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From Crisis to Recovery

Federal, State, and Institutional Recommendations for Higher Education

Education Policy & State Higher Education Executive Officers Association

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New America Education Policy program use original research and policy analysis to help solve the nation's critical education problems, crafting objective analyses and suggesting new ideas for policymakers, educators, and the public at large.

SHEEO equips state higher education executive officers and their staffs with the tools to effectively advance the value of higher education; promoting public policies and academic practices that enable Americans to achieve success in the 21st century; and serving as an advocate for state higher education leadership.

About New America

We are dedicated to renewing the promise of America by continuing the quest to realize our nation's highest ideals, honestly confronting the challenges caused by rapid technological and social change, and seizing the opportunities those changes create.

About Education Policy

We use original research and policy analysis to help solve the nation's critical education problems, crafting objective analyses and suggesting new ideas for policymakers, educators, and the public at large.

About Higher Education

New America's higher education program works to make higher education more accessible, innovative, student-centered, outcomes-focused, and equitable.

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Introduction

The past year has been one of the most tumultuous in modern history for America's colleges and universities. In spring 2020, while many of the nation's college students were on spring break, growing alarm over COVID-19 forced most campuses to pivot their operations entirely online. Faculty, many who had little to no experience teaching online, had to rapidly switch teaching modalities. Support staff had to re-envision how to help their students remotely as the demand for services increased. On-campus physical operations staff found themselves furloughed or laid off. Students on residential campuses were told to go home. Many had no real home or safe place to go, and others had to work essential jobs to support their households and had increased caregiving responsibilities. Faculty, staff, and students alike had technology and connectivity issues. The challenge of this sudden pivot cannot be understated, nor can it be divorced from the reality that in the background, a deadly pandemic raged, the economy took a nosedive, and the murders of George Floyd and Breonna Taylor spurred nationwide racial justice protests.

In spring 2020, New America and the State Higher Education Executive Officers (SHEEO) Association partnered on a year-long research project to understand the effect of the confluence of these crises on America's colleges and universities. We interviewed over 100 college leaders from across higher education sectors, membership organizations, and students to hear, in their own voices, about the difficulties faced by campus communities.

Over the course of this year, we wrote dozens of blog posts highlighting such issues as the increase of housing insecurity for students who were living on campus and the need for better broadband infrastructure and improving the transfer pipeline.¹ We conducted multiple nationally representative surveys of students—one that followed undergraduate experiences over time,² and another that looked at the pandemic's effect on community college students.³ We tracked the budgetary effects of the crisis for state higher education systems.⁴ We called on Congress to help struggling students and institutions with relief funds by passing the Coronavirus Aid, Relief, and Economic Security (CARES) Act, allowing for spending flexibility of those dollars, and including additional student-centered relief in subsequent stimulus packages.⁵

All of our efforts were focused on helping colleges, universities, and students with the crisis mode they were under and dealing with the disruptions campus communities were facing. Now, there are signs that it is time to shift to a conversation about what recovery could and should look like for higher education. The California State University (CSU) system has been a bellwether when it comes to campus reopenings during the COVID-19 pandemic. It was one of the first to announce in spring 2020 that its campuses would remain remote for

the fall, and one of the first to announce that schools would continue to be remote in the spring of 2021. As vaccinations have been approved and distributed across the nation, CSU announced its campuses will reopen for in-person learning in the fall of 2021.⁶ It feels like the light at the end of the tunnel when it comes to the worst aspects of the public health crisis. But the decimation caused by the economic recession, and the inequality gap that COVID-19 has exacerbated, will remain for years to come. We will also have to deal with the trauma of a deeply challenging year.

As we consider the near- and longer-term future of colleges and universities and the students they serve, New America and SHEEO have reflected on what we have learned over the past year. We believe there is an important role for federal and state governments and for institutions to ensure a robust recovery of America's higher education system, which will be imperative to the growth of the economy. Below, we detail several recommendations for federal, state, and institutional policymakers as we move from crisis to recovery.

Federal Recommendations

Like so many sectors of the economy, the infusion of federal funds from the CARES Act and subsequent relief legislation staved off a financial crisis for higher education. The cost of rapidly shifting instruction online and purchasing personal protective equipment, sanitization, and testing supplies—paired with revenue losses from enrollment declines, fewer auxiliary activities, housing refunds, and more—could have been the nail in the coffin for many institutions that already survive on narrow budget margins, had the government not provided relief funding and flexibility with existing federal dollars. But it was not just institutions that received help. Students received emergency grant aid to cover unexpected expenses, and low-income students were extended help to purchase food and broadband internet. Student borrowers were given a pause on interest and payments on their federally held student loans for approximately 18 months (at least).

Looking forward, the federal government has an opportunity to significantly change American higher education for the better. Through additional proposed relief packages, other legislation, and executive authority, policymakers can make changes to improve higher education for students, families, and taxpayers. In this section we outline our recommendations for how the federal government can do so through five areas: funding and affordability, accountability, transparency, the digital divide, and student support. Higher education can be more affordable, accessible, and equitable if we address systemic funding inequities on racial and socioeconomic lines, improve quality throughout the system, and provide support to students.

Funding and College Affordability

Establish a Federal-state Partnership

Similar to past economic crises, the pandemic has revealed the shortcomings of the uncoordinated—yet interdependent—national approach to higher education financing. The public health emergency reduced economic activity, leading to less available state revenue for public programs and services, including higher education.⁷ Colleges, meanwhile, faced considerable new expenses and sharp losses in revenue, particularly from campus auxiliary services. Congress passed a series of relief packages to stave off institutional losses and state budget cuts in the near-term, with the relief packages including modest “maintenance of effort” provisions to keep states from supplanting state funding with federal dollars.

However, structural reforms are needed to maintain state funding for public higher education and college affordability, especially through the economic recovery but even over the long-term. Over the past several decades, public

colleges and universities—which educate nearly three in four college students—have had their per-student funding reduced by the state, shifting the cost to students and families, often in the form of student debt. The federal government has increased funding for Pell Grants, but those increases have not kept pace with rising college prices stemming from state budget cuts. Even middle-income families are being squeezed by the rising cost of higher education. A state-federal partnership that provides federal grants to incentivize state funding for public higher education—and that allows the federal government to shoulder more of the burden during times of national crisis like the current pandemic and recession—will help keep college affordable and restore balance and alignment between state and federal financing of higher education.

President Biden has proposed enacting tuition-free community college in the American Families Plan, his vision for securing and advancing the economic future for families, including key provisions for educational opportunities after high school.⁸ This proposal would likely be enacted through America’s College Promise, an already-proposed legislative effort to make two years of community college free for students, a federal-state partnership itself.⁹ Tuition-free community college is an important first step towards improving affordability for millions of students, but still does not fully address affordability at four-year institutions. A federal-state partnership that addresses affordability at all public colleges and universities is the best way to put higher education within reach for all students.

Invest in Minority-Serving Institutions

Similar to other colleges, minority-serving institutions (MSIs) faced budget cuts and financial uncertainty as a result of the pandemic-induced economic downturn. However, minority-serving institutions, including historically Black colleges and universities (HBCUs) and tribal colleges and universities (TCUs), have been historically underfunded and have often done more to support students with fewer resources. During the pandemic, many MSIs saw their already skinny budgets slashed, which made it difficult for them to support their students, who are more likely to be low-income and first-generation, in a time of crisis.

Beyond the federal-state partnership we propose, additional investment in Minority-Serving Institutions is necessary to remedy this historic underfunding and to enable these colleges to better support their students. Many of the students who attend MSIs suffered the greatest losses during the pandemic and will need support to start or complete their education. The American Families Plan would go a long way toward addressing systemic institutional funding inequities. First, it would allocate \$39 billion to subsidize two years of tuition at MSIs for students from families earning less than \$125,000 annually. Second, it includes a \$5 billion expansion of existing institutional grants, which would help alleviate those inequities.

Revive and Redesign the TAACCCT Program at Community Colleges

During the Great Recession, the Obama administration sought to invest in community colleges to build the institutions' capacity to provide new programs, along with better support services, through the Trade Adjustment Assistance Community College and Career Training (TAACCCT) program. Community colleges received almost \$2 billion in grants so that they would have the resources to support the growing demand for training as the economy recovered. Research has shown that the TAACCCT investment paid off.¹⁰ A meta-analysis of 36 final evaluations showed that participants completed their programs or earned a credential at nearly twice the rate as other students. And those who completed their programs were nearly 30 percent more likely to either get a job or a wage increase than other students.

Workers without any education after high school have been hit hardest by the economic downturn, so Congress must make investments to address these disparities. Community colleges will be essential in terms of equipping workers with the education and skills necessary to find a well-paying job.¹¹ But community colleges have been systemically underfunded, a problem that will be exacerbated by the double-digit drop in enrollment they saw in the pandemic.¹² Congress should revive and redesign the TAACCCT program so that community colleges have the capacity and resources to meet the demand for high-quality training that leads to positive labor market outcomes for workers.

Help Low-income Students by Reinvesting in the Pell Grant

The Pell Grant program—a cornerstone of college access—provides well-targeted financial assistance to low-income undergraduate students. However, increases in the maximum award have not kept pace with increases in tuition, particularly at four-year colleges.¹³ Just 15 years ago, the maximum Pell Grant amount covered 79 percent of the average tuition and fees at public four-year institutions. But challenging economic circumstances and diminishing state investments in higher education mean that last year, it covered just 59 percent. At private four-year colleges, the grant covered an even smaller portion of the cost (from 22 percent of average tuition and fees in 2003 to 17 percent a decade and a half later).¹⁴

The pandemic has exacerbated inequities in the economy and highlighted the importance of higher education for finding a well-paying and stable job. Low-income families who have suffered the most in the economic downturn, as well as workers who have lost their jobs and are returning to school, will need the Pell Grant program even more in order to access and afford higher education. Congress should restore the purchasing power of the Pell Grant program by substantially increasing funding for the program and increasing its total value, helping low-income students take on less debt and making college more affordable. Additionally, Congress should permanently reinstate the annual

inflationary increase to the maximum Pell Grant so that the program keeps pace with growing costs.

Accountability

Carefully Monitor Clock-hour Programs Engaged in Distance Education

Most clock-hour programs are vocational training ones, often tied to a specific state or industry requirement for a certain number of hours of training, in fields like health care and cosmetology. Prior to the pandemic, clock-hour programs were not permitted to offer distance education. After all, who wants their blood drawn by a phlebotomist who has been trained entirely virtually? During the pandemic, however, some clock hour programs did go virtual, while others shut down temporarily. Regulations finalized in late 2020 and scheduled to take effect on July 1, 2021 will permit clock-hour programs to operate virtually—both synchronously, where the instructor and students are logged in at the same time, and asynchronously, where they are not—for the first time. The U.S. Department of Education should carefully monitor institutions engaging in this practice, which may have repercussions for students’ learning, success, and potentially for a college or university’s ability to meet licensure and/or accreditation requirements. In addition, the Department should require institutions offering clock-hour programs to disclose when they offer such programs virtually, and to provide details about their strategies for ensuring student attendance and measuring student progress.

Stop Predatory Recruiting Practices

During the Great Recession, for-profit colleges engaged in a host of aggressive and sometimes predatory or misleading strategies to recruit and enroll students. Between 2006 and 2010, enrollment in for-profit colleges jumped by 76 percent.¹⁵ The pandemic-fueled recession is still in its early stages, but enrollment in for-profit colleges is again up, even while community colleges face double-digit declines in enrollment.¹⁶ The Education Department needs to take steps to monitor these trends, hunt down and put an end to the use of predatory recruiting practices. By monitoring schools with especially steep enrollment growth, looking for evidence of predatory practices (perhaps through a “secret shopper” program in which reviewers pose as students), and enacting strict penalties, the Department can not only avoid the mistakes of the last recession, but also protect students from facing such harm in the first place.¹⁷

Require Accrediting Agencies to Increase their Reviews of Colleges

Throughout the pandemic, institutional accrediting agencies have largely sought to step out of the way of colleges so that colleges have flexibility to respond to the crisis. Yet most students whose colleges transitioned online say the quality of

their education was worse as a result.¹⁸ Accrediting agencies must step up to ensure quality and better protect students enrolled in higher education. For instance, accrediting agencies should closely monitor when institutions cease using pandemic-related distance education, and ensure added oversight for institutions that first began to offer online education during the pandemic and plan to continue using it. Accreditors should communicate expectations to institutions about their instructor capacity and skill, as well as requirements that faculty regularly interact with students on course content. (New regulations for these “regular and substantive interaction” requirements take effect on July 1, 2021.) Accreditors should monitor colleges’ use of online program management companies especially carefully, since contracts may lock schools into problematic or costly terms and outsource key academic functions to unaccountable, unaccredited private companies.¹⁹ Finally, accrediting agencies should ensure adequate oversight of institutions’ finances and—importantly—*take action when colleges appear at risk of closure*. On too many occasions, accreditors have done little more than ask for a plan in the event of closure; when the closure comes, the plan has too few details to be actionable. Agencies need to increase the rigor of their oversight of college closure planning, even while they seek to ensure colleges do not have to close.

Restore Federal Accountability to Higher Education Programs

During the last recession, for-profit colleges flooded the market with low-quality credentials, sometimes through deceptive marketing practices, that left students worse off for having returned to school during a time of sky-high unemployment. In response, the Obama administration implemented a host of federal regulations designed to protect students’ and taxpayers’ dollars. The gainful employment regulations required for-profit colleges and non-degree public and nonprofit programs to meet minimum standards for providing credentials of value. The borrower defense rules provided students with relief on their loans if their schools were found to have lied to them, with the colleges on the hook for their bad actions. The Trump administration, however, rescinded the gainful employment rules entirely and greatly weakened the borrower defense rules. Those regulations will be needed now more than ever, as higher education begins to follow its typical counter-cyclical patterns of high enrollment during high unemployment and as more federal aid begins to flow to and through colleges. The Biden administration should act quickly to restore strong gainful employment and borrower defense regulations.

Improve Monitoring of Colleges’ Finances and Prepare for Possible Closures

At the outset of the pandemic, higher education experts predicted that a large number of colleges would likely be forced to shutter permanently, thanks to a combination of enrollment declines, financial hits to students and their families, and the pivot to remote learning.²⁰ More than a year into the national crisis, only around a dozen colleges have closed, largely thanks to the tens of billions of

dollars in federal relief Congress provided colleges to stave off more serious financial catastrophe. But the worst has not necessarily passed: as federal relief money dries up and enrollment patterns potentially shift due to the pandemic, closures and consolidations are still possible.

The Education Department is ill-equipped to deal with a possible wave of college closures. Its monitoring of college finances lags behind what is actually happening at many institutions as it waits for annual audited financial statements, and it does not always exercise precautionary consumer protection measures even if schools appear to be at high risk of closure. Now is the time for change.²¹ The Department should immediately begin monitoring schools at the highest risk of possible closure—those in dire financial straits before the pandemic, and those that have seen the most substantial declines in Title IV aid or enrollment since—using timely financial reporting, rather than just audited statements. Colleges at high risk of closure should be required to take immediate steps to protect their students, including developing teach-out plans (or, for the highest-risk, teach-out agreements with nearby institutions) and recording management plans. The Department should also ensure students receive fair warning and clear communications about any possible closure and their eligibility for a closed school student loan discharge.

Transparency

Analyze and Publish Details of How Colleges Spent COVID Relief Funds

Throughout the pandemic, Congress has provided more than \$75 billion to colleges for expenses and for emergency aid to students through three rounds of COVID relief packages. Yet relatively little is known about how institutions have allocated or spent those dollars, which came with virtually no requirements or strings attached, especially for such a significant amount of money. The Education Department has required quarterly public reporting detailing how both institutional and student relief aid has been spent but has not yet centralized that reporting anywhere for analysis. Colleges and universities recently submitted their annual reporting on expenditures, but the Department has not evaluated or published these reports. It should move quickly to analyze that information and better understand how colleges spent these dollars. Were institutional relief funds spent purchasing technology or personal protective equipment, hiring more instructors, or reimbursing students' housing and other expenses, for instance? Were grants to students awarded based on application, Pell Grant status or income, or both? How quickly were those dollars spent? Policymakers are still in the throes of legislating a response to the pandemic, and this information is needed to help shape this response. The Department should publish this information in an electronic and searchable database.

Improve the Collection of Data on Distance-education Programs and Higher Education Broadly

As the pandemic forced schools to shutter quickly and millions of students moved online overnight, one thing was glaringly apparent: our higher education data infrastructure could not keep up. Most information on distance-education students is reported through the Integrated Postsecondary Education Data System (IPEDS), where data are reported in aggregate. Reporting happens long after the fact; the effects of the pandemic will appear in the IPEDS data roughly three years after the start of the national emergency. Federal administrative data sources lack information on distance education status, race/ethnicity, and other student characteristics that could have helped measure the effects of the pandemic on formerly-in-person students and Black and Latinx students almost in real time. Those data would have informed policymakers' efforts to develop solutions for students as the pandemic wore on. In fact, federal data did not even keep track of the names or numbers of institutions that moved to remote learning in response to the pandemic (or when they reopened).

Still, the fallout from the pandemic will continue for years, and it is not too late to improve the data collection. Congress could also pass the College Transparency Act, a bipartisan bill led by Senators Elizabeth Warren and Bill Cassidy, which would help to plug many of the gaps in existing federal data that undermine the utility of those data. And the Education Department should take whatever steps it can in the meantime to improve the collection and use of its data, including beginning to gather information about federally aided students' distance-education status and ultimately publishing information about those students' successes in higher education.

Rescind Guidance and Promote Transparency on Transcript Withholding

The Education Department can—and should—strongly signal that it stands with students, not institutions, when it comes to transcript withholding for unpaid debts.²² Currently, the Department **explicitly states** that institutions can withhold academic transcripts until a defaulted federal student loan is satisfied. The Department should revoke this guidance and help answer questions about how widespread these practices are by making transcript withholding a reporting requirement. Colleges should be required to disclose whether they withhold transcripts if a student defaults on a federal student loan and/or owes a sum to the institution. The Department should analyze and publish this information and clarify that institutions that withhold transcripts over defaulted federal loans should cease doing so and encourage institutions to cease the practice more broadly (for example, due to institutional debts).

The administration can also think more broadly about opportunities to provide incentives to colleges to adopt more student-focused behavior. For instance, the Department of Veterans Affairs runs the **Principles of Excellence** program,

which requires institutions to commit to certain policies and practices (like heightened transparency and an end to aggressive recruiting practices) in exchange for access to G.I. Bill dollars. An agreement to stop transcript withholding practices should be added to the Principles of Excellence.

Digital Divide

Make the Emergency Broadband Benefit Permanent and Reduce the Burden of Verification for Pell Grant Recipients

During the pandemic, Congress created the Emergency Broadband Benefit (EBB) program at the Federal Communications Commission (FCC). The EBB takes a remarkable step in helping low-income and struggling households afford broadband and access technology through a \$50-a-month subsidy. And it will include Pell Grant recipients as eligible beneficiaries. However, with fewer than \$10 billion provided for the EBB program, it is clear that the funds will run out quickly, and not all eligible low-income households will be served. And once the pandemic is over, the need for affordable broadband access will not subside. Congress should move to make the EBB a permanent program and increase its funding. And lawmakers and the Education Department (among other federal agencies) should act to make the benefit as easy to use as possible, ensuring information about the program is readily accessible. The Department should continue outreach to current Pell-recipients to inform them how they can access the benefit. The Department and other federal agencies should also ensure that verification is, to the extent possible, accomplished through administrative data-matches that automate what might otherwise be a burdensome and time-consuming process.

Pass Legislation Supporting College Students' Internet Access

Broadband access problems, while in the spotlight during the pandemic, are not solely a pandemic problem. Today's college students require broadband access to participate in coursework, complete assignments, and prepare for the jobs of the future. Yet low-income, rural, and tribal students, in particular, face persistent challenges in accessing broadband services and high-speed internet connections. In addition to making a broadband subsidy program permanent, the Accessible, Affordable Internet for All Act, introduced this spring by Senator Amy Klobuchar and House Majority Whip James Clyburn, would invest in expanding the nation's broadband infrastructure and make affordable internet service a priority in the long term.²³

Student Support

Build on Safety Net Expansions for College Students

In December 2020, Congress passed a second coronavirus relief bill that expanded the Supplemental Nutrition Assistance Program (SNAP) to make college students eligible if they are enrolled at least half-time and otherwise meet the income and eligibility requirements.²⁴ Many college students faced food insecurity before the pandemic, but the pandemic exacerbated those struggles as many Americans lost jobs and income. A survey New America conducted in August 2020 in partnership with Third Way found that 46 percent of college students were worried about being able to afford necessities like food and housing in the next few weeks to a month.²⁵

This expansion of food benefits was a significant step in addressing the basic needs of college students, but there is more that can be done. Unfortunately, the SNAP expansion expires 30 days after the end of the emergency. Congress should make this benefit permanent so that students are not faced with hunger after the pandemic. Congress should also expand other safety net programs to help college students. The Temporary Assistance for Needy Families (TANF) program currently counts postsecondary education towards a recipient's work requirement for only one year, which is certainly not long enough to complete a degree. Even during that time, education can count towards the work requirement only after a recipient has worked at a "real" job for 20 hours a week. A student working that many hours is more likely to attend college part time, which extends the time required to earn a degree. Congress should change this law and allow education to count towards TANF work requirements for more than one year.

Provide Institutions Permanent Flexibility to Use SEOG Funds for Emergency Aid

When Congress passed the CARES Act, it allowed colleges to use their Supplemental Educational Opportunity Grant (SEOG) funds as emergency grant aid for students. This evidence-based intervention has been shown to help students succeed.²⁶ Today's students, even outside the pandemic, can quickly find themselves off-track if an unexpected emergency occurs. A broken-down car, a family medical emergency, child care falling through, or other financial hardship can prevent students from continuing with their studies, even when they have been successful in the classroom. The flexibility in the CARES Act helped support students in response to the pandemic. Congress should permanently give institutions the flexibility to use SEOG as a pool of money to provide emergency funding for students.

Support Student Parents through Child Care Investments

Roughly one in five undergraduate students have children, and these student parents faced particular challenges during the pandemic when nearly one in four associate degree students and one-third of bachelor's degree students considered stopping out because of child care responsibilities.²⁷ These challenges will continue after the pandemic and getting student parents back on track to

complete their credentials will be even more essential. While colleges can do more to make student parents aware of services and benefits that can help them to pay for child care expenses while they are in school, Congress also needs to take steps to better support these students.²⁸

The Child Care and Development Fund program (CCDF) provides block grants to states to support low-income working parents, including those who attend a postsecondary educational program.²⁹ Yet many states, which determine the eligibility criteria, have placed additional restrictions on those parents that make accessing child care funds while in school difficult, such as limiting the type of degree the parent can be seeking and the time frame for which student parents can receive funds, as well as requiring a minimum number of hours spent in education each week.³⁰ All of these restrictions can make it even more challenging to access reliable care that will help student parents complete their credentials. Lawmakers should invest more in these federally funded child care programs, and limit states' ability to further restrict eligibility for student parents. States also often require parents to fill out onerous paperwork. This process should be streamlined through data-matching and partnerships with institutions. And programs like the Child Care Access Means Parents in School (CCAMPIS) program should be expanded to support more on-campus programs. CCAMPIS is a small program that provides grants to colleges and universities to help low-income students afford child care through the use of a sliding fee scale based on income. Both undergraduate and graduate students are eligible to participate, as are students taking online courses. CCAMPIS funds can be used to support on-campus child care centers, or can be directed to off-campus child care programs.

State Recommendations

This section highlights actions and policy changes state actors can take to help more students earn credentials beyond high school after the pandemic. In recent years, many states have established attainment goals to increase the number of residents holding credentials of value beyond a high school diploma. Many have identified closing educational attainment gaps by race and ethnicity as a priority in their attainment goals, yet the COVID-19 pandemic has the potential to derail the momentum many states have gained.³¹

As the higher education sector recovers from the COVID-19 pandemic, states will play a critical role in ensuring the return to normalcy proceeds as smoothly as possible. At the state level, different actors play separate yet important roles. State legislatures appropriate funds to institutions and students as well as enact enabling legislation for higher education agencies and state authorizers to carry out their responsibility of protecting students. Governors can set policy agendas that prioritize college access, affordability, and accountability. SHEEO agencies not only play a critical role in providing data, guidance, and information to these policymakers but are also responsible for enforcing consumer protections and coordinating the state's higher education enterprise. The recommendations below outline actions for each of these state actors to take to ensure postsecondary education remains accessible, affordable, and high-quality as students return to campuses.

Funding and College Affordability

Reallocate Appropriations to Support Colleges that Serve the Students with the Most Need

In many states, colleges that serve financially better-off students also receive more state funding. While open-access institutions like community colleges and regional four-year institutions spend only around \$15,000 on academics per full-time student, highly selective colleges spend more than \$52,000 per student.³² This results in resource inequities for the students who need the most support. During the pandemic, these inequities have been exacerbated, as many Black, Latinx, and low-income students have struggled to find support to stay enrolled. States should reallocate or add resources to give more support to colleges that serve low-income students and students of color.

Maintain or Increase Direct Appropriations to Institutions in Order to Ensure Appropriate Levels of Support and Services for Students

Greater state funding for higher education results in more students completing college degrees.³³ But it can be easier to find political will to fund student

financial aid programs than to budget for direct aid to public colleges. As some states see constrained budgets due to the economic impact of COVID-19, they should resist the temptation to cut direct appropriations to colleges in order to fund financial aid. Colleges need consistent public support to provide adequate education to students and vouchers alone make that level of funding difficult to maintain. At the same time, public colleges use state funds to keep in-state prices low for students. This low price point can help convince more students that they can afford higher education without having to calculate aid eligibility.³⁴

Be More Equitable with Student Financial Aid

Coming out of a year marked by trauma and economic upheaval, students are facing increased challenges paying for college and living expenses. States should consider allocating the majority of their financial aid programs to need-based aid. Need-based aid (as opposed to merit-based aid) helps students go to college who might not otherwise be able to afford it and should be the primary way that states disperse their student aid.³⁵ To deal with the economic uncertainty going forward, states should also consider supplementing the federal emergency aid money by adding an additional, state funded emergency aid program so that students who face financial hardships can get small grants that allow them to stay enrolled. States should collect data on how public colleges and universities dispersed federal emergency grant funds to students and the impact these funds had to make the case for a new program that lasts beyond the pandemic.

Design Funding to Address the Digital Divide for Students

The pivot online highlighted the substantial number of college students who do not have access to high-speed internet or devices to stay online.³⁶ A survey New America conducted in December with Third Way, a left-leaning think tank in Washington, DC, shows that 22 percent of college students reported having major challenges accessing a stable, high-speed internet connection.³⁷ That translates to approximately four million students enrolled in higher education who likely are struggling to access the internet, during a time when the vast majority are required to complete their coursework online, which leads to a troubling consequence: many people are not starting or continuing their education. Another survey from New America asked why people either stopped out of community college or changed their mind and did not enroll in the fall semester, and nearly one-fifth said they did not have the technology or internet access needed to take classes online.³⁸ States should consider providing internet subsidies and devices for college students, along with building connectivity in rural areas to ensure that students have access to the internet and the devices they need to be successful.

Help Colleges Use Federal Stimulus Funding Well by Providing Technical Assistance and Support

Over the past year, Congress has authorized around \$75 billion in higher education relief money.³⁹ This is a historic investment. And while around half the money must be spent on direct aid to students, institutions have been awarded billions of dollars to continue offering quality educational opportunities during the pandemic. SHEEO agencies and higher education systems should provide support to colleges and universities receiving federal stimulus funds to ensure that they use the money in ways that have lasting positive impact. This support could be in the form of technical assistance to navigate federal guidance on allowable uses of these funds or convening institutional leaders to share best practices. States have an important role to play in helping colleges think about how to best support students.

Coordinate Agencies to Facilitate Student Access to Basic Need Supports

Across the country, lack of food and housing support has led many students to drop out of higher education.⁴⁰ New America has heard from students and colleges about just how badly the pandemic has exacerbated insecurity around these basic needs, which will likely continue with the recovery. State higher education agencies should consider coordinating and connecting agencies that provide support for basic needs with public colleges. Coordinating these agencies and connecting them to colleges will enable more students access to the support they need to stay enrolled.⁴¹

Accountability

Build the Capacity of SHEEO Agencies and State Authorizers

SHEEO agencies and state authorizers need increased levels of funding and staffing to fulfill their statutory responsibilities to protect students. SHEEO agencies have had to seek additional sources of revenue beyond state support, such as federal and philanthropic support to fulfill their missions. In 2020, only about two-thirds of SHEEO agency funding came from state revenues.⁴² Additionally, state authorization offices have been underfunded for years, with the majority relying on fees paid by institutions they oversee to fund operations. This underfunding has led to significant staffing capacity challenges in many offices. In 2020, the average authorization office had only one full-time employee for every 74 institutions that it authorized.⁴³ Prioritizing funding for these critically important agencies will help ensure states are able to properly oversee the increased number of online programs.

Adopt New Policies that will Protect Students' Time and Money

By providing incentives for orderly closures of colleges, states can help ensure students' educational trajectories are minimally impacted. Policies that cancel institutional debt, issue tuition refunds, and provide transfer options will all help

protect the investment students have already made. The Maryland Disorderly School Closures legislation passed in 2020 provides an example of the type of action states can take. Under this law, students may be entitled to a refund of tuition and fees if the institution does not properly file student records with the Maryland Higher Education Commission prior to discontinuing academic or administrative operations.⁴⁴

Create Information-sharing Agreements and Alignment across Agencies that Oversee Educational Providers

Many for-profit and non-degree credential providers interact with multiple state agencies (including veterans program approval agencies, workforce eligible training provider lists, and occupational licensure boards). In many instances, state agencies may be the only entity that oversees these providers if they are not accredited and do not participate in the Title IV federal aid programs. Inconsistent communication and enforcement of policies can create confusion and can result in substandard student outcomes.⁴⁵ States that establish clear lines of communication and responsibilities across agencies can reduce confusion and take quicker, coordinated action against bad actors.⁴⁶

Prioritize Oversight and Enforcement of Consumer Protection Laws and Practices

The pandemic has created an unprecedented situation where states have had to provide waivers and extraordinary flexibilities in quality assurance processes. While these flexibilities were necessary to prevent even greater disruptions in student learning, it is important to recognize that this unique situation has created opportunities for abuse, and it is critical for states to increase their oversight efforts now, particularly as for-profit institutions increase recruitment for online programs. Enrollment in for-profit institutions has expanded rapidly during the pandemic while many nonprofit institutions have seen declining enrollment. The enrollment increase in for-profit institutions is reminiscent of what happened during the Great Recession, but many of the federal regulations put in place following for-profit abuses have been rolled back in recent years.⁴⁷ These rollbacks mean that quality assurance oversight is more important than ever at the state level.

Use Outcomes Data to Identify Institutions that may be Problematic.

States should collect outcomes data on postsecondary education providers as part of the authorization renewal process. While many states require institutions to provide information on retention, graduation, and licensure exam passage rates, these data elements are often self-reported and not standardized across institutions.⁴⁸ If states were able to collect standardized data, they could create benchmarks that establish minimum thresholds providers are required to meet. States should also consider linking student records with workforce data to get a more complete picture of employment outcomes and wage data. This type of

linkage could also help institutions demonstrate the value their credentials provide to state economies. If states are not able to collect all of the data elements they would like, data made available by the Department of Education could be an alternative, although it will likely not be up to date. The data provided by the Department's College Scorecard and the Integrated Postsecondary Data System (IPEDS) outcome measure could be useful, but these data sources do not capture many non-degree credential providers because they are not accredited and do not participate in Title IV federal aid programs.

Monitor Institutions' Financial Viability.

By using audited financial statements to calculate financial viability ratios and composite scores, states will be able to better identify troubled institutions before closure becomes inevitable. For financially troubled institutions, requiring regular updates on liquidity can help determine when states need to require additional consumer protections. The federal COVID relief funding has helped prevent widespread closures of institutions, but this one-time funding will eventually expire, and it remains unknown how student enrollment patterns, learning modalities, and preferences will change in the aftermath of the pandemic. Institutions that struggle to attract students and serve them well will struggle during the pandemic recovery. It is these institutions on which states will need to focus their financial monitoring efforts. Many financially struggling institutions are adept at staying open; however, requiring these institutions to be prepared for a closure, even if it never occurs, will help minimize the disruption to students in the event it does happen.⁴⁹

Require Teach-out Plans and Agreements from High-risk Institutions

Institutions at risk of closing develop teach-out plans with another institution to ensure their students are treated fairly and have a pathway for finishing their programs if the schools do have to close.⁵⁰ Requiring these agreements be in place and clearly communicated to students will help lessen the confusion that accompanies a closure. Additionally, states should ensure a records management plan is in place, and require clear information be provided to students about closed school discharge opportunities. States may also want to provide legal authority for higher education agencies to seize student records if they are in danger of being lost, stolen, or otherwise not available to students, as Illinois has done.⁵¹

Emergency Response Monitoring

Assess the Equity Impacts of Institutions' Reopening Statuses and Develop Plans to Counteract the Inequity for Students of Color and Low-income Students

The COVID-19 pandemic exacerbated the inequity that has existed in higher education for a long time. Due to the public health crisis and the economic downturn caused by the pandemic, many low-income students, first-generation students, Latinx, and Black students have transferred or stopped out of college completely.⁵²

Last August, a survey conducted by New America showed that the major reasons that many students at community colleges stopped out in fall 2020 included having to work, no longer being able to afford the program, facing the uncertainty of the pandemic, having to provide care for another family member, and questioning the safety of taking classes in person.⁵³

As the vaccine is rolling out and colleges are making plans for reopening, states must work with institutions to incentivize students' re-enrollment. The Biden administration's recently proposed American Families Plan can provide tremendous financial help for states to alleviate students' cost concerns and improve student support.⁵⁴ Apart from alleviating students' concerns about cost, states need to ease re-entry requirements and improve the transfer pipeline to help students enroll and accelerate their time to degree. Regardless of the plans or programs implemented, states should regularly assess the equity impacts of such plans or programs and provide interventions, if necessary, to support and incentivize students of color and low-income students to return to campus.⁵⁵

Monitor Closely Any Transition in Response to Emergency Events

The pandemic posed unprecedented challenges and enormous uncertainty to colleges and universities, which not only threaten their financial stability, but also disrupt the academic trajectory of students if the institutions close. Unfortunately, students are not always informed in a timely way about potential closures, which leaves them with no clear plans for how to continue their education.

As institutions face enormous uncertainty as a result of the emergency events, states should strengthen their oversight. In April 2020 New America and the National Governors Association recommended three main actions for states to consider in response to the unprecedented challenges posed by the pandemic, including re-evaluating and re-calibrating the state systems, identifying institutions at risk of financial collapse, and planning for possible closure.⁵⁶

New America and the National Governors Association believe that governors should create systems that allow oversight agencies to collaboratively monitor struggling institutions. In spring 2020 institutions transitioned to online learning quickly in response to the pandemic; in the future to monitor emergency transition to online learning, states should require institutions to provide information such as when institutions go online, when they cease operations, or

when enrollment changes. States should also strengthen the authorization process for institutions that start recruiting for their online programs.⁵⁷

In terms of identifying institutions at risk of collapse, we emphasized the need to examine institutions' current and projected financial status through data such as the Department of Education's financial responsibility composite scores. States can also develop their own financial stability metrics.⁵⁸

After identifying institutions that are at the greatest risk of closing, states should require them to have teach-out arrangements with financially stable institutions. The teach-out plans should include record management plans to ensure students still have access to their transcripts and other important records. Students should also be informed of what will happen to their student loans and whether they will be eligible for closed school discharges.⁵⁹

Make Applications Virtual/Digital and Return to In-person Site Visits Once it is Safe

As the pandemic pushed institutions to move online, it also gave state authorizers and accreditors opportunities to rethink their approach to approving institutions. In some instances, these approaches became more efficient as state authorizers and accreditors made applications virtual. State authorizers and accreditors should consider making virtual approaches, such as digital application processes, permanent, as long as they do not sacrifice quality. However, some processes that became virtual out of necessity during the pandemic should return to their in-person schedule. For example, state authorizers were creative in making site visits and the review of sensitive documents virtual during the pandemic, but institutions can hide bad practice if site visits remain entirely virtual.⁶⁰

Require Institutions of Higher Education to Have an Emergency Management Plan in Place

The pandemic affected higher education institutions across the country, heightening the critical role of colleges and universities in working with state and local governments to manage responses to emergencies. However, according to a recent report by the National Conference of State Legislatures, only a few states (including Virginia, Arkansas, and Maryland) require public colleges and universities to have emergency preparedness plans.⁶¹ While a global pandemic can feel like a unique threat, colleges and universities are regularly faced with other types of emergencies such as natural disasters (e.g., hurricanes, earthquakes, fires, etc.) or human-made disasters (e.g., shootings, terrorism, war, bomb threats, etc.).⁶² To effectively prepare for emergencies, states should work closely with higher education institutions and require them to report on their emergency preparedness and response plans. The plans can be based on the U.S. Department of Education's 2013 *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*, which categorizes emergency management into five areas: prevention, protection, mitigation, response, and

recovery.⁶³ States may also want to consider requiring institutions to keep a small share of their total revenues in reserve to help overcome financial shocks caused by emergency situations.

Transfer Pipeline

Establish Credit Transfer Policies between Institutions to Facilitate Enrollment Changes

The survey conducted by New America last December to understand the enrollment decline among students at or interested in community colleges found that about half of students enrolled in community colleges in spring 2020 and stopped out in fall 2020 will need a license to work in the field they were pursuing, and seven in ten of these students will need to finish their programs to earn the license.⁶⁴ This statistic highlights the need for institutions to ease the re-entry and transfer process and for states to implement flexible transfer policies between institutions within states to make sure student learning prior to and during the pandemic will be counted towards their progress, encouraging students, especially those who have stopped out, to re-enroll.

Prevent Institutions from Holding Academic Transcripts Hostage for Unpaid Debts

California is in the vanguard when it comes to preventing transcript withholding.⁶⁵ The state has a simple, clean law that forbids any school from withholding a student's transcript over an unpaid debt. Other states should follow California's lead and prevent institutions from harming former students by holding their academic records hostage. Estimates indicate that roughly 6.6 million students have had their transcripts or degree blocked due to unpaid debt.⁶⁶ These policies tend to be more harmful to low-income students who do not have the means to pay the debt. With the pandemic and disparate economic recovery disproportionately harming low-income households, these policies may dissuade students from continuing their education, even if they are the ones who stand to gain the most from a college degree.

Institutional Recommendations

Students and colleges faced many unprecedented challenges during the pandemic. Most colleges made a rapid pivot to deliver education online, many adopted different grading policies, and all had to implement safety policies and practices that changed frequently and quickly. Many colleges suffered enrollment losses and students struggled to keep up with their academics. Institutions' budgets were strained, and as discussed in prior sections, federal and state dollars became integral and continue to be important for colleges' survival.

Moving out of the crisis, institutions should keep several innovations they adopted during the pandemic and implement some changes to ensure higher education is safer, higher quality, and more accessible than before the pandemic. These recommendations are largely policies institutions can implement independently, or in tandem with state and federal dollars or initiatives. Because change at the institutional level can often happen faster than at the state or federal level, colleges are in a key position to ensure the new normal is more equitable than before the pandemic.

Online Learning and Support Services

Carefully Consider OPM Contracts

To establish an online presence, many colleges are looking for support from outside companies that specialize in the business. At the same time, with more schools considering online education as a way to diversify their enrollment and revenue pools, the pandemic may lead to more distance education in the long term. In looking to the future, many colleges appear to be considering online program management companies (OPMs). Online program managers are third-party companies—contractors to the institution—that agree to develop and maintain online programming. These OPMs have seen increased interest from colleges. But colleges considering an OPM partnership need to be careful.

While some OPMs may deliver a platform that works for students and faculty, others promise the moon and deliver only shoddy quality offered by sketchy providers. This has even led to the collapse of some colleges. Colleges should consider three broad aspects of an OPM contract before signing: (1) the institution's capacity to take on such a contract, (2) the terms of the contract, and (3) the quality of the contract. Colleges can use New America's 2020 guide, *Considering An Online Program Management (OPM) Contract: A Guide for Colleges*, when entering into contracts with OPM companies to help them analyze their own contracts or guide their consideration of an OPM partnership to ensure both the institution and students are protected.⁶⁷

Keep Online Student Supports

Many colleges shifted their advising, career, and support services online during the pandemic. Academic counselors, mental health counselors, career coaches, and other student support professionals no longer met with students in person, which allowed for much wider access to services and more flexibility for students. As we found from the many interviews we have conducted over the course of this project, students could schedule appointments that fit their schedules much more easily than when these services were only in person.

Institutions should capitalize on this innovation and ensure that online support service options remain available after the pandemic. Doing so is especially important considering the greater proportion of students with caregiving or work responsibilities in higher education as a result of the pandemic. Instead of struggling to schedule an in-person appointment in a busy work, school, and personal schedule, students can get the help they need much more easily if these supports have an online option available.

Invest in and Expand Mental Health Services

Even before the pandemic, mental health was a serious issue for students. But the pandemic resulted in increased mental and emotional distress. The isolation and challenges students and staff faced within and outside of higher education often negatively affected their performance and well-being. Across various student surveys and focus groups, students cited the urgent need for mental health services.⁶⁸

Colleges can use some of their new federal funds to guide students toward community-based mental health resources or, preferably, by hiring mental health counselors and social workers. These counselors should also be trained to work with diverse student populations. Investing in the well-being of students should be viewed as part of the effort to get more students to graduation.

Emergency Response

Ensure Students, Faculty, and Staff have Access to Free and Readily Available COVID-19 Testing and PPE, According to CDC Guidance

As colleges and universities make plans to return to in-person learning and activities, they must ensure that students, faculty, and staff have access to the tools necessary to make the return as safe as possible. Institutions invested significant amounts of money into making classrooms and other communal spaces safe during the pandemic, including improving ventilation as much as possible. But the return to pre-pandemic levels of in-person learning require additional steps to make the college community safe.

Institutions should ensure that students, faculty, and staff have access to COVID-19 testing that is easy to receive and free or affordable. Institutions should consider prevalence testing—testing members of the campus community who may be asymptomatic to understand the spread of COVID-19 on campus—if recommended by local, state, or federal public health authorities. In addition, institutions should provide high-quality PPE such as KN95 or N95 masks to those on campus who are unvaccinated or at increased risk of contracting COVID-19. It is also important to provide guidance for how faculty and staff can maintain and promote good ventilation in classrooms, offices, and meeting spaces.

Ease Access to COVID-19 Vaccination, Promote Vaccine Confidence, and Make Vaccination a Requirement for those Living on Campus

Institutions must make access to COVID-19 vaccines easy. Presently, all adult Americans are eligible to receive one of various COVID-19 vaccines authorized for emergency use. But many students and communities are hesitant to get vaccinated and/or have yet to receive their vaccine, which poses a potential threat to public health and institutional well-being in the fall and winter.

Colleges and universities should participate in efforts to increase confidence in vaccines and in local vaccination efforts. Colleges can lower barriers to access for students, faculty, and staff by making vaccines available on or near campus. Institutions must also help improve vaccine confidence by acknowledging and helping to combat the structural racism of health systems. Campuses must ensure hard-to-reach campus populations have easy and free access to vaccines and information about their safety. At a minimum, COVID-19 vaccines should be listed as one of the required vaccinations for living in a residence hall. Institutions should explore whether they can require vaccination of their students, faculty, and staff, either under emergency use authorization or once regular authorization is received.

Plan for Epidemics, Pandemics, and Other Emergencies in the Future

Epidemics, pandemics, and other emergencies such as natural disasters will happen in the future. In the past, emergencies (hurricanes, fires, incidents of violence, etc.) have pushed institutions to adjust their normal operations in the interest of students, faculty, and staff safety. Despite some emergency preparedness plans, higher education, like the rest of the country and world, was caught by surprise by the COVID-19 emergency and had to make decisions on the fly.

Institutions must have public health plans and protocols in place when the spread of illness threatens the health of campus and local communities or when they face other emergencies. These plans should include when to pivot on-campus operations online, what PPE to require, and which public health decisions to implement in consultation with recommendations of local health authorities. In

addition, campuses must create a playbook that protects students who will face housing and food insecurity as a result of emergency campus closure.

Lines of Communication with Students

Create an Institution-wide Communications Strategy so Information is Consistent, Helpful, and Timely

Staying on top of policy changes and health regulations, and communicating these to students, faculty, and staff, was a major challenge for institutions during the pandemic. Grading policies, the gradual return to in-person classes, payment deadlines, and other rules changed frequently and were not always communicated clearly. Students often felt confused about what guidance to follow and frustrated with their colleges.

Institutions can and should create institution-wide communication strategies so that important information is communicated as effectively and equitably as possible. These strategies can help in the case of emergencies, as well as to disseminate important policies that can help students succeed, such as transfer requirements or how to access important resources.⁶⁹ These communication strategies can include the implementation of new or updated technology, a diverse communications team, and research into how students receive messages.

Use Behavioral Economics Concepts to Craft Messages that will get Students to Take Action

When colleges did communicate changes and requested students take action, these messages were not always crafted in a way that helped students do so. Students often received messages that implied they needed to take action but left them wondering how to do so. When colleges announced changes to an enrollment deposit or admissions acceptance date, for example, these messages may have left students wondering how to make their payment or accept their admissions offer in an ever-changing environment.

Creating messages based on behavioral economics concepts helps students act upon the information they are provided with, especially when guidance changes frequently.⁷⁰ Messages can include links to help students complete a task, outline steps for completing a task later, or be sent to students at a strategic time. Implementing behavioral concepts can help students follow through, both in an emergency and during normal times, something that will be particularly important once students return to college in person or after having taken time off from school.

College Closures

Ready a Contingency Plan and Teach-out Agreement in the Event of Closure

Many institutions are facing steep revenue losses due to the pandemic, but some were already experiencing budget deficits or other financial struggles. A precipitous college closure can leave students in the lurch, trying to figure out their plans with little, if any, guidance. In worst-case scenarios, students could be left with loan debt and no degree if their college suddenly closes.

Any institution, but especially an institution at risk of permanent closure, must take the necessary steps to have a contingency plan for a wind-down, including creating teach-out agreements with other colleges, not just teach out plans.⁷¹ Most accreditors require a teach out plan from an institution, a written document outlining what steps the college would take if it were to close. But a teach out plan is just that—a plan. Instead, a teach out *agreement* is a signed document between two colleges agreeing to collaborate, adopt student credits, and more in the case that one college closes.

Institutions can be proactive in protecting students in the case of closure by creating a signed teach out agreement with a partner institution. This takes a teach out plan from being a hypothetical idea to a signed contract, with action steps in collaboration with another institution. Additionally, it is critical that colleges communicate these plans and agreements to students in a timely enough manner so they are not left in the dark and they are able to plan for their continued education at another institution. Having a signed teach out agreement with another college is important in ensuring the institution is prepared for the worst case scenario and will not leave its students in the lurch.

Transfer Pipeline

Audit Transfer Policies

When it comes to implementing effective and efficient institutional policies, knowledge really is power: the more an institution knows about what makes it successful and what holds it back, the better it can improve its own internal processes. One way to do this is by collecting and analyzing information about existing programs or policies. A transfer audit can assist an institution in creating policies that make its transfer process more equitable for students and therefore more attractive to potential transfers. Colleges should consider what policies hold transfer students back, and which are no longer applicable.

For example, colleges should embark on a transfer audit with their institutional research offices to determine how many credits transfer students lose or have in excess. To conduct the audit, they must collect data on how many credits transfer students graduate with to understand if they leave with more credits than

students who started at the institution. If transfer students are graduating with a surplus of credits, it could mean that the institution is doing them a disservice in terms of their money and their time. Schools should examine their general education requirements for transfer students and their transcript evaluation process to see if those areas can be improved to honor what transfer students have already completed. This audit can also determine the schools students tend to transfer from. Four-year colleges should work to build partnerships with these feeder schools, creating equivalency databases, degree pathways, and articulation agreements. These tools and policies will aid in creating a seamless transfer process. Once transfer students settle on campus, colleges should make sure they are supported so that they are retained. Surveying transfer students can reveal weak points in the transfer, orientation, and welcoming process.

Create a Smooth Transfer Process

Transferring institutions is a complicated process, as it is often not easy for students to navigate the multiple steps they must go through. Often, students end up losing valuable credits, a waste of time and money.⁷² Colleges need to address these hurdles if they want to improve their transfer policies to attract student transfers. Fortunately, there are several proven policies that can make transfer smoother and more equitable for students: guaranteed transfer credit acceptance, credit articulation transparency, and reverse transfer policies.

Many transfer students follow the path from a two-year to a four-year school. Higher education institutions and systems should consider enacting policies that guarantee transfer students will receive the credit for any of the courses taken for their general education core or their associate degree if they have completed one. Public institutions should agree to accept core lower-division general education credits from other publics within the same state and accept transfer students who enter with an associate degree within the state as having completed their new school's general education requirements. These policies honor the work students have already done and sets them on the path to a timely graduation.

Getting credits into the new institution is only half the battle. Transfer students also have to ensure those credits count toward program completion. Institutions should provide transparency in this area so that students know what to expect when they do transfer. One way schools and systems can do this is by identifying equivalent courses across institutions and labeling them with the same course number. Common-course numbering is usually done for lower-division courses like English 101, which means that transfer students understand that any 101 course they take at one college will be the same at another. Similar to common-course numbering, course equivalency databases can map out similar courses at other institutions. Showing program alignment can help prevent students from losing some of their hard-earned credits when transferring.

Students sometimes transfer from a two-year college to a four-year college without completing their associate degree. Four-year programs, and university systems, can help students earn credit—and degrees—where they are due through a process called reverse transfer. Reverse transfer means that students are awarded their associate degree from their former school once they have completed the requirements for it at the four-year institution.

Provide Prior Learning Assessment Opportunities

As the face of the typical college student—and thus the transfer student—changes, institutions must be flexible. Nontraditional students often juggle additional responsibilities, balancing child care with work responsibilities. Some of them may already have some college credit. Others may be unsure where to even begin after time away from the classroom. One way institutions can address this is with prior learning assessment (PLA) opportunities, which award credit for college-level learning that happened outside the classroom.

However, many students are unaware of PLA and take-up rates for these opportunities are low.⁷³ As Americans return to school to reskill or upskill because of the economic uncertainty set off by the pandemic, PLA can help make program completion cheaper and faster and it can attract students to return to college.⁷⁴ Institutions need to be better at communicating PLA opportunities to students and help them see through the process by offering advising and support. Professors and teachers can be pivotal to this process, so faculty buy-in of PLA is essential. Institutions should also track and analyze PLA data to know what is effective and what areas need improvement. System leaders should work to ensure that proactive PLA communication and implementation plans are fully supported at all of the member institutions.

Accept Pass/Fail Transfer Credits

The online learning implemented in spring 2020 continued through to the fall semester, as some institutions remained virtual and many others offered hybrid learning modes. Partly because of the unexpected shift to online, and because of the additional stressors brought by pandemic learning, many institutions adopted pass/fail grading policies. Regardless of whether or not students chose their grading mode or it was implemented by their institution without their input, students who apply to transfer institutions or to graduate school should not be punished for having pass/fail credits on their transcripts. Those credits should be viewed as academically sound and not prohibit students' admission or ability to receive institutional aid.

International Students

Include a Representative from the International Student Office in Decision-making

To maintain their legal status in the U.S, international students are required to enroll full time in an institution approved by the Student Exchange and Visitor Program (SEVP), a division of the U.S. Immigrations and Customs Enforcement (ICE) that manages international students and the schools that enrolled them. These students must finish their programs within a certain time limit, and they cannot take more than one class, or three credits, per semester, online.⁷⁵ Any changes to study programs can put international students at risk of losing their legal status.

In response to the COVID-19 pandemic, most colleges transitioned their entire programs of study online, putting international students at risk of losing their legal status in the U.S. It is critical for colleges and universities to include at least one international student officer who is knowledgeable about immigrant issues on the task force that deals with emergencies to make sure issues that concern international students are thoroughly discussed. Consulting with these officers will make colleges and universities better prepared to support international students during emergencies.

Support International Students during Disruption and be Clear about how Support will be Provided

For international students living on campus, their dorms are their only residence in the U.S. In the event of campus closure due to emergencies, colleges and universities should make arrangements so that students who cannot go home will be able to stay on campus. If students decide to go home, colleges should provide support such as transportation to the airports or storage for their belongings.⁷⁶

Financial support to help international students cover extra living expenses that might be incurred in an emergency cannot be overlooked. In response to COVID-19, Congress allocated some of the CARES Act for colleges and universities to provide emergency financial relief to students. However, the Department of Education under Secretary Betsy DeVos limited the funding to only federal student aid recipients, effectively excluding international and undocumented students.⁷⁷ Faced with this limitation, many colleges found creative ways to support these students through fundraising, reaching out to alumni, and tapping into private sources such as the Institute of International Education Fund's Emergency Student Fund.⁷⁸

Such creative ways to help international students are encouraging; at the same time, students need to be informed about what support is available and how they can receive it. Colleges should be transparent about information such as what criteria make them eligible for support, when they will expect to know if they receive the support, or how long the support will last.⁷⁹

Inform International Students Promptly of Changes to their Legal Status

Any changes to academic programs can affect students' legal status in the U.S. Therefore, it is imperative colleges promptly inform and provide guidance to help students maintain their status in such cases.

The Trump administration caused a stir last summer when it decided to bar international students from continuing classes and remaining in the U.S. if their colleges remained online in fall 2020.⁸⁰ While the directive was short-lived, it created enormous anxiety among international students still trying to navigate the raging pandemic.⁸¹ Colleges and universities publicly, and quickly, opposed this directive, and communicated to international students the colleges' next steps. There were, however, two paths that colleges took: those that adopted new policies that let international students take some classes on campus to guarantee their legal status, and those that maintained their decision to stay online.⁸² Promptly informing students of the changes is helpful; at the same time, institutions should pursue policy solutions that would minimize the impact of campus shutdowns on students' status.

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