

**-EMBARGOED-**

February 14, 2024

The Honorable Miguel Cardona Secretary  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202

Dear Secretary Cardona,

As representatives of American universities and colleges, we are alarmed to learn that the U.S. Department of Education (ED) is moving to curb access and affordability course materials programs such as [Inclusive Access](#) – which are highly effective offerings that provide low-cost, high-quality course materials to students at our nation's institutions of higher education, dramatically increase faculty and student choice, and deliver particularly strong benefits to low income and at-risk populations.

We request that you move quickly and decisively to protect and preserve these critically important options for course materials by retaining the current rules. Given many of the concerns raised during the negotiation sessions, we encourage the Department to consider this feedback in its next draft of language during this process.

By way of background, access and affordability programs such as Inclusive Access were developed by colleges and universities during the Obama-Biden administration when the Department of Education issued federal guidance creating an important mechanism for institutions of higher learning to include course material expenses as part of tuition and fees, with the caveat that those materials had to be offered to students at a cost below the competitive market rate. This move enabled low-income students to pay for course materials through their federal grants and loans—rather than going out of pocket—providing significant relief to those struggling to afford their degree.

In the years that followed the introduction of these programs, the positive impact has been nothing less than extraordinary. More than 1,900 colleges and universities (nearly 50%) from across the country now offer access and affordability programs based on the rules created during the Obama-Biden era.

The response from students has been extremely positive as well. In just one example, 83% of students surveyed at Norfolk State University said that such programs had a positive impact on their academic success, and 89% said that they would be likely to recommend the program to other students.

In terms of affordability, these programs have contributed to a dramatic [57% decline in student spending](#) on course materials over the past decade, according to independent research group

Student Watch. As part of that ongoing trend, students now spend an average of just \$310 a year in the category, according to the [2023 Trends in College Pricing and Student Aid](#) Report from the College Board.

While the benefits in terms of affordability are clear, students also always have the choice of opting out of the program and acquiring the course materials they need elsewhere.

In short, these programs are an essential tool for making higher education affordable to a broader range of Americans than ever before.

Additionally, these affordability and access programs accelerate student access to high-quality course materials, providing them seamlessly on or before the first day of class, and dramatically improve student outcomes and retention rates.

Programs providing early access to course materials have been shown to have particularly strong benefits for the most underserved student populations. In fact, [recent independent academic research](#) has shown substantial increases in course completion rates for at-risk groups, including Black students (up 21%), students over the age of 25 (up 6%), and female students (up 13%) who participate in these programs.

While there is no one-size fits all solution when it comes to course materials, these programs provide faculty and students with the option to choose high-quality materials at an affordable rate, while at the same time providing critically important support to at-risk groups.

The proposed regulation updates would effectively gut these programs by making it much more difficult for students to apply their federal student aid to course materials, undermining the successful legacy of a key Obama-Biden era campaign promise to bolster quality and affordability in higher education.

Affordability and access programs will, of course, continue to improve and evolve over time. We are committed to enhanced transparency and disclosure for students. But there is simply no good reason to threaten the extraordinary progress that these programs have made in terms of affordability and improved student outcomes over the past eight years.

As college administrators we urge ED to modify your proposed cash management regulation updates and retain the current regulations that make possible an important, successful course material access model that has demonstrated real positive outcomes for students.

Respectfully,

75 Signatories, representing 61 Institutions

(See the full list of Signatories below)

## Higher Education Professionals at Four Year Institutions:

Russell Weldon, Auburn University

Sandra Hope, Professor, Microbiology & Molecular Biology, Brigham Young University

Marie C. Pizzorno Ph.D., Professor of Biology, Bucknell University

Kimberly Yates, Assistant Director – Course Materials, Central Michigan University

Barry Waters, Central Michigan University

John A. Marohn, Professor, Cornell University

Tigran Abrahamyan, PhD, Florida International University (FIU)

David R. Decker, Franklin University President, Franklin University

Kathleen Hutcheson, Lab Supervisor, Staff, Georgia Southern University

Derick Robertson Director of Retail, Georgia Southern University

Carrie Rose, Bookstore Manager, Grove City College

Jacklyn Downing, Kutztown University of Pennsylvania

Dr. Andrew Steele, Associate Professor, Chemistry, School of Natural Sciences and Mathematics, Lenoir Rhyne University

Dr. Eric Terry, Associate Professor, Miami Dade College

Thania Rios, Miami Dade College

Tina Kuhn, Miami Dade College

Shahrooz Moosavizadeh, Professor, Director of the Spartans All Inclusive Learning (SAIL) Program, Norfolk State University

Amy Barnsley, Professor, Mathematics, Northern Michigan University

Jennifer Kelly, Executive Director University Affairs, Northwestern State University

Briana Salas, Associate Professor, Our Lady of the Lake University

Daryoush Tahmassebi, Purdue University Fort Wayne

Jeff Laborda, Associate Professor, Natural Science Dept., State College of Florida, Manatee-Sarasota

Scott Chapman, Book Division Manager, UCLA Store, University of California Los Angeles (UCLA)

Melvin Beck, University of Memphis

Eric Parsons, Director of Undergraduate Studies, Department of Economics, University of Missouri

Dr. Mike Moore, Affiliate Research Assistant Professor, University of New Hampshire

Christina Green, University of North Georgia

Timothy Barnett, University of South Carolina

Jerry Carroll Director of Contract and Retail Services, University of South Carolina Upstate

Betty Phillips, Course Materials Manager, University of Tennessee

Lee Murphy, Distinguished Lecturer, Department of Nutrition, University of Tennessee – Knoxville

Lindsay Mahony, University of Tennessee, Knoxville

Dr. Matthew Pamental, Senior Lecturer, Department of Philosophy, University of Tennessee-Knoxville  
Michelle Childs, The University of Tennessee  
Shirley Streeter, Assistant Director, Volbooks, University of Tennessee  
A. Vaish, University of Virginia  
Juno A. Farnsworth, Assistant Professor, Vincennes University  
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Randy Simmons, Utah State University  
Linne Marsh, Utah Tech University  
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**Higher Education Professionals at Two-Year, Community College, and Technical Schools:**

Gena Britt, Ph.D., Professor of Psychology, Brightpoint Community College  
Christopher Walsh, Anne Arundel Community College  
William Hoover, MD Science Coordinator for Allied Health Sciences, Bunker Hill Community College  
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Herman Calzadillas, Dean of Prof Tech, Everett Community College  
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Doug Sutton, Coordinator of Online Course Materials ICCOC, Iowa Community College Online Consortium  
Johnette McKown, President, McLennan Community College  
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Dr. Scott Zimmer, Paradise Valley Community College  
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Josh Wrightson, Bookstore Manager, Tri-County Technical College  
Beth Dunn, Triton College  
Glenn Jablonski, Mathematics Instructor, Triton College

**College and University Signatories:**

Anoka Ramsey Community College  
Cornell University  
Eastern Iowa Community College  
Florida International University  
Kennebec Valley Community College  
North Carolina Central University  
University of Virginia  
Waukesha County Technical College

**Bookstore Professionals:**

Jon Bibo, Independent College Bookstore Association  
Kevin Taylor, Bookstore Manager, SGA Bookstore (Serving Slippery Rock University)