



Dr. Michael L. Lomax
President and CEO

Frederick D. Patterson
Founder

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Columbia, SC

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Orangeburg, SC

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New Orleans, LA

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Fisk University
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Florida Memorial University
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Shaw University
Raleigh, NC

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Tuscaloosa, AL

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Talladega, AL

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Tougaloo, MS

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Tuskegee, AL

Virginia Union University
Richmond, VA

Voorhees University
Denmark, SC

Wilberforce University
Wilberforce, OH

Wiley College
Marshall, TX

Xavier University
New Orleans, LA

United Negro College Fund, Inc.
Washington, DC, Area Office
1805 7th Street, NW
Washington, DC 20001
T 202 810 0333
F 202 234 0224
UNCF.org

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The Honorable Miguel Cardona
Secretary
United States Department of Education
400 Maryland Ave, SW
Washington, DC 20202

The Honorable James Kvaal
Under Secretary
United States Department of Education
400 Maryland Ave, SW
Washington, DC 20202

RE: Docket ID #: ED-2023-OPE-0030

Dear Secretary Cardona and Under Secretary Kvaal:

Thank you for your visionary leadership and service to America's students and institutions of higher education.

I appreciate this opportunity to provide perspective on the bundled services guidance because seldom does a question of sub-regulatory guidance carry with it such vast impacts on the critical goals we all share for higher education in America. Having led the United Negro College Fund for nineteen years, I deeply appreciate the fundamental importance and transformational power of two key principles: (1) expansion of access to higher education; and (2) support for under-resourced institutions. The bundled services guidance actively serves to advance both of these principles.

When it was formulated in 2011, the bundled services guidance was understood and intended as a means to ensure that all institutions—despite the disadvantages that many face—have access to the tools they need in order to serve students online. The guidance has and continues to serve its purpose well. While very large and very well-resourced institutions enroll more online students than others, I am pleased to see that even institutions who continue to struggle with the effects of years of divestment and on-campus enrollment declines—including some historically Black colleges and universities—have been able to successfully become a part of the increasingly important online ecosystem. Their ability to do so is a direct result of the bundled services guidance.

There is no question that online programs are an essential part of the present and the future. If we are to meet our goal of ensuring that all students have the access they need and deserve, then robust and growing online options must be available. And if we are to meet our goal of ensuring that all institutions—and not just the privileged few—have the tools they need to provide those options, then the bundled services guidance must remain in place.

Sincerely yours,

Michael L. Lomax, Ph.D.