already taken.** We recognize the federal government alone cannot address affordability. It is regrettable that many states, like New York, have backed away from their commitment to support public higher education, especially in the past decade. States should be incentivized to recommit financial resources if higher education access and affordability are to be ensured in the future.

### Accountability

- **Congress should adopt policies that address fraud and abuse in federal student aid programs to help further ensure their integrity.** Existing federal accountability measures should be examined, as appropriate, to ensure that students receive an education worth their time and money and are not leaving school with debt they cannot repay. New accountability measures, however, should not increase undue burden on high-quality and low-risk institutions and methods should be reflective of the higher education community.

### Accreditation

- SBU is committed to the highest standards of educational quality and continuous improvement. Congress should look for ways to improve accreditation, as a valuable piece to the process of helping to ensure academic quality and public accountability. Potential reforms should avoid one-size fits all approaches and aim at developing more effective measures of preventing fraud and abuse and holding poor performing institutions accountable without infringing on the academic freedom and autonomy of institutions with a proven record of success.

## Student Achievement

- **SBU endorses an accreditation system that promotes effective assessment of student achievement in the context of the missions of individual institutions, provides flexibility for institutions with a record of stability and successful performance and focuses attention on substandard institutions.** It is important to note that the HEA requires institutions to provide evidence of “success with respect to student achievement in relation to an institution’s mission.”
- We support a system in which all institutions, working with their institutional accreditors, should be expected to provide evidence of student success in three areas: student learning experience, student academic performance, and post-graduation outcomes. The areas are drawn from a [statement on effective assessment](#) of student achievement endorsed by all seven regional accrediting commissions and the six major national presidential higher education associations.

## Risk-Based Review

- **We strongly support implementing risk-based accreditation views, but the authority of accreditors to conduct “differentiated reviews” needs to be clarified.** We believe accreditors have the legal authority under the HEA to allow institutions with records of exceptional quality and performance to undergo a less arduous set of procedures and processes. To that end, we request Congress include a provision in the HEA that would require accreditors to design and implement a system of risk-based review.
- The accreditation system should respond differentially to the varying degrees of risk that different institutions present. Risk-adjusted scrutiny is a standard and indispensable regulatory practice. For example, when institutions perform biological research, the safety standards appropriate to the different laboratories vary with the kind of research that is conducted there. Both low- and high-risk biological research may be valuable to society. The regulatory variations recognize that safety investments must be tailored to the kinds of dangers they are likely to represent.

## Cohort Default Rates and Loan Repayment Rates

- **SBU agrees that the cohort default rate is an important measure of accountability, but it may not be enough to meet the goal of ensuring accountability for all institutions of higher education.** The metric of using program loan repayment rates for Title IV eligibility should be closely analyzed and modeled to determine whether it has any negative consequences or unintended consequences for students and institutions who serve at-risk students. There is no evidence that using program repayment rates is a good measure, particularly without potentially penalizing students in public service, theology, and arts and humanities fields that may not be remunerated well by the marketplace and without adding a regulatory burden. In addition, because programs across higher education are unique to their institution, there will be challenges in defining a “program,” particularly for the purpose of dual majors and differences in how sectors define their program.

## The Gainful Employment Rule

- **SBU strongly supports gainful employment regulations that would exclude programs from Title IV federal financial aid programs that fail to serve students well, regardless of where such programs are offered.** We believe that changes can be made to the rule that increases their effectiveness and reduces unnecessary burden. The rule should be targeted to the programs and institutions where the risks are the highest.

## **Title VI/International Education Programs**

- **The array of programs supported by Title VI of the HEA addresses critical national needs in foreign language expertise as well as cultural and historical understanding and contemporary analyses of different world regions.** As the main federal program for training in languages and cultures, Title VI plays a strategic role in ensuring that our nation can maintain deep expertise and analytic capacities in less commonly taught languages and culture. For example, the National Resource Centers program, the nation's premier source of expertise for research, language, and cultural training in regions identified as being of vital importance for economic and security reasons, improves the understanding of such regions.

## **De-Regulation**

- **SBU supports regulations necessary to protect taxpayers' investments and root out fraud and abuse. At the same time, we believe that more regulations that add to the compliance burden but provide no added accountability are a waste of government and university resources.** Unwarranted, duplicative, and sometimes conflicting federal regulations cause significant and costly compliance problems. This is especially true for research universities, whose involvement with the federal government is much more expansive than the requirements outlined in the HEA.
- **We encourage Congress to implement the recommendations of the [Research Universities and the Future of America: Ten Breakthrough Actions Vital to Our Nation's Prosperity and Security](#) and [Recalibrating Regulation of Colleges and Universities](#) de-regulation reports.** We also recommend that Congress require the Department of Education to ensure that regulations are meeting their goals in terms of performance rather than simply in terms of process. We believe that a regulatory approach that is based on performance-based standards offers institutions greater flexibility to achieve the regulatory goals and would result in a more rational and cost-effective regulatory structure.