

March 2, 2026

Ms. Tamy Abernathy  
Office of Postsecondary Education  
400 Maryland Ave. SW  
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0944

Dear Ms. Abernathy,

Thank you for the opportunity to provide public comments on the draft regulations stemming from the RISE Committee's negotiated rulemaking session regarding critical changes to Title IV programs of the Higher Education Act, as found in *Pub. L. 119-21*, known as the *One Big Beautiful Bill Act*. The topics addressed in this letter are of most relevance to community, technical, and junior colleges, which are open-access public institutions offering degrees and certificates, as well as credit and non-credit education, and serve as engines of workforce development.

The Association of Community College Trustees (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 for 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, both in terms of finances and student success.

**Public Comments for Draft Regulations from the RISE Committee**

As stated previously, ACCT is interested in the implications of the implementation of *Pub. L. 119-21* on community, technical, and junior colleges. Overall, we support a tight adherence to the law for the regulations without many additional provisions. As we look at the larger universe in which we operate, however, there are three areas to which we would like to draw attention.

First, in order for our colleges to maintain accreditation, particularly in the medical field programs at our institutions, instructors must hold at least a master's degree in their field. The decision to limit the fields eligible for the higher professional level loan limits, compared to the graduate loan limits, will likely limit those pursuing these master's

degrees needed to teach. We encourage the Department to review the limited list to consider additional high-cost, high demand fields, particularly in medical fields.

A concrete example of this scenario comes from the field of nursing. The majority of community colleges offer high-quality nursing degrees, mainly Associate Degree in Nursing (ADN) and Associate of Science in Nursing (ASN), and a growing number of those degrees are also in Bachelor of Science in Nursing (BSN). A study shows that 77 percent of respondents find that the new loan caps will negatively impact faculty at their college of nursing. While this statistic comes from the four-year sector, two-year institutions can anticipate a parallel sentiment. As with other professions, post-baccalaureate studies in nursing are both high-cost and high-demand; this demand is not only seen in the profession itself, but it also applies to the need for instructors forming the next generation of nursing professionals.

ACCT supports a well-educated, diverse nursing workforce to advance the nation's health. Access to ADNs and ASNs promotes seamless academic progression in nursing education beyond the associate's degree. This is only possible with available and qualified professors at our two-year public institutions.

ACCT recognizes that there is currently a proposal from Congress to include degrees such as Master of Science in Nursing, Doctor of Nursing Practice, and PhD in Nursing in the currently non-exhaustive list of professional degrees. However, it is critical to point out that Congress's lack of explicit designation of which post-baccalaureate degrees are to be considered professional and graduate when passing *Pub. L. 119-21* gave the Administration latitude in making these designations, thus making new Congressional action unnecessary.

Second, also of relevance to public two-year institutions, is qualifying for exceptions to the loan limits under Parent PLUS loans. ACCT acknowledges that the usage rate for these types of loans is low in the two-year sector, with about 2 percent of parents using Parent PLUS to borrow for their community college dependents. Regardless, ACCT would like to point out that under the current proposed rule, students transferring from an associate's degree program to a bachelor's would receive an exception to the new Parent PLUS loan limits; however, it is unclear if they would only qualify for such an exception if they did not earn their associate's degree before transferring to a four-year program. As such, ACCT asks for clarification of these proposed regulations.

Finally, ACCT wants to again recommend to the Department to include representation from public two-year institutions in negotiated rulemaking. Other constituencies, such as our peers from the four-year sector, are not fully able to speak on the unique nature of our institutions.

To conclude, ACCT, on behalf of our governing boards across the nation, appreciates the Department of Education for this opportunity to participate in the public comment period of the negotiated rulemaking process.

For more information or with questions, please contact ACCT Vice President, Public Policy, Carrie Warick-Smith at [cwsmith@acct.org](mailto:cwsmith@acct.org).

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  
ACCT President and CEO