

Comments: Howard Community College, OPEID 00817500
Docket ID: ED-2017-OS-0074

Howard Community College (HCC) welcomes this opportunity to comment on whether Title IV postsecondary education regulations should be repealed, modified, or replaced. HCC is located in Columbia Maryland. We enrolled 14,467 credit students in FY2016 and 15,571 noncredit continuing education students. Almost a quarter of graduating seniors from Howard County high schools in 2016 enrolled at HCC in Fall 2016, and 42% of undergraduate students living in the county attend HCC. The average age of our student is 26 years old and 37% of our students enroll fulltime. Forty-eight percent (48%) of fall 2016 credit students received financial aid during their enrollment at HCC. Seventy-one percent (71%) of our aid recipients are Pell Grant students. Thirty percent (30%) of our aid recipients borrowed from the student loan programs, which is 10% of our enrolled students.

We concur with the comments submitted by the American Association of Community Colleges, and would like to emphasize a few of the points made by AACC in the comments below.

Program Integrity: Gainful Employment Regulations

We are pleased that ED has already undertaken the process to reopen negotiated rulemaking proceedings to modify the gainful employment (GE) regulations. We agree with the basic approach to create GE eligibility metrics for individual GE programs, which show whether students who complete GE programs are subsequently able to repay their student loans without undue burden in a reasonable time period. Our understanding is that the vast majority of community college GE programs were never in any danger of failing the debt-to-earnings metric (and none did). Howard Community College has 27 GE programs, and only one program had earnings published (verified student count of 17 with median earnings of \$60,704 and mean earnings of \$58,273) and no programs had a sufficient number of borrowers for a debt to earnings ratio to be published. The cost of implementing the GE regulations is enormous, involving staff across many academic and administrative office, and there was no benefit to our students.

We recommend that the GE regulations should exempt institutions and/or programs that have a history of low borrowing. Most community colleges have well below 50% of their students borrowing federal loans. Only about 10% of HCC's enrolled students borrow from the loan program, and even far less than that percentage of students who are enrolled specifically in the GE programs. Therefore we recommend that our GE programs should be exempted from the current GE reporting regulations and any new GE regulations, other than some basic program disclosures referred to below.

Additionally, we agree with AACC's recommendation that a minimum threshold be set for the number of Title IV students enrolled in the program in order to require reporting on GE programs to align with confidentiality and other rules. This includes almost all of HCC's GE programs.

Return of Title IV Funds:

These regulations are the most complex of the Title IV regulations and they are the most difficult to implement in a community college. The complexity of these regulations basically requires that these calculations be done manually. The complexity is not in the math, but in the gathering of the correct enrollment data for the calculation. The reason why this area remains one of the top 3 findings in program reviews and audits for the past decade is not because colleges do not put the time and effort

into complying, it's because it's too complex to automate and too complex to be able to reliably do a manual calculation for hundreds of students each term. HCC has surveyed other community colleges and on average, it takes about 30 minutes per withdrawn student to complete the r2t4 calculation process from start to finish. The ACE report proposes modifications to several provisions of these regulations to ease the burden of compliance.

Verification and ISIR Comment Codes:

It's the highest need students, Pell eligible applicants, who are most subject to having to gather additional documentation to validate the information they submitted on the FAFSA. This occurs as a part of the verification process and also through various comment codes assigned by the U.S. Department of Education on the ISIR. Simplifying the FAFSA but increasing the complexity of the documentation required to complete the file does not improve access for high need students. We recommend that the simplification approach be also applied on the "back end" to make it easier for students to complete their financial aid file. One critical issue that we hope doesn't occur again is the shutdown of the IRS Data Retrieval Tool on the FAFSA.

Thank you for your consideration of these comments. If you have any questions, please contact Dawn Mosisa-Lowe, Director of Financial Aid Services