

The Honorable James Kvaal  
Under Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20202

August 31, 2023

Dear Under Secretary Kvaal:

As the Department of Education proceeds with establishing a negotiated rulemaking committee on student loan debt relief, we write to urge you to remain committed to pursuing the rulemaking process on topics related to institutional quality and accountability that your office announced as part of the Biden Administration's unified regulatory agenda in April 2023.

The regulatory issues proposed for this session—including the Secretary's recognition of accrediting agencies and state authorization as a component of institutional eligibility—are of vital importance to providing robust consumer protection for students and ensuring institutional accountability in higher education. The addition of a negotiated rulemaking table this fall focused on student loan debt relief does not negate, but rather heightens, the urgency for the intended rulemaking process on institutional quality and accountability.

The Department of Education must continue to move forward with its planned regulatory agenda on accreditation, state authorization, and other critical accountability topics, and must ensure that it does so on an appropriate timeline to allow for these final rules to be developed and implemented by November 1, 2024, in accordance with the Master Calendar.

Our undersigned organizations strongly urge the Department of Education to stand firm in its stated commitment to strengthening accountability standards in the higher education system and ensuring that all institutions receiving access to Title IV funding are serving as good stewards of taxpayer dollars. We look forward to productive rulemaking processes on quality and accountability issues.

Sincerely,

Arnold Ventures  
Carolyn Fast, Senior Fellow, The Century Foundation  
National Consumer Law Center (on behalf of its low-income clients)  
New America Higher Education Program  
Project on Predatory Student Lending  
Student Defense  
The Education Trust  
The Institute for College Access & Success  
Third Way  
Veterans Education Success