April 24, 2023

The Honorable Miguel Cardona
Secretary of Education
U.S. Department of Education
400 Maryland Avenue S.W.
Washington, D.C. 20202

Re: Docket ID ED-2023-OPE-0039, Intent to Establish Negotiated Rulemaking Committee.

Dear Secretary Cardona:

We appreciate the opportunity to comment on the topics the U.S. Department of Education ("the Department") should consider during upcoming negotiated rulemaking. We urge the Department to include **"cost of attendance"** as defined under Section 472 of the *Higher Education Act of 1965* (20 U.S.C. 1087ll) as an issue for negotiation.

Ensuring that institutions accurately calculate and communicate their "cost of attendance" (COA) is crucial to helping students and families understand, prepare for, and manage the high price of college. Reliable COA estimates are also essential for determining the amount of financial assistance students will receive to finance their higher education expenses and enabling students to make informed decisions about where to enroll in higher education. And COA estimates have significant implications for federal expenditures, including Title IV financial aid, public benefits, and tax benefits.

Recent changes under the *FAFSA Simplification Act* (FSA Act) provide an opportunity to increase transparency for students and potentially expand available federal, state, and institutional aid. These changes include the FSA Act's removal of the prohibition on regulating the non-tuition components of COA and new requirements on how institutions calculate and communicate these costs to students, including food, housing, transportation, child care, and other basic necessities.

The Urgency for Regulating COA

College has never been more expensive, and students have never needed more support. The cost of tuition, fees, and living expenses has nearly doubled at both public and private non-profit four-year institutions over the past twenty years.[1] Living expenses have increased more rapidly than tuition and fees, and total costs have vastly exceeded the growth in family incomes. Rising college prices and insufficient financial support have increasingly resulted in high levels of basic needs insecurity and student debt. According to a national survey of nearly 200,000 students at more than 200 colleges conducted in the fall of 2020 from The Hope Center at Temple University, *three in five* students (58 percent) do not have enough to eat or a safe and stable place to live, and 14 percent are experiencing homelessness.[2] A national survey of

[1] College Board. (2023). *Trends in College Pricing and Student Aid 2022.*
[2] The Hope Center for College, Community, and Justice. (2021). *The Hope Center Basic Needs Survey: Basic Needs Insecurity During the Ongoing Pandemic.*

community college students from fall 2021 reported similar levels of student food and housing insecurity, with nearly a third of the 82,000 respondents reporting running out of food and not having money to get more.[3] And yet another survey of 63,000 students conducted in fall 2021 not only found similar levels of basic needs insecurity, but also that more than half of students have anxiety about paying for school and monthly expenses and would have trouble finding $500 in case of an emergency.[4]

For many students, it is far from just tuition and fees that make higher education expensive and, often, unaffordable. The cost of food, housing, textbooks, child care, health care (including mental and physical health), transportation, hygiene, and other basic necessities weigh heavily on students and their families.

Non-tuition higher education expenses make up 80 percent of the annual cost of attending a community college, 61 percent of the cost of a public four-year institution, and 32 percent of the cost at a private non-profit four-year institution.[5] These non-tuition expenses do not impact different populations equally. For example, older adult students face substantially higher non-tuition expenses for child care, housing, and healthcare—exceeding COA by an average of $8,800 each year.[6] Additionally, research shows that Black, Latine, Native and Indigenous, LGBTQ+, and parenting students experience basic needs insecurity at much higher rates than other student populations.[7]

COA has profound implications for student access, persistence, and success. The price of college is among the most important factors in a student's choice of whether, when, where, and how they will attend higher education.[8] A national survey of students conducted by Gallup and the Lumina Foundation during the pandemic found that the cost of college was the third-most common reason students considered dropping out of associate degree programs (behind emotional stress and COVID-19) and the second-most common reason for bachelor's degree students (behind emotional stress, but above COVID-19).[9] The cost of a program was the *most* significant factor in students' decision not to enroll at all, followed by family responsibilities, which are also deeply impacted by COA. A recent survey of community college students who stopped out, or who aspired to college but did not enroll, also confirmed that the cost of higher education was a major factor in their decision-making.[10]

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[3] CCCSE. (2022). *Mission critical: The role of community colleges in meeting students' basic needs.*
[4] Trellis Company. (2022, November). *Student Financial Wellness Survey (SFWS), Fall 2021.*
[5] College Board. (2022, October). *Trends in College Pricing 2022: Figure CP-1.*
[6] Palacios, V., Goldvale, C., Geary, C., & Tatum, L. (2021, April). *Obstacles to Opportunity: Increasing College Success by Understanding & Addressing Older Students' Costs Beyond Tuition.* Georgetown Center on Poverty and Inequality.
[7] The Hope Center (2021), CCCSE (2022), and Trellis Company (2022).
[8] Note: In this letter and associated data, "cost" is used to describe an amount students and families pay, and not the amount needed to provide the education or expense to the student. Therefore, "cost" and "price" are used interchangeably herein, although the terms are technically distinct. The COA represents the total price for students, before any financial aid is applied.
[9] Gallup and Lumina Foundation. (2022, April). *The State of Higher Education 2022 Report.*
[10] Fishman, R. & Cheche, O. New America Foundation. (2023, February). *Why Didn't the Community College Students Come Back?*

The Evidence on COA Variation & Transparency

To help students prepare for the major and often life-altering expenses of college, institutions estimate their COA with allowances based on students' general circumstances, such as whether the student is living on or off campus and with or without a meal plan. For most institutions, housing costs comprise the largest portion of COA estimates and almost always represent the most significant portion of non-tuition costs.

Students and families rely on the transparency of these costs to decide basic living arrangements and how to finance higher education. However, **research has indicated significant and often inexplicable variations in living-cost allowances**, even when two colleges are geographically close. A foundational analysis on this topic found that *nearly half* of all colleges provided living-cost allowances outside of county-level estimates of how much money students needed to live modestly while attending higher education.[11] As many as one in three colleges estimated those living expenses at least 20 percent lower than the actual cost of living using the county-level calculation. And the same research found that higher enrollment of Asian, Black, and Hispanic students was associated with lower living-cost allowances, and colleges with higher family incomes among dependent students had higher allowances, raising significant equity concerns.

A similar examination of federal data by New America found that, within the average U.S. county that has more than one institution of higher education, off-campus housing estimates vary by as much as $6,448 between the nearby colleges.[12] Another analysis noted that a surprising number of colleges lowered their living cost estimates while simultaneously raising tuition, making the college appear cheaper, even though inflation typically increases both of these expenses simultaneously.[13] While these variations have not yet been proven to be intentional, rather than accidental, or a product of limited resources, the implications for equity in student outcomes are nonetheless quite significant.

When colleges underestimate their living-cost allowances relative to actual student needs, it may deprive students of the total federal, state, or institutional financial aid they would need to cover the full price of college, affect their college choice process, and negatively impact students' chances of success. A student might choose to live at home without knowing that their college's estimate for living costs is inaccurate, thus keeping them from accessing the financial aid they need. Alternatively, an inaccurate COA could make off-campus rent look more expensive than on-campus housing, driving more students to choose on-campus housing, and creating a revenue stream–or even profit–for the college.

Widespread underestimation of college costs could also have negative implications for federal and state accountability and transparency efforts to improve affordability and reduce student debt. Net price calculators mandated by Congress are less effective if the underlying COA is

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[11] Kelchen, Robert, Goldrick-Rab, Sara, and Hosch, Braden. (2017, March). *The Costs of College Attendance: Examining Variation and Consistency in Institutional Cost Allowances.* The Journal of Higher Education.

[12] Dancy, Kim & Fishman, Rachel. *More Than Tuition: High Uncertainty and Complicated Incentives.* New America Foundation

[13] Dancy, Kim & Fishman, Rachel. *More Than Tuition: Trends in Cost Estimates Over Time.* New America Foundation.

underestimated. Colleges could manipulate their COA to appear less expensive or to limit student borrowing artificially.

Populations of students who face additional barriers to higher education, such as parenting students, are especially in need of clear and accurate information to estimate their costs and seek out more aid. For example, data from the 2016 National Postsecondary Student Aid Survey indicate that 22% of undergraduates and 31% of graduate students have dependent children, representing approximately 5.4 million students.[14] Parenting students are also disproportionately at risk of basic needs insecurity. Black, Latine, and Asian parenting students suffer extremely high rates of basic needs insecurity, potentially harming their young children.[15] Yet, the Government Accountability Office (GAO) conducted a review to determine whether colleges provided information on their websites about the "dependent care allowance" authorized by law—a longstanding element of COA—and found that two-thirds of the colleges they reviewed failed to disclose this allowance to their students.[16] GAO recommended that the Department take further action to increase the transparency of COA for parenting students.

The COA is also difficult to find for many students and families. It is often not available in plain language terms on an institution's website. Even the most basic communication of costs—the financial aid offer—frequently does not contain this information. One analysis found that *more than two-thirds* of financial aid offers did not include an itemized COA, and even when it was included, it often was described in opaque or inconsistent terms.[17] Recognizing the need for transparency, Congress recently required requires institutions to publish their COA elements "on any portion of the website describing tuition and fees of the institution."

Current COA Processes, Resources, and Incentives

Colleges are not operating without guidance in calculating COA, but still experience variations, shortcomings, and pressures in constructing their estimates. Federal guidance says very little about the specific methods, tradeoffs, and implications of different approaches to estimating COA. For the 2022-23 award year, the Federal Student Aid Handbook simply states:

> *"There are a variety of methods to arrive at average costs for your students, such as conducting periodic surveys of your student population, assessing local housing costs or other pertinent data, or other reasonable methods you may devise which generate accurate average costs for various categories of students."*[18]

The National Association of Student Financial Aid Administrators (NASFAA) produces a more detailed guide for their member institutions on how to construct COA estimates, which it notes

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[14] Author calculations from NPSAS and data confirmed by other analysis. See, e.g., SPARK Collaborative. (2023). *Context: A Large Share of College Students are Parenting.*

[15] Kienzl, G., Hu, P., Caccavella, A., & Goldrick-Rab, S. (2022, January). *Parenting while in college: Racial disparities in basic needs insecurity during the pandemic.* The Hope Center for College, Community, and Justice.

[16] U.S. Government Accountability Office (2019, August). *Higher Education: More Information Could Help Student Parents Access Additional Federal Student Aid.*

[17] Burd et al. (2018, June). *Decoding the Cost of College: The Case for Transparent Financial Aid Award Letters.* New America.

[18] U.S. Department of Education. (2022). *2022-2023 Federal Student Aid Handbook, Chapter 2: Cost of Attendance.*

arises from *"the profession's continuing desire to self-regulate."*[19] The guide suggests sources and methods for developing COA estimates—but also acknowledges that calculating COA may involve incentives that are not always data-driven:

> *"Cost of attendance can be a political hot issue on your campus. For example, if you are one of several regional public universities in your state you may find yourself pressured to keep your COA in line with the others around your state. For institutional budgetary reasons, you may be pressured to keep COA low or not increase it over a certain amount each year… the pressure to be more affordable can lead to scrutiny of the COA by senior administrators."*

While financial aid administrators undoubtedly operate under significant time and resource constraints, institutions of higher education must meet revenue and expenditure requirements and, like other business entities, are prone to mistakes and human error, conflicting incentives, and—on infrequent occasions—fraud and abuse. Even when changing living costs would necessitate an update to an institution's COA, administrators may be wary of raising the price when it could reduce the number of applications and enrollment to the institution or negatively affect the colleges' rankings. When determining off vs. on-campus housing differences, institutions would also face a potential conflict of interest given that residence halls and dining services are auxiliary enterprises that typically generate revenue for the college.[20] And, now that federal pandemic relief funds have expired, colleges are once again looking toward auxiliary services for potential revenue.[21] All of these circumstances and incentives call for federal oversight. Even state officials have suggested further action may be needed at the state level to regulate COA.[22]

Thankfully, there are a variety of administrative data sources available for institutions of higher education to consult in crafting their COA estimates. For example, the U.S. Bureau of Labor Statistics Consumer Expenditure Survey is a rigorously evaluated, nationally-representative dataset with hundreds of types of expenditures that can be disaggregated by a wide range of demographic variables. Colleges can also survey their students about estimated costs and expenditures or consult other local, state, and regional datasets. For housing costs in particular, it is important for colleges to reference local data, as local rental and mortgage markets differ greatly by geographic location and urbanicity.

The COVID-19 pandemic induced significant changes in student living arrangements and educational modalities. More students than ever before are taking hybrid or fully-online coursework and using online course materials, which often necessitate a stable and quiet place to live with fast internet connectivity or at least ready access to libraries and flexible workplaces with the requisite technology.[23] Students preparing to attend higher education need reliable

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[19] National Association of Student Financial Aid Administrators. (2018). *Developing the Cost of Attendance.*
[20] Goldrick-Rab, Sara and Kendall, Nancy. (2016, March). *The Real Price of College.* The Century Foundation.
[21] Hall, Madison. (2023, April). *The cost of college room and board is rising even faster than tuition. It's driving students into even more debt.* Yahoo News.
[22] State Higher Education Executive Officers. (2018, March). *Cost of Living Estimates for Financial Aid Purposes: Should States Get Involved?*
[23] Bay View Analytics. (2022). *Turning Point for Digital Curricula: Higher Education Resources in the U.S.*

information about how much they will pay to attend higher education, use educational materials, and complete their coursework. Given the significant need for accurate cost estimates and the growing importance of living costs, it is the appropriate time for the Department to address how and when the major elements of COA are calculated.

Statutory Changes and Regulatory Authority

The *FSA Act* amended Section 478 of the Higher Education Act of 1965 (20 U.S.C. 1087rr) to remove a longstanding prohibition on the Department regulating most components of COA, other than tuition and fees. The Department has also announced that the *FSA Act* modifications to COA are in effect for the upcoming 2023-24 award year, as authorized by Congress.[24] Given that the provisions are now in effect for the upcoming award year, and the Department has been granted the statutory authority to regulate Section 472, it is timely, appropriate, and necessary for the topic to be added to the negotiated rulemaking agenda.

Several changes under the *FSA Act* have the opportunity to increase transparency for students and ensure they receive aid and resources to meet their full needs, including:

- Food allowances must reflect the cost of three meals a day to ensure adequate nutrition, regardless of whether the student lives on or off campus;
- Dependent students living at home will receive a food and housing allowance (amount greater than $0) to reflect the reality that students living off-campus still have living costs and often contribute to groceries and rents or mortgages of their parent(s) or guardian(s);
- Students with dependents who wish to live on campus will receive a separate on-campus housing allowance, given higher costs for family housing;
- Transportation will always receive a separate allowance, which must now include costs for a student coming and going to their place of work;
- Tuition and fees will always be separately listed from required equipment, materials, or supplies in order to avoid bundling and increase transparency for students;
- Each COA element must be publicly disclosed on the institution's website anywhere that it discusses tuition and fees, including the dependent care allowance;
- The phrase "room and board" transitions to the more commonly understood phrasing "housing and food";
- Students attending less than half-time can still receive an allowance for the purchase of a personal computer;
- Costs for incarcerated students are expanded to include other required expenses; and
- Any student who must obtain a license, certification, or a first professional credential, to work in their program will receive an allowance for such cost.

[24] U.S. Department of Education. (2022, November 4). *Dear Colleague GEN-22-15: FAFSA Simplification Act Changes for Implementation in 2023-24.*

Recommendations for COA Regulations

Given the clear need to establish consistency, transparency, and reliability for COA estimates, the Department should propose that the following best practices be established in regulation:

- **Data-driven calculations:** Institutions typically employ a wide range of formal and informal methods of calculating the non-tuition elements of COA—from using government or administrative datasets, to surveying students, to inquiring with housing and child care providers—but they are not required to choose a source based on objective data. The Department should require institutions to choose a data-driven method for calculating each COA component. The NASFAA guide for constructing COA states that *"explaining detailed break-downs of items included in each COA component as well as underlying assumptions is essential for consistency over time, for justifying estimates, for making professional judgment decisions, and for deriving consumer information."* For housing costs for off-campus students, institutions should establish whether their calculation is based on whether the student shares costs (i.e. has one or more roommates) or lives alone (i.e. efficiency or studio apartment) and justify their decision as reasonable and appropriate based on the availability of local housing options and student demographics.

- **Documentation and reporting:** Institutions are not currently required to report or disclose the methods they use to construct COA. Each college should report its method(s) directly to the Department with the appropriate reference or citation. The method should be externally verifiable, particularly by the Department and state authorizing agencies for oversight purposes. When a student survey is used as a data source, the institution should maintain records of the survey instrument, the raw survey data, and any data analysis or conclusions. And institutions should disclose its method(s) of COA calculation directly to students and families on the website where COA is required to be listed or, at a minimum, be required to produce the requisite documentation upon request.

- **Transparency and disclosure:** The price of attending an institution of higher education is a basic element of consumer information but is often difficult to discern for students and their families. In addition to the statutory requirement to post COA on the website, the Department should additionally require that each element of COA be accessible from the institution's homepage and included on all financial aid offers, with each element clearly displayed in plain language. COA should always be referred to as "cost of attendance" and not other terms, such as "sticker price" which may confuse students. The institution may choose to offer a net price calculator on such a website in order to contextualize the COA. Estimates related to student housing should clearly disclose the assumptions made by the institution (i.e. living alone or with roommates).

- **Regular updates:** Living costs often change rapidly for students and other households due to shifts in supply, demand, or inflation rates. To ensure that COA estimates accurately represent the current housing price burden on students, colleges must be required to update their COA regularly and, at a minimum, every other year. The Department should strongly consider establishing a standardized update calendar for all institutions to facilitate comparability, oversight, and the ability to provide timely technical assistance to financial aid professionals.

- **Survey guidelines:** Survey response rates may vary by student characteristics, leading to nonresponse bias.[25] For example, students with low incomes, parenting students, older students, and those lacking internet connectivity may be less likely to respond. Some surveys also conflate the expenses a student needs to meet with how they eventually spend their limited funds; a student who experiences basic needs insecurity and decides to cut their food intake below nutritious levels or put off essential medical care may report lower costs, leading to underestimation. And colleges may also already field a variety of student surveys throughout the year related to basic needs, campus climate, or student engagement and satisfaction, which could induce survey fatigue. Financial aid professionals are not typically trained in survey administration and design. If an institution insists on using surveys instead of administrative data to determine COA, the regulations should require such student surveys to be rigorously designed and representative of the institutions' students by including appropriate weights related to age, race and ethnicity, income, and gender and sex. This may require oversampling to ensure that disaggregation is possible for systemically marginalized groups and testing survey questions with student focus groups or faculty researchers.

- **Students with dependents or married students**: COA's shortcomings lead to significant shortfalls in COA estimates for students who have dependent children of their own, are older, married, or otherwise cannot live with one or more roommates in the same way that younger students can. Inaccurate COA estimates deny these students critical access to financial aid—even the ability to borrow through student loans. For example, non-tuition expenses exceed COA by an average of $8,800 per year for all older students and by $10,900 for older students with dependent children.[26] This gap can lead to basic needs insecurity and parenting students already face substantial obstacles to succeeding in higher education. The Department should require that colleges publish a separate COA estimate for all parenting students. And the rules should describe which dependent care expenses must be included, including all expenses that occur during school-related activities and the cost of providing food and housing to such dependent(s). The statute indicates that dependent care allowance "includes, *but is not limited to"* costs that occur during class time, study time, fieldwork, internships, and commuting – which clearly requires support for the child's food, housing, and other basic needs.[27] These rules will also support the FSA Act's adjustments to the federal methodology to enhance financial aid eligibility for single parents.

- **Basic necessities:** Institutions currently have broad latitude to define the costs that are included in "miscellaneous personal expenses." The Department should establish minimum standards for institutions to include certain types of basic necessities when calculating this allowance—and move certain best practices into regulation. For example,

[25] Standish, Trey & Umbach, Paul. (2019, May). *Should We Be Concerned about Nonresponse Bias in College Student Surveys? Evidence of Bias from a Validation Study.* Research in Higher Education.
[26] Palacios, V., Goldvale, C., Geary, C., & Tatum, L. (2021, April).
[27] Section 472(a)(9)(B) of the HEA.

NASFAA recommends that the allowance account for clothing, toiletries, laundry and cleaning, personal hygiene, grooming, cell phone plan, and recreation.[28] Today, nearly all students must have broadband internet access to succeed with their coursework. The Affordable Connectivity Program is also available to help provide students with internet connectivity. Finally, health care is a basic necessity that has a major role in student success and well-being. COA estimates should account for each of these basic needs and common expenses for students and create consistency between institutions.

- **Health care:** The statute governing COA clearly authorizes the "miscellaneous personal allowance" to include all health care costs for students. The transportation allowance can account for transportation to and from health care services. Federal rules should not only ensure health care is always included in each institution's COA institution but clearly articulate the specific categories required for colleges to adequately account for the health needs of their students–not just including health insurance premiums–but all out-of-pocket or uninsured costs, including co-pays, vaccinations, lab work, urgent care, prescription drugs, and mental and behavioral health care. Colleges that offer their own health services on-campus should ensure all costs of care, not just insurance, are included in their estimates. In recognition of the differing, and often harmful, state policy environments facing students who can become pregnant, the rules should also ensure that allowances include traveling out-of-state for abortion care or obtaining abortion care on-campus or in local clinics, as applicable, and costs for purchasing medication abortion and contraceptives, family planning, and sexual and reproductive health care.

- **Housing:** When institutions create their housing allowances, they must be required to include all related expenses required of students, per the statutory reference to "rent *or other housing costs.*" Some institutions may mistakenly calculate only rent for off-campus housing estimates, but students are still likely to face down payments, renters insurance, maintenance, and utilities. Some of these costs are likely to be incurred before the student begins an academic year to ensure their housing is secured by the beginning of the term. When calculating on-campus allowances, the institution should be required to include any related costs or fees typically assessed to students.

- **Transportation:** The statutory changes from the FSA Act ensure the transportation allowance will soon capture essential expenses like a student's commuting time to and from work. Colleges must also base their transportation estimates on the full range of transportation expenses that students face. Unfortunately, public transit is often inaccessible for many students; 43 percent of community colleges do not have a transit stop within walking distance of campus.[29] Even where transit is available, routes and schedules may not accommodate student needs. As a result, owning a vehicle is often a necessity for students, and not just at rural institutions. As a result of racist redlining policies, Black and Latine households are also more likely to live further from public transit and work.[30] People with disabilities also face limited transportation options. For

[28] NASFAA (2018).
[29] Civic Mapping Initiative. (2021). *SHSF Public Transit Map.*
[30] Spieler, Christof. (2020, August). *Racism has shaped public transit, and it's riddled with inequities.* Rice University Kinder Institute for Urban Research: Urban Edge.

those who already own a car, expenditures should include fuel, insurance, and maintenance. The Department should also consider reversing its ban on COA allowances accounting for vehicle purchases or car payments. Many students may not be able to realistically get to campus without their own vehicle, or their existing vehicle could break down while they are enrolled. If the Department does not reverse the ban, students should at least be able to pursue a professional judgment to account for their unique transportation circumstances if they need to purchase a low-cost vehicle to get to and from college, home, and work.

- **Branch campuses:** Given the wide variation in living costs by geographic location, COA must reflect where students are attending college. Under current practice, colleges could construct COA at a system level, even if their campuses are not proximate. Colleges should be required to produce separate COA estimates for each campus location within a given system or reporting entity if the institution of higher education has one or more branch campuses or satellite locations.

- **Professional judgment:** Students can receive an adjustment of their COA or Student Aid Index on a case-by-case basis to accommodate certain costs that may differ from the allowances set by the institution. However, professional judgment is rarely used by students, and many may not be aware of the option. The Department should require that all students applying for financial aid be made aware of the opportunity for professional judgment and be provided with the relevant procedures and contact information.

- **Require the Department to support colleges:** Financial aid professionals already have demanding workloads and significant time and resource constraints. The Department should supply the technical assistance necessary to effectuate these new rules and equip financial aid professionals with the tools they need to refer to government datasets or design high-quality student surveys. Within the regulations, the Department should task itself to provide regular trainings and guidance on methods for calculating COA. This could include tutorials on how institutions can analyze the public use microdata available from the U.S. Bureau of Labor Statistics' Consumer Expenditure Survey; the benefits and drawbacks of various federal datasets; ways to benchmark institutions in the same geographic area; and alerts when notable trends or economic conditions may warrant an update to living cost estimates. For institutions that insist on using student surveys, the Department could provide sample survey designs, sampling methodology, and administrative procedures. It may also be helpful for the Department to study and project the amount of staff time needed to ensure reliable COA estimates under the new rules to help financial aid professionals advocate for additional resources from their institution to support this critical work.

These recommendations will bring reliability, consistency, and improvement to the estimation and disclosure of higher education expenses for students and families. As the Department considers the upcoming negotiated rulemaking agenda, we urge you to include COA as a topic for negotiation.

Congress has newly authorized this rulemaking, and the Department now has clear authority to establish overdue federal oversight. The research documenting widespread variations and shortcomings in COA estimates and the crisis of basic needs insecurity facing students nationwide demand swift action. We look forward to working with you to support more transparency and fairness for students in higher education.

Sincerely,

The Hope Center at Temple University

American Association of University Women
Arizona Students' Association
Benefits Data Trust
California Association of Food Banks
Campaign for College Opportunity
Georgetown Center on Poverty & Inequality
GRACE/End Child Poverty California
Higher Learning Advocates
Hunger Solutions Minnesota
LeadMN - College Students Connecting for Change
Los Angeles Regional Food Bank
Massachusetts Law Reform Institute
NAACP Maryland State Conference
Pregnant Scholar Initiative, Center for WorkLife Law
#RealCollege Consulting LLC
Rise
Swipe Out Hunger
The Education Trust
The Institute of Student Loan Advisors
William E. Morris Institute for Justice
Young Invincibles