September 21, 2026

Re: Accreditation, Innovation, and Modernization: The Secretary's Recognition of Accrediting Agencies: Institutional Eligibility Under the Higher Education Act of 1965, as Amended, Student Assistance General Provisions (Docket ID ED-2025-OPE-1042)

On behalf of the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, and Advance CTE, the nation's longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary, and adult Career Technical Education (CTE) across all 50 states and U.S. territories, we are writing in response to the Federal Register notice released August 20 proposing new changes to postsecondary accreditation.

Our organizations support the Department's stated commitment to ensuring that postsecondary institutions provide high-quality programs that lead to economic mobility for all students. Accreditors play an important role in advancing these goals by establishing meaningful standards for educational quality and holding institutions accountable when programs fail to meet these requirements. Furthermore, accreditation serves as a gateway for participation in the federal student aid program, ensuring taxpayer dollars are targeted to institutions that are aligned to high-quality standards.

Postsecondary CTE programs, most often delivered within community and technical colleges, area technical centers and other institutions, operate within accreditation and regulatory frameworks designed to provide strong results for the students that they serve. Implementation of the recently enacted Workforce Pell (WFP) program also underscores the need for robust accreditation standards to ensure that only high-quality institutions and programs are eligible to participate.

While our organizations agree with the Department's stated focus on improving the quality of postsecondary education and support proposed rules that would streamline credit transfer, we are concerned that other aspects of this rulemaking would increase administrative burden while disadvantaging the community and technical colleges that are central to preparing the nation's current and future workforce.

Our specific recommendations therefore include the following:

1. Credit transfer policies: We strongly support the inclusion of rules that would streamline and better facilitate the transfer of postsecondary credit between institutions and promote credit mobility for learners.

In particular, regarding noncredit coursework, we support the proposed rule requiring institutions to provide a statement on whether they accept credits earned in a nondegree program or accept hours completed in a noncredit program toward transfer or articulation to a degree program. As currently structured, this rule would allow students in noncredit or nondegree programs to easily identify institutions and degree programs that recognize that coursework, including students enrolled in WFP-eligible programs.

2. Cost-benefit analyses of facilities and student support services: We are concerned that the rule would require accreditors to conduct a cost-benefit analysis of equipment, facilities and student support services for each institution they accredit. While we appreciate the Department's intent to reduce costs for students and taxpayers, the rule would create additional burden for accreditors without accurately capturing the value of these expenditures, particularly in community and technical colleges (where many CTE programs are offered).

Community and technical colleges offer unique supports tailored to specific nontraditional student populations, including part-time students, full-time workers, adult learners and students who are also parents. These supports can often include academic tutoring, career guidance and advising, on-campus childcare facilities, transportation amenities, housing assistance and student food and resource pantries. Research shows that community and technical colleges enroll a higher percentage of nontraditional students compared to four-year universities,[1] [2] while 42% of postsecondary CTE concentrators in [2023-24]() were from economically disadvantaged families and could benefit from these types of supports to help them succeed in their CTE programs.

Equipment, facilities and student support services are also critical to student retention and program completion[3] and cannot be easily quantified in monetary terms. Ensuring that CTE programs have up-to-date equipment currently used by industry is a necessary ingredient that helps to ensure these programs are truly preparing learners for what comes after their education, and accreditors are not necessarily the best positioned to make value determinations about equipment and technology needs. Accreditors should ensure that institutions are financially sustainable, but this can be done through other means besides cost-benefit analyses, such as greater transparency in related reporting.

3. Program- and institution-level outcomes: While we support a focus on program and institutional outcomes, we have concerns about these proposed measures can

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[1] COE - College Student Employment
[2] COE - Characteristics of Postsecondary Students
[3] Basic Needs Supports in Community Colleges

effectively be operationalized by accreditors themselves. While research shows that postsecondary CTE programs lead to strong workforce outcomes,[4] [5] different types of federal and state earnings data may produce incomplete or misleading measures of program value that could inadvertently disadvantage specific programs. For example, if an accreditor compared the earnings of a postsecondary CTE program completer living and working in a rural community to the statewide median wage for high school graduates, the result could underestimate that program's earnings benefit. Additionally, federal administrative earnings data from the IRS and state unemployment insurance systems undercount several categories of income common in CTE-relevant occupations, including tipped income, untaxed housing and other self-employment income. Accreditors may also lack access to the data needed to examine program- and institution-level outcomes.

Therefore, we recommend the Department clarify and provide flexibility in its rule that the economic returns for programs should be calculated and adjusted for geographical context and cost-of-living differences. The Department should also ensure accreditors can access the data needed to evaluate institutions or articulate a vision for how state or federal government entities can help them ensure these new requirements are implemented with fidelity.

4. Federal involvement in postsecondary operations: Many of the proposed rules are significantly more prescriptive than is necessary, lacking flexibility for accreditors to address unique institutional needs and falling outside the scope of accreditation's goals related to institutional quality and outcomes. We urge the Department to exercise caution and ensure that the rules do not interfere or detract from the independent role of accreditors and institutions. The Department should also carefully consider the burden introduced from the significant new and additional requirements proposed herein, particularly whether the potential benefits of these proposals do or do not outweigh costs .

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Chief Policy, Research and Content Officer Alisha Hyslop (ahyslop@acteonline.org) or Advance CTE's Federal Policy Advisor Steve Voytek (svoytek@careertech.org).

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[4] Which Community College Awards Are Likely to Prepare Students for Post-Completion Success?
[5] The Major Payoff: Evaluating Earnings and Employment Outcomes Across Bachelor's Degrees - CEW Georgetown