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SUMMARY

Teacher Education Assistance for College and Higher Education (TEACH) Grants: A Primer

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The Teacher Education Assistance for College and Higher Education (TEACH) Grant program is intended to encourage individuals to enter the teaching profession by providing recipients with grants of up to $4,000 annually to pursue coursework that leads to a certification in teaching. Congress authorized the TEACH Grant program in the College Cost Reduction and Access Act of 2007 (P.L. 110-84) to address concerns about growing demand for high-quality teachers, especially in low-income schools.

To be eligible for a TEACH Grant, among other requirements, a postsecondary student has to meet certain academic achievement requirements and be enrolled in a TEACH-Grant eligible program of study. The TEACH Grant program is the only Higher Education Act (HEA) Title IV student financial aid program with an academic merit requirement.

As a condition of receiving a TEACH Grant, a recipient must complete four years of teaching in a high-need field and in a school that serves low-income students, within eight years of completing their program of study. If a recipient fails to complete the required teaching service, their TEACH Grant is converted into a Direct Unsubsidized Loan, which must be repaid in full including interest that would have accrued since grant disbursement.

To be eligible to disburse TEACH Grants, among other requirements, an institution of higher education (IHE) must provide a high-quality teacher preparation program that is either (1) accredited by a Department of Education (ED)-recognized accrediting agency of teacher education programs or (2) approved by a state, includes a minimum of 10 weeks of full-time pre-service clinical experience, and provides or assists in providing pedagogical coursework. Additionally, such teacher preparation programs must provide or assist in providing supervision and support services to program completers when they are working as teachers.

Program administration tasks are divided among IHEs, ED, and the third-party entities with which ED contracts. IHEs award and disburse TEACH Grants to recipients, while the contractors perform day-to-day administrative tasks after a grant has been disbursed. ED oversees both the IHEs' and the contractors' functions.

Since the inception of the program, over 400,000 TEACH Grants, totaling over $1.3 billion, have been disbursed. Based on a Government Accountability Office (GAO) analysis, the estimated take-up rate of TEACH Grants by the potentially eligible population in the 2013-2014 academic year was 19%, the most recently available estimate. Additionally, in a report to Congress on TEACH Grants, ED found that from 2008 to 2018 among the more than 180,000 recipients that received TEACH Grants, approximately 21,000, or 12%, completed their full four years of teaching service.

According to an American Institutes for Research (AIR) study, among TEACH Grant recipients who began their eight-year service period prior to July 2014, 63% saw their grants converted to loans as of July 2016. ED estimates, based on administrative program data, that 52% of students who receive a TEACH Grant in FY2025 will fail to complete their service obligation and will see their grants converted to loans.

Several issues related to TEACH Grants may garner congressional attention. Current issues pertain to program design, including the extent to which the program successfully identifies individuals who commit to teaching, the size of the TEACH Grant benefit, challenges associated with finding and sustaining a qualifying teaching placement, and teacher preparation program quality at IHEs that disburse TEACH Grants. Other historical issues relate to program implementation, such as challenges associated with certification of teaching service and the absence of an appeals process, which ED and Congress have attempted to address. Lawmakers may wish to consider other changes that have been proposed since the TEACH Grant program was authorized. Some of these include permitting partial payback of TEACH Grants converted into loans that is prorated based on the length of service fulfilled for recipients who do not complete the full service requirement, allowing teachers whose roles or duties change to continue to fulfill their required teaching service with such new roles or duties, or replacing or sunsetting the program altogether.

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Introduction

The Teacher Education Assistance for College and Higher Education (TEACH) Grant program provides grants to students who are completing or plan to complete the coursework required to begin a career in teaching. As a condition for receiving a TEACH Grant, a recipient must teach for at least four years in a high-need field at an elementary or secondary school or in an educational service agency that serves students from low-income families within eight years of completing their program of study. If a recipient does not fulfill the service obligation, their TEACH Grants are converted to Direct Unsubsidized Loans. A recipient must repay these loans in full, including interest that would have accrued from the date of each TEACH Grant disbursement. Since the inception of the program in 2008, over 400,000 TEACH Grants have been disbursed, totaling over $1.3 billion.

Over the last decade, the TEACH Grant program has received significant attention due to challenges associated with administering it. One of the more prominently cited challenges pertains to loan conversions of TEACH Grants when recipients fail to submit annual certification paperwork on time even though they have been teaching in a qualifying position. The U.S. Department of Education (ED) recently implemented a reconsideration process to address loan conversions in such circumstances.

While ED and Congress have worked to address some of these administrative challenges, a broader issue still persists with the program: half of new TEACH Grant recipients are expected to see their grants converted to loans. This high expected conversion rate raises several questions regarding the efficacy of the program.

Several additional issues related to TEACH Grants may garner congressional attention. Current issues are related to program design, including the extent to which the program successfully identifies individuals who commit to teaching, the size of the TEACH Grant benefit, challenges associated with finding and sustaining a qualifying teaching placement, and teacher preparation program quality at institutions that disburse TEACH Grants. Other historical issues, which ED and Congress have attempted to address, are related to program implementation, such as challenges associated with certification of teaching service and the absence of an appeals process. Lawmakers may also wish to consider other changes that have been proposed since the TEACH Grant program was authorized.

This report begins with a brief legislative history of the TEACH Grant program. That is followed by a description of how the program is structured and administered, as well as its budgeting approach and participation data. The report concludes with a discussion of issues related to the TEACH Grant program that might garner attention in the 118th Congress.

Legislative History

The TEACH Grant program was first authorized in 2007 under the College Cost Reduction and Access Act (CCRAA; P.L. 110-84). Prior to that, as early as 2005, bills were introduced in both the House and the Senate that included an authorization for TEACH Grants, such as H.R. 2835[1] and its companion bill, S. 1218.[2] H.R. 2835 presented findings suggesting that there was a shortage of qualified teachers in public schools, and in light of the significant number of teacher

[1] Teacher Excellence for All Children Act of 2005, 109th Congress.

[2] Ibid.

retirements expected over the next few years, the country would need to field 2 million new teachers over the next decade.[3]

Congress authorized the TEACH Grant program in response to concerns about growing demand for high-quality teachers in low-income schools.[4] This demand was identified as being driven by several factors, including (1) the expected surge of retirements over the next five years and (2) a newly established set of minimum standards for teacher quality as enacted through the No Child Left Behind Act (NCLB; P.L. 107-110).[5] Other concerns the TEACH Grant program aimed to address were related to low-income schools, where students were identified as being disproportionately taught by teachers who were inexperienced, unqualified, and out-of-field; and which were struggling to retain teachers for as long as three to five years.[6]

The committee report accompanying H.R. 2669, the College Cost Reduction Act of 2007, stated that the TEACH Grant program was created to attract high-achieving individuals into the teaching profession to meet the demand in low-income schools.[7] Given that, on average, teacher salaries tended to be lower than other entry-level jobs out of college, providing a financial incentive to help subsidize the cost of college was viewed as an important tool in offsetting the opportunity cost of entering into teaching.[8] There was also a distinction made in providing financial assistance on the front-end in the form of a grant when an individual started undergraduate or graduate studies versus providing assistance once the individual had been teaching for some time, as was done already with existing teacher loan-forgiveness programs. The idea was that earlier intervention might influence a student's career path and, thus, academic major, which could potentially incentivize many more individuals to pursue teaching as a career who would not have chosen it otherwise.[9]

The program was also focused on incentivizing high-quality individuals to teach in both schools and subject areas for which it is typically harder to attract and retain staff. This was intended to help address some of the recurring issues faced by low-income schools, in particular.[10]

Opponents of the program believed that this new entitlement was poorly targeted, unproven, and would place a significant financial burden on taxpayers.[11] Further, it was argued that the program was not focused on the goals of increasing access to and persistence in higher education for

[3] Ibid.

[4] See, for example, Senator Edward Kennedy, "Introducing the Teacher Excellence for All Children Act of 2005," remarks in the Senate, *Congressional Record*, daily edition, vol. 151 (June 9, 2005).

[5] Ibid.

[6] Ibid.

[7] U.S. Congress, House Committee on Education and Labor, *College Cost Reduction Act of 2007*, report to accompany H.R. 2669, 110th Cong., 1st sess., June 25, 2007, H.Rept. 110-210, pp. 47-48.

[8] See, for example, Senator Edward Kennedy, "Introducing the Teacher Excellence for All Children Act of 2005," remarks in the Senate, *Congressional Record*, daily edition, vol. 151 (June 9, 2005).

[9] See, for example, Representative George Miller, "College Cost Reduction Act of 2007," remarks in the House, *Congressional Record*, daily edition, vol. 153 (July 11, 2007), p. H7557.

[10] See, for example, Senator Edward Kennedy, "Introducing the Teacher Excellence for All Children Act of 2005," remarks in the Senate, *Congressional Record*, daily edition, vol. 151 (June 9, 2005).

[11] See, for example, "House Panel OK's Bill on Student Loan Subsidies," CQ.com, June 13, 2007; and U.S. President (G. W. Bush), "Statement of Administration Policy: H.R. 2669 - College Cost Reduction Act of 2007," July 10, 2007, https://www.presidency.ucsb.edu/documents/statement-administration-policy-hr-2669-college-cost-reduction-act-2007.

students with the greatest need.[12] Given that the program was authorized with mandatory funds, it was also contended that there was no mechanism for congressional accountability.[13]

Changes Since Enactment

Since its enactment, there have been a number of changes to the statutory provisions of the TEACH Grant program. In 2008, the Higher Education Opportunity Act (HEOA; P.L. 110-315) added a provision that required ED to develop a "plain-language" disclosure form to accompany each recipient's Agreement to Serve that clearly described the nature of TEACH Grants, the service requirement, and the consequences of not fulfilling this requirement (see the "Service-Related Requirements" section for a description of the Agreement to Serve). It included a provision that permitted grant recipients who obtained degrees in fields that were designated as "high need" at the time they applied for the grant but were no longer designated as such to still be able to complete their service requirement by teaching in that field. It also required ED to establish regulations describing the extenuating circumstances in which all or part of the service requirement could be waived. Finally, it required ED to prepare and submit to Congress a report every two years on TEACH Grant recipients and the schools and students served by those recipients.

Later, the Consider Teachers Act of 2021 (Consider Teachers Act; P.L. 117-49) made more substantial changes to the TEACH Grant program. The legislation codified a reconsideration process for participants whose TEACH Grants were converted to loans in certain circumstances, allowing grants to be reinstated if the Secretary of Education (the Secretary) determines that the participant had met or is meeting their teaching service obligation. The Consider Teachers Act also eliminated the requirement that a TEACH Grant program participant meet the definition of a "highly qualified teacher" (HQT) as defined in the Elementary and Secondary Education Act (ESEA) (see the "Highly Qualified Teacher" box below). Instead, the participant must "meet all State certification requirements for teaching." Additionally, the legislation provided that participants are no longer required to submit employment certification annually, but instead, "within the timeframe that would allow that individual to complete their service obligation before the end of the service obligation window." As part of changes related to employment certification, ED is required to

- notify participants at least once per year of how they are to complete employment certification requirements,
- notify participants of required submission deadlines for employment certification, and
- provide participants with an alternative means to meeting employment certification requirements in certain situations.

Other changes made by the legislation include

- a provision to permit the inclusion of a "geographic area" in the definition of high-need field if it is designated as such by the federal or a state government or local educational agency, and

[12] See, for example, U.S. Congress, House Committee on Education and Labor, *College Cost Reduction Act of 2007*, report to accompany H.R. 2669, 110th Cong., 1st sess., June 25, 2007, H.Rept. 110-210, p. 141.

[13] See, for example, Representative Virginia Foxx, "New Spending in the College Cost Reduction Act," remarks in the House, *Congressional Record*, daily edition, vol. 153 (July 17, 2007), p. E1537.

- a requirement that ED must maintain and annually update a list of qualifying schools and high-need fields for the purposes of meeting the TEACH Grant service obligation.[14]

"Service Payback" Programs

At the time of the TEACH Grant program's authorization, the idea of awarding grants or scholarships to subsidize the cost of undergraduate or graduate education in exchange for service (i.e., "service payback" programs) was not a new one. Prior to TEACH Grants, the Paul Douglas Teacher Scholarships program was first authorized under the Higher Education Amendments of 1986 (P.L. 99-498) as a discretionary program to provide financial assistance to college students preparing to be elementary and secondary school teachers. Eligible students, who graduated in the top 10% of their high school class, could receive a scholarship in the amount of $5,000 per year for a maximum amount of up to $20,000. In exchange, scholarship recipients were required to teach one to two years for every year of scholarship receipt in a preschool or elementary or secondary school, depending on where and what subjects they taught. The program was administered as a formula grant to states, which were responsible for selecting scholarship recipients, verifying that each recipient was meeting service requirements, and submitting performance reports to ED. The program was repealed by the Higher Education Amendments of 1998 (P.L. 105-244), though it was defunded in FY1996 appropriations (P.L. 104-134). In eliminating funding for the program, the committee report that accompanied H.R. 2127 stated that the program was duplicative of other teacher training and student aid programs. It was also characterized as costly to administer and difficult to implement, monitor, and enforce.[15]

Another example of a teaching service payback program, authorized prior to the TEACH Grant program's inception, is the National Science Foundation's (NSF's) Robert Noyce Teacher Scholarship program, which was enacted under the National Science Foundation Authorization Act of 2002 (P.L. 107-368). It makes awards to institutions of higher education (IHEs) to provide scholarships of $10,000 per year to undergraduate science, technology, engineering, and math (STEM) majors, starting in their junior year, and to graduate STEM students.[16] In exchange for this assistance, recipients are expected to obtain teaching certification in a STEM subject and serve as a teacher in a high-need local educational agency (LEA)[17] for at least two years for each year of scholarship receipt.[18] Similar to TEACH Grants, if recipients do not complete their

[14] The Consider Teachers Act also provided certain program flexibilities with respect to the service obligations of teachers affected by the COVID-19 pandemic.

[15] U.S. Congress, House Committee on Appropriations, *Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriation Bill, 1996*, report to accompany H.R. 2127, 104th Cong., 1st sess., July 27, 1995, H.Rept. 104-209, p. 171.

[16] National Science Foundation, *Robert Noyce Teacher Scholarship Program Solicitation*, https://new.nsf.gov/funding/opportunities/robert-noyce-teacher-scholarship-program/5733/nsf21-578/solicitation#awd_info.

[17] In general, a local educational agency is a public board of education or other public authority legally constituted within a state for either administrative control of or direction of, or to perform service functions for, public elementary or secondary schools in a city, county, township, school district, or other political subdivision of a state, or a combination of school districts or counties a state recognizes as an administrative agency for its public elementary or secondary schools (20 U.S.C. §7801(30)(A)).

[18] P.L. 107-368; National Science Foundation, *Robert Noyce Teacher Scholarship Program Solicitation*, https://new.nsf.gov/funding/opportunities/robert-noyce-teacher-scholarship-program/5733/nsf21-578/solicitation#awd_info.

required service, then they must repay all or a portion of their scholarships in the form of a loan, including interest that would have accrued since disbursement.[19]

Other examples of existing service payback programs include scholarships at each of the U.S. Service Academies[20] and Reserve Officers' Training Corps (ROTC) Scholarships,[21] which provide tuition assistance in exchange for military service. Boren Scholarships and Fellowships provide financial assistance to undergraduate and graduate students to study less commonly taught languages in international regions critical to U.S. interests in exchange for working in the federal government for at least one year upon graduation.[22] The National Institutes of Health Ruth L. Kirschstein National Research Service Awards provide financial support for training to pre- and postdoctoral students in biomedical, behavioral, and clinical research in exchange for engaging in health-related biomedical, behavioral, and/or clinical research, research training, or health-related teaching for one year upon completion of their program.[23]

Program Structure

This section describes how the program is structured, including TEACH Grant recipient eligibility, award amounts, service-related requirements, the obligation to repay TEACH Grants, institutional eligibility to disburse TEACH Grants, and program administration.

TEACH Grant Recipient Eligibility

To be eligible to receive a TEACH Grant, a student must meet the basic eligibility criteria for the HEA Title IV federal student aid programs.[24] Among the requirements generally applicable to the HEA Title IV student aid programs for award year (AY) 2023-2024 are the following:

- A student must be accepted for enrollment or enrolled in an eligible program at an eligible institution for the purpose of earning a certificate or degree.[25]
- A student must not be enrolled in an elementary or secondary school and must have a high school diploma (or equivalent).[26]

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[19] P.L. 107-368; National Science Foundation, *Robert Noyce Teacher Scholarship Program Solicitation*, https://new.nsf.gov/funding/opportunities/robert-noyce-teacher-scholarship-program/5733/nsf21-578/solicitation#awd_info.

[20] CRS Report RL33213, *Congressional Nominations to U.S. Service Academies: An Overview and Resources for Outreach and Management*, by R. Eric Petersen and Sarah J. Eckman.

[21] CRS In Focus IF11235, *Defense Primer: Senior Reserve Officers' Training Corps*, by Kristy N. Kamarck.

[22] National Security Education Program; "David L. Boren Scholarships," https://www.nsep.gov/content/david-l-boren-scholarship.

[23] 42 U.S.C. §288.

[24] See Higher Education Act, as amended (hereinafter referred to as HEA), §484 (34 C.F.R. part 668, subpart C) for general requirements and Section 420N(a)(2)(A) (34 C.F.R. §686.11) for TEACH Grant-specific requirements.

[25] An eligible program requires at least 16 semester hours (or the equivalent) offered during a minimum of 15 weeks. Alternatively, an eligible program may be at least 8 semester hours (or the equivalent) offered during a minimum of 10 weeks, if an associate's degree is required for admissions. One semester hour requires one hour of classroom or direct faculty instruction and at least two hours of out-of-class work each week for approximately 15 weeks. For information on HEA Title IV eligible programs and eligible institutions, see CRS Report R43159, *Institutional Eligibility for Participation in Title IV Student Financial Aid Programs*, by Alexandra Hegji.

[26] The equivalent of a high school diploma may include a general educational development (GED) certificate, the completion of an eligible homeschool program, or the completion of one of the ability-to-benefit alternatives and either being enrolled in an eligible career pathway program or being first enrolled in an eligible postsecondary program prior (continued...)

- A student must meet citizenship requirements.[27]
- A student must maintain satisfactory academic progress while enrolled. Satisfactory academic progress requires a minimum grade point average (GPA) or its equivalent and passing a minimum percentage of attempted credits or hours.
- A student must not be in default on a Title IV student loan, or have failed to repay or make an arrangement to repay an overpayment on a Title IV grant or loan, or be subject to a judgment lien for a debt owed to the United States. A student must have repaid any Title IV funds obtained fraudulently.
- A student may be disqualified for an unusual enrollment history—receiving HEA Title IV aid at multiple schools in the same semester, or receiving aid and withdrawing before earning any credit.

Specific eligibility requirements for the TEACH Grant program include the following:

- A student must also be enrolled as an undergraduate, post-baccalaureate, or graduate student at an IHE that participates in the TEACH Grant program,[28] and in a TEACH Grant-eligible program of study within the IHE.[29] A post-baccalaureate program is a program of instruction for individuals who have completed a bachelor's degree that (1) does not lead to a graduate degree and (2) consists of courses required by a state in order for a student to receive a professional certification or licensing credential that is required for employment as a teacher in an elementary or secondary school in that state.[30]
- A student must meet certain academic achievement requirements, generally, scoring above the 75th percentile on one or more portions of an undergraduate, post-baccalaureate, or graduate school admissions test or having a cumulative GPA of at least 3.25 on a 4.0 scale or the numeric equivalent. The TEACH Grant program is currently the only HEA Title IV program with an academic merit requirement.
- If a student is a current or prospective teacher applying for the TEACH Grant program to obtain a graduate degree, then the student must be a teacher or retiree

to July 1, 2012. The *ability to benefit* may be demonstrated by passing an examination approved by ED to be eligible for federal student aid, or by successfully completing six credits or 225 clock hours of college work applicable to a certificate or degree offered by a postsecondary institution. A career pathway program combines occupational skills training, counseling, workforce preparation, high school completion, and postsecondary credential attainment.

[27] In general, students must be U.S. citizens or permanent U.S. residents. Individuals with several other entrance statuses can qualify for aid. Individuals in the United States on a temporary basis, such as those with a student visa or an exchange visitor visa, are not eligible for federal student aid. Students with Deferred Action for Childhood Arrivals (DACA) status, conferred by the U.S. Citizenship and Immigration Services (USCIS) office in the Department of Homeland Security, are not eligible for HEA Title IV aid.

[28] Only HEA Title IV-eligible IHEs may be considered for TEACH Grant participation. For more information, see CRS Report R43159, *Institutional Eligibility for Participation in Title IV Student Financial Aid Programs*, by Alexandra Hegji.

[29] A TEACH Grant-eligible program is a program of study that is designed to prepare an individual to teach as a highly qualified teacher in a high-need field and leads to a bachelor's or master's degree, or is a post-baccalaureate program of study. A two-year program of study that is acceptable for full credit toward a bachelor's degree is considered to be a program of study that leads to a bachelor's degree (34 C.F.R. §686.2). An IHE has some discretion to select the programs of study within the IHE to designate as TEACH Grant-eligible (Office of Federal Student Aid, "Receive a TEACH Grant to Pay for College," https://studentaid.gov/understand-aid/types/grants/teach).

[30] 34 C.F.R. §686.2.

from another occupation with expertise in a field in which there is a shortage of teachers or a teacher who is using a high-quality alternative certification route.

Award Amounts

A student enrolled full-time in a qualifying program may receive a total of four annual TEACH Grant awards of up to $4,000 each for their first bachelor's degree and their first post-baccalaureate credential combined. The aggregate award amount, or the total cumulative award amount, that a student may receive for their first bachelor's degree and first post-baccalaureate program of study combined is $16,000.[31]

A graduate student enrolled full-time in a qualifying program may also receive two annual TEACH Grant awards of up to $4,000 each for a master's degree. The maximum aggregate award amount that a student may receive for one master's degree is $8,000.[32]

Table 1. Maximum Annual and Aggregate TEACH Grant Award Amounts for a Program of Study by Program Type

Program Type	Annual Award Amount	Aggregate Award Amount
Bachelor's Degree or Post-baccalaureate Credential	$4,000	$16,000[a]
Master's Degree	$4,000	$8,000

Source: HEA, §420M.

Notes: Maximum annual award amounts reflected here are for a full-time student.

a. The aggregate award amount applies to the first bachelor's degree and first post-baccalaureate credential combined.

Students enrolled in a qualifying program less-than-full-time are eligible to receive a prorated TEACH Grant award based on their attendance intensity (i.e., half-time, three-quarter-time, or less-than-half-time). For example, a student enrolled in a master's degree program on a half-time basis may receive an annual award of up to $2,000.[33]

A TEACH Grant in combination with other student financial assistance cannot exceed the cost of attendance; thus, in some instances, an annual TEACH Grant award may be reduced.[34]

An individual could be awarded TEACH Grants for a bachelor's degree and then later awarded TEACH Grants for a master's degree. In that case, the aggregate award amount for the two programs of study combined could be more than $16,000.

Service-Related Requirements

When receiving a TEACH Grant, recipients must participate in TEACH Grant counseling that explains the terms and conditions of the TEACH Grant service obligation. They must receive entrance counseling with each TEACH Grant disbursement and exit counseling once they cease

[31] HEA, §420M.

[32] Ibid.

[33] Ibid; 34 C.F.R. §686.21(b).

[34] HEA, §420M. Since 2013, annual TEACH Grant awards have also been reduced due to the sequestration required under the Budget Control Act of 2011 (BCA; P.L. 112-25). For more information, see the "Budgeting Approach" section of this report.

or complete their program of study.[35] They must also sign a TEACH Grant Agreement to Serve or Repay, which specifies the terms and conditions for receiving a TEACH Grant, including the consequences of not fulfilling the service obligation.[36]

Years of Teaching Service

Upon completion or cessation of their respective program of study, recipients must serve as full-time teachers for at least four academic years within an eight-year period. An individual could receive TEACH Grants for more than one program of study. For example, a student could be awarded TEACH Grants for a bachelor's degree and then later awarded TEACH Grants for a master's degree. In such cases, recipients are required to complete four years of teaching service for each program of study for which they received TEACH Grants. However, creditable teaching service may concurrently apply to more than one service obligation. More specifically, if an individual received a TEACH Grant for two programs of study, then any qualifying teaching service that is performed prior to the completion of the second program may only satisfy the service obligation for the first program. Any qualifying teaching service performed after the completion of the second program may apply to the service obligations for both programs. For example, concerning the student who was awarded TEACH Grants for completion of a bachelor's degree program, suppose they were immediately to enroll in a master's degree program, for which they receive TEACH Grants, without completing any part of their service obligation related to the bachelor's degree program. If that student requests and receives a suspension of their eight-year service obligation window for the bachelor's degree program while enrolled in the master's degree program (see the "Service Obligation Window Suspensions and Modifications" section), then after completing the master's degree program, they would only have to complete four years of qualifying teaching service to concurrently satisfy the service obligations for both programs.

Under ED's current implementation of the program, recipients must provide documentation of each year of completed teaching service. Specifically, recipients must submit a Certification of Qualifying Teaching form[37] signed by the chief administrative officer of the school or educational service agency in which the recipient taught certifying that they taught (1) in a low-income school or ESA and (2) in classes in which more than half were in a high-need field for the year being certified. (See the "Types of Elementary and Secondary Schools Served" and "Eligible Teaching Fields" sections.)

Types of Elementary and Secondary Schools Served

Recipients must teach at a public or nonprofit private elementary or secondary school that serves low-income students, which is defined as a school: (1) that is in a school district of an LEA that is eligible for assistance under Title I-A of the ESEA and (2) in which more than 30% of the children enrolled in the school meet a measure of poverty identified in statute.[38] A recipient may also teach in an educational service agency (ESA)[39] in which more than 30% of the children meet a measure of poverty identified in statute.[40] Additionally, ED includes in the definition of a school

[35] 34 C.F.R. §686.32.

[36] 34 C.F.R. §686.2 and §686.12.

[37] The form is available at https://studentaid.gov/sites/default/files/teachgrantcertificationofqualifyingteaching.pdf.

[38] Ibid and §465(a)(2)(A); ESEA, §1113(a)(5).

[39] An educational service agency is a regional public multiservice agency authorized by state statute to develop, manage, and provide services or programs to LEAs (ESEA, §8101(18)).

[40] HEA, §465(a)(2)(A); ESEA, §1113(a)(5).

that serves low-income students, schools operated by the Bureau of Indian Education (BIE) or operated on Indian reservations by Indian tribal groups under contract or grant with BIE.[41] ED identifies all qualifying schools in the annual Teacher Cancellation Low-Income (TCLI) Directory,[42] which ED is required to update annually.[43]

Once a recipient locates a vacancy in a high-need field in a qualifying school, they must apply for the job and be offered (and accept) a qualifying position at the school. If the school in which a recipient teaches in a qualifying position is designated as a school serving low-income students in their first year, and subsequently is no longer designated as such, a grant recipient may still fulfill their service obligation by continuing to teach in that school.[44]

Eligible Teaching Fields

As mentioned above, a recipient must also teach in high-need fields, which are defined[45] as bilingual education and English language acquisition, foreign language, mathematics, reading specialist, science, and special education.[46] High-need fields also include any other field or geographic area that has been identified as high-need by the federal government, a state government, or an LEA, and approved by ED.[47] ED documents teaching fields and geographic areas that are identified as high-need by the federal government, a state government, or an LEA in the annual Teacher Shortage Area Nationwide Listing ("Nationwide List"),[48] following ED approval,[49] which ED is required to update annually.[50]

Qualifying teaching fields on the Nationwide List must be designated as high-need at the time a TEACH Grant was received or when the individual begins teaching.[51] Depending on their program of study, recipients may be required to declare a major and take coursework in a high-need field in order to be eligible for teacher certification in their state. If recipients choose a field that is on the Nationwide List when they first received the grant but the field is no longer

[41] 34 C.F.R. §686.2.

[42] Ibid; The Teacher Cancellation Low-Income Directory is available at https://studentaid.gov/tcli.

[43] HEA, §420(d)(4).

[44] 34 C.F.R. §686.40(b).

[45] HEA, §420N(b)(1)(C).

[46] Bilingual education is an educational program in which two languages are used to provide content matter instruction. English language acquisition is the process of acquiring English as a second language (34 C.F.R. §686.2).

[47] HEA, §420N(b)(1)(C)(vii).

[48] The Nationwide List is available at https://tsa.ed.gov.

[49] In 34 C.F.R. §682.210(q)(8)(vii), ED defines "teacher shortage area" to be an area of specific grade, subject matter, or discipline classification; or a geographic area in which ED determines there is an inadequate supply of elementary or secondary school teachers. ED encourages each Chief State School Officer (CSSO) to determine their state's proposed teacher shortage areas based on the prescribed methodology and other requirements in 34 C.F.R. §682.210(q)(6)(iii). For ED to consider the state-specified areas as teacher shortage areas, the percentage of the state's proposed teacher shortage areas may not exceed the automatic designated limit of 5% of all unduplicated full-time equivalent (FTE) elementary and secondary teaching positions in the state. However, under 34 C.F.R. §682.210(q)(6)(iv), if the total number of proposed designated FTE elementary and secondary teaching positions in the state exceeds 5% of the total number of elementary and secondary FTE teaching positions, the CSSO may submit, with the list of proposed areas, supporting documentation showing the methods used for identifying the specific shortage areas, and an explanation of the reasons why ED should designate all of the proposed areas as teacher shortage areas. (U.S. Department of Education, *Teacher Shortage Areas Nationwide Listing: 1990-1991 through 2017-2018*, June 2017, https://www2.ed.gov/about/offices/list/ope/pol/bteachershortageareasreport201718.pdf.)

[50] HEA, §420(d)(4).

[51] Office of Federal Student Aid, "Receive a TEACH Grant to Pay for College," https://studentaid.gov/understand-aid/types/grants/teach.

designated as high-need by the time they start teaching, they may still perform qualifying service by teaching in that field.[52] Further, if recipients are teaching in a field on the Nationwide List that in subsequent years is no longer designated as high-need, they may still teach in that field to fulfill their service obligation.[53]

Highly Qualified Teacher

Prior to the enactment of the Consider Teachers Act in October 2021, participants also had to meet the requirements of a "highly qualified teacher" (HQT) as defined in the Elementary and Secondary Education Act (ESEA). Prior to December 2015, to be deemed an HQT the ESEA required that teachers possess a bachelor's degree and a state teaching certificate, and that they also demonstrate subject-matter knowledge for their teaching level. In December 2015, the Every Student Succeeds Act (ESSA; P.L. 114-95) reauthorized the ESEA and repealed the HQT definition, but still made the pre-December 2015 HQT requirements applicable to the TEACH Grant program. ED issued final regulations governing the TEACH Grant program in August 2020, which further defined the meaning of HQT for the purposes of the TEACH Grant program.[54] The Consider Teachers Act eliminated the requirement that TEACH Grant recipients meet the HQT definition, and instead included a new requirement that a recipient "meet all State certification requirements for teaching (which may include meeting such requirements through a certification obtained through alternative routes to teaching)."[55]

Service Obligation Window Suspensions and Modifications

The eight-year period in which a recipient must complete their four-year teaching service obligation begins once the recipient's enrollment in the eligible program of study ends. However, a recipient may be eligible to request a suspension of the eight-year period under various circumstances, including the following

1. enrollment in another TEACH Grant-eligible program (such as a master's degree program if the recipient received TEACH Grants for a bachelor's degree program),
2. enrollment in a program of study that is required by a state to receive certification or licensure to teach within the state,
3. receiving state-required instruction or fulfilling other requirements for state certification or licensure,
4. a condition qualifying for leave under the Family and Medical Leave Act,[56]

[52] HEA, §420N(d)(1).

[53] 34 C.F.R. §686.40(c)(2).

[54] Current ED regulations, which have not been updated since the Consider Teachers Act eliminated the requirement that TEACH Grant recipients meet the HQT definition, define HQT in a number of ways, depending on several factors, including level of education taught, school type (e.g., public, nonprofit, charter), and whether an individual is new to the profession. See 34 C.F.R. §686.2.

[55] Current regulations do not reflect amendments made by the Consider Teachers Act. As of this writing, ED has not updated the TEACH Grant Agreement to Serve or Repay or TEACH Grant counseling forms to reflect the elimination of the HQT requirement included in the Consider Teachers Act. ED has updated the TEACH Grant Certification of Qualifying Teaching form, which is used by participants to document qualifying years of teaching service (U.S. Department of Education, *TEACH Grant Certification of Qualifying Teaching*, accessed on July 12, 2024, at https://studentaid.gov/sites/default/files/teachgrantcertificationofqualifyingteaching.pdf). Additionally, the TEACH Grant website no longer includes the HQT requirement.

[56] Conditions that generally qualify for leave under the Family and Medical Leave Act include (1) birth of a child, (2) adoption or fostering of a child, (2) care for an immediate family member (spouse, child, or parent) with a serious health condition, (4) a serious health condition that would prevent the individual from performing the functions of their job, or (5) any qualifying exigency due to the fact that an immediate family member is on covered active duty in the Armed Forces (29 U.S.C. §2612(a)(1)).

5. a call or order to active duty status as a member of the Armed Forces reserves or service as a member of the National Guard,
6. military orders for the recipient's spouse for (1) deployment in support of a call to active duty or (2) a change in permanent duty station from a location in the continental United States to a location outside of the continental United States or from a location in a state to any location outside of that state, or
7. residing in or being employed in a federally declared major disaster area as defined in the Robert T. Stafford Disaster Relief and Emergency Assistance Act.[57]

Suspensions are granted in one-year increments, not to exceed a combined total of three years for the first four reasons or a total of three years for each of the last three reasons in the list above.[58] Additionally, on a case-by-case basis, ED may grant a temporary suspension if it determines that the recipient was unable to complete a full year of qualifying teaching service due to exceptional circumstances affecting the operation of the school or ESA in which the recipient was employed.[59]

If a TEACH Grant recipient withdraws from an IHE before completing their respective program of study but later re-enrolls in the same program or a different TEACH Grant-eligible program prior to the date their TEACH Grants are converted to Unsubsidized Loans, then the period for completing their service obligation would be adjusted to begin when the recipient ceases to be enrolled at the most recent IHE. If such a TEACH Grant recipient performed one or more years of qualifying teaching service during the period between the recipient's withdrawal and re-enrollment, then the completed service would count toward satisfying their service obligation, but ED would not adjust the start date of the period for completing their service obligation. In these cases, a recipient can receive credit toward satisfying their service obligation if they continue to perform qualifying teaching service while concurrently enrolled in their TEACH Grant-eligible program, provided they do not request and receive a temporary suspension of their service obligation window while enrolled in the program.[60]

For a TEACH Grant recipient who receives TEACH Grants for more than one program of study, approved suspensions may concurrently apply to more than one service obligation.[61]

Obligation to Repay a TEACH Grant

In general, TEACH Grants convert to a Direct Unsubsidized Loan, plus the interest that would have accrued since the date of disbursement of each grant,[62] under the following conditions:

- Grant recipients voluntarily request that their TEACH Grants be converted to loans because they decide not to teach or not to teach in a qualifying school or field.
- Grant recipients do not maintain qualifying employment within the timeframe that would allow them to complete the service obligation within the eight years required. For example, assume an individual received TEACH Grants for one

[57] 34 C.F.R. §686.41(a)(1).

[58] 34 C.F.R. §686.41(a)(2).

[59] 34 C.F.R. §686.41(d).

[60] 34 C.F.R. §686.12(c).

[61] 34 C.F.R. §686.12.

[62] TEACH Grants that are converted to Direct Unsubsidized Loans do not count toward any annual or aggregate loan limits (34 C.F.R. §685.203(k)).

eligible program of study and was never granted any suspensions of their service obligation window. If the recipient has not begun qualifying teaching after completing their TEACH Grant program of study, then the earliest their TEACH Grants would be converted into Unsubsidized Loans is after five years. At the five-year mark, they would only have three years remaining in their eight-year service obligation window to complete four years of teaching service.

If a recipient's TEACH Grants are converted to Direct Unsubsidized Loans, then ED must notify the recipient of the conversion and offer them conversion counseling, which includes information on loan repayment and the option to request a reconsideration of their grant-to-loan conversion, among other guidance.[63]

Reconsideration of Grant-to-Loan Conversions

A recipient whose TEACH Grants were converted to Direct Unsubsidized Loans may request a reconsideration of the conversion. For a loan to be converted back to a TEACH Grant, the recipient must demonstrate that they had completed or were completing qualifying teaching service or that their grants were converted to loans in error. If the recipient succeeds in demonstrating this, then

- their Direct Unsubsidized Loans are converted back into TEACH Grants;
- any academic years of qualifying teaching completed by the recipient before or during the period in which the TEACH Grant was incorrectly in loan status would be applied toward the recipient's four-year service obligation;
- the period of time to complete any remaining portion of the service obligation is updated to be equal to eight years minus the number of full academic years of qualifying teaching completed by the recipient prior to the reconversion of the loan back to grant status, including any years of qualifying teaching completed while the grant was incorrectly in loan status;
- any payments made toward the Direct Unsubsidized Loans that are reconverted to TEACH Grants are credited to the recipient;[64]
- the recipient is notified of the reconversion of their Direct Unsubsidized Loans back to TEACH Grants and of their responsibility to fulfill their service obligation; and
- ED requests the deletion of any derogatory information reported to consumer reporting agencies related to TEACH Grants while in loan status and provides a statement confirming that the grant was converted to a loan in error, which a recipient may furnish to creditors until their credit history is corrected.[65]

A recipient who voluntarily requested to have their TEACH Grants be converted to Direct Unsubsidized Loans may submit a request to ED to have their loans be reconverted to grants. ED will grant such a request provided that (1) excluding any periods of suspension of their service obligation window, there is sufficient time remaining to complete the required four years of

[63] 34 C.F.R. §686.43(a)(4).

[64] While it is not specified in the regulation how the credit is to be applied, the Consider Teachers Act requires that "if the recipient has other loans under part D, [then the Secretary shall] apply any payments made for the Federal Direct Unsubsidized Stafford Loan under part D during such period to those other loans under part D," and "if the recipient does not have other loans under part D, [then the Secretary shall] reimburse the recipient for any amounts paid on the Federal Direct Unsubsidized Stafford Loan under part D during such period."

[65] 34 C.F.R. §686.43(a)(6)

qualifying teaching within eight years of ceasing enrollment at the IHE where the grants were received or at the transfer IHE in the case of a transfer student; or (2) in the case of a recipient who would not have enough time remaining to complete the service obligation, the recipient qualifies for, requests, and is granted a suspension of the service obligation window which may be applied retroactively.[66]

Discharge of TEACH Grant Service Obligation

TEACH Grant service obligations can be canceled if the recipient dies or becomes totally and permanently disabled. Additionally, some or all of a recipient's service obligation may be discharged if they are called or ordered to active military duty for more than three years.[67]

For a TEACH Grant recipient who receives TEACH Grants for more than one program of study, a service obligation discharge resulting from a call to active military duty may concurrently apply to more than one service obligation.[68]

Institutional Eligibility

To be eligible to disburse TEACH Grants, an IHE must meet general Title IV institutional eligibility requirements specified in statute and regulation.[69] Additionally, IHEs must meet program-specific eligibility requirements. The HEA requires that an IHE (by determination of the Secretary)[70]

- provide high-quality teacher preparation and professional development services, including extensive clinical experience as a part of pre-service preparation;
- be financially responsible;
- provide pedagogical coursework, or assistance in the provision of such coursework, and formal instruction related to the theory and practices of teaching; and
- provide supervision and support services to teachers, or assistance in the provision of such services.

ED further clarifies in regulation that to be a *TEACH Grant-eligible institution*,[71] an IHE must

- meet financial responsibility standards or qualify under an alternative standard established in regulation;

[66] 34 C.F.R. §686.43.

[67] 34 C.F.R. §686.42.

[68] 34 C.F.R. §686.12.

[69] HEA, §102; 34 C.F.R. part 600. In general, an institution must meet basic criteria, including offering at least one eligible program of education (e.g., programs leading to a degree or preparing a student for gainful employment in a recognized occupation). In addition, an IHE must satisfy the program integrity triad, under which it must be: (1) legally authorized to provide a postsecondary education in the state in which it is located; (2) accredited or preaccredited by an agency recognized by ED for such purposes; and (3) certified by ED as eligible to participate in Title IV programs. For additional information, see CRS Report R43159, *Institutional Eligibility for Participation in Title IV Student Financial Aid Programs*, by Alexandra Hegji.

[70] HEA, §420L(1).

[71] 34 C.F.R. §686.2; 34 C.F.R. part 668, subpart L.

- provide a high-quality teacher preparation program[72] at the bachelor's or master's degree level that
  - is either accredited by an ED-recognized accrediting agency of teacher education programs;[73] or is approved by a state, includes a minimum of 10 weeks of full-time pre-service clinical experience, or its equivalent, and provides either pedagogical coursework or assistance in the provision of such coursework; and
  - provides supervision and support services to teachers, or assists in the provision of services to teachers, such as
    - identifying and making available information on effective teaching skills or strategies,
    - identifying and making available information on effective practices in the supervision and coaching of novice teachers, and
    - mentoring focused on developing effective teaching skills and strategies;
- provide a two-year program of study that is acceptable for full credit for either a bachelor's teacher preparation degree or a bachelor's degree program in a high-need field at another TEACH Grant-eligible IHE with which it has an agreement;[74]
- offer a bachelor's degree that, in combination with other training or experience, will prepare a student to teach in a high-need field, and have an agreement[75] with another IHE that offers a teacher preparation program or a post-baccalaureate program that prepares students to teach; or
- offer a post-baccalaureate program of study that is designed to prepare an individual to teach in a high-need field. A post-baccalaureate program is not TEACH Grant-eligible if it is offered by an IHE that also offers a bachelor's degree in education.

ED regulations define a "TEACH Grant-eligible program" as an eligible program of study[76] that is designed to prepare an individual to teach as a highly qualified teacher[77] in a high-need field

[72] ED defines "teacher preparation program" as a state-approved course of study, the completion of which signifies that an enrollee has met all the state's educational or training requirements for initial certification or licensure to teach in the state's elementary or secondary schools. A teacher preparation program may be a regular program or an alternative route to certification, as defined by the state. For purposes of a TEACH Grant, the program must be provided by an IHE (34 C.F.R. §686.2).

[73] As of the cover date of this report, there are no agencies for the accreditation of high-quality teacher preparation programs that are recognized by ED (Office of Federal Student Aid, *Federal Student Aid Handbook 2023-2024, Volume 2: School Eligibility and Operations*, p. 14, at https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_vol2.pdf).

[74] An IHE may demonstrate that it has appropriate agreements in place with another IHE through a formal articulation or consortium agreement or any other written agreement between the IHEs (Office of Federal Student Aid, Dear Colleague Letter (DCL), GEN-08-07, June 3, 2008, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2008-06-03/gen-08-07-institutional-eligibility-teach-grant-program).

[75] An IHE may demonstrate that it has appropriate agreements in place with another IHE through a formal articulation or consortium agreement or any other written agreement between the IHEs (Office of Federal Student Aid, Dear Colleague Letter (DCL), GEN-08-07, June 3, 2008, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2008-06-03/gen-08-07-institutional-eligibility-teach-grant-program).

[76] 34 C.F.R. §668.8.

[77] As noted above, the Consider Teachers Act eliminates the requirement that a teacher meet the definition of a highly (continued...)

and leads to a bachelor's or master's degree, or is a post-baccalaureate program of study. A two-year program of study that is acceptable for full credit toward a bachelor's degree is considered to be a program of study that leads to a bachelor's degree.[78]

A student who first received a TEACH Grant for enrolling in an eligible program of study is entitled to receive subsequent TEACH Grants to complete that program, even if it is no longer TEACH Grant-eligible.[79]

Administration

Historically, TEACH Grant program administration responsibilities have been divided among IHEs, a single ED-contracted loan servicer, and ED.[80] IHEs are generally responsible for determining program eligibility and awarding and disbursing grants to recipients. ED assumed the broader role of setting program policy, providing guidance to the loan servicer and IHEs on how to administer the program, providing oversight of program recipients and the loan servicer, and monitoring for program compliance. The ED-contracted loan servicer had managed the day-to-day program administration tasks such as tracking whether recipients are fulfilling their required service obligation, sending recipients reminders of when annual certification is due, and managing loan repayment if a recipient's grant was to convert to a loan.

Beginning in spring 2024, student loan servicing is being restructured, with some loan servicer responsibilities, including many functions related to TEACH Grant program administration, being transitioned to ED-administered functions as part of a broader effort to allow federal student loan borrowers and TEACH grant recipients "to fully manage [their] federal student loan and grants [directly] on StudentAid.gov."[81] Instead of relying on a single loan servicer, multiple ED-contracted entities will be responsible for fulfilling those TEACH Grant administrative functions not fulfilled by ED or IHEs. The new TEACH Grant servicing structure is expected to be fully implemented by November 2024.[82]

Institutions of Higher Education

The IHE is responsible for determining whether to participate in the TEACH Grant program. It also selects the specific programs of study within the IHE to designate as TEACH Grant-eligible and, thus, decides whether to make TEACH Grants available to students enrolled in those

qualified teacher. However, current regulations, including the definition of a TEACH Grant-eligible program, do not reflect amendments made by the Consider Teachers Act.

[78] 34 C.F.R. §686.2.

[79] Office of Federal Student Aid, *Federal Student Aid Handbook 2023-2024, Volume 9: The TEACH Grant Program*, p. 3, https://fsapartners.ed.gov/sites/default/files/2023-2024/2023-2024_Federal_Student_Aid_Handbook/_knowledge-center_fsa-handbook_2023-2024_vol9.pdf.

[80] U.S. Government Accountability Office, *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes,* GAO-15-314, February 24, 2015; Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program*, U.S. Department of Education, March 2018.

[81] Office of Federal Student Aid, "We're Streamlining Your Loan and Grant Web Experience," accessed on May 31, 2024, at https://studentaid.gov/announcements-events/streamlining-loan-web-experience.

[82] U.S. Department of Education, *New Loan Servicing Contract Implementation: Unified Servicing and Data Solution (USDS),* February 1, 2024, PowerPoint presentation, on file with author (hereinafter, "*USDS Implementation*"). It is unclear from publicly available information the precise division of labor between the ED-contracted entities and ED on TEACH Grant administration, including the reconsideration process.

programs.[83] TEACH Grant administration is primarily overseen by the IHE's student financial aid office, sometimes in partnership with teacher preparation program departments. The financial aid office's responsibilities generally consist of evaluating initial and ongoing student eligibility, providing required TEACH Grant counseling to students who elect to participate in the program, disseminating information and materials about TEACH Grants to students and teacher preparation program staff, and packaging and disbursing TEACH Grants to recipients. Teacher preparation program staff's responsibilities could include supporting the financial aid office in evaluating student eligibility, creating awareness about TEACH Grants amongst students, and aiding students in identifying and securing qualifying job placements upon program completion.[84] Additionally, IHEs have some latitude in determining how TEACH Grants are administered. For example, IHEs can choose to make TEACH Grants available only to upperclassmen at the undergraduate level, only to students who have been admitted into a teacher preparation program, or only to students who have declared a major or minor in a high-need field.[85]

Loan Servicer

Historically, ED had contracted with a single entity to support TEACH Grant administration at the federal level. Unlike other HEA Title IV grant programs, which are primarily administered by ED following disbursement, many aspects of the TEACH Grant program had been administered by the ED-contracted loan servicer post-disbursement. This was due to the program's service payback structure, which is unique among HEA Title IV aid programs.

Following disbursement, the ED-contracted loan servicer was tasked with tracking whether recipients were fulfilling their required service obligation, rather than undertaking administrative tasks typically associated with federal student loans such as collecting and applying loan payments to borrower accounts.[86] The loan servicer did this by accepting and processing recipients' annual certification paperwork. Its responsibilities also included reminding grant recipients of when their employment certification paperwork was due and sending quarterly notices informing recipients of the amount they would owe, including interest, if their grants were to convert to a loan. If a recipient's grants were converted to a loan, the loan servicer also carried out the more traditional loan servicer responsibilities of tracking loan repayment, providing billing and repayment services, and informing borrowers about their repayment options. The servicer was also responsible for administering the newly implemented grant-to-loan reconsideration process, which includes managing the intake of reconsideration requests, assessing the merits of reconsideration requests, and notifying recipients of whether their reconsideration requests are approved or denied. Additionally, the loan servicer initially responded to customer service inquiries.[87]

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[83] Regulations outline basic requirements that must be met by a particular program of study within an IHE to be considered a TEACH Grant-eligible program (34 C.F.R. §686.2). IHEs are given some discretion in selecting which programs of study within the IHE to designate as TEACH Grant-eligible. Even if a program of study meets the eligibility requirements established in regulation, it may not be designated as TEACH Grant-eligible by the IHE (Office of Federal Student Aid, "Receive a TEACH Grant to Pay for College," https://studentaid.gov/understand-aid/types/grants/teach).

[84] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program*, U.S. Department of Education, March 2018, pp. 26-33.

[85] Ibid, p. 33.

[86] For additional information on federal student loan servicing in general, see CRS Report R44845, *Administration of the William D. Ford Federal Direct Loan Program*, by Alexandra Hegji.

[87] U.S. Government Accountability Office, *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, pp. 11-12.

As mentioned previously, starting in spring 2024, student loan serving is being restructured, with some loan servicer responsibilities being transitioned to ED-administered functions. Specifically, borrowers are to go to StudentAid.gov to directly manage their participation in TEACH Grants (e.g., submitting relevant forms, certification paperwork) and ED-contracted vendors (known as Business Process Operations [BPO] vendors) are to perform manual form processing when necessary with respect to TEACH Grant servicing.[88] For example, a TEACH Grant recipient will be able to submit their Certification of Qualifying Teaching form to StudentAid.gov. FSA's Digital Customer Care application is to run the form through a rules engine to determine whether the form requires manual processing. If it does, a BPO vendor would be assigned to take action needed to process the form. If manual processing is not needed, the borrower would receive an automatic update to their account status. The new loan servicing structure is expected to be fully implemented by November 2024.[89]

Department of Education

Historically, while the ED-contracted loan servicer had managed the day-to-day administration of TEACH Grants, ED played a broader role of setting program policy, providing guidance to the loan servicer and IHEs on how to administer the program, providing oversight of program recipients and the loan servicer, and monitoring for program compliance. This included monitoring the loan servicer to ensure that it delivered on its responsibilities such as regularly communicating with recipients, adequately tracking recipients' progress toward satisfying grant requirements, and accurately converting TEACH Grants to loans if recipients did not meet grant requirements.

As part of the overhaul of student loan servicing starting in spring 2024, ED will now administer some TEACH Grant functions, through StudentAid.gov, that were previously managed by the loan servicer. Such functions include tracking TEACH grant eligibility and progress, tracking the status of forms, providing certification reminders, receiving forms and supporting documentation through digital uploads, and providing program information.[90]

ED also broadly reviews participant compliance with TEACH Grant program requirements. For example, it completes program reviews of IHEs that participate in Title IV programs and monitors its contracted vendors. ED is also responsible for broad outreach on how to apply for and receive student aid such as TEACH Grants and developing student borrower guidance, which it maintains centrally on StudentAid.gov.[91]

Budgeting Approach

Given that a TEACH Grant may be converted to a Direct Loan in certain circumstances, the TEACH Grant program is treated as a *federal credit program*. Thus, as with all other federal credit programs, the costs to the government, or *subsidies,* of the TEACH Grant program are

[88] Under the new loan servicing structure, another type of vendor, known as Unified Servicing and Data Solution (USDS) servicers, will perform more traditional loan servicing tasks such as providing loan billing and repayment services. If a TEACH Grant is converted into a loan, then it would be assigned to a USDS servicer.

[89] *USDS Implementation*. It is unclear from publicly available information the precise division of labor between the BPO and ED on TEACH Grant administration, including the reconsideration process.

[90] Ibid.

[91] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, pp. 11, 16-17, 26-30.

estimated in accordance with the requirements of the Federal Credit Reform Act of 1990 (FCRA; Title V of P.L. 101-508). These subsidies are reestimated on an annual basis.

According to FCRA, the budgetary cost of Direct Loans and loan guarantees must be measured on the basis of their estimated long-term cost to the government on a net present-value basis. For each cohort year of TEACH Grants, the loan subsidy cost is the estimated long-term cost of those TEACH Grants to the government, given underlying assumptions about grant-to-Direct Loan conversion, loan repayment, and interest rates. Such cost estimates exclude administrative costs. It represents the estimated present value of the cash flows from the government (e.g., grant disbursement), less the estimated present value of the cash flows to the government (e.g., payments made by recipients whose grants convert to loans), discounted[92] to the time when the grants are disbursed. Loan terms and conditions such as interest subsidies, deferments, loan forgiveness, defaults, and discharges are accounted for in these estimates.

A positive loan subsidy cost for a TEACH Grants cohort means that those grants are estimated to result collectively in a cost to the government, whereas a negative loan subsidy cost means that the cohort of grants will collectively achieve budgetary savings for the government (through repayment, with interest, of TEACH Grants that have been converted to loans).[93] Subsidy costs are large and positive for TEACH Grants that have been made since the inception of the program.[94] Subsidy costs are funded through permanent, indefinite budget authority.[95] Administrative costs are funded separately through annual discretionary appropriations.[96]

Since FY2013, nonexempt mandatory spending programs have been subject each year to sequestration, a process of automatic "across-the-board" reductions in federal spending to reduce the federal budget deficit. This process was triggered by provisions in the Budget Control Act of 2011 (BCA; P.L. 112-25).[97] The TEACH Grant program account is not exempt from sequestration. In May 2013, ED implemented the first BCA-required sequester by reducing each recipient's TEACH Grant award by a specified percentage, starting with awards disbursed after March 1, 2013. A sequester has since been applied annually to the TEACH Grant program, resulting in a reduction in the annual award amount in each subsequent fiscal year.[98] Under

[92] To account for the time-value of money, future cash flows are "discounted" to a value in present dollars.

[93] Office of Management and Budget, "Federal Credit," OMB Circular No. A-11, pp. 3-4.

[94] Budget of the United States Government, Fiscal Year 2025, Federal Credit Supplement, Table 7—Direct Loans: Subsidy Reestimates, https://www.whitehouse.gov/wp-content/uploads/2024/03/cr_supp_fy2025.pdf.

[95] HEA, §420O.

[96] HEA, §493.

[97] For more information, see CRS Report R44874, *The Budget Control Act: Frequently Asked Questions*, by Grant A. Driessen and Megan S. Lynch.

[98] Office of Federal Student Aid (FSA), Dear Colleague Letter (DCL), GEN-13-22, October 17, 2013, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2013-10-11/gen-13-22-subject-fy-2014-sequestration-changes-title-iv-student-aid-programs-updated-october-25-2013; FSA, DCL, GEN-14-10, May 2, 2014, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2014-05-02/gen-14-10-subject-fy-2015-sequester-required-changes-title-iv-student-aid-programs; FSA, DCL, GEN-15-07, April 23, 2015, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2015-04-23/gen-15-07-subject-fy-2016-sequester-required-changes-title-iv-student-aid-programs; FSA, DCL, GEN-16-11, May 31, 2016, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2016-05-31/gen-16-11-subject-fy-2017-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 18 Sequester-Required Changes to the Title IV Student Aid Programs*, June 19, 2017, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2017-06-19/general-subject-fy-18-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 19 Sequester-Required Changes to the Title IV Student Aid Programs*, June 6, 2018, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2018-06-06/general-subject-fy-19-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 20 Sequester-Required Changes to the Title IV Student Aid Programs*, May 30, 2019, (continued...)

current law, the annual sequestration of nonexempt mandatory spending programs is scheduled to continue through FY2029.[99]

Participation

Since the inception of the TEACH Grant program, ED has disbursed over 400,000 grants totaling over $1.3 billion.[100]

Table 2 presents, by academic year since program inception, the number of TEACH Grant awards disbursed, the number of IHEs that disbursed awards, the total amount disbursed, and the average award disbursed. The program saw a significant uptick in awards disbursed in academic year (AY) 2010-2011 and AY2011-2012. Since then, the program has seen a gradual decrease in awards per academic year over time.

Table 2. Selected TEACH Grant Program Data

Academic Year (AY) 2008-2009 through AY2022-2023

Academic Year	Number of Awards Disbursed	Number of IHEs that Disbursed Awards	Total Amount Disbursed (in millions)	Average Award Disbursed
2008-2009	11,820	364	$37.3	$3,158
2009-2010	30,659	730	$95.9	$3,127
2010-2011	38,772	901	$121.4	$3,132
2011-2012	38,445	903	$120.0	$3,122
2012-2013	35,784	797	$109.8	$3,069
2013-2014	32,937	791	$96.5	$2,930
2014-2015	32,027	793	$94.3	$2,946
2015-2016	30,810	773	$89.4	$2,902
2016-2017	30,135	761	$86.7	$2,876
2017-2018	29,820	750	$86.5	$2,899
2018-2019	28,001	737	$80.8	$2,885

https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2019-05-30/fy-20-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 21 Sequester-Required Changes to the Title IV Student Aid Programs*, June 23, 2020, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2020-06-23/fy-21-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 22 Sequester-Required Changes to the Title IV Student Aid Programs* (EA ID: GENERAL-21-31), May 17, 2021, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2021-05-17/fy-22-sequester-required-changes-title-iv-student-aid-programs-ea-id-general-21-31; FSA, *FY 23 Sequester-Required Changes to the Title IV Student Aid Programs* (GENERAL-22-27), May 19, 2022, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2022-05-19/fy-23-sequester-required-changes-title-iv-student-aid-programs; FSA, *FY 24 Sequester-Required Changes to the Title IV Student Aid Programs*, May 15, 2023, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2023-05-15/fy-24-sequester-required-changes-title-iv-student-aid-programs; and FSA, *FY 25 Sequester-Required Changes to the Title IV Student Aid Programs*, April 30, 2024, https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2024-04-30/fy-25-sequester-required-changes-title-iv-student-aid-programs.

[99] For more information, see CRS Report R45941, *The Annual Sequester of Mandatory Spending through FY2029* by Charles S. Konigsberg.

[100] CRS analysis of Office of Student Aid, Title IV Grant Volume Reports, AY2008-2009 through AY2022-2023. Please note that this total refers to the number of grants disbursed, not the unduplicated count of total recipients over time.

Academic Year	Number of Awards Disbursed	Number of IHEs that Disbursed Awards	Total Amount Disbursed (in millions)	Average Award Disbursed
2019-2020	26,925	741	$80.1	$2,974
2020-2021	24,832	733	$75.6	$3,043
2021-2022	23,525	701	$70.0	$2,976
2022-2023	23,220	716	$68.4	$2,945
2008-2009 to 2022-2023	**437,712**	**n.a.**	**$1,312.7**	**$2,999**

Source: CRS Analysis of Office of Student Aid, Title IV Grant Volume Reports, AY2008-2009 through AY2022-2023.

Over the last decade, analyses of the program have shed some light on benefit take-up rates, service obligation completion, and conversions of grants to loans. The Government Accountability Office (GAO), for instance, estimated that in the 2013-2014 academic year, 19% of individuals potentially eligible for TEACH Grants received grants under the program.[101]

In terms of service obligation completion, ED estimates that in FY2018 38% of TEACH Grant recipients had completed one or more qualified years of teaching service six or more years after receiving their last TEACH Grant award.[102] Additionally, in a report to Congress on TEACH Grants, ED found that from 2008 to 2018, more than 180,000 students received TEACH Grants, of which approximately 21,000 recipients (roughly 12%) completed their full four years of teaching service.[103]

With regard to loan conversions, studies suggest at least half of TEACH Grant recipients have seen or are expected to see their grants converted to loans. For example, an American Institutes for Research (AIR) study found that among TEACH Grant recipients who began their eight-year service period prior to July 2014, 63% had their grants converted to Unsubsidized Direct Loans as of July 2016.[104] Further, ED estimates that as of March 2019, approximately 94,000 recipients (over half of all recipients) saw 164,000 TEACH Grants converted to loans, representing about 49% of the total number of grants disbursed up to that point.[105] Separately, in its FY2025

[101] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, p. 15. GAO analyzed ED data on IHEs offering TEACH Grants to their students during the 2013-2014 academic year. Using IPEDS data, GAO obtained the number of students who graduated from these IHEs in the 2012-2013 academic year with qualifying bachelor's or master's degrees or those who completed qualifying post-baccalaureate teacher training programs. In total, it identified 96 potentially eligible academic program types including general education and secondary education teaching programs as well as education programs with a concentration in math, science, and special education based on fields specifically listed in federal law. However, because participating IHEs have discretion to choose which programs are eligible, GAO may not have included all eligible graduates or may have included some that are not eligible.

[102] U.S. Department of Education, *TEACH Grants Fiscal Year 2025 Budget Proposal*, p. 3, https://www2.ed.gov/about/overview/budget/budget25/justifications/s-teach.pdf.

[103] U.S. Department of Education, Report to Congress on the Teacher Education Assistance For College and Higher Education (TEACH) Grant Program: A Report to Congress in response to Section 420P of the Higher Education Act of 1965, as amended, December 2019, p. 3, https://www2.ed.gov/about/offices/list/ope/19-005630teachgrantreport.pdf.

[104] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program*, U.S. Department of Education, March 2018, p. 10.

[105] U.S. Department of Education, *Report to Congress on the Teacher Education Assistance For College and Higher Education (TEACH) Grant Program: A Report to Congress in response to Section 420P of the Higher Education Act of* (continued...)

Congressional Budget Justification, ED estimates, based on administrative program data, that 52% of students who receive a TEACH Grant in FY2025 will fail to complete their service obligation and will see their grants converted to loans.[106]

Selected Issues

Many issues that span aspects of the TEACH Grant program have arisen and garnered congressional interest. In general, these issues fall into two categories: (1) current program design issues and (2) historical program implementation issues.[107]

Current Program Design Issues

Current program design issues relate to whether the way in which the TEACH Grant program is structured contributes to its intended goal of recruiting and retaining high-quality teachers in low-income classrooms. They include whether the program identifies individuals with a commitment to teaching, the size of the benefit, challenges with finding and sustaining a qualifying teaching position, and program quality at institutions that are eligible to disburse TEACH Grants.

Commitment to Teaching

One issue of interest pertains to whether the TEACH Grant program is effective at identifying individuals committed to teaching and teaching in high-need classrooms. Some data suggest that this may be a programmatic challenge. GAO reported that from August 2013 through September 2014, 14% of TEACH Grant recipients had voluntarily requested that their grants be converted to loans, and of those, 38% reported that the reason for the voluntary conversion was because they no longer intended to teach.

One explanation may be that TEACH Grants can be made available to students as early as freshman year in their undergraduate education. Earlier intervention may have the effect of recruiting more individuals to enter into teaching who might not have considered it otherwise. However, those individuals who may not have chosen teaching otherwise might also lack a strong commitment to the endeavor of teaching or teaching in a high-need school. Further, underclassmen are making the choice to accept a potentially high-stakes grant at a point when they may be less likely to have a full understanding of where their career interests lie. These factors may impact the likelihood of a TEACH Grant recipient's successful completion of their required service obligation and whether their grant converts to a loan.

1965, as amended, December 2019, p. 3, https://www2.ed.gov/about/offices/list/ope/19-005630teachgrantreport.pdf. This may be an overestimate given that, since the publication of the report, ED has implemented a reconsideration process to enable recipients to apply to have grants that were wrongly converted to loans reconverted to grants. This includes recipients who were on track to meet the requirements of their service obligation but failed to submit their certification paperwork.

[106] U.S. Department of Education, *TEACH Grants Fiscal Year 2025 Budget Proposal*, p. 3-4, https://www2.ed.gov/about/overview/budget/budget25/justifications/s-teach.pdf.

[107] Policy issues and options discussed in this section of the report are based on existing and prior congressional legislative proposals, proposals forwarded by presidential administrations, topics addressed at congressional hearings, and issues and options identified by external researchers, think tanks, and practitioner groups. An effort is made to describe policy issues and options and what they are aiming to address so as to provide some context for their consideration. No attempt is made to evaluate the policy issues and options discussed.

Evidence of the effects of restricting TEACH Grants to students who might be more committed to teaching is inconclusive. Data from the 2018 AIR study[108] suggest that institutions that restrict TEACH Grant availability to juniors and seniors, when students may be more fully committed to a career in teaching, are more likely to have lower grant-to-loan conversion rates. Anecdotal data from the AIR and GAO studies[109] suggest that some institutions may restrict TEACH Grants to upperclassmen and graduate students because underclassmen "tend to change majors more frequently" and encounter challenges with maintaining the 3.25 GPA required for TEACH Grant eligibility. At the same time, the AIR study also suggests that there is no difference in grant-to-loan conversion rates by undergraduate class and graduate school year,[110] with the only exceptions occurring for juniors and first-year graduate students (who had lower conversion rates). Further, there is no difference in loan conversion rates between recipients who were accepted into a teacher preparation program prior to receiving their first TEACH Grant versus after receiving their first TEACH Grant.[111]

Data from a study of the Robert Noyce Teacher Scholarship ("Noyce Scholarship"), which is only available to students during the last two years of their undergraduate program or during their graduate program, suggest that the scholarship self-selects candidates who are already committed to teaching given that it is available later in an individual's education trajectory.[112] However, this same study also suggests that the Noyce Scholarship is less useful as a recruitment tool into teaching because it is less likely to influence a recipient's decision to enter into the profession; rather, studies suggest that the Noyce Scholarship is more likely to influence an individual's decision to teach in a high-need school.[113] Even with TEACH Grants potentially available to individuals at any class level, the AIR study findings seem to corroborate this idea that teaching service payback programs may have a greater influence on a recipient's decision to teach in a high-need school versus their decision to enter into the teaching profession more generally. The AIR study findings show that 44% of recipients indicated that the grant was somewhat or very influential in their decision to teach, while 58% of recipients indicated that the grant was somewhat or very influential in their decision to teach in a high-need school.[114]

To address some of these concerns, one legislative proposal would amend TEACH Grants to limit eligibility to upperclassmen and graduate students.[115] Limiting eligibility to upperclassmen may help to ensure that grants are not being awarded to individuals who may not demonstrate a strong

[108] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, pp. 33-34. This study, conducted for ED by AIR, is hereinafter referred to as the "AIR study" in the report text.

[109] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, p. 35; U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes,* GAO-15-314, February 24, 2015, p. 22 (hereinafter referred to as the "GAO study" in the report text).

[110] Year-in-school refers to the academic level of the recipient at the time he or she received their first TEACH Grant.

[111] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, pp. 22, 34.

[112] Cindy S. Ticknor, Deborah Gober, Time Howard, Kimberly Shaw, and Leigh A. Mathis, "The Influence of the CSU Robert Noyce Teacher Scholarship Program on Undergraduates' Teaching Plans," *Georgia Educational Researcher,* vol. 14, iss. 1 (July 2, 2017).

[113] Ibid; Pey-Yan Liou, Christopher David Desjardins, and Frances Lawrenz, "Influence of Scholarships on STEM Teachers: Cluster Analysis and Characteristics," *School Science and Mathematics*, vol. 110, no. 3 (2010), pp. 128-143; Pey-Yan Lou and Frances Lawrenz, "Optimizing Teacher Preparation Loan Forgiveness Programs: Variables Related to Perceived Influence," *Science Education*, vol. 95, no. 1 (January 2011), pp. 121-144.

[114] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, p. 7.

[115] See S. 969, Educator Preparation Reform Act, 116th Congress.

commitment to teaching and, thus, are more likely to remain in a high-need classroom and complete their service obligation. At the same time, restricting TEACH Grants may limit the program's ability to recruit individuals who may not have otherwise considered teaching as a career.

Additionally, there is some evidence from the AIR study that suggests IHEs market TEACH Grants to students as a means to fund their education more so than as a means to enter into teaching.[116] Anecdotal evidence from IHEs also suggests that some students accept a TEACH Grant to access additional education funding, with no intention of fulfilling the required teaching service.[117] For example, the AIR study found that in academic year 2013-2014, 42% of grant recipients would have been borrowing over their federal annual loan limit[118] if their grants were considered loans from the outset.[119] While these data do not shed light on the share of recipients who took a TEACH Grant only to fund their education and with no intention of teaching, they illustrate the prospect that this source of aid may be playing a role not encompassed in original program aims.

Size of the Benefit

Under the TEACH Grant program, a qualifying student is eligible for up to $4,000 per year to cover the cost of attendance at an eligible IHE for an eligible program of study. At the undergraduate and post-baccalaureate levels, the maximum cumulative amount a student could receive is $16,000, and at the graduate level, the maximum cumulative amount a student could receive is $8,000. At the time the program was authorized, it was thought that the award amount would help to offset the opportunity cost of entering into teaching, given the below-average compensation teachers receive.

The estimated low take-up rate of TEACH Grants may be an indicator of several things. It may suggest that some students consider the program but cannot meet the academic requirement, or decide not to take the risk of accepting a grant that could convert to a loan if they are unable to meet program requirements. The low take-up rate could also indicate that the financial benefit may not be large enough to incentivize students to accept a TEACH Grant when they would have otherwise not considered teaching. Some research suggests that teacher scholarship programs can be effective at both recruiting and retaining teachers in high-need schools when the financial incentive "meaningfully offsets the cost of a teacher's professional preparation."[120] One such study cited TEACH Grants as an example of a teacher scholarship program that did not provide a large enough financial benefit.[121] In contrast, the Noyce Scholarship provides $10,000 per year to undergraduate students in their junior or senior year or the same amount per year for graduate studies. In 2013, an independent evaluator found that among Noyce Scholarship recipients who

[116] Barkowski, Elizabeth et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, p. 25.

[117] Ibid, p. 19.

[118] Direct Subsidized and Unsubsidized Loans have annual loan limits, which are the maximum amounts that a student may borrow for an academic year. Annual loan limits are based on the student's dependency status and grade level (34 C.F.R. §685.203).

[119] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program,* U.S. Department of Education, March 2018, p. 36.

[120] Anne Podolsky and Tara Kini, *How Effective Are Loan Forgiveness and Service Scholarships for Recruiting Teachers?"* Learning Policy Institute, policy brief, April 2016, p. 1.

[121] Ibid; Pey-Yan Lou and Frances Lawrenz, "Optimizing Teacher Preparation Loan Forgiveness Programs: Variables Related to Perceived Influence," *Science Education,* vol. 95, no. 1 (January 2011), pp. 121-144.

had had at least two years to find a teaching position after obtaining certification, 90% were teaching in high-need school districts.[122]

Some legislative proposals would double the annual TEACH Grant award, increasing it from $4,000 to $8,000.[123] Any increase in the TEACH Grant award amount may have the effect of attracting more individuals to participate in the program. However, if a recipient fails to complete their service obligation, it could mean that recipients are left with a larger amount to pay back in loans. The impact on the cost to the government is unclear given that the change may increase the number of individuals who participate in the program and, thus, the cost, but if the rate at which grants convert to loans does not change, then it can be expected that a significant number of individuals' grants would continue to convert to loans, and they could be repaying the government in larger amounts.

Finding and Sustaining a Qualifying Teaching Position

For a TEACH Grant recipient to fulfill their service obligation, they are required to teach at a school or in an ESA that serves low-income students and in a high-need field. This is intended to focus federal dollars on helping to produce teachers in schools and fields that historically face teacher shortages.[124]

Data from the 2021-2022 school year suggest that nearly 65% of all operational public schools may have met the TEACH Grant definition of a school that serves low-income students.[125]

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[122] Ellen Bobronnikov and Cris Price, "Preliminary Highlights from the Noyce National Program Evaluation," PowerPoint presentation on May 30, 2013, at http://www.nsfnoyce.org/wp-content/uploads/2013/06/2013-Abt-Noyce-Prog-Eval-Final.pptx.

[123] See the Diversify Act (S. 1581) and EDUCATORS for America Act (S. 1341).

[124] See, for example, Senator Edward Kennedy et al., "Introducing the Teacher Excellence for All Children Act of 2005," remarks in the Senate, *Congressional Record*, daily edition, vol. 151 (June 9, 2005).

[125] Joe Angert, CRS Research Assistant, performed the analysis to produce this estimate using U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD) for the 2021-2022 school year. (While more recent data are available, information about Title I-A programming is no longer included in CCD data files starting with the 2022-2023 school year.) The estimate is based on the number of operational non-territorial public schools that might have met the definition of a school that serves low-income students for the purposes of the TEACH Grant program in the 2021-2022 school year. Further, this estimate does not include potentially eligible private schools in which a TEACH Grant recipient may complete their service obligation. CRS used CCD data to identify schools that operated or were eligible to operate an ESEA Title I-A-funded program. (It should be noted that for more than 11,000 schools, over 90% of which were located in the state of California, Title I program information was not reported; these schools were not included in the sample for the purposes of this analysis.) CRS then used this information to approximate the universe of LEAs that were eligible for Title I-A assistance, as a public school could only receive or be eligible to receive Title I-A funds if the LEA in which it was located received Title I-A funds. Per the TEACH Grant program requirements, an eligible school must be located in a LEA that is eligible to receive Title I-A funds even if the school itself does not receive funds. Thus, the next step was to identify all operational public schools within the universe of LEAs that were identified as having received Title I-A funds in the first step. CRS then approximated the number of schools that would have met the poverty threshold to qualify as a school serving low-income students under TEACH Grants by identifying those schools with more than 30% of their student enrollment eligible for free and reduced-price lunch (FRPL). Counts of students eligible for FRPL in CCD include students who became eligible for free or reduced-price lunches under the National School Lunch Program (NSLP) by filling out a household application or students who were directly (automatically) certified as eligible for free lunches under the NSLP (including data from Community Eligibility Provision schools). FRPL counts may be missing or inaccurate for a number of reasons. For example, a single school may provide meals for a cluster of schools. These schools sometimes report FRPL counts for all the schools they serve, over-representing their own FRPL membership and leaving other schools with missing or zero counts. Further, institutional settings such as public residential schools or juvenile correctional facilities may participate in the NSLP but may not be required by the state or another authority to report education data such as FRPL counts. Additionally, a school may elect not to participate in the NSLP if participation is not required by the state, and therefore, would not need to certify students as eligible for FRPL.

However, despite the seeming prevalence of schools where recipients could fulfill their service obligation, they may still face challenges in locating and maintaining qualifying employment, especially since those schools still may not have vacancies in fields that qualify as high-need. For example, elementary school teachers may not be considered as teaching in a high-need field—where the majority of their time must be spent teaching math or science—because many of them may teach all subjects an equal amount of time.

The AIR study found that 39% of TEACH Grant recipients whose grants were converted to loans reported that they did not fulfill their service requirement because they were teaching in positions that did not qualify for TEACH Grant service. Of those recipients, 15% reported that they could not find a job in a high-need field and school, 15% decided they did not want to teach in a high-need field and school, 14% applied to one or more qualifying positions but were not offered the job, and 13% found a higher-paying teaching position at a non-qualifying school. Additionally, 43% of those recipients reported other reasons for not teaching in a qualifying position, such as their school losing its Title I-A designation, a previously qualifying position being eliminated, confusion about whether the position qualified, teaching students from low-income families in a non-qualifying school, or not being certified in a high-need field.[126] Similarly, the GAO study found that finding and keeping an eligible teaching position can be a challenge for recipients in satisfying grant requirements.[127] Some of the reported reasons include limited hiring by school districts and the length of time it can take to find a qualifying position. Another factor is that promotions to nonteaching administrative positions in eligible schools do not qualify as positions fulfilling TEACH Grant service requirements.

Some legislative proposals would expand the fields that would qualify as high-need, adding areas such as early childhood education, technology, engineering, career and technical education, and writing specialist.[128] This change could help to attract individuals to teach in fields that may be considered as high-priority and, thus, provide more options for securing a position in a qualifying school. However, some of these additional fields may not face true shortages in low-income schools. Further, while low-income communities may face a shortage of early childhood educators, it could be challenging for states to identify all qualifying early childhood programs. The HEA defines an early childhood education program as a Head Start or Early Head Start program; a state licensed or regulated child care program; or a program that addresses the cognitive, social, emotional, and physical development of children from birth through age six, and is a state prekindergarten program, a preschool or infant/toddler program authorized under the Individuals with Disabilities Education Act (IDEA), or a program operated by an LEA.[129]

Not all recipients receive support from their institutions to find and secure qualifying teaching placements. The AIR study found that 70% of IHEs in its sample provided students with some placement services for identifying qualifying TEACH Grant service positions: 58% provided guidance on how to identify TEACH Grant-qualifying positions; 48% provided an updated list of available positions; and 46% established relationships with schools that have eligible positions. However, none of these practices were correlated with lower grant-to-loan conversion rates.[130] In

[126] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program*, U.S. Department of Education, March 2018, pp. 15-16.

[127] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, p. 21.

[128] See, for example, the EDUCATORS for America Act (S. 1341; 118th Congress); and Supporting the Teaching profession through Revitalizing Investments in Valuable Educators Act (STRIVE Act; H.R. 4914, 115th Congress).

[129] HEA, §103(8).

[130] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program*, U.S. Department of Education, March 2018, pp. 36-38.

addition, while the TCLI and Nationwide List help recipients identify TEACH Grant-qualifying schools and fields, respectively, there is no central job search tool that identifies existing TEACH Grant-qualifying vacancies or job announcements.

It is possible that expanding the types of schools that would qualify as eligible teaching placements could lead to longer retention rates in the classroom, and thus improve grant-to-loan conversion rates. Under the Paul Douglas Teacher Scholarships Program, which preceded TEACH Grants, there was no statutory requirement that the schools in which recipients taught be high-need; although, recipients could reduce the length of their required teaching service if they taught in a geographic area with teacher shortages.[131] The ED Biennial Evaluation Report of the Paul Douglas Teacher Scholarship program from FY1995 and FY1996 showed that through FY1992, 63% of scholarship recipients had completed their teacher certification course of study. Of those, 67% had taught in the past or were teaching as of the 1992-1993 school year. Additionally, 6% of scholarship recipients were repaying or had repaid some part or all of their scholarship as loans.[132] The North Carolina Teaching Fellows Program, which is similar in structure to TEACH Grants, requires that its fellows only teach in North Carolina public schools. One study found that the program is more likely to produce teachers who stay in public classrooms for five years or more. However, that same study also found that fellows tended more than other novice teachers to teach students who are more advantaged.[133] As such, expanding the types of schools in which recipients could complete their service obligation could run counter to the original intent of the program to support low-income schools with recruitment of high-quality teachers.

Program Quality at Institutions Eligible to Disburse TEACH Grants

To be eligible to disburse TEACH Grants, an IHE must provide a high-quality teacher preparation program. Such teacher preparation program must be accredited by an ED-recognized accrediting agency of teacher education programs; or be approved by a state, provide a minimum of 10 weeks of full-time pre-service clinical experience, or its equivalent, and provide or assist in the provision of pedagogical coursework. The program must also provide or assist in the provision of supervision and support services to teachers.[134]

The HEA and accompanying regulations do not define what it means for a teacher preparation program to be *high-quality*.[135] Title II of the HEA requires states and IHEs to publish report cards on the quality of teacher preparation.[136] States must also report to ED on the quality of teacher preparation programs. Title II of the HEA further requires states to develop criteria to assess program quality, identify programs that are low-performing or at risk of being low-performing based on those criteria, and report this information to ED.[137]

In 2014, 12 states and Puerto Rico reported a total of 45 programs as low performing or at risk of being low-performing. Of those 45 programs, 28 were based in IHEs that disburse TEACH

[131] P.L. 99-498, as amended.

[132] U.S. Department of Education, *Biennial Evaluation Report, Fiscal Years 1995-1996*, pp. 532-533.

[133] Gary T. Henry, Kevin C. Bastian, and Adrienne A. Smith, "Scholarships to Recruit the 'Best and Brightest' Into Teaching: Who Is Recruited, Where Do They Teach, How Effective Are They, and How Long Do They Stay?" *Educational Researcher*, vol. 41, no. 3 (April 2012), pp. 83-92.

[134] 34 C.F.R. §686.2.

[135] HEA, §420L; 34 C.F.R. §686.2.

[136] For more information, see CRS Report R45407, *Teacher Preparation Policies and Issues in the Higher Education Act*, by Jeffrey J. Kuenzi.

[137] HEA, §205(a)-(b), §207(a).

Grants.[138] In 2019-2020, 6 states identified a total of 24 programs as low-performing or at risk of being low-performing, and 20 states (compared to 22 in 2014) have never identified a program as low-performing or at risk of being low-performing.[139]

In 2016, ED published regulations that would have linked the definition of "high-quality teacher preparation program" in Section 420L(1)(A) of the HEA to teacher preparation program ratings under the HEA Title II state reporting requirements;[140] although, these regulations were subsequently overturned under P.L. 115-14, pursuant to the Congressional Review Act.[141] Not only did the regulations require that states identify programs that are "effective," but among other things they required states to develop and report on specific indicators for assessing teacher preparation program performance, including the learning outcomes of students taught by program graduates. Further, under these regulations, IHEs operating a program that a state identified as low-performing or at risk of being low-performing for two out of three years would have lost their eligibility to participate in the TEACH Grant program.[142] One argument made for limiting TEACH Grant eligibility to those programs that states identified as "effective" was that TEACH Grant recipients might be more likely to fulfill their service obligation if prepared by strong teacher preparation programs.[143] In contrast, some arguments against limiting TEACH Grant eligibility included concerns about the decrease in the number of IHEs that would be eligible to provide TEACH Grants, which may result in fewer students pursuing teaching in high-need fields and low-income schools. It was also stated that such a change could disproportionately impact the entry of low-income students into the teaching profession.[144]

Historical Program Implementation Issues

Historical implementation issues relate to whether the way in which the TEACH Grant program is administered by ED may have impacted the program's success. They include challenges associated with certification of teaching service and the absence of a formal appeals process. In recent years, ED and Congress have made efforts to address both issues through regulatory and legislative changes, respectively.

Challenges with Certification of Teaching Service

Prior to recent regulatory and legislative changes, TEACH Grant recipients had to provide an initial certification of their employment as a teacher in a qualifying teaching position or of their intention to obtain employment in a qualifying teaching position within 120 days of completing or ceasing enrollment in the relevant program of study. Thereafter, a recipient was required to provide an annual certification of having completed or intending to complete (if the time in which it is possible to complete the required teaching service had not lapsed) qualifying teaching

[138] U.S. Department of Education, Office of Postsecondary Education, *Preparing and Credentialing the Nation's Teachers: The Secretary's 10th Report on Teacher Quality*, August 2016, https://title2.ed.gov/Public/TitleIIReport16.pdf.

[139] U.S. Department of Education, Office of Postsecondary Education, *Preparing and Credentialing the Nation's Teachers: The Secretary's 13th Report on the Teacher Workforce*, July 2023, https://title2.ed.gov/Public/TitleIIReport23.pdf. There is no information on which of the 24 programs identified by states in 2019-2020 are based in IHEs that disburse TEACH Grants.

[140] For more information, see CRS In Focus IF10596, *Teacher Preparation Regulations*, by Jeffrey J. Kuenzi.

[141] For more information, see CRS Report R43992, *The Congressional Review Act (CRA): Frequently Asked Questions*, by Maeve P. Carey and Christopher M. Davis.

[142] U.S. Department of Education, "Teacher Preparation Issues," 81 *Federal Register* 75494-75622, October 31, 2016.

[143] U.S. Department of Education, "Teacher Preparation Issues," 79 *Federal Register* 71819-71892, December 3, 2014.

[144] U.S. Department of Education, "Teacher Preparation Issues," 81 *Federal Register* 75494-75622, October 31, 2016.

service. If certifying completed teaching service, the recipient was also required to provide documentation demonstrating that they (1) were teaching in a low-income school, (2) had taught a majority of classes during the year in a high-need field, and (3) met HQT requirements.

There are a number of issues that stemmed from the requirement for annual certification, the administrative process by which recipients maintained their grant status. In its review of complaint data from ED's Federal Student Aid Ombudsman, GAO found that 64% of TEACH Grant recipients cited problems with submitting annual certification paperwork.[145] The AIR study also found that 41% of TEACH Grant recipients whose grants had been converted to loans did not fulfill their service requirements due to factors related to annual certification. In particular, 19% did not certify because they did not know about the annual certification process and 13% did not certify because of challenges related to the process.[146]

The GAO study documented anecdotal evidence suggesting that students may not have fully comprehended the paperwork requirements, despite the requirement that recipients undergo TEACH Grant counseling when each grant was disbursed and once recipients completed their program of study. Further, GAO found evidence suggesting that the ED-contracted loan servicer converted 2,252 grants in good standing to loans in error between August 2013 and September 2014. Of those erroneous conversions, 19% were converted because a recipient did not understand the terms of the grant and certification requirements, including paperwork needed to document teaching service, or the servicer provided "inaccurate, unclear, confusing, or misleading" information about program or certification requirements to the recipient.[147]

This lack of understanding and information about certification requirements may have had consequences—the AIR study found that recipients whose grants had been converted to loans were half as likely as recipients whose grants were still in good standing to report that they were well-informed about the annual certification requirements.[148]

News coverage in 2018-2019 brought attention to TEACH Grant recipients whose grants were converted to loans due to a failure to certify on time, despite the fact that they had been performing qualified teaching. The failure to certify may have occurred for a number of reasons, from submitting the certification late to forgetting to submit the certification altogether. Certification documentation had to be mailed or faxed, forms of communication for which it is difficult to verify whether the paperwork was received and on time. Additionally, the annual certification date often occurred over the summer when recipients or certifying school personnel were away on vacation.[149]

If recipients failed to certify on time, then all of their grants were converted into Unsubsidized Direct Loans (which includes interest that accrued since disbursement of each grant) regardless of whether they were performing qualified teaching service. However, until recently there had not

[145] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, p. 21.

[146] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education Grant Program*, U.S. Department of Education, March 2018, p. 14.

[147] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, pp. 21, 27.

[148] Elizabeth Barkowski et al., *Study of the Teacher Education Assistance for College and Higher Education Grant Program*, U.S. Department of Education, March 2018, p. 17.

[149] NPR, "Teachers Begin to See Unfair Student Loans Disappear," May 3, 2019, https://www.npr.org/2019/05/03/711373657/teachers-begin-to-see-unfair-student-loans-disappear.

been a formal process for a recipient to appeal such a decision (see the "Lack of a Formal Appeals Process" section).[150]

To help address issues with certification, in 2020 ED published final TEACH Grant regulations eliminating the 120-day certification requirement. Under the rules,

- ED no longer requires that recipients submit annual certifications for each year of their service obligation window, and thus, grants would no longer be converted to loans if a recipient fails to submit certification every year;
- a recipient is only required to certify each of the four years of completed teaching service; and
- ED must provide annual notifications reminding recipients of the certification requirements for each year of completed teaching service, the number of service years completed, and the remaining timeframe in which the recipient must complete their service obligation.[151]

Additionally, under the Consider Teachers Act, Congress codified that participants are no longer required to submit employment certification annually, but instead, "within the timeframe that would allow that individual to complete their service obligation before the end of the service obligation window." As part of changes related to employment certification, Congress also required ED to notify participants at least once per year of how they are to complete employment certification requirements, to notify participants of required submission deadlines for employment certification, and to provide participants with an alternative means to meeting employment certification requirements in certain situations.[152]

Lack of a Formal Appeals Process

The consequences of an erroneous or premature grant-to-loan conversion can be disruptive for recipients, including new and unexpected debt and a negative effect on their credit history. Some documentation also suggests that some recipients whose grants were converted into loans were unable to stay in their qualifying teaching positions, and instead had to change to a more lucrative position or other employment in order to make their new loan payments.[153]

Erroneous or premature grant-to-loan conversions have largely occurred in two types of circumstances. The first is when grants in good standing are converted to loans due to an administrative error. As mentioned above, GAO reported that from August 2013 through September 2014, ED discovered that 2,252 recipients had their grants converted to loans in error. Fifty-six percent of the errors occurred because the servicer did not give recipients the full 30 days from final notification to submit their certification. Another 15% of the erroneous conversions occurred because recipients were not given the full year from graduation to submit their certification. ED and the ED-contracted loan servicer implemented changes to combat these erroneous grant-to-loan conversions resulting from administrative error. The loan servicer started

[150] Ibid.

[151] U.S. Department of Education, Office of Postsecondary Education, "Federal Perkins Loan Program, Federal Work-Study Programs, Federal Supplemental Educational Opportunity Grant Program, Federal Family Education Loan Program, William D. Ford Federal Direct Loan Program, National Direct Student Loan Program, Teacher Education Assistance for College and Higher Education Grant Program, Federal Pell Grant Program, Leveraging Educational Assistance Partnership Program, and Gaining Early Awareness and Readiness for Undergraduate Programs," 85 *Federal Register* 49798-49828, August 14, 2020 (hereinafter, "*2020 TEACH Grant Regulation*").

[152] P.L. 117-49. It is unclear whether ED has implemented these required changes as of the cover date of this report.

[153] NPR, "Teacher Begin to See Unfair Student Loans Disappear," May 3, 2019, https://www.npr.org/2019/05/03/711373657/teachers-begin-to-see-unfair-student-loans-disappear.

conducting system checks and manually reviewing all accounts flagged for conversion to determine if the recipient met certification requirements in accordance with regulation. ED also expanded the loan servicer's authority to reconvert loans to grants in certain circumstances without having to elevate disputes to ED.[154]

The second circumstance is when grants are converted to loans for recipients who are performing qualified teaching but fail to submit their certification paperwork on time, as discussed above.[155] The extent of this problem is not known. Starting in January 2019, ED established a reconsideration process for anyone whose grant had been converted to a loan and who met or was on track to meet the TEACH Grant service requirements within the eight-year window. In May 2019, of the nearly 6,000 recipients who applied for reconsideration, about 38% had been approved for a reconversion and less than 0.3% had been denied.[156]

In response to some of these issues, ED established through the 2020 regulations the formal reconsideration process (described in the "Reconsideration of Grant-to-Loan Conversions" section).[157] Additionally, Congress codified in law in the Consider Teachers Act a reconsideration process for participants whose TEACH Grants were converted to loans in certain circumstances, which allows grants to be reinstated if the Secretary determines that the participant had met or is meeting their teaching service obligation.[158]

Legislative Proposals to Reform TEACH Grants

Apart from the legislative changes mentioned in the preceding sections, there have been a number of additional proposals concerning the TEACH Grant program. Most bills propose to keep but amend the program, while others would replace or repeal it.

Some legislative proposals that would retain but amend the TEACH Grant program seek to allow partial payback of the award on a prorated basis based on the length of service completed for recipients who do not complete their full service requirement.[159] The Noyce Scholarship currently implements this practice, and the Paul Douglas Teacher Scholarship program used it as well. This might lessen the risk to recipients of accepting the grant and, therefore, encourage more students to participate in the program and enter into teaching. It may also reduce the financial burden on those who had fulfilled some part of their service in a high-need classroom and field. However, one concern may be that this concession could detract from the program's overall goal to retain teachers in low-income classrooms and high-need fields, as there may be an incentive not to complete all four years of required service.

In the 116th Congress, one amendment proposed would have allowed teachers whose roles or duties change to continue to fulfill their required teaching service with such new roles or duties.[160] This could include recipients who are promoted to leadership roles in which they might

[154] U.S. Government Accountability Office (GAO), *Better Management of Federal Grant and Loan Forgiveness Programs for Teachers Needed to Improve Participant Outcomes*, GAO-15-314, February 24, 2015, pp. 28-29.

[155] NPR, "Teacher Begin to See Unfair Student Loans Disappear," May 3, 2019, at https://www.npr.org/2019/05/03/711373657/teachers-begin-to-see-unfair-student-loans-disappear.

[156] NPR, "Teachers Begin to See Unfair Student Loans Disappear," May 3, 2019, at https://www.npr.org/2019/05/03/711373657/teachers-begin-to-see-unfair-student-loans-disappear.

[157] *2020 TEACH Grant Regulation*.

[158] P.L. 117-49.

[159] See, for example, the Educator Preparation Reform Act (S. 969, 116th Congress) and EDUCATORS for America Act (S. 1341, 118th Congress).

[160] See the BETTER TEACH Grants Act of 2019 (H.R. 4578, 116th Congress).

be spending more time supporting other teachers instead of in the classroom instructing. Under current regulations, a teacher must teach a majority of classes in a high-need field[161]—new roles or duties may not meet service requirements and a recipient may not be able to accept a new position or may have to find another qualifying position that meets service requirements. As research suggests, allowing opportunities for advancement may lead to greater retention rates amongst TEACH Grant recipients, potentially beyond the required four years.[162] However, permitting other positions beyond teaching to qualify could detract from the overarching goal of recruiting and retaining high-quality individuals in the teaching profession.

Alternatively, there have also been proposals to replace TEACH Grants and other student financial assistance programs for teachers with a new program altogether. One such proposal would have provided to teachers in qualifying positions a larger maximum loan forgiveness amount than is available under currently authorized federal teacher loan forgiveness programs, and in graduated amounts beginning with their first year and increasing the longer they stay in a qualifying position.[163] One argument for such a proposal is that the current combination of approaches to student financial assistance programs for teachers—either fully back-loading benefits (as with current teacher loan forgiveness) or fully front-loading benefits (as with TEACH Grants)—has not been sufficient in incentivizing high-quality candidates to join and remain in the teaching profession.[164] However, one consideration is that such a new program would likely result in an increased cost to the federal government.

Several bills have proposed to eliminate the TEACH Grant program without creating a new program in its place.[165] As justification for elimination, proponents have stated that because ED projects that the majority of TEACH Grant recipients will not be able to fulfill their service requirements, the program ultimately becomes a "risky gamble" for students, as they are more likely than not to incur a significant amount of debt as a result.[166]

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[161] 34 C.F.R. §686.40.

[162] TNTP, *The Irreplaceables: Understanding the Real Retention Crisis in America's Urban Schools*, 2012, https://tntp.org/publication/the-irreplaceables-understanding-the-real-retention-crisis/.

[163] See the Teacher Loan Repayment Act of 2017 (S. 1247, 115th Congress).

[164] U.S. Department of Education, *TEACH Grants Fiscal Year 2017 Budget Request*, https://www2.ed.gov/about/overview/budget/budget17/justifications/p-teach.pdf.

[165] See, for example, the Promoting Real Opportunity, Success, and Prosperity Through Education Reform Act (PROSPER Act; H.R. 4508, 115th Congress).

[166] U.S. Congress, House Committee on Education and the Workforce, *Promoting Real Opportunity, Success, and Prosperity through Education Reform Act*, report to accompany H.R. 4508, 115th Cong., 2nd sess., February 8, 2018, H.Rept. 115-550 (Washington, DC: GPO, 2018), p. 183.

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