January 25, 2016

The Honorable Barack Obama
President of The United States
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. President:

I am writing to you in my capacity as President and CEO of The National Association for Equal Opportunity in Higher Education (NAFEO), the national membership association of the nation’s 106 Historically Black Colleges and Universities (HBCUs) and approximately 50 Predominantly Black Institutions (PBIs). I am writing in response to your recently released measures to expand education access and success and to express appreciation for your efforts to expand higher education access and success, especially for low-income student and families. We believe that your newly announced priorities offer some good news, to be sure. However, the announced priorities are a mixed bag of affirmative actions, and some that could have unintended adverse impacts on HBCUs, PBIs, and other institutions educating disproportionate percentages of students of limited financial means.

Included among the measures that were proposed are those that would ensure that the maximum Pell Grant would keep pace with inflation; a measure that would reward colleges that graduate “a significant number” of Pell grant recipients; and two provisions to enhance community colleges: the American College Promise and the American Technical Training Fund that would provide funds for technical training. It includes two new measures that would make Pell Grants available to some students during the summer and provide a bonus for students who take 15 or more credits per term.

If they become legislation, the proposed measures would help low-income students of all races, ethnicities, religions, and persuasions. African Americans and other students of color who attend community colleges in disproportionate percentages—51 percent in the case of African Americans—would be greatly helped to access and complete college. The measures could restore Summer Pell and offer a substantial step out of the hole in which low-income students find themselves as the result of the confluence of the Great Recession, the Parent Plus Loan debacle, the elimination of Summer Pell, and the limitation imposed on the number of months a student can receive a Pell Grant.

Important measures that were overlooked or not announced illustrate what some believe to be the Administration’s lack of understanding about the centrality of HBCUs and PBIs to important national and international goals. It also adds fodder to those who decry what they believe to be a push to incentivize low-income students to attend a technical or training program rather than a four-year college. The completion rates for low-income students at two-year institutions remain lower, on average, than those from HBCUs. We want all students to prepare for and to attain a post-secondary education aligned with their preparation and aspiration and not have cost serve as a barrier.
America’s College Promise, the measure that is referenced in your announcement as, “making two years of high-quality community college free for responsible students,” and was referenced by you in your town hall meeting in Baton Rouge as, “making two years of high-quality community college free for responsible students,” would also make two years of college free for qualifying students attending an HBCU or an MSI. That the HBCU or MSI provisions in the same legislation were not referenced is deeply troubling. It confirmed the Administration is aggressively advancing the community college provisions of America’s College Promise, while ignoring the HBCU and MSI provisions. Congressman Bobby Scott (VA) and Senator Tammy Baldwin (WI) who introduced the America’s College Promise legislation in the House and Senate, respectively, with the support of the Administration, must be very disappointed.

That the Administration would announce support for The College Opportunity and Graduation Bonus Program, a measure that “provide[s] a bonus to ‘high performing’ colleges that enroll and graduate a significant number of low- and moderate-income students, as demonstrated by high graduation rates for Pell Grant recipients and low cohort default rates,” also misses the mark. Its positive impact on HBCUs and other institutions doing the lion’s share of educating and graduating low-income and African American students will be less than expected. Here’s why:

HBCUs are unquestionably graduating the greatest percentage of low-income students, most of whom are members of the growing populations of this nation. They are graduating them in STEM, health professions, education professions, agriculture, the arts and other disciplines at a higher rate than any other grouping of colleges and universities. At a majority of HBCUs, two thirds or more of all enrolled students receive federal Pell Grants. There are eight HBCUs at which more than 90 percent of all students receive Pell Grants. There are another nine black colleges and universities where more than 80 percent of the students are Pell Grant recipients. HBCUs have one-eighth the average size of endowments for historically white colleges and universities (HWCUs). Despite the smaller endowments, and the disproportionate percentage of low income students, HBCUs graduate the majority of America’s black professionals: 85 percent of doctors, 80 percent of federal judges, more than 60 percent of engineers, scientific and technological professionals, and 50 percent of PK-12 teachers. Given these data, one wonders why the Administration would choose to reward institutions that graduate “a significant number” (not defined) of Pell Grant recipients rather than disproportionate percentages. The measure, “significant number” is capricious and difficult to measure. The use of “numbers” of students rather than percentages would set up a program in which few HBCUs could compete regardless of their graduation rates and default rates because of their small size.

NAFEO suggested in testimony, in comments to requests for information from congressional committees, Members of Congress, and study groups that a better way of achieving the goals of The College Opportunity and Graduation Bonus Program is to concentrate the bonus dollars on institutions educating disproportionate percentages of low-income students, e.g. HBCUs, PBIs, HSIs, TCUs, and ANAPISIs. To close the access, achievement and attainment gaps and increase the success rates will require a greater

2 At Arkansas Baptist College 96.8 percent of all undergraduate students qualify for federal Pell Grants, the highest percentage among the black colleges and universities. Lane College, Morris College, Mississippi Valley State University, Miles College, Texas College, Benedict College, and Allen University each have student bodies in which 90 percent or more receive Pell Grant awards. JBHE Id.
3 These institutions include Tougaloo College, Livingstone College, Voorhees College, and Alcorn State University. JBHE Ibid.
investment of public resources in those institutions. It will also require incentivizing more colleges and universities that are educating proportionately few low-income, first generation and/or racial and ethnic minorities, to do a better job in this regard. The provision of “cost of education” direct aid to institutions in proportion to the percentage of financially needy students they graduate, would be a cost efficient way of moving the nation in this direction. The provision of “cost of education” grants to colleges that educate disproportionate percentages of financially needy students would be consistent with the initial intent and the enabling legislation for the Pell Grant. It was understood that educating socially and economically disadvantaged students would increase college costs. To cover the extra costs, the original authorizing legislation for Pell grants envisaged direct institutional grants to colleges that enrolled Pell grant recipients to assist them in absorbing additional costs associated with educating students of least advantage. The “cost of education allowances” was never funded but the legislative history of the Pell Grant makes clear the intent that there be such an allowance for institutions doing the heavy lifting in educating low-income students. Now is the time to realize the initial intent of the Pell Grant and to award “cost of education” allowances to institutions graduating disproportionate percentages of low-income students.

Mr. President, I urge you to give the above observations and recommendations your every favorable consideration in the context of our shared goals of increasing education access and success. As a 32 year veteran in the field of Higher Education having researched, published and litigated in the field, and having served as Higher Education counsel to the Lawyer’s Committee for Civil Rights, pro bono counsel to the Committee on Civil And Constitutional Rights, officer of the College Board, pro bono counsel for the Law and Justice Committee for the National Black Caucus of State Legislators, Executive Director of the National Black Leadership Roundtable, the advocacy and mobilization arm of the Congressional Black Caucus, and NAFEO CEO, I want to assist the Administration in advancing the best public policy that we can from our collective wisdom and experiences. I welcome the opportunity to work with Acting Secretary King, Under Secretary Mitchell, and others to adjust the priority proposals to make them the best that we can.

Respectfully submitted,

Lezli Baskerville
Lezli Baskerville, Esquire
President & CEO
(202) 439-4704

cc: John King, Ph.D., Acting Secretary of Education
    Ted Mitchell, Under Secretary, United States Department of Education