

April 16, 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Re: Accreditation, Innovation, and Modernization (AIM) Negotiated Rulemaking Committee

Dear Under Secretary Kent:

On behalf of the organizations listed below, we write to express our concerns regarding the composition of the Accreditation, Innovation, and Modernization (AIM) Negotiated Rulemaking Committee. We are particularly concerned with the absence of meaningful voting representation for programmatic and degree-granting accreditors on the Committee.

We appreciate the Department of Education's efforts to bring together a diverse group of stakeholders to inform important regulatory discussions related to higher education quality, innovation, and accountability. We also recognize the challenges inherent in assembling a balanced negotiating committee. However, the current structure, in which key constituencies are limited to non-voting or advisory roles, raises concerns about the inclusivity and overall effectiveness of the process, especially for institutions that educate and train the nation's health workforce.

As recent discussions on accreditation reform have highlighted, representation is not only about participation, but about ensuring a meaningful voice in decision making. This is particularly important in the health professions, where accreditors and institutions uphold rigorous standards that directly influence public health and clinical competence. Given the scope of the policies under consideration, this gap is especially concerning for health professions institutions, their students, and the communities they ultimately serve.

Programmatic and degree level accreditors in the health professions play a central role in the higher education landscape. They oversee education and training across fields such as public health, nursing, medicine, behavioral health and other allied health professions, helping to ensure that graduates are prepared to meet workforce needs. Excluding these accreditors from full participation in shaping the regulatory framework that governs their work creates a disconnect between policy development and the realities of preparing a competent, practice ready health workforce.

We are also concerned that non-voting or advisory roles do not provide an adequate pathway for these stakeholders to meaningfully influence outcomes. In health professions

education, regulatory decisions can have immediate implications for training capacity, workforce supply, and health outcomes. A process that does not fully incorporate this expertise risks weakening both the quality of the resulting policies and confidence in the process itself.

We remain committed to working constructively with the Department to strengthen accreditation and support a higher education system that is responsive to workforce and public needs. We stand ready to contribute our expertise and to engage in good faith dialogue to advance policies that promote quality, accountability, and student success. Ensuring that all materially affected stakeholders, including those representing health professions programs and institutions, have appropriate voting representation is essential to achieving these shared goals.

We respectfully urge the Department to reconsider the current composition of the negotiating committee and to provide programmatic and degree granting accreditors, particularly those representing health professions education, with meaningful voting representation. Doing so will help ensure a more inclusive and informed rulemaking process and will contribute to stronger, more effective policy outcomes that support both educational quality and public health.

We appreciate your consideration of these concerns and stand ready to serve as a resource as this important work moves forward.

Please contact tleshan@aspvh.org with questions or to request additional information.

Sincerely,

Association of Schools and Programs of Public Health (ASPPH)
American Association of Veterinary Medical Colleges (AAVMC)
American Dental Education Association (ADEA)
American Association of Colleges of Pharmacy (AACP)
Association of Chiropractic Colleges (ACC)