July 10, 2026

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

The Honorable Keith Sonderling
Acting Secretary of Labor
U.S. Department of Labor
200 Constitution Ave NW
Washington, D.C. 20210

Dear Secretary McMahon and Acting Secretary Sonderling:

The American Council on Education (ACE), which represents more than 1,600 colleges and universities and related organizations, and the Council for Opportunity in Education (COE), representing the nation's TRIO programs, write to express our concerns with the U.S. Department of Education's (Department) recent efforts to alter the Federal TRIO Talent Search (TS) and Educational Opportunity Centers (EOC) competitions. While we appreciate the Department's stated interest in expanding pathways to workforce development and economic mobility, we strongly believe that the proposed changes move TRIO away from its longstanding function, ignore clear statutory and congressional intent, and will undermine one of the most successful college access programs in the country.

Since the creation of the first TRIO program through the Economic Opportunity Act of 1964, TRIO has served as a cornerstone of federal efforts to support low-income, first-generation students. Among many things, these programs provide academic advising, mentoring, tutoring, financial aid counseling, and college preparation services that help students access and succeed in postsecondary education. In fact, the Higher Education Act (HEA) states that these programs are:

> [D]esigned to identify qualified individuals from disadvantaged backgrounds, to prepare them for a program of postsecondary education, to provide support services for such students who are pursuing programs of postsecondary education, to motivate and prepare students for doctoral programs, and to train individuals serving or preparing for service in programs and projects so designed.[1]

Students who face barriers to college access and completion benefit most from direct engagement with those institutions and professionals that possess expertise in student advising and support. Colleges and universities have spent decades building this expertise, and across the country, TRIO programs are staffed by highly trained professionals who specialize in serving first-generation and low-income students. These staff understand the academic and financial barriers these students face

[1] Higher Education Act of 1965, 20 U.S.C. § 1070a-11 (2025). https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf

and are uniquely positioned to provide individualized support. Over 817,000 students benefit annually through approximately 3,400 TRIO programs nationwide.[2]

While there a total of seven TRIO programs in operation that have a profound impact on students, we would like to specifically highlight the benefits of both TS and EOC. Talent Search participants enroll in postsecondary education at higher rates than similarly situated peers: 67.5 percent of Talent Search participants enrolled in postsecondary education immediately after high school, compared with 55.6 percent of students from the bottom income quartile.[3] The TS program also continues to demonstrate strong cost-effectiveness, with the average cost per successful student outcome declining from $702 in 2021–2022 to $651 in 2022–2023.[4] The EOC is equally effective. The overall postsecondary enrollment rate increased to 57.2 percent in 2023-2024, up from 55.4 percent in 2022–2023, meaning more college-ready participants successfully enrolled in college. Similarly to TS, EOC has also demonstrated its cost-effectiveness with taxpayer dollars. The average cost per successful participant outcome fell to $679, down from $732 in 2022–2023.[5]

These outcomes produce meaningful public returns. Higher educational attainment is associated with lower unemployment, higher lifetime earnings, greater tax contributions, and reduced reliance on public assistance programs, and the lifetime earnings of a bachelor's degree holder are more than double those of a high school graduate without postsecondary education.[6] TRIO's contribution to expanding these attainments strengthens the nation's workforce, competitiveness and economy.

We strongly oppose any effort to eliminate TRIO or substantively alter the administration of the program by retrofitting it to accomplish a task for which it was not designed nor intended. We are particularly concerned by the Department's recent approach to restructuring TS and EOC grant administration by shifting eligibility and administrative capacity toward state-level entities and workforce systems. While workforce development is an important national priority, there are numerous other programs created by Congress and authorized in law to address those goals. TRIO is not the appropriate mechanism to achieve those goals.

The proposed changes introduce other structural problems. Many state entities are not operationally equipped to administer TRIO grants at scale while complying with the program's rigorous statutory and regulatory requirements. TRIO programs require participant eligibility verification, including documentation of citizenship, income status, and first-generation status. At least two-thirds of TS and EOC participants must meet statutory low-income and first-generation criteria. Grantees must also maintain performance reporting and participant data, often tracking outcomes for years after program participation. The administrative burden associated with these requirements is substantial and has not previously been managed by state entities.

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[2] Stevenson, T. (2026, April 3). *COE rejects proposal to eliminate federal trio programs in FY 2027 budget*. COE. https://coenet.org/news-impact/press-release/coe-rejects-proposal-to-eliminate-federal-trio-programs-in-fy-2027-budget/

[3] TRIO. (2026, February). *Pre-collegiate TRIO programs*. COE. https://coenet.org/wp-content/uploads/2026/03/TRIO_Fast-Facts-Research-Brief_f.pdf

[4] Office of Postsecondary Education. (2024). *Talent search program: Project and Program Measures for Government Performance and Results Act (GPRA), reporting period 2023–24*. U.S. Department of Education. https://www.ed.gov/media/document/ts-2022-23-grantee-level-gpra-narrative-113039.pdf?utm_source=.com

[5] Office of Postsecondary Education. (2024). *Educational opportunity centers program: Project and program measures for Government Performance and Results Act (GPRA), reporting period 2023–24*. U.S. Department of Education. https://www.ed.gov/media/document/educational-opportunity-centers-gpra-narrative-report-2023-2024-113213.pdf?utm_source=.com

[6] Pender, M., Ma, J., Hu, X., & Edwards, A. (2026). *Education pays, 2026: The benefits of higher education for individuals and society*. College Board. https://research.collegeboard.org/media/pdf/education-pays-2026-full-report.pdf

Finally, it is important to note that Congress has demonstrated clear bipartisan support for preserving TRIO's mission and structure. During the FY 2027 Labor-HHS-Education appropriations markup, the committee approved an amendment that increased TRIO support, reinforcing congressional recognition of the existing program's critical value and longstanding purpose.[7] This action alone underscores Congress' disapproval of the proposed changes and clear view that TRIO should remain focused on college access, student support, and educational attainment. This reflects the long history of bipartisan support for these programs through continued financial investment by Congress to protect and preserve these programs.

We respectfully urge the Department to administer TS and EOC grant processes in a manner consistent with congressional intent and the statutory purpose established under the HEA. These programs have proven to be successful, cost effective, and invaluable to the students they serve and the country they benefit. Altering these programs without congressional approval is ill-sighted and contrary to law.

Thank you for your attention to these concerns. ACE and COE stand ready to work with the Department to ensure that TRIO remains a strong, effective, and accessible pathway to postsecondary opportunity and success for students.

Sincerely,

Ted Mitchell
President
American Council on Education

Kimberly Jones
President
Council for Opportunity in Education

Cc:

The Honorable Nicholas Kent, Under Secretary of Education
The Honorable Henry Mack, Ed.D., Assistant Secretary of Labor for Employment and Training

[7] Rep. Aderholt, R. (2026). *Amendment to H.R. 9260*, H.Amdt. 1, 119th Cong. (2026). https://appropriations.house.gov/sites/evo-subsites/republicans-appropriations.house.gov/files/evo-media-document/aderholt-1-manager-s-amendment.pdf