January 10, 2000

The Honorable Richard W. Riley  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 7W301  
Washington, DC 20202

Dear Secretary Riley:

This letter is in response to the letter of November 30, 1999 by the Advisory Committee on Student Financial Assistance concerning the Department of Education Office of Student Financial Assistance. EDUCAUSE, an international association of more than 1,700 colleges and universities, has worked toward the ubiquitous and effective use of networking and information technology in higher education since its inception in 1964. Many of our members were involved in the formative stages of the Internet in the 1970s and 1980s, and throughout the 1990s EDUCAUSE has worked to assist our member campuses in their adaptation to the tremendous changes wrought by the Internet. The utilization of the Internet and middleware and its implications for systems integration is a core component of EDUCAUSE’s professional development activities.

Over the past year we have worked with the Department of Education in an ongoing basis, collaborating with the Department on such issues as security for open networks as well as the more general creation and evolution of relevant standards for and within higher education. We consider it part of our mission to help prepare the nation’s colleges and universities for the modernization of the student financial aid system.

Accordingly, it was with regret that we read the November 30 letter by the Committee, which criticized the Department for its “emphasis on short-term systems solutions rather than systems and database integration.” In its letter the Committee recommended that the Department reevaluate its reliance on the Internet and middleware, implying that these “short-term solutions” should not act as a substitute for “lasting systems and database integration.”

EDUCAUSE, on behalf of its 1,700 college and university members, disagrees with the Committee and believes OSFA is on the right track. In its Title IV modernization efforts OSFA is employing, with much foresight, an approach which leverages recent developments in information technology for the future benefit of the many financial institutions, schools, and students who rely on the Office of Student Financial Assistance.
We believe that middleware and the Internet are not “short-term solutions” to database integration. To the contrary, middleware and the Internet are key methods by which a number of our own members (and as the OSFA blueprint points out, many large businesses) are successfully accomplishing database integration and modernizing their own systems. They choose this approach rather than attempt a wholesale, monolithic replacement of multiple stovepipe systems, recognizing that the pace of technological development does not favor a large, centrally-organized, static infrastructure of the type commonly employed pre-Internet.

The OSFA’s modernization blueprint accurately notes that governmental efforts to design and build an entire agency’s system in one large chunk are ill-advised; the task is so lengthy that “new technology makes such an attempt obsolete before it’s finished and management turnover blurs the original vision.”

In short, we ask that you and the Advisory Committee on Student Financial Assistance support OSFA as work progresses according to its current Modernization Blueprint, and not compel OSFA to employ an outdated systems integration methodology as it tackles the daunting task of modernizing the Title IV infrastructure. EDUCAUSE looks forward to working with the Committee and OSFA as we collectively educate and help prepare the nation’s colleges and universities for pending changes in Title IV administration.

Very best regards,

Mark Luker
Vice President

cc:
The Honorable William F. Goodling
The Honorable Richard W. Riley
Members of the Advisory Committee on Student Financial Assistance
Members of the Senate Health, Education, Labor and Pensions Committee
Members of the House Committee on Education and the Workforce
Members of the Subcommittee on Postsecondary Education, Training, and Life-Long Learning