

April 10, 2018

The Honorable Paul Ryan
Speaker
U.S. House of Representatives
H-232, The Capitol
Washington, DC 20515

The Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives
H-204, The Capitol
Washington, DC 20515

The Honorable Kevin McCarthy
Majority Leader
U.S. House of Representatives
H-107, The Capitol
Washington, DC 20515

The Honorable Steny Hoyer
Minority Whip
U.S. House of Representatives
H-148, The Capitol
Washington, DC 20515

The Honorable Virginia Foxx
Chair
Committee on Education & the Workforce
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable Bobby Scott
Ranking Member
Committee on Education & the Workforce
U.S. House of Representatives
2101 Rayburn House Office Building
Washington, DC 20515

Dear Speaker Ryan, Minority Leader Pelosi, Majority Leader McCarthy, Minority Whip Hoyer, Chairwoman Foxx, and Ranking Member Scott:

As President of the Council for Opportunity in Education, I, along with more than 400 undersigned institutions and associations that host and support the Federal TRIO Programs, write to share our concerns regarding certain provisions within the Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act. We believe that, if enacted, these proposals would have harmful consequences that would vastly diminish the ability of these institutions to provide the academic, financial, and cultural supports necessary to ensure the success of low-income, first-generation students at institutions of higher education and in the surrounding communities.

A chief issue of concern rests in two provisions of the PROSPER Act that, if exercised to their fullest extent, would all but eliminate any opportunity for institutions to offer TRIO services. Specifically, the legislation requires the Secretary of Education to reserve a portion of the TRIO appropriation for entities that have never received TRIO grant funds in the past. Similarly, another provision within the bill mandates that the Secretary reserve a portion of the TRIO appropriation to fund a newly created competitive grant program known as IMPACT Grants.

We greatly understand and appreciate the Committee's interest in expanding the universe of institutions that host TRIO programs. We also share the Committee's commitment to promoting evidence-based models for college access and success. Yet, in attempting to achieve these goals, the PROSPER Act wrests authority from the Congress and forces legislators to yield completely

to the will of the Secretary of Education. Given the austere fiscal environment of the last several years, it is certainly plausible that an Administration would take advantage of such broad authority to direct funds away from traditional TRIO grants in order to fund new institutions and this new initiative. Therefore, we respectfully request that your Committee reconsider these provisions within the legislation.

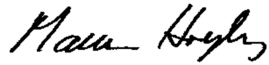
Another concern within the PROSPER Act is the addition of language that would limit the eligibility of entities that host programs similar to TRIO. Specifically, the legislation allows the Secretary to “limit an entity’s eligibility to receive [TRIO] funds ... because such entity sponsors a program similar to the program to be assisted under this division, regardless of the funding source of such program [unless]...the program is the serving a different population or a different campus.” By disadvantaging institutions that host other college access and success programs for low-income and/or first-generation students, this language actually contradicts the notion of “skin-in-the-game.” For, it penalizes institutions that invest their own resources into promoting successful outcomes for students who stand in need. Typically, such investments serve as a supplement to the funding provided by the TRIO programs, which, in turn, serve as models for student support on campus and in the local community. Also, this language particularly prejudices applicants from California, New Jersey, New York, and other states that fund their own Educational Opportunity Programs (EOPs) to support low-income students at state institutions.

A third troubling provision within the PROSPER Act is language that requires applicants to secure a 20 percent match for proposed grant awards. Despite perceptions to the contrary, many institutions of higher education are under-resourced and must continuously fight to fully meet the needs of their students, faculty, and overall infrastructure. This is particularly true of institutions that enroll a high number of low-income, first-generation students—that is, the very students that TRIO programs are designed to support. The same is true for non-profit agencies that focus on providing high-impact services in communities where youth and adults stand in the greatest need of support. It is for this reason that such institutions apply for TRIO grants. While matching funds need not come from the institutions themselves, the creation of this requirement would impose a severe burden on entities located in areas where few partners for such a match exist. This is particularly true of institutions in rural, more isolated parts of the country. It is also important to note that this provision fails to distinguish between institutional efforts to serve students who are enrolled undergraduates and those being served in the broader community through TRIO’s pre-college outreach programs serving youth, out-of-work adults, and military veterans.

Finally, we must also note with concern that the PROSPER Act only authorizes TRIO at a \$900 million funding level for FY 2019 and the five succeeding fiscal years. Yet, this sum is \$110 million less than the amount approved by Congress in the final omnibus appropriations package for FY 2018. Together with the aforementioned language requiring funds to be reserved for new applicants and the IMPACT Grants initiative, this proposed authorization level can only be interpreted as an intention to reduce the amount of funding available for students currently being served by TRIO programs.

We very much hope that you will consider these concerns as you and your colleagues continue the process of reauthorizing the Higher Education Act. We look forward to working with you on these matters and ultimately working to ensure that equal educational opportunity remains accessible for our nation's low-income, first-generation students for years to come.

Sincerely,



Maureen Hoyler
President

On behalf of:

Adrian College
Aims Community College
Alpha Phi Alpha Educational Talent Search Project
American Association of Community Colleges
American Association of State Colleges and Universities (AASCU)
American Council on Education
American Dental Education Association
American Student Assistance
Anoka-Ramsey Community College
APPA, "Leadership in Educational Facilities"
Arkansas State University Mid-South
Association of Catholic Colleges and Universities
Association of Jesuit Colleges & Universities
Augsburg University
Bacone College
Baldwin Wallace University
Baylor University
Bellevue College
Bellingham Technical College
Beloit College
Bemidji State University
Berkshire Community College
Bevill State Community College
Big Bend Community College
Binghamton University, State University of New York
Black Hills State University
Bloomfield College
Blue Mountain Community College
Bluefield State College

Boise State University
Boston College
Boys & Girls Clubs of the Tennessee Valley
Briar Cliff University
BUILD Inc.
California State University, Chico
California State University, Long Beach
Carl Sandburg College
Castleton University
Central Arizona College
Central Carolina Community College
Central Carolina Technical College
Central Lakes College
Central New Mexico Community College
Central State University
Central Wyoming College
Centralia College
Century College
Chadron State College
Chipola College
City College of San Francisco
Claflin University
Clark State Community College
Cleveland State University
Cloud County Community College
Coalition of Urban and Metropolitan Universities
Coconino Community College
Colby Community College
College Now Greater Cleveland
College of St. Benedict
College of the Marshall Islands
College of the Redwoods
Colorado Community College System
Colorado Mountain College
Colorado State University
Colorado State University-Pueblo
Columbus State Community College
Communities In Schools of Charlotte Mecklenburg
Community College of Aurora
Community College of Denver
Community College of Philadelphia
Community College of Rhode Island

Community College of Vermont
Compton Community College District
Concord University
Consortium of Universities of the Washington Metropolitan Area
Cornell University
Creighton University
CUNY, Bronx Community College
Cuyahoga Community College
Dabney S. Lancaster Community College
Dakota County Technical College
Danville Area Community College
Danville Community College
Davis & Elkins College
Delaware Technical Community College
DePaul University
Des Moines Area Community College
Dixie State University
Dutchess Community College
East Central University
East Tennessee State University
Eastern Illinois University
Eastern Kentucky University
Eastern Michigan University
Edmonds Community College
Educational Opportunity Centers of Pennsylvania
EDUCAUSE
Ellsworth Community College (Iowa Valley Community College District)
Everett Community College
Family Legacy Foundation
Fayetteville State University
Feather River Community College District
Finlandia University
Fisk University
Fitchburg State University
Florida Gulf Coast University
Fond du Lac Tribal and Community College
Fort Belknap Indian Community
Front Range Community College
Frostburg State University
Fulton Montgomery Community College
Gateway Technical College
Gavilan Joint Community College District

Genesee Community College
Georgian Court University
Glen Oaks Community College
Graceland University
Grand Valley State University
Grays Harbor College
Hampton University
Harlem Center for Education
Hartnell College
Hennepin Technical College
Hibbing Community College
Hinds Community College
Hiwassee College
Hope College
Howard Community College
Howard University
Hunter College, The City University of New York
Idaho State University
Illinois College
Illinois Eastern Community Colleges
Illinois Valley Community College
Immigrant and Refugee Community Organization (IRCO)
Independence Community College
Indian Hills Community College
Indiana University-Purdue University Indianapolis
Indiana Wesleyan University
Introspect Youth Services, Inc.
Inver Hills Community College
Iowa Central Community College
Iowa Lakes Community College
Iowa State University
Itasca Community College
JCYC
Jefferson College
John Wood Community College
Johnson State College
Kansas State University
Kean University
Kellogg Community College
Kilgore College
Kirkwood Community College
Knox College

Lake Land College
Lake Superior College
Lake Washington Institute of Technology
Lake-Sumter State College
LEARN Inc. TRIO Programs
Lehman College City University of New York
Lewis-Clark State College
Lincoln University
Lord Fairfax Community College
Louisiana State University
Lower Columbia College
Loyola Marymount University
Loyola University New Orleans
LULAC National Educational Service Centers Inc.
Lyndon State College
Lyon College
Madison College
Marquette University
Mars Hill University
Marshall University
Marshalltown Community College (Iowa Valley Community College District)
MassEdCO, Inc.
Mercer County Community College
Mesabi Range College
Metropolitan Community College-Kansas City
Metropolitan State University
Middlesex County College
Mills College
Mineral Area College
Minneapolis Community and Technical College
Minnesota State University, Mankato
Missouri State University
Missouri State University-West Plains
Montana State University Billings
Montana State University-Northern
Montana Tech
Montclair State University
Mount Mary University
Mount Wachusett Community College
Mt. Hood Community College
Murray State University
National Association for College Admission Counseling

National Association for Equal Opportunity in Higher Education (NAFEO)
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Park College
Nebraska Methodist College
Neosho County Community College
Neumann University
Nevada State College
New Jersey City University
New Mexico State University
Normandale Community College
North Arkansas College
North Carolina Central University
North Central Missouri College
North Dakota State University
North Hennepin Community College
North Idaho College
North Shore Community College
Northeast Higher Education District-Hibbing, Itasca, Mesabi Range, Rainy River, and Vermilion Community Colleges
Northern Essex Community College
Northern Kentucky University
Northern Michigan University
Northwest College-Powell, WY
Northwest Iowa Community College
Northwest Missouri State University
Northwestern Oklahoma State University
Oakland University
Opportunity Resource Services, Inc.
Otero Junior College
Owens Community College
Pace University
Paine College
Palm Beach State College
Paris Junior College
Patrick Henry Community College
Paul Quinn College
Paul Smith's College
Penn State University
Pennsylvania Institute of Technology
Pensacola State College
Pierce College District
Pierce College Fort Steilacoom

Pima Community College
Plymouth State University
Polk State College
Portland Community College-Cascade
Pueblo Community College
Rainy River Community College
Ramapo College of New Jersey
Rappahannock Community College
Red Rocks Community College
Reedley College
Rider University
Ridgewater College
Ripon College
Riverland Community College
Rochester Community and Technical College
Rogers State University
Rogue Community College
Rollins College
Roosevelt University
Rose State College
Rowan University
Saint Francis University
Saint Louis University
Saint Paul College, A Community & Technical College
Saint Peter's University
Salem University
Salt Lake Community College
Sam Houston State University
San Antonio College
San Juan College
Santa Monica College
Seattle Colleges
Seminole State College
Seton Hall University
Seton Hill University
Shawnee State University
Siena Heights University
Sierra Community College
Simpson College
Skagit Valley College
Snow College
South Central College

South Dakota State University
South Seattle College
Southeast Alabama Education Outreach Center
Southeastern Community College
Southeastern Louisiana University
Southern Arkansas University
Southern University at New Orleans
Southern Vermont College
Southwest Minnesota State University
Southwest Texas Junior College
Southwest Virginia Community College
Southwestern Oregon Community College
Southwestern University
Spoon River College
St. Cloud Technical & Community College
St. Edward's University
St. John's University
St. Mary's University-San Antonio
St. Olaf College
State University of New York at Fredonia
State University of New York at Plattsburgh
State University of New York at Potsdam
Stillman College
Stockton University
Suffolk County Community College
Suffolk University
Sul Ross State University
SUNY Ulster
Syracuse University
Taft College
Technical College of the Lowcountry
Texas Southern University
The College Board
The College of St. Scholastica
The Gloria J. Taylor Foundation
The National High School Equivalency Program (HEP)/College Assistance Migrant Program (CAMP) Association
The University of Central Florida
The University of Iowa
The University of Kansas
The University of New Hampshire
The University of New Mexico-Taos
The University of Texas at Arlington

The University of Texas Rio Grande Valley
The University of Toledo
The University of Virginia's College at Wise
The University of Wisconsin-Superior
Thomas College
Thomas Nelson Community College
Trident Technical College
Trinidad State Junior College
Trinity University
Tyler Junior College
Umpqua Community College
UNCF (United Negro College Fund)
United Piedmont Center for Educational Excellence
Universidad Adventista de las Antillas
University at Buffalo (SUNY)
University of Alaska Anchorage
University of Arkansas
University of Arkansas at Little Rock
University of California Berkeley
University of California, Davis
University of California, Irvine
University of California, Santa Cruz
University of Central Oklahoma
University of Cincinnati
University of Connecticut
University of Dayton
University of Delaware
University of Detroit Mercy
University of Dubuque
University of Guam
University of Hawaii Hilo
University of Hawai'i Maui College
University of Louisiana at Lafayette
University of Maine
University of Maine at Farmington
University of Maine at Presque Isle
University of Maryland, Baltimore County
University of Massachusetts Boston
University of Massachusetts Dartmouth
University of Minnesota
University of Montevallo
University of Nebraska-Lincoln

University of Nevada, Las Vegas
University of Nevada, Reno
University of New Orleans
University of Northern Colorado
University of Pennsylvania
University of Pittsburgh
University of Rochester
University of South Carolina
University of Southern Indiana
University of Texas at San Antonio
University of Utah
University of Vermont
University of Washington
University of Wisconsin-Parkside
University of Wisconsin-River Falls
University of Wisconsin-Stout
University Settlement Society of New York
Utah State University
Vermilion Community College
Vermont Student Assistance Corp
Vermont Technical College
Virginia State University
Virginia Tech
Voorhees College
Wallace Community College
Washington State Community College
Weber State University
Wenatchee Valley College
Wesleyan University
West Hills College Coalinga
West Virginia University
West Virginia University Institute of Technology
Western Kentucky University
Western Oregon University
Western Piedmont Community College
Western Texas College
Westfield State University
Westminster College
Westmoreland County Community College
Whatcom Community College
Williamsburg Technical College
Wilson Community College

Winona State University
Wittenberg University
Woodland Community College
Wytheville Community College
Xavier University
Yakima Valley College