



COUNCIL for OPPORTUNITY in EDUCATION

April 10, 2018

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

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

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

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

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

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

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

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

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

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

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

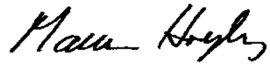
Another concern within the PROSPER Act is the addition of language that would limit the eligibility of entities that host programs similar to TRIO. Specifically, the legislation allows the Secretary to “limit an entity’s eligibility to receive [TRIO] funds ... because such entity sponsors a program similar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

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

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

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

Sincerely,



Maureen Hoyler  
President

On behalf of:

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

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

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

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

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

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



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

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

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

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

Woodland Community College  
Wytheville Community College  
Xavier University  
Yakima Valley College