



July 30, 2025

Mr. James Bergeron  
Acting Under Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Mr. Jeff Andrade  
Deputy Assistant Secretary for Policy, Planning, and Innovation  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Acting Under Secretary Bergeron and Deputy Assistant Secretary Andrade,

We are writing to express our profound concern regarding the unnecessary risk to the successful implementation of the provisions of the One Big Beautiful Bill Act resulting from the exclusion of financial aid administrators from the constituency groups identified for the upcoming negotiated rulemaking sessions.

Given the monumental policy changes to federal student loan programs, the Pell Grant Program, and institutional and programmatic accountability, the absence of the primary institutional stakeholders responsible for implementing these changes is a significant and troubling omission that will significantly impact students and families navigating these changes.

Financial aid professionals are essential to the effective delivery of federal student aid. They will interpret, communicate, and implement the intricate details of this wide-ranging bill to students and families attending college campuses nationwide. Their practical, on-the-ground expertise is invaluable for crafting workable, student-centered regulations that ensure a smooth and successful implementation. To exclude them from the negotiating table is to risk developing rules that are difficult to administer, create unintended consequences for students, and ultimately jeopardize the success of these important policies.

We understand there may be an intention to have a financial aid administrator occupy a seat designated for a representative of a specific college sector. While well-intentioned, this approach does not adequately address our concern. The role of a negotiator representing a college sector is to advocate for the interests of that group of institutions. That is far removed from representing the profession responsible for the technical implementation of financial aid programs and communicating those changes to students and their families across all campus types. When tasked with representing their entire profession, a financial

aid professional brings a crucial and distinct perspective focused on the operational mechanics of aid delivery, and an expertise that transcends the interests of any single institutional sector.

The deliberate exclusion of a key stakeholder group undermines the foundational principle of negotiated rulemaking, which is to ensure all essential voices are represented in the process. Ignoring the expertise of the financial aid community not only compromises the spirit of collaboration and transparency that negotiated rulemaking is designed to foster, but it also creates a significant risk of operational failure once these regulations reach our institutions.

We strongly urge you to reconsider the composition of the negotiating committees and add a dedicated seat for financial aid professionals. Their expertise will be critical in foreseeing potential implementation hurdles and developing practical solutions that benefit both students and institutions.

We stand ready to collaborate with the Department of Education to ensure the successful implementation of this landmark legislation. Thank you for your time and consideration of this urgent matter.

Regards,

A handwritten signature in dark ink, reading "Melanie E Storey". The signature is written in a cursive, flowing style. The first name "Melanie" is written in a larger, more prominent script, followed by "E" and "Storey". The signature is positioned below the "Regards," text.

Melanie Storey, President & CEO