



COUNCIL FOR CHRISTIAN COLLEGES & UNIVERSITIES

January 15, 2026

Office of Information and Regulatory Affairs
Office of Management and Budget

Re: Comment on Application for Approval to Participate in Federal Student Financial Aid Programs

ICR Reference Number: 202508-1845-004

OMB Control Number: 1845-0012

Thank you for the opportunity to comment on the proposed revisions to the Application for Approval to Participate in the Federal Student Financial Aid Programs.

The Council for Christian Colleges & Universities (CCCUC) represents over 170 institutions around the world, including 145 in the United States. Our institutions enroll approximately 525,000 students annually, with over 11 million alumni. The CCCUC's mission is to advance the cause of Christ-centered higher education and to help our institutions transform lives by faithfully relating scholarship and service to biblical truth. We are committed to graduating students who make a difference for the common good as redemptive voices in the world. CCCUC institutions tend to be smaller, enrollment-driven, and efficiently staffed, with compliance responsibilities often concentrated among a limited number of individuals. As a result, administrative requirements that may be manageable for larger institutions can have a disproportionate impact on smaller, private nonprofits. The burden-reducing elements of the proposed revisions therefore provide especially meaningful relief for our sector and allow staff to devote more time to direct student support and institutional operations.

We appreciate the Department's continued commitment to improving the efficiency, clarity, and usability of the eligibility and recertification process. The proposed revisions reflect thoughtful attention to institutional feedback and represent meaningful progress toward reducing administrative burden while maintaining strong program integrity.

We are grateful for several of the proposed updates that will have a particularly positive impact:

- Eliminating unnecessary personal information fields for most officials and board members reduces data-entry time and addresses longstanding privacy concerns.
- Automatic acceptance of simple updates will shorten processing times and reduce delays for both institutions and the Department.

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- Improved question logic and clearer wording, including updates related to Federal School Codes, program end dates, accreditation and licensure, and Title IV program selection will reduce confusion and minimize follow-up requests.
- Self-certification options for certain policies and procedures appropriately replace document uploads, easing administrative workload for institutions and reviewers.
- Enhanced use of technology, including pre-population of prior responses, smart logic, and built-in alerts, continues to make the application more intuitive and efficient.

Collectively, these changes represent a meaningful reduction in administrative burden while preserving the Department’s ability to conduct effective oversight.

We offer a few recommendations to further streamline the process.

- One area where we encourage the Department to consider further refinement relates to board-member reporting requirements. Under the proposed revisions, public institutions will be required to report only two board positions, while private nonprofit institutions must continue to report all board members. Many private nonprofit institutions also maintain large governing boards, and most already publicly disclose board membership through institutional websites, accreditation materials, or IRS Form 990 filings. We respectfully suggest that the Department consider whether a similarly streamlined reporting approach could be appropriate for private nonprofit institutions.
- We also recommend that the Department consider updating the way institutional official titles are collected in the application. A more accurate and efficient approach would be to begin with a drop-down list of commonly used higher-education leadership titles, followed by an “Other” option for institutions whose structures do not align with the listed choices. An open field could then allow institutions to specify additional titles or context as needed. This would avoid the current reliance on corporate terminology—such as requiring institutions to identify a “CEO”—that does not reflect the governance structures of most nonprofit colleges and universities. It would also reduce duplicative entries and minimize the risk of reporting inconsistencies.
- We also encourage the Department to ensure that any expectations related to suspension and debarment verification remain aligned with longstanding, effective institutional practices. Institutions already comply with federal debarment rules

through established procurement controls, and there is no evidence of systemic non-compliance in this area. To avoid unnecessary burden, we recommend that any additional verification or documentation requirements be risk-based and triggered only when there is a specific compliance concern, rather than applied universally.

Overall, we strongly support the Department's proposed revisions and appreciate the clear effort to simplify processes, reduce unnecessary data collection, and improve the user experience. We encourage the Department to continue pursuing opportunities to align oversight needs with efficient, modernized administrative practices.

Sincerely,

A handwritten signature in black ink that reads "David A. Hoag". The signature is written in a cursive, flowing style.

David A. Hoag, Ph.D.
President
Council for Christian Colleges & Universities