February 10, 2023

Secretary Miguel Cardona
U.S. Department of Education
400 Maryland Ave., SW Washington, DC 20202

Re: Docket ID ED-2022-OUS-0140

Dear Secretary Cardona,

I am writing today on behalf of the Council for Christian Colleges & Universities in response to the Department of Education’s request for information (RFI) regarding public transparency for “low-financial value” postsecondary programs.

The Council for Christian Colleges and Universities (CCCU) is a higher education association representing over 190 institutions around the world, including 145 in the United States. Our institutions enroll approximately 520,000 students annually, with over 10 million alumni. The CCCU’s mission is to advance the cause of Christ-centered higher education and to help our institutions transform lives by faithfully relating scholarship and service to biblical truth. As the leading national voice for Christian higher education, we provide a unified voice to highlight the contributions of our institutions, and of our students, to the common good. One in three CCCU students is a first-generation student, and 33% of our students are Pell grant recipients.

Thank you for the opportunity to submit comments regarding low-value programs. We share the Department’s goal to ensure students have the information to make the best decision about the program and institution that is the best fit for the student. However, the CCCU has some concerns about the narrow approach which seems to view education as solely or primarily about earnings after graduation. CCCU institutions support a coherent approach to education in which the development of the mind, spirit, body, and emotions are seamlessly woven together in the quest not just for knowledge but also for wisdom. Education that instructs the mind without deepening the soul is not true learning. Our schools seek to develop students who, in the words of the Old Testament prophet, “act justly and love mercy and walk humbly with their God” (Micah 6:8). This requires not simply professional competence but wisdom, which is a sense of things in their proper relationship and a love for the right things. Our purpose is to form students of moral commitment who live out Christian virtues such as love, courage, and humility. This task gives meaning and coherence to every part of the academy, from the classroom to the fine arts studio, from the internship placement to the residence hall and the athletic field.

We are committed to graduating students who make a difference for the common good as redemptive voices in the world. Our schools offer a wide variety of academic programs because we believe that Christians are called to use their vocations as vehicles to aid the marginalized, the underserved, and the oppressed. Our graduates are “hopeful realists” who recognize the brokenness of the world but believe that God has called them to work for its healing. As such, they play a redemptive and restorative role in the world as doctors, teachers, marketers,
engineers, parents, soccer coaches, and in a host of other ways. In other words, we are private religious institutions that exist for the public good and contribute to human flourishing. For example, CCCU students participate in community service at higher rates than the average college student. CCCU students understand their vocation is an extension of their faith, and 12.7% of our graduates go into human services fields like counseling, mental health support, and community service, compared to 4.2% of all four year institutions. These roles may not provide a large paycheck, but they are vital to the communities in which these students serve.

We commend the comment of the National Association of Independent Colleges & Universities, which the CCCU joined. They write:

Historically, the federal role in higher education has focused on aiding students to attend the college and select the major that best fits their goals and aspirations. Federal aid is distributed based on a student’s need, not on the type of institution or program the student attends. A warning label for “low-financial-value” programs represents a potentially dangerous turning point in which the federal government begins to actively take a role in directing students on where and what to study. We therefore urge the Department to exercise caution in its approach.

The CCCU agrees and asks the Department to return to its role of allowing students to choose the program and institution that is the best fit for the student. We wholeheartedly agree that finances are an important part of education, both for the student and family carefully considering their finances to attend college, as well as ensuring the student can pay back the loans in a way that does not create an unreasonable burden. We understand and appreciate the need for clear and transparent information about the educational institution. Perhaps funding professional development programs for admissions and financial aid counselors to assist students to understand the debt to earnings ratio of a major or minor is one action the Department could consider. The Department has a strong desire to ensure students attend programs that will provide the best opportunity to repay students loans. The CCCU shares that desire. However, the Department’s ability to determine value at the program level for every student and to do so fairly, accurately, and timely is impossible or nearly so. We ask that the Department rescind the RFI relating to low financial value programs and not move forward with plans to create a low-value program list.

In the alternative, we have two suggestions: first, if the Department is aware of egregious bad actors in the higher education space such as some for-profit institutions, deal with them directly instead of casting an unnecessarily wide net. These institutions have a different mission than nonprofit institutions, and their mission is to train students in skills for specific jobs. Metrics like job placement and debt-to-income ratios would measure the strength and validity of the for-profit’s programs because they directly evaluate what the institutions promise. Nonprofit institutions, on the other hand, exist to develop the whole person: one’s faith, courage, ability to reason, and understanding of the world. The broad scope of the RFI is akin to doing surgery with a machete, whereas limiting the RFI to for-profits may be the scalpel needed to address the issue. Identifying low-value postsecondary programs in the nonprofit realm would miss the fullness of these institutions’ missions and reduce them to incomplete financial metrics.

Second, create a task force of higher education professionals from associations and colleges to work with the Department to problem solve around the issue. ACE, NAICU, the CCCU and many others would be willing to roll up our sleeves with you.
The CCCU is thankful for the Department of Education’s care and concern about students’ futures and we share the goal of developing the next generation and setting them up for success, not only in a job but throughout their whole life. Higher education institutions are working proactively to ensure students and their families have access to the full range of information and advising that would help students make the best decision. We believe the educational institutions, not the government, are best positioned to create pathways to success for students, and we look forward to partnering with the Department to promote access and affordability and to share success stories. Thank you for the opportunity to provide comments, and we look forward to working closely with Department.

Warmly,

Shirley V. Hoogstra,
President