

January 29, 2025

Ms. Denise L. Carter Acting Secretary U.S. Department of Education 400 Maryland Ave. SW Washington, DC 20202

Dear Acting Secretary Carter,

On behalf of the undersigned higher education associations, I write to ask that the Department of Education (Department) delay the reporting requirements for the financial value transparency (FVT) and gainful employment (GE) rule beyond the newly established Feb. 18 deadline. Given the change in the administration and the challenges institutions faced in reporting their data by Jan. 15, we ask that the deadline be extended from Feb. 18 to at least July 2025 and include an opportunity to also correct the completers list.

During the initial reporting window, we received feedback from institutions that found it difficult to successfully report the data due to a number of issues, to include lack of clarity in guidance issued from the Department; challenges with institutional student information software, such as Ellucian Banner; inaccuracies in institutional completers lists; challenges with the National Student Clearinghouse data; operational barriers resulting in the inability of institutions to upload their files efficiently to the National Student Loan Data System; and a lack of communication from the Department to institutional questions about the reporting requirements.

While the issues with the reporting burden is one that this new administration is inheriting, you have an opportunity to pursue a new approach that ensures institutions have an adequate amount of time to report the data. It is unacceptable that flawed data has been transmitted to the Internal Revenue Service (IRS) to calculate debt-to-earnings ratios and the earnings premium measures that institutions will be held accountable for. We ask that you terminate this process and only send data to the IRS after institutions have been given time to report with clear guidance. Institutions should not be penalized for data errors when it has been clear that more time was needed for accurate reporting.

The American Council on Education (ACE) sent a letter to former Secretary Miguel Cardona last month asking for a delay in reporting until July 2025 with results from a survey of senior

¹ Federal Student Aid. (2025, January 17). Reopening of FVT and GE Debt Reporting Process Until Mid-February. U.S. Department of Education. https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2025-01-17/reopening-fvt-and-ge-debt-reporting-process-until-mid-february

college and university leaders.² While we are asking for a delay until at least July 2025, we understand that you will need time to staff up, assess what has taken place, and finalize your approach towards FVT and GE. Time beyond July 2025 may well be needed in order to operationally process the data reporting, and we welcome continued conversation with you on this matter.

We thank you for your attention to this letter. It is our hope that you will consider these institutional concerns and delay the reporting requirements until July 2025, at the very least.

Sincerely,

Ted Mitchell President

On behalf of:

AccessLex Institute Achieving the Dream

ACPA-College Student Educators International

AICU Rhode Island

American Association of Colleges and Universities

American Association of Colleges for Teacher Education

American Association of Colleges of Osteopathic Medicine

American Association of Collegiate Registrars and Admissions Officers

American Association of Community Colleges

American Association of State Colleges and Universities

American Association of Veterinary Medical Colleges

American Council on Education

American Dental Education Association

American Indian Higher Education Consortium

APPA: Leadership in Educational Facilities

Association for Institutional Research

Association of American Medical Colleges

Association of American Universities

Association of Catholic Colleges and Universities

Association of Community College Trustees

Association of Governing Boards of Universities and Colleges

Association of Independent California Colleges and Universities

Association of Independent Colleges and Universities in Massachusetts

Association of Independent Colleges and Universities of Pennsylvania

 $^{^2\} American\ Council\ on\ Education.\ (2024,\ December\ 13).\ Request\ for\ Extension\ on\ Financial\ Value\ Transparency\ and\ Gainful\ Employment\ Reporting.\ https://www.acenet.edu/Pages/Advocacy-Documents.aspx$

Association of Jesuit Colleges and Universities

Association of Jesuit Colleges and Universities

Association of Public and Land-grant Universities

Association of Schools and Colleges of Optometry

Association of Schools and Programs of Public Health

Career Education Colleges and Universities

Council for Christian Colleges & Universities

Council for Higher Education Accreditation

Council of Graduate Schools

EDUCAUSE

Great Lakes Colleges Association

Hispanic Association of Colleges and Universities

Higher Education Loan Coalition

Higher Learning Commission

Independent Colleges and Universities of Texas

Independent Colleges of Indiana

Independent Colleges of Washington

Maryland Independent College and University Association

Michigan Independent Colleges & Universities

National Association of College and University Business Officers

National Association of Colleges and Employers

National Association of Independent Colleges and Universities

National Association of Student Financial Aid Administrators

New England Commission of Higher Education

North Carolina Independent Colleges and Universities

Southern Association of Colleges and Schools Commission on Colleges

State Higher Education Executive Officers Association

WASC Senior College and University Commission

Wisconsin Association of Independent Colleges and Universities