



August 6, 2025

Mr. James Bergeron
Deputy Under Secretary of Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Deputy Under Secretary Bergeron,

Re: Docket ID ED-2025-OPE-0151, Intent to Establish Negotiated Rulemaking Committees

As presidents of associations whose members collectively include the nation's public colleges and universities, we write to raise concerns about the Department's announcement that it intends to establish negotiated rulemaking without separate representatives for public two-year institutions *and* public four-year institutions. This break with longstanding Department of Education practice, including during President Trump's first term as president, would diminish the voice of institutions that together educate three-quarters of all students in postsecondary education and deprive the Department and the committee of needed perspectives on policy of vital importance to students, colleges and universities, and the nation. We respectfully request the Department revise its plans to allow for distinct representation of both community colleges and public four-year universities.

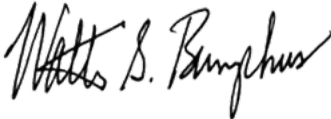
Public two- and four-year colleges and universities are the cornerstone of American higher education, fueling upward mobility for millions of students each year and powering the world's most productive and innovative workforce. Nearly three-quarters of all students enrolling in higher education, totaling almost 14 million students, study at public institutions each year.ⁱ Consolidating representation for these sectors into a single shared representative dilutes the voice of public higher education in the rulemaking process, but most concerningly, will fail to provide the committee the needed perspectives of how policy will impact different institutions possibly quite differently.

Although public two- and four-year institutions share a unique mission in the sector to advance the public good through education, workforce development, and community impact, they also have distinct but complementary roles in the higher education ecosystem. As an example, the mission of an open-access community college with a focus on short-term credentials, associate degrees, and pathways to four-year institutions is markedly different from a research-intensive public university that awards bachelor's, professional, master's, and doctoral degrees. These critically important but distinct roles often mean that federal policy has materially different impacts on public two- and four-year institutions. Continuing the longstanding practice of two distinct representatives for these sectors would ensure the fullest representation of institutions that educate the vast majority of American college students and their unique contributions to the policymaking process to help inform the committee and ED's next steps.

As the Department of Education begins One Big Beautiful Bill Act negotiated rulemaking through one committee addressing student loan issues and another addressing institutional and program accountability, Pell Grants, and other issues, we respectfully request the Department restore distinct rulemaking representation for public two- and four-year universities.

Please do not hesitate to let us know how we can be a helpful resource and partner. Thank you for your consideration.

Sincerely,



Walter G. Bumphus, Ph.D.
President, American Association of Community Colleges



Waded Cruzado
President, Association of Public and Land-grant Universities



Charles Welch
President, American Association of State Colleges and Universities

ⁱ IPEDS Fall Enrollment collected in 2023-24