

August 23, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Docket ID ED-2024-OPE-0050

Dear Secretary Cardona:

The Association of the Community College Trustees (ACCT) appreciates the opportunity to provide comments on the Notice of Proposed Rulemaking (NPRM) regarding program integrity and institutional quality. This NPRM covers distance education, return of title IV funds (R2T4), and the Federal TRIO programs (TRIO). ACCT has joined the American Council on Education to provide comments on distance education and return to title IV funds (R2T4), as such, we will focus the comments on this letter to the Federal TRIO programs.

ACCT is a non-profit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,000 community, technical, and junior colleges in the United States and beyond. Trustees have the fiduciary responsibility of their institution and responsibility for hiring the college leadership. Further, trustees are leaders in their community and are concerned with the health of the community college sector. In this role, they take their duties of both board governance and advocacy on behalf of their colleges seriously.

ACCT would like to commend the Department of Education for its proposed changes to §§ 643.3, 644.3, 645.3 as it regards Talent Search, Educational Opportunity Centers, and Upward Bound (Regular, & Math and Science) programs. As individuals who came to this country through no fault of their own, ACCT has long championed providing a permanent solution for dreamers. While we wait for Congress to act, dreamers continue being a part of our community and actively enroll in our institutions to continue their postsecondary education. A subset of those dreamers, DACA recipients, have also found employment in our institutions. As open access institutions, community colleges serve all members of their communities, our program offerings cover the entire education continuum, from cradle to career. While we have been able to provide postsecondary education to many regardless of status, many ACCT member institutions who serve as TRIO providers have been forced to limit their services based on current

eligibility restrictions. ACCT welcomes the ability of our institutions to expand the eligible pool of students who they could serve regardless of migratory status.

Sincerely,

A handwritten signature in black ink, appearing to read "Jee Hang Lee". The signature is fluid and cursive, with the first name "Jee" being the most prominent.

Jee Hang Lee
President and CEO
Association of Community College Trustees