



The Career College Association's Legislative Priorities for the 110th Congress

■ Federal Investment in Postsecondary Education

CCA strongly supports federal aid programs that allow students to achieve their educational goals without incurring excessive debt. The number of students receiving federal student aid has increased significantly over the past 20 years; however, increases in the maximum Pell Grant and other financial aid have not kept pace with inflation and the rising costs of education.

CCA encourages Congress to maximize funding increases to the Pell Grant program. It should explore other innovative proposals, such as the concept of “front-loading” federal grant aid to provide increased assistance to students during their first two years of postsecondary education. CCA proposes that the Pell Grant program be modified to allow students who participate in year-round programs to obtain additional grant funding as they complete each academic year, without regard to whether they have crossed over into a new award year or whether the institution is degree-granting. We also support increasing funding for campus-based programs, tax credits or deductions for tuition and loan repayment, and additional improvements to the federal loan programs.

■ 90-10 Rule

The 90-10 rule requires proprietary institutions of postsecondary education to demonstrate that they receive at least 10% of their tuition revenue from sources other than Title IV grants and loans. However, the rule, as applied through regulations of the Department of Education, does not give institutions a fair opportunity to demonstrate compliance and has the unintended, unfortunate consequence of denying higher education access to some low-income students.

CCA supports language that moves the 90-10 rule to the Program Participation Agreement section of the Higher Education Act, making it an issue of administrative capability rather than institutional eligibility, and making the rule applicable to all postsecondary education institutions. Also, it is critically important that the statute specify some of the types of funds that may be counted towards demonstrating compliance with the rule, including funds from non-Title IV sources that students use to pay for tuition and fees, as long as the institution can reasonably demonstrate that such funds did not come from Title IV. These would include institutional matching funds for Title IV programs such as, SEOG; funds from education saving plans; funds for non-Title IV eligible programs; institutional aid in the form of tuition discounts based upon academic achievement or financial need; and revenue from activities necessary for the education and training of the students, such as restaurants, clinics, and hair salons.



■ **Transfer of Credit**

CCA's 1300 member institutions must be accredited by either a regional or national accrediting organization that is recognized by the US Department of Education. The majority are accredited by national accrediting agencies, which meet the same strict standards for recognition by the Department as the regional agencies. Yet students who attend nationally accredited institutions who attempt to transfer credits to another institution or have degrees recognized to pursue graduate work are frequently told that their credits or degrees will not be accepted by institutions with regional accreditation without any meaningful explanation. When a student's credits are denied acceptance on transfer, it is costly to the student in both time and money and wastes federal resources, as students are required to repeat coursework that the federal government has helped support through grants or loans.

CCA proposes that receiving institutions be required to provide more information to potential students and the public about the credit transfer process. We do not propose to restrict academic freedom and recognize that receiving institutions must have some flexibility on credit transfer. CCA supports language requiring institutions to have and publicly disclose a detailed policy on transfer of credit and acceptance of degrees and to consider fairly proffered credits or degrees without regard to whether the institution is nationally or regionally accredited, so long as the accreditation is by an agency recognized by the Department of Education.

■ **Institutional Accountability**

The Secretary of Education's Commission on the Future of Higher Education recently released a report with recommendations that coalesce around three themes at the center of CCA's policy agenda for the last three years – accessibility, affordability and accountability. One way to improve accountability is to ensure that students, parents, and the taxpayers who support much of higher education have access to data comparable across all sectors of higher education to let them measure the benefits to students of educational programs at different institutions.

CCA supports improved consumer information to help prospective students choose the institution that is the best match for their needs. In support of this goal, CCA has proposed creating an "Institutional Report Card" based on a general framework with three constituent parts: input measures to assess the resources and capacity to deliver educational services; output measures to provide information on graduations/completions, and outcomes measures to demonstrate value added to students.