

June 20, 2023

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

RE: Docket ID ED-2023-OPE-0089

Dear Secretary Cardona:

On behalf of the Association of Catholic Colleges and Universities (ACCU) and the Association of Jesuit Colleges and Universities (AJCU), we offer these comments in response to the U.S. Department of Education's Notice of Proposed Rulemaking (Docket ID: ED-2023-OPE-0089). We would also like to associate ourselves with the comprehensive comments submitted by the American Council on Education and the National Association of Independent Colleges and Universities.

We share the Department's desire to ensure that the post-secondary education that students and families contribute to through their tuition dollars is worthy of this investment. Our general comments encourage the Department to weigh more deliberately the limitations and consequences of building an accountability and transparency framework that relies solely on earnings data to identify "low financial value programs."

Our institutions encourage our students to pay close attention to the needs of the poor and vulnerable, and to find ways to use the knowledge and skills from their education to contribute toward the greater good of the world. As they consider their career pathways upon graduation, we trust that our graduates have been challenged academically, supported socially, emotionally, and spiritually; grounded in a tradition of inquiry; and nurtured to be people for and with others.

Using the two metrics defined in the regulations of debt to earnings rate and the earnings premium elevates salary over service. They run the risk of categorizing certain programs as "low value programs" and punishing institutions for promoting post-graduate pathways that celebrate and value community service. Many of our graduates turn down higher salary employment offers to serve others through programs like the Jesuit Volunteer Corp and Teach for America. Our graduates pursue opportunities in AmeriCorps, the Peace Corps, nonprofit work, government work and military service.

Graduates of Catholic and Jesuit colleges and universities are well prepared and qualified for critical careers in religious ministry, schools, childcare settings, public safety, sacred music, and active-duty service to our country. The low salaries in these fields do not reflect the value of these jobs or programs to our society or the nobility of the work; rather, it is a distressing example of the undervaluing of some of the most important jobs in our nation.

ACCU and AJCU are confident that graduates of our institutions of higher education are well equipped to secure jobs and thrive in them thanks to the education and formation they received. But if their learning

leads them to place others before themselves in service to their community and nation, we should allow room for that and not summarily dismiss these college and university programs as “low value.”

We ask you, therefore, to exercise a measure of caution as you design the mechanisms that will trigger these sanctions. In the name of accountability and transparency, this regulation sends a message that earnings equal value: this concept merits a more nuanced analysis. Further, we urge the Department to take inventory of the tools and resources we currently have to help students make sound choices (like the College Scorecard) and to ensure that these regulations are consistent with the goals of other federal education programs, like Public Service Loan Forgiveness. With shortages in many of the professions designed to help, heal, and educate, these regulations have the potential to discourage graduates from pursuing public service fields.


These regulations will also demand additional staff to provide the required monitoring and reporting at a time when higher education is emerging from the challenges of the pandemic and precious funds would be better spent on instruction, supports, and other vital services that we know contribute toward the success of our students.

Please be assured that we support putting students first and developing policy and regulations that protect and empower them and their families to make the best choices. We would like to work collaboratively with the Department to develop a framework that achieves our mutual goals of making high quality post-secondary education available and of value to all students, while encouraging the importance of service to others.

Sincerely,

A handwritten signature in blue ink that reads "Rev. Dennis Holtschneider, CM".

Rev. Dennis Holtschneider, CM
President
Association of Catholic Colleges and Universities

A handwritten signature in black ink that reads "Rev. Michael J. Garanzini, S.J.".

Rev. Michael J. Garanzini, S.J.
President
Association of Jesuit Colleges and Universities