

Anchors Aweigh for Change: **How to leverage your insights to influence laws**

Procedural Aspects of Submitting Comments From Multi-Level Perspectives

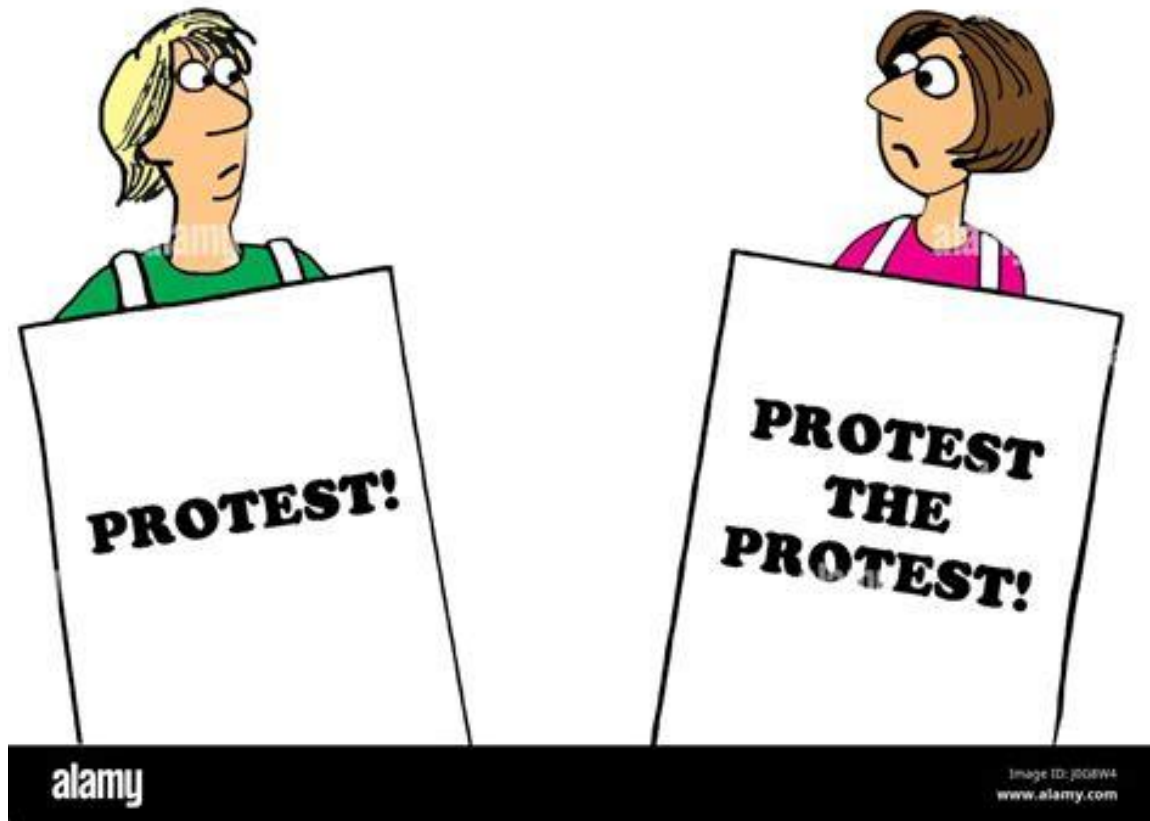


2025 NASASPS Annual Conference

**NATIONAL ASSOCIATION OF STATE ADMINISTRATORS
AND SUPERVISORS OF PRIVATE SCHOOLS**

April 27-30 | St. Louis, MO

Not advocating extraordinary actions

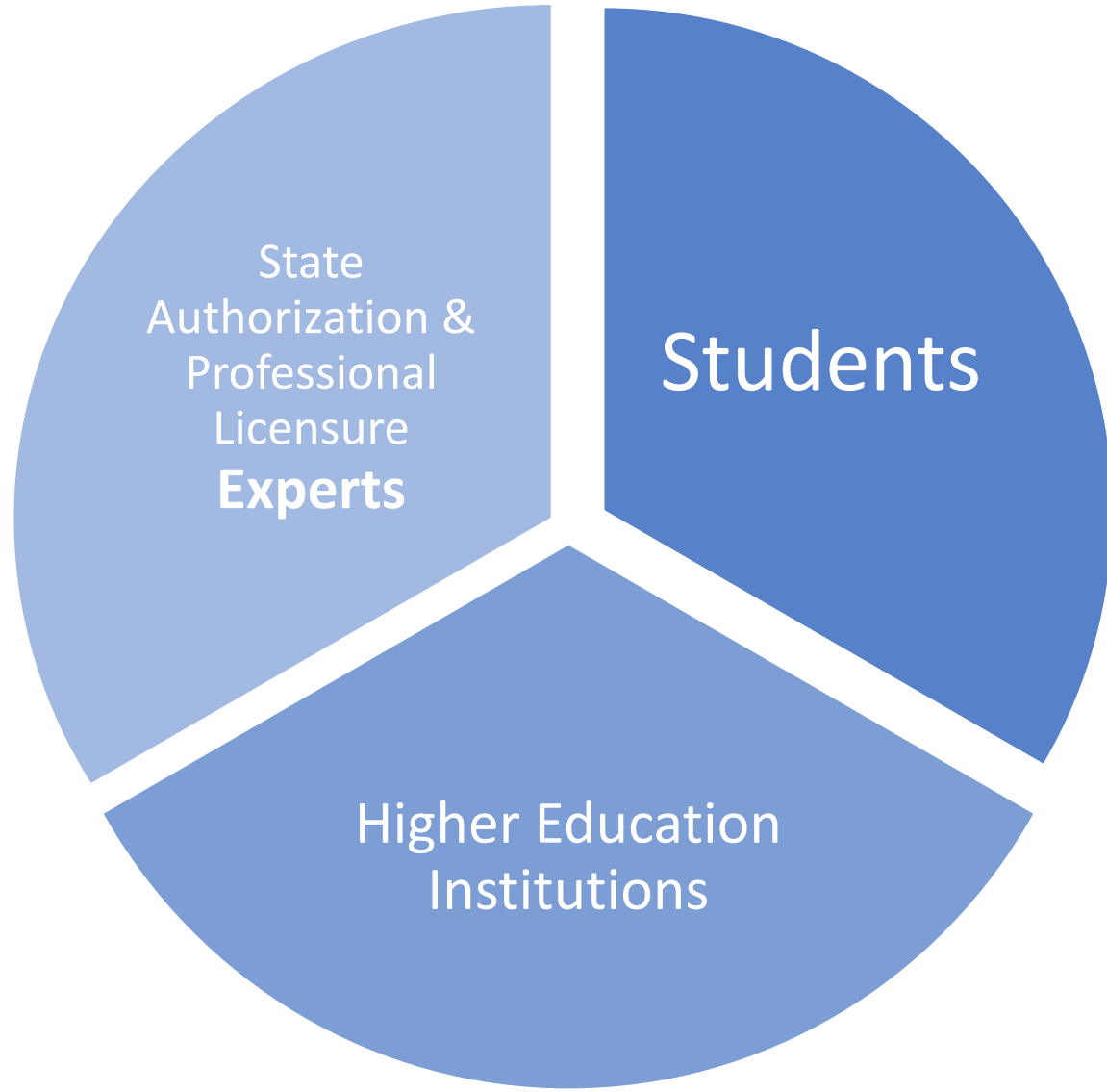


Why comment? It's not like my opinion matters, right?

- **Wrong!**
- Comments, (public AND anonymous) significantly influence regulations
- Rulemaking involves drafting, feedback, revision, and reintroduction.
- Your expertise is crucial - share it!



**Why
should
you share
your
thoughts?**



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your
thoughts?**



Do our letters,
e-mails, comments, or
phone calls even
matter to federal,
state or local
representatives or
regulators?

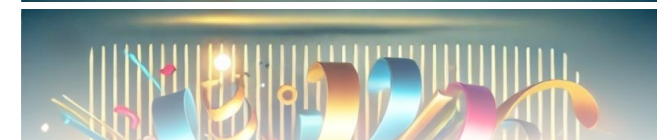


to our lists,
emails, or
needing
feedback
from local
representatives
representors?



Why do **WE** think comments are important?

- We analyzed the comments for July 2024 - Proposed Reg from DoED
- and the August 2024 - Public Comments
- and the effects of the comments were pretty impressive.

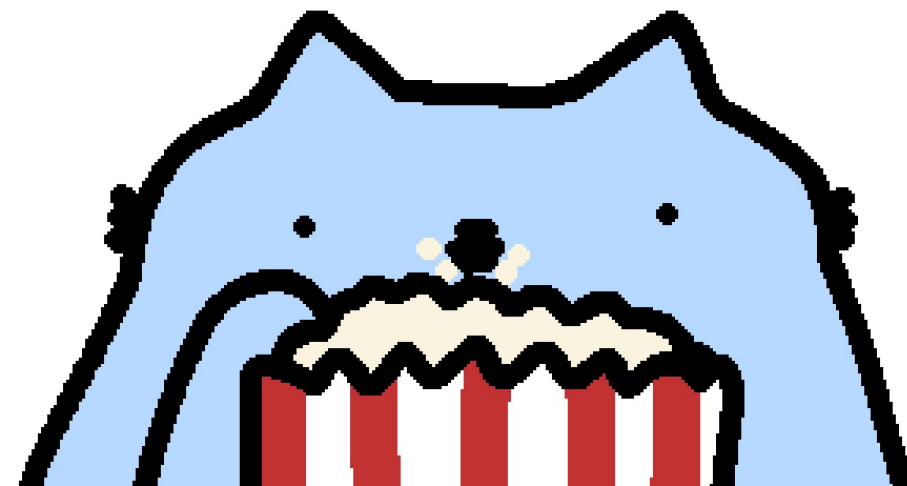


Topic	Proposed Rule	Final Rule	Did Comments Make an Impact?
Asynchronous Learning Ban	Banned for clock-hour programs	Not finalized ; may be revisited later	☑ Yes – Strong pushback from institutions
TRIO Program Expansion	Expanded eligibility to some undocumented students	Not finalized ; reconsidered for later	☑ Yes – Mixed support & opposition led to removal
Title IV Return Policy	Required strict returns for withdrawn students	New exemption for institutions refunding tuition	☑ Yes – Colleges gained flexibility
Distance Ed Reporting	Required reporting of online enrollments	Delayed until 2027	☑ Yes – More time for institutions
Virtual Location Reporting	Schools must report a "virtual location"	Removed – No virtual location required	☑ Yes – Institutions avoided extra paperwork
Attendance Tracking	Required for all online students	Removed – Not finalized	☑ Yes – Institutions avoided extra oversight
Loan Repayment for No Attendance	Required repayment under promissory note	Withdrawn – No new policy	☑ Yes – Mixed feedback led to policy removal
Return of Title IV (R2T4) Timeline	Takes effect in 2026	No delay – Schools must comply by 2026	✗ No – Schools requested more time but didn't get it

Who wants my opinion?!

Everyone!

IM JUST HERE FOR THE COMMENTS
DONT MIND ME



Who wants my opinion?!

● Local

- HOA Boards
- Mayor or Aldermen
- County Supervisors
- Town Halls
- City Offices
- Commissions

● State

- State Legislators
- State Agencies
- Governor

Who wants my opinion?!

- Federal : Non-Governmental: International
 - US Legislators
 - Federal Agencies
 - US Accrediting Bodies: SACSCOC, WASC, etc.
 - National Associations: American Bar Association, American Library Association, etc.
 - International Associations: [SACS CASI](#), [WHO](#), [AOAC](#)

Stick to the Facts, Avoid Bias!

- Good comments are not political
- Commentors should be just as vocal in support than in opposition
- As SME's, your focus should be on facts, not feelings



- Focus on Tangible Things
 - Student Impacts
 - MONEY
 - Other Costs
 - Unintended Consequences

Providing Comments to Local Entities

Things to consider:

- Audience
 - Will comments be public or hidden?
- Tone
- Timing
- Submission Procedures



Things to consider:

- Author
 - Institution
 - Organization
 - Personal

Providing Comments to Local Entities

Things to consider:

- Audience
 - Will comments be public or hidden?
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- Timing
- Submission Procedures



Things to consider:

- Auth

- **Anonymous option**

Exercise 1: What are your thoughts about the nosy Homeowners Association?

the nosy Homeowners Association;

Exercise 1: What are your thoughts about

Description of the Homeowner's issue

Exercise 1: What are your thoughts about the nosy Homeowners Association?

3 minutes

We need to 2 volunteers to share their response

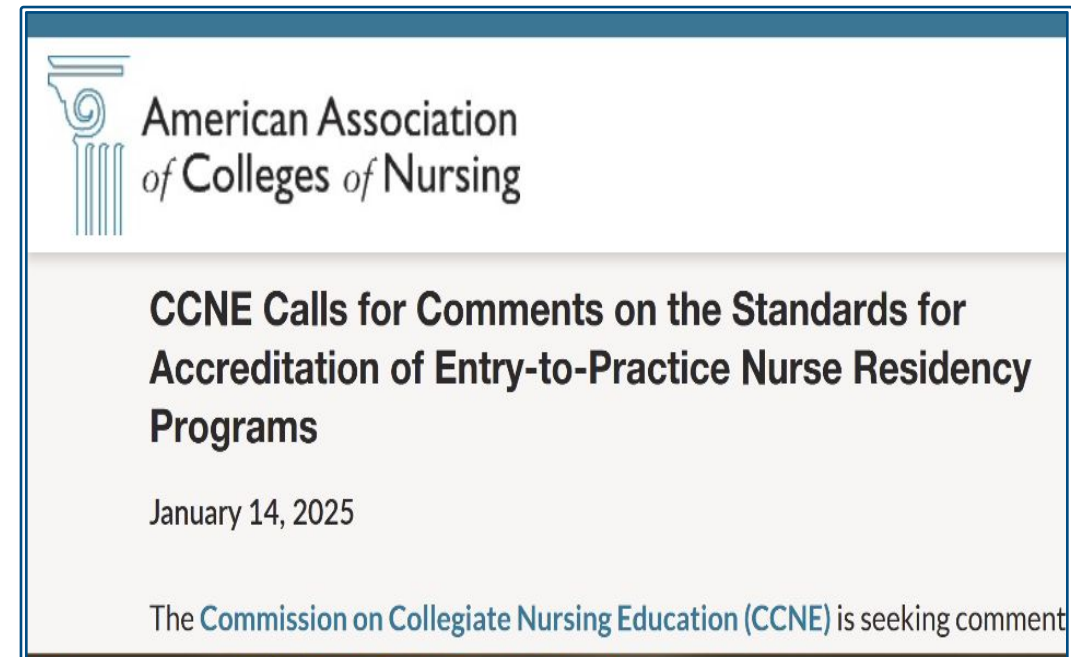
Providing Comments to National Groups

Governmental or Non-Governmental Agencies

Things to Consider:

- Specific agency, Accreditor or National Association
 - NC-SARA
 - AACN
- Authorship:
 - You, an Organization, or an Institution
- Reviewers and submission method

Request for public input was made by the Organization.



Members of the Triad May Comment Too! Compelling Governmental Interest

- Compelling governmental interest in the subject matter
- Member institutions will be impacted as a whole
- Example: Professional Licensure, Reciprocity
- Money and other Costs to Comply
 - FTE
 - Lost Revenue
 - Time!
- SARA: member states
 - Improper intrusion into State's authority
 - Contract

Know All of Your Audience: Using Professional Licensure as an Example

Next Steps
for
Professional
Licensure
Disclosures



**Reach out
to NC-SARA
and SAN**



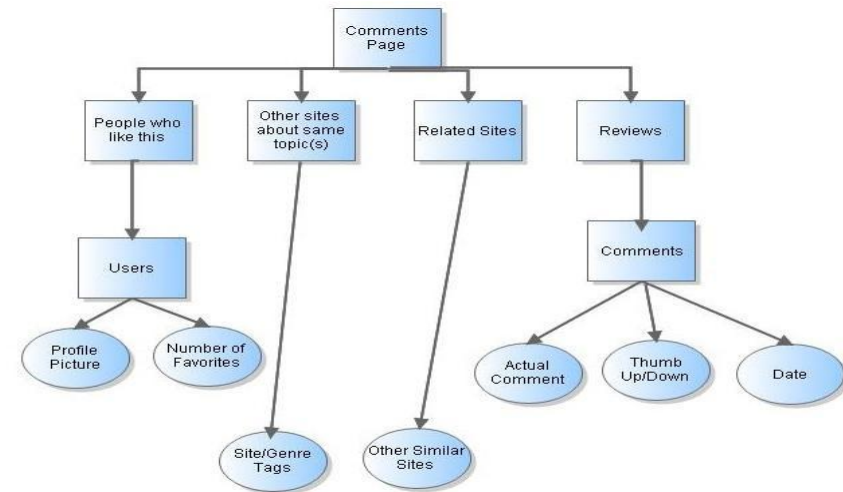
**Work with your State
Professional Licensing
Boards to support
alternative pathways to
licensure**



**Work with your Legislative Action
team & reach out to your legislators
Submit A Comment to US DOE
Negotiated Rulemaking**

Organization Review Process

- Visualize your organization's review chart clearly
- Identify internal stakeholders involved in a comment submission



Organization Review Process



Providing Comments to State Entities

Things to Consider:

- Audience
 - ◆ State Legislators
 - ◆ State Agencies
 - ◆ Governor
- Format
 - ◆ Public or Anonymous?
- Tone
- Timing
- Submission



Exercise 2: Where are State Regs posted?

[Home](#) > [Regulation & Enforcement](#) > [Administrative Bulletin](#)



MISSISSIPPI ADMINISTRATIVE BULLETIN

Welcome to the Mississippi Administrative Bulletin. The Mississippi Secretary of State's Office is the official registrar for the rules of all state agencies and the publisher of the Mississippi Administrative Bulletin. This service allows you to conduct a search in the Mississippi Administrative Bulletin of the rules of state agencies, boards, and commissions which have been proposed for public comment and adopted but not yet effective.

Administrative Bulletin Search

Agency Search: Title 40 - WILDLIFE, FISHERIES, AND PARKS ▼

Search Rule Summaries: *Does not search rule text*

Order By: System Number ▼ ☐ Ascending ☒ Descending

Filing Type: ☒ All ☐ Final ☐ Proposed

Search Date: To

☒ Final Date ☐ Proposed Date ☐ Effective Date ☐ Withdrawal Date



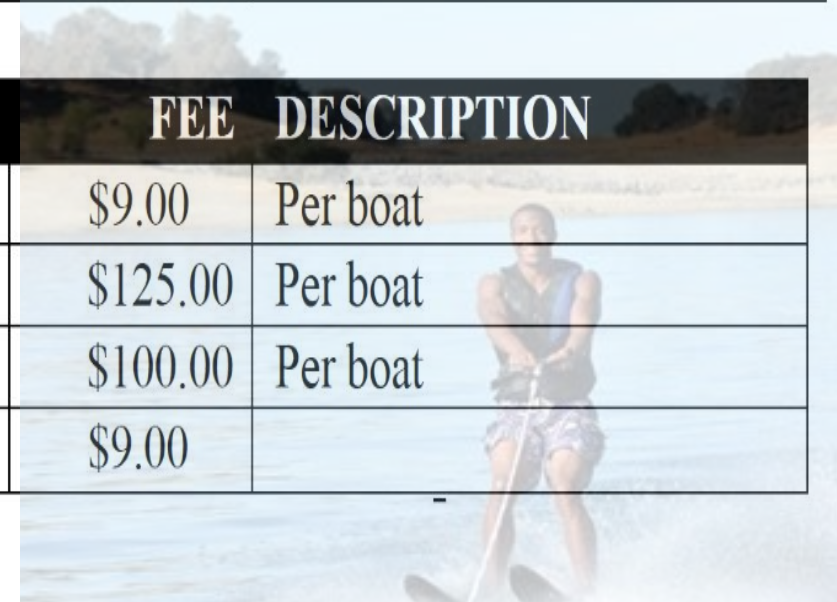
Exercise 2: Fishing & Water Skiing

Rates are going through the roof!



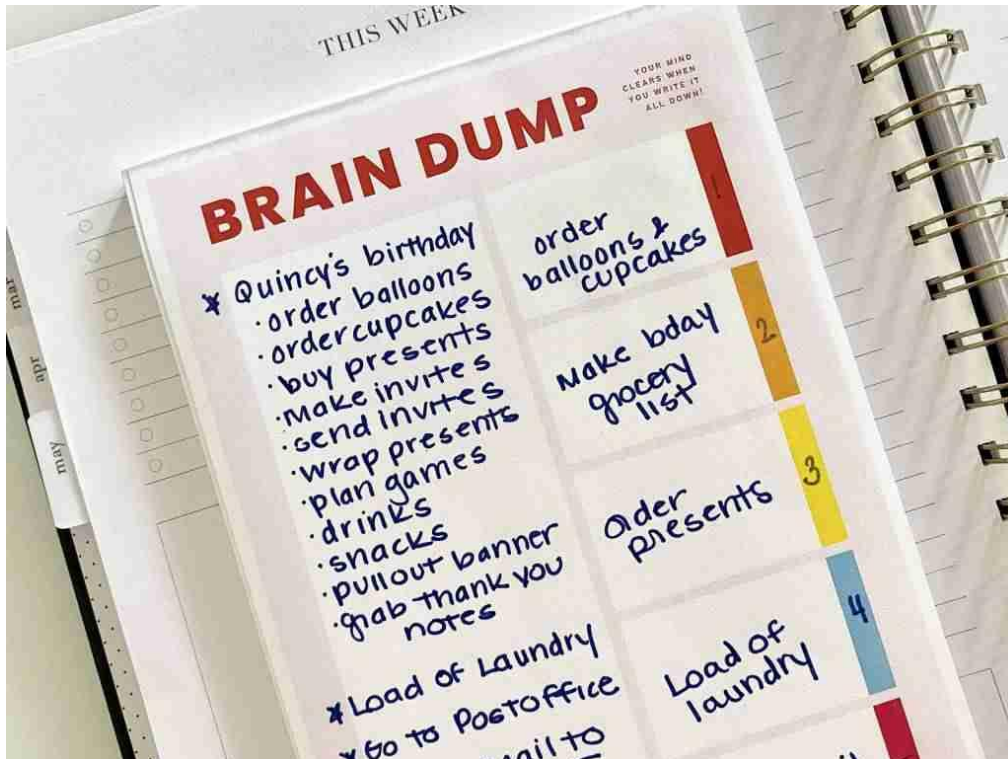
FISHING PERMITS	FEE	DESCRIPTION
Daily Fishing	\$5.00	Per person
Annual Bank/Pier Fishing (Ages 16-64)	\$55.00	Per person
Annual Bank/Pier Disabled/Age Exempt Fishing	\$35.00	Per person

FISHING PERMITS	FEE	DESCRIPTION
Daily Boat Launch Fish/Ski (Ages 16-64)	\$9.00	Per boat
Annual Boat Launch Fish/Ski- (Ages 16-64)	\$125.00	Per boat
Annual Boat Launch Fish/Ski- Disabled/Age Exempt	\$100.00	Per boat
Duplicate copy of Annual Permit	\$9.00	



Exercise 2: Fishing & Water Skiing Rates are going through the roof!

Time : 3 minutes



Who wants to share?
2 Volunteers





My comment isn't important, it's just a raindrop in vast lake

Someone else will send in a comment

I am not a good writer.
It's just too hard.

It's a lot of work to get everyone in my organization to approve a written comment.

My comment isn't important, it's just a raindrop in vast lake

I don't have the time.

The deadline is too soon.

Someone else will send in a comment

I am not a good writer.
It's just too hard.

I don't want everyone to see my name & comment on the web.

It's a lot of work to get everyone in my organization to approve a written comment.

Our Gift to You



Artificial Intelligence

but use it as a
tool not as
content creator

Using AI in Commenting

Common Uses:

- 1) **Analyzing** regulatory documents
- 2) **Comparative** analysis: "AI can compare previous comments to rulemaking outcomes to predict what types of comments or arguments have historically had the most impact"
- 3) **Drafting** comments
- 4) **Strengthening** an argument and creating impact
- 5) **Tone** analysis



Using AI in Commenting

Options

- ★ ChatGPT — OpenAI's conversational AI
- ★ Claude — Anthropic's chatbot
- ★ Gemini — Google's conversational AI
- ★ NotebookLM – an AI-powered research and note-taking tool
- ★ Perplexity — Conversational search and answer generation



CHAT GPT Search

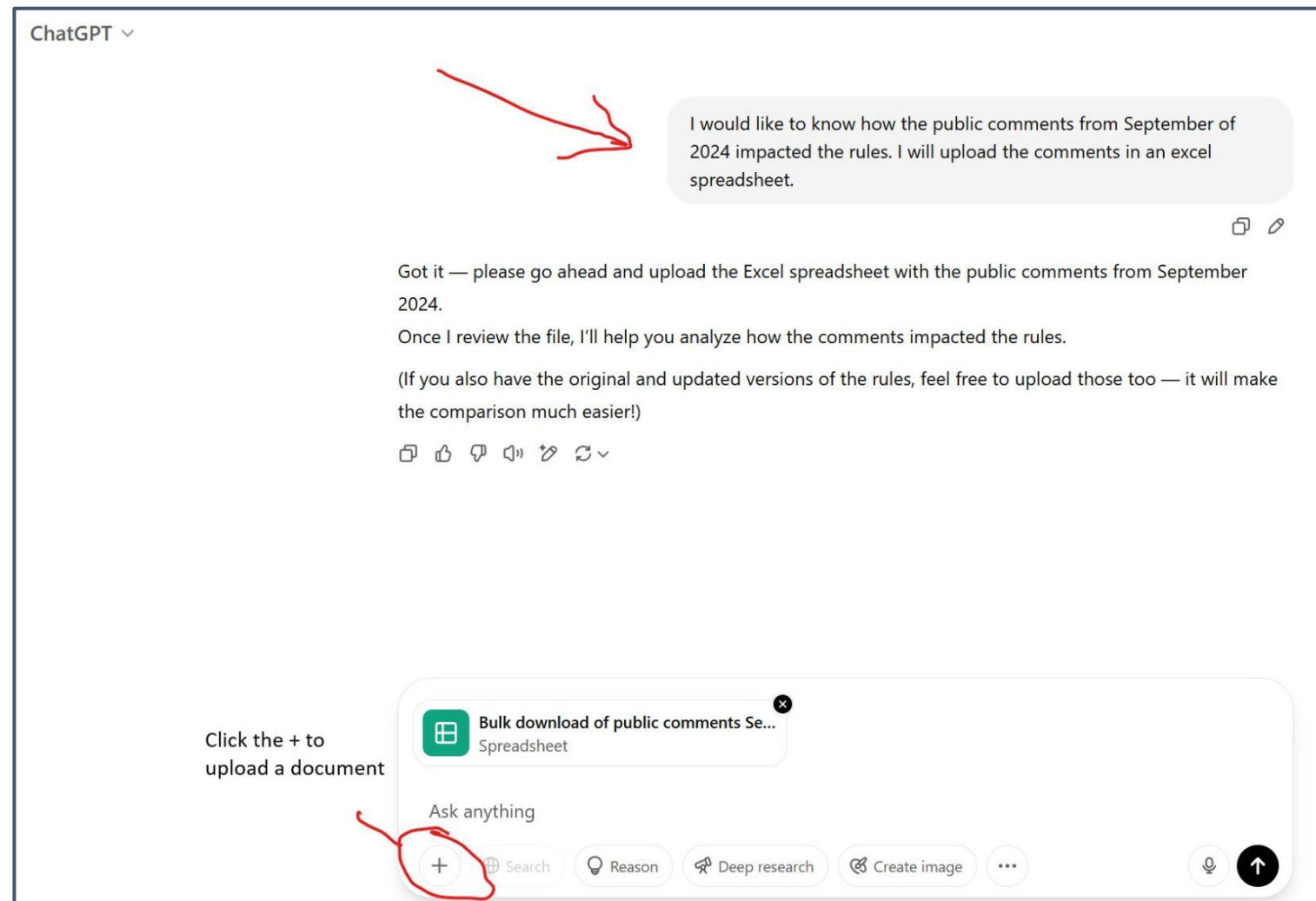
You said:

I would like to know how the public comments from September of 2024 impacted the rules. I will upload the comments in an excel spreadsheet.

ChatGPT said:

ChatGPT

Absolutely, please upload the Excel spreadsheet containing the public comments. I'll review the data and provide insights on how they might have influenced the final rules issued by the Department of Education.



Homework: Let's try it out at home!

Pick an example that interests you

- Example: accreditation
- Example: Public Service Loan Forgiveness, seeking comments on streamlining definitions
- Examples: Distance Education, Reciprocity, etc.

Need Some feedback?

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Tips for an Impactful Comment

The Importance of Public Comments: Whose opinions are they representing and what is the intended impact?

- ❖ **On whose behalf are the comments being submitted?**
 - An institution?
 - Personal opinion?



Tips for an Impactful Comment

The Importance of Public Comments: Whose opinions are they representing and what is the intended impact?

❖ Tone

- If commenting on behalf of an agency or institution, be sure to not insert your own opinions
- Comments that recognize both sides of an issue but are able to factually refute one of them, will receive the most consideration.



Tips for an Impactful Comment

The Importance of Public Comments: Whose opinions are they representing and what is the intended impact?

❖ **Review**

- Does this need to be reviewed by General Counsel, Chancellor, or President?
- Are there other departments that wish to sign off?





Questions?



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Thank you!

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