February 23, 2024

The Honorable Miguel Cardona Secretary U.S. Department of Education 400 Maryland Ave., SW Washington, DC 20202

Dear Secretary Cardona,

As college student leaders across the United States, we write to express our support for the Department of Education's proposal to curb automatic textbook billing programs such as "Inclusive Access" and "Equitable Access." These programs pose challenges that affect not only our finances but also our ability to make informed choices about the materials essential for our learning. We urge you to put students' needs over those of the textbook industry and make these programs "opt-in."

It's no secret that textbooks are a significant financial burden for many students, with costs often running into the hundreds of dollars per semester for a single course's materials. These high costs can severely impact our ability to afford other essentials, such as housing, food, and transportation. Getting automatically billed for course materials only exacerbates this financial strain, leaving less room for students to manage our limited resources and financial aid effectively.

Automatic textbook billing can lead to higher expenses for students and erode our ability to make informed decisions about our educational resources. Many of us have found ourselves forced into these programs, billed for digital textbooks that we may not want or need, and faced with opt-out processes that are cumbersome and not always clearly communicated. The lack of transparency and difficulty in opting out can make it hard to seek out more affordable alternatives, such as used textbooks, rental options, or other digital formats available at a lower cost. Some "Equitable Access" programs are so outrageous that they even bill students for using open educational resources (OER), which can be accessed online for free.

We are also concerned about the equity implications of these programs. Despite the textbook industry's use of the terms "inclusive" and "equitable" to describe them, automatic billing programs can disproportionately affect lower-income and first generation students, who are already facing significant barriers in pursuing their education. Truly inclusive and

equitable access to education requires policies that support transparency, affordability, and choice in how students acquire their materials, not practices that obscure the true cost of education and limit students' options.

It is for these reasons that we urge the Department of Education to continue with its efforts to curb automatic textbook billing, including changing the Cash Management rule to make these programs "opt-in" for students. Making "Inclusive Access" and "Equitable Access" truly optional empowers students to decide whether these programs offer the savings and benefits they claim. If it's a good deal, students will opt-in in large numbers. If it's not, students won't and shouldn't be forced to.

Higher education is meant to prepare students for a better future, not funnel our financial aid and limited resources into the hands of the textbook industry. This is an opportunity to support a common-sense, student-friendly policy.

Thank you for your consideration on this matter and your ongoing work on behalf of students.

Sincerely,

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