

# Council of Recognized Accrediting Commissions

April 8, 2026

The Honorable Nicholas Kent  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202  
**RE: Docket ID: ED-2026-OPE-0133**

Dear Under Secretary Kent:

The Council of Recognized Accrediting Commissions (C-RAC) appreciates the opportunity to provide comments in response to the Department of Education's (ED's) March 9, 2026, [notice](#) of proposed rulemaking (NPRM) following the Accountability in Higher Education and Access Through Demand-Driven Workforce Pell (AHEAD) negotiated rulemaking committee.

C-RAC represents seven federally recognized institutional accrediting commissions that are responsible for accrediting nearly 3,000 postsecondary, degree-granting colleges and universities across the United States. These include over 1,500 public, 1,100 private non-profits, and nearly 100 private for-profit institutions with a broad set of missions and constituencies.

C-RAC's members are the Accrediting Commission for Community and Junior Colleges (ACCJC), Higher Learning Commission (HLC), Middle States Commission on Higher Education (MSCHE), New England Commission of Higher Education (NECHE), Northwest Commission on Colleges and Universities (NWCCU), Southern Association of Colleges and Schools Commission on Colleges (SACSCOC), and WASC Senior College and University Commission (WSCUC).

Workforce Pell grants can provide new opportunities for students seeking highly focused programs designed to prepare them for a job as well as future educational growth. We believe the NPRM provides a helpful set of guidelines to help ensure these opportunities may be realized. Our comments are focused upon two specific areas of the NPRM including those related to the approval of programs and written arrangements.

## **Approval of Programs**

All C-RAC members have policies related to certificates/short-term programs to ensure they are within the scope of the institution's accreditation. Each agency's substantive change policies also outline issues such as when approval, or simply notification, is required on the part of institutions when establishing or expanding such programs.

Given the current role of accreditors in this area, we appreciate language included in the discussion portion of the NPRM under 600.10(c) "Date, Extent, Duration, and Consequence of Eligibility," which states the following:

*"... An eligible institution must be able to demonstrate that each program, including eligible workforce programs,—collectively or individually—is included within its grant of accreditation. The Department does not require the accrediting agency to approve each eligible workforce program but an accrediting agency recognized by the Department may establish its own internal processes regarding the approval of eligible workforce programs, which must follow its established review procedures for substantive changes*

*set forth in § 602.22. If an accrediting agency decides to approve one or more eligible workforce programs separately or based on established policies that require eligible institutions to make a substantive change request to add an eligible workforce program, the accrediting agency approval may come before or after approval by the Governor (but prior to Department approval)."*

This language rightly reaffirms the proper and current role and responsibilities of accreditors when it comes to the review of workforce programs. This includes the ability of accreditors to continue their individual agency efforts and approaches in the quality assurance and oversight of these programs.

## **Written Arrangements**

The consensus language of the AHEAD negotiated rulemaking committee limited the proportion of a program that may be provided through a written arrangement by an ineligible institution or organization to 25 percent. While the NPRM maintains this proposed language, we appreciate that ED included a directed question seeking input on the extent to which this limitation should be expanded to allow for arrangements of up to 50 percent "under specific conditions."

Under current regulations, written arrangements may be expanded to 50 percent if reviewed and approved by the eligible institution's accrediting agency as a substantial change. We believe this same flexibility should be afforded to Workforce Pell programs as long as they are reviewed and approved by the eligible institution's accrediting agency.

In explaining the rationale for the 25 percent limitation, ED argues "there is not the same level of quality assurance given the broad lack of experience in the accreditation industry in evaluating agreements for short-term programs." However, institutional accreditors do in fact have decades of experience in evaluating short-term programs. Institutional accreditors have the proven ability and capacity to make determinations for the approval of expanded written arrangements in the context of Workforce Pell programs. We believe such flexibility can enable new and innovative efforts on the part of our member institutions and strongly encourage the Final Rule to enable such flexibility and to recognize the role and ability of accreditors in approving such arrangements.

C-RAC members are committed to working with all stakeholders to ensure the smooth implementation of eligible Workforce Pell programs that are innovative and high-quality as envisioned under the law and proposed regulations.

Again, thank you for the opportunity to submit these comments. Please contact the Chair of C-RAC, Dr. Heather F. Perfetti, by phone at [REDACTED] or by email at [REDACTED] if we can provide additional information or lend our expertise.

Sincerely,



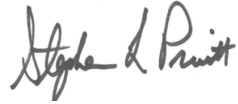
Dr. Heather F. Perfetti  
C-RAC Chair  
President, Middle States Commission on  
Higher Education (MSCHE)



Dr. Selena M. Grace, President  
Northwest Commission on Colleges and  
Universities (NWCCU)



Dr. Mac Powell  
C-RAC Vice-Chair  
President, Accrediting Commission for  
Community and Junior Colleges (ACCJC)



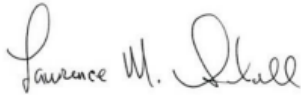
Dr. Stephen Pruitt, President  
Southern Association of Colleges and  
Schools Commission on Colleges  
(SACSCOC)



Dr. Barbara Gellman-Danley, President  
Higher Learning Commission (HLC)



Dr. Maria Toyoda, President  
WASC Senior College and University  
Commission (WSCUC)



Dr. Lawrence M. Schall, President  
New England Commission of Higher  
Education (NECHE)