



Alamo Colleges District
Dallas College
Kentucky Community and
Technical College System
Lone Star College
Louisiana Community and
Technical College System
Metropolitan Community
College
Virginia Community
College System
Wisconsin Technical
College System

January 10, 2024

The Honorable James Kvaal
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Under Secretary Kvaal,

On behalf of Rebuilding America's Middle Class (RAMC), I am writing to express concern about the Department of Education's (ED) negotiated rulemaking proposal to eliminate most ways in which institutions of higher education help students save money by bundling the cost of books and supplies with tuition and fees. We would urge the Department to reconsider this proposal as the negotiated rulemaking process continues.

RAMC represents more than 120 community colleges and 1.5 million students nationwide. As you know, community colleges serve 45 percent of all first-time freshmen and 40 percent of our students are first-generation college students. Additionally, a significant proportion of our nation's minority undergraduates attend community colleges, including 44.6 percent of all African American undergraduates, 49.7 percent of all Hispanic undergraduates, and 48 percent of Native American undergraduates. Community colleges are open access, seek to make higher education accessible and affordable for everyone and match employers' need for a larger, more diverse workforce. We know the importance of preparing more Americans to enter the workforce with the skills necessary to compete for in-demand jobs, especially during times of economic recession or labor market contraction.

Current regulations allow schools to facilitate lower cost access of books and supplies to students by bundling the cost of these materials with the cost of tuition and fees. The books and supplies need to be priced at below competitive market rates and students must be provided a way to opt out if they want to acquire the materials on their own. Under the proposal, ED would largely eliminate this ability to save students money through this bundling approach, only maintaining this authority when there is a compelling health or safety reason, or if the institution is the only option for students to access the books or supplies.

This proposal would ultimately limit student access to lower cost books and supplies and lead to reduced academic outcomes. Without the full purchasing power of

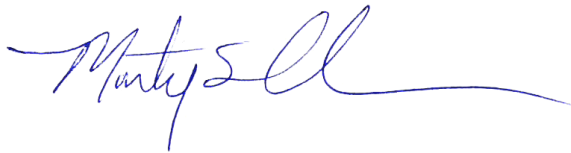
institutions, the elimination of current regulations would increase costs for students, making it harder to access course materials. Lastly, the current regulations allowing institutions to bundle books with tuition and fees have positively impacted student achievement.

We have seen significant benefits of bundling books with tuition and fees at RAMC institutions. For example:

- The AlamoBOOKS+ program provides Alamo Colleges District students with rental instructional materials, including books, by the first day of class. The program saved students an estimated \$51.6 million over the course of the 2022-2023 academic year.
- IncludED, a similar program at Dallas College, provides students with all required learning materials on the first day of classes for no additional cost beyond tuition. Historically, one third of Dallas College students had gone without a required textbook due to financial constraints. Since the implementation of IncludED in 2019, the program has saved the average student over \$835 per year, for a total of \$46.7 million in student savings annually, and over 96 percent of credit students opt-in to the program.
- Inclusive Access was also implemented at Nunez Community College in the Louisiana Community and Technical College System (LCTCS). The impact of Inclusive Access was immediately evident at Nunez, where LCTCS and Nunez observed double digit retention rate improvements as well as an eight percent increase in graduation rates directly attributable to this initiative.

Thank you for your consideration of our views. RAMC urges ED to rethink the advancement of this proposal during the current negotiated rulemaking and stands ready to continue to help our students access instructional materials in a cost effective and successful manner.

Sincerely,



Monty Sullivan
Board President, Rebuilding America's Middle Class (RAMC)
President, Louisiana Community and Technical College System