



How to Write an Effective Public Comment

*AHEAD Proposed Rule – Accountability Framework
Deadline: May 20, 2026*

Why Your Comment Matters

The Department of Education is currently reviewing feedback on a proposed rule that could change how program outcomes are evaluated for Title IV eligibility. Public comments are a formal part of the rulemaking process and are reviewed before a final rule is issued. **The Department of Education is required to review all submitted comments and either incorporate that feedback into the final rule or explain why changes were not made.** Well-written, specific comments from institutions are one of the most effective ways to ensure real-world perspectives are considered.

Where to Submit Your Comment

1. Go to <https://www.regulations.gov/document/ED-2026-OPE-0100-0001>

2. Select  **Comment** in top left

OR navigate to www.regulations.gov and search the docket ID: **ED-2026-OPE-0100**

What Makes a Strong Comment

- **Specific:** Focus on how the proposed rule would impact your institution
- **Original:** Written in your own words (not copied or templated)
- **Supported:** Include data, outcomes, or real examples when possible
- **Relevant:** Address specific parts of the proposed rule

** Well-supported, individualized comments are more impactful than multiple form letters*

Recommended Structure

Use this simple format to guide your comment:

1. Introduction (Who You Are)

- Name of your institution
- Type of programs offered (degree, nondegree, clock-hour, etc.)
- Number and type of students served

2. Impact Statement (What This Means for You)

In 3–5 sentences, explain how the proposed rule would affect:

- Your programs
- Your students
- Your operations

** Be as specific as possible (enrollment impact, program viability, student access to aid, etc.)*

Key Areas You May Want to Address

Based on the proposed rule, institutions may consider commenting on:

Earnings-Based Metrics	• Does the earnings calculation reflect your students' actual outcomes? • Are there factors (tips, self-employment, part-time work) that may not be captured?
Comparisons Used in the Metric	• Are your programs being compared to an appropriate benchmark group? • Does the comparison reflect your students' career paths and timelines?
Impact on Students and Access	• How could this affect your students' ability to access financial aid? • Would it limit access to education or workforce pathways in your community?
Program and Institutional Impact	• Would programs need to be reduced or discontinued? • Would this impact staffing, operations, or long-term sustainability?
Alternative Solutions	If you disagree with part of the rule not stated above: • Clearly state your concern • Offer a reasonable alternative or adjustment • Explain why your approach would better reflect student outcomes

Best Practices

- Clearly reference specific sections of the proposed rule when possible
- Keep your comment organized and easy to follow
- Use real examples, data, or student outcomes to support your points
- Stay professional and factual in tone

What to Avoid

- Copying and pasting template responses
- Submitting very short or general comments without detail
- Missing the submission deadline