

Macias, Wendy

From: [REDACTED]
Sent: Thursday, June 18, 2009 3:08 PM
To: negreg09
Subject: HEOA comments
Attachments: HEOA comments 609.pdf

I have attached comments from the American Council of Engineering Companies in response to a notice published in the Federal Register on May 26, 2009. Thank you –





[REDACTED]

June 18, 2009

Ms. Wendy Macias
Office of Postsecondary Education
U.S. Department of Education
1990 K Street, NW
Room 8017
Washington, D.C. 20006

Dear Ms. Macias:

On behalf of the American Council of Engineering Companies (ACEC) – the voice of America’s engineering industry – I am writing to express our strong support for section 430 of the Higher Education Opportunity Act of 2008 (HEOA). This important program will provide student loan forgiveness in areas of national need, including engineering, and we ask that it be considered by the new negotiated rulemaking committee that will be established to write regulations for the HEOA.

ACEC members – numbering some 5,500 firms representing hundreds of thousands of engineers and other specialists throughout the country – are engaged in a wide range of engineering works that propel the nation’s economy, and enhance and safeguard America’s quality of life. Engineers are in demand now more than ever, but the number of bachelor’s degrees awarded in engineering has declined by nearly 20 percent since 1985. The engineering workforce is also getting older. Nearly 30 percent of workers who hold engineering and science degrees are age 50 or over and are expected to retire in the next 15 years.

We need to take steps now to increase the number of engineers who graduate from our universities, and section 430 of the HEOA will help us achieve this goal. By linking student loan forgiveness to years worked in a designated area of national need, we will encourage young people to pursue careers in fields such as engineering.

ACEC member firms and their employees are excited about this new opportunity, and have asked several relevant questions that we respectfully submit for consideration by the negotiated rulemaking committee. One of the most frequently asked questions is whether the program will be available to individuals who received their degree prior to the enactment of the legislation. ACEC strongly supports offering student loan forgiveness to all individuals who meet the criteria of the program, regardless of when they received their degree.

[REDACTED]

The statutory language does not specify what educational degree in engineering an individual must have completed in order to qualify for student loan forgiveness. ACEC encourages the negotiated rulemaking committee to make the student loan forgiveness available to individuals who have completed at least a bachelor's degree in engineering.

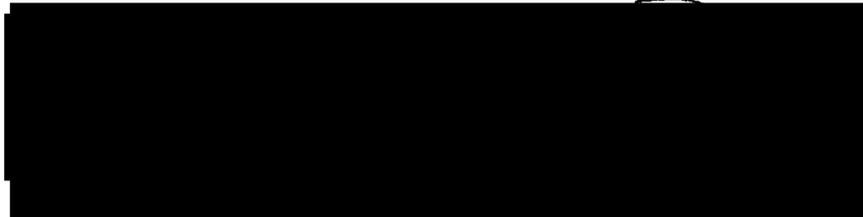
The negotiated rulemaking committee will also face questions about the types of student loans that will be covered by the program. For example, the committee must consider whether an engineer is eligible for student loan forgiveness if he or she has consolidated their student loans with their spouse. ACEC encourages the committee to include a broad range of student loans when determining eligibility for the program.

In addition, the committee will need to define the term 'engineer' for the purposes of qualifying for the program. ACEC suggests defining an engineer as an individual who is qualified to be employed in an occupation with a professional engineering designation, including any of the following designations: aerospace engineer; agricultural engineer; biomedical engineer; chemical engineer; civil engineer; computer hardware engineer; electrical engineer; electronics engineer; environmental engineer; health and safety engineer; industrial engineer; marine engineer and naval architects; materials engineer; mechanical engineer; mining and geological engineer; nuclear engineer; petroleum engineer; and professional land surveyors.

Finally, employers will play a crucial role in certifying that an individual has worked in a designated field and is eligible for student loan forgiveness. ACEC member firms are ready and willing to participate in this important program. We ask that the process for certifying an individual's work history be made as simple and efficient as possible. In particular, we are concerned about the paperwork burden on small firms. Small businesses comprise over 70 percent of ACEC's membership. Engineers who work for those firms should not be artificially constrained from receiving student loan forgiveness by the limited resources that small firms have to devote to a complicated certification process.

Thank you for your consideration. ACEC stands ready to assist the Department of Education in ensuring that the student loan forgiveness program is as effective as possible.

Sincerely,

A large black rectangular redaction box covering the signature and name of the sender.