



February 13, 2026

David Barker, Assistant Secretary for Postsecondary Education  
United States Department of Education  
400 Maryland Avenue, S.W.  
Washington, DC 20202  
Via email: [negregnominations@ed.gov](mailto:negregnominations@ed.gov)

RE: Docket ID ED-2025-OPE-1042 – Accreditation, Innovation, and Modernization (AIM) Committee

Dear Mr. Barker:

We write on behalf of The National Accreditation Commission (NAC), a nonprofit programmatic accreditor focused on quality and accountability for short-term workforce programs, in strong support of the nomination of **NAC Founder & President Rebecca A. Busacca** to serve as a negotiator on the U.S. Department of Education’s *Accreditation, Innovation, and Modernization (AIM) Committee*. This nomination is in response to the U.S. Department of Education’s January 27, 2026, *Federal Register* notice that the Department intends to select negotiators to serve on a negotiated rulemaking committee to prepare proposed regulations amending the regulations for the Secretary’s recognition of accrediting agencies and related institutional eligibility regulations for the programs authorized under title IV of the Higher Education Act of 1965, as amended (HEA) (title IV, HEA programs).

Rebecca brings more than three decades of experience working across accreditation, institutional and program effectiveness, and federal and state regulatory compliance within postsecondary education. Her career reflects a rare combination of accrediting agency leadership, institution-facing advisory work, and direct engagement with regulatory and legal processes—experience that uniquely positions her to contribute meaningfully to the AIM Committee’s work.

Earlier in her career, Rebecca served for more than a decade as Director of Accreditation at the Accrediting Council for Continuing Education & Training (ACCET), an institutional accrediting agency recognized by the Secretary of Education. In that role, she played a central part in two successful petitions for federal recognition, chaired multiple accreditation committees, led hundreds of on-site evaluations nationwide, and worked extensively with the commission and institutions navigating initial accreditation, reaccreditation, substantive change, adverse actions, distance education approvals, and Title IV compliance. Her responsibilities also included standards development, recognition proceedings, ISO quality management systems, state licensure coordination, and regulatory matters involving the Department of Homeland Security.

Building on this accrediting agency experience, Rebecca later brought nearly two decades of entrepreneurial leadership as the founder and chief executive of an independent accreditation consultancy. Through this work, she provided hands-on, consultative guidance to postsecondary institutions of all sizes supporting institutional effectiveness, strategic planning, accreditation readiness, and program innovation. Her advisory work emphasized practical, outcomes-oriented solutions that helped institutions translate regulatory requirements into operationally sound policies, sustainable business models, and high-quality educational offerings.

Complementing her accrediting and institutional experience, Rebecca has also served extensively as an expert accreditation witness in complex federal and state litigation involving accreditation, institutional



eligibility, and regulatory compliance. Retained by the U.S. Departments of Justice, Defense, and Homeland Security, the FBI, Accreditors, and private counsel, she has provided expert analysis and testimony subject to rigorous review. This work has required careful interpretation of accreditation standards, recognition criteria, and regulatory language, and has given her a clear understanding of how such frameworks are evaluated by courts, agencies, and the public.

Throughout her career, Rebecca has worked closely with federal and state regulators, accrediting agencies, institutional leaders, and legal counsel. She brings a pragmatic, implementation-focused perspective to policy development and a deep appreciation for how regulatory decisions affect institutions, accreditors, and students in practice.

Rebecca is prepared to commit the time, effort, and professional judgment required to serve effectively as a negotiator. She would contribute a knowledgeable, independent, and deeply informed voice to the Committee's deliberations and would engage constructively with diverse stakeholder perspectives in pursuit of workable, durable regulatory outcomes.

For these reasons, we join the NAC commission and staff in strongly recommending Rebecca Busacca for appointment to the Accreditation, Innovation, and Modernization Committee. Please do not hesitate to contact us should additional information be helpful as you consider nominations; her CV is also attached. You can reach us at the email addresses below. Rebecca may be contacted by phone at 703-850-2500 or by email at [rebecca@nationalaccreditation.org](mailto:rebecca@nationalaccreditation.org), and her mailing address is 7620 Little River Turnpike, Suite B100, Annandale, VA 22003.

Respectfully submitted,

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