

December 2, 2024

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

Re: Docket ID *ED-2023-OPE-0089-3916*

Dear Secretary Cardona,

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), I am writing to share the concerns of our member institutions regarding the [Financial Value Transparency \(FVT\) and Gainful Employment \(GE\)](#) reporting requirements that went into effect July 1, 2024.

AACRAO members were grateful for the initial postponement of the reporting deadline from October 30, 2024 to January 15, 2025 that was published in electronic announcement [GE-24-08](#). However, it is becoming increasingly evident that this will still not provide institutions with sufficient time to deliver accurate data to the Department of Education (Department). As such, I urge the Department to consider a further delay for the reporting deadline.

About AACRAO

Founded in 1910, the American Association of Collegiate Registrars and Admissions Officers (AACRAO) is one of the oldest nonprofit higher education associations in the nation and represents over 15,000 higher education admissions and registration professionals from 2,300 institutions across the United States and 40 countries. Our mission is to provide guidelines and standards for the higher education community regarding record management, admissions, enrollment management, administrative information technology, and student services.

Ongoing FAFSA Impacts

Institutions have known of the need to prepare for the FVT/GE reporting since October 2023. However, the delayed release of the 2024-2025 Free Application for Federal Student Aid (FAFSA), and subsequent technical issues with the form, combined with the delay in the release of the final FVT/GE guidance on reporting, have undermined institutions' ability to devote needed time to meeting the FVT/GE requirements.

For the individual staff, this has meant an enormous backlog of work, which is only further worsened by the fact that the 2025-2026 FAFSA was not released on the traditional date of October 1st. Additionally, at most institutions, the financial aid office is responsible for both processing student financial aid

packages and reporting major portions of data under the FVT/GE regulations, forcing these individuals to juggle several priorities at the same time. Trying to place a priority on these two competing important operating/reporting procedures is not in the best interest of the Department or the students that they serve.

Issues with the Completers Lists

In electronic announcement [GE-24-09](#), the Department stated that the revised draft FVT/GE Completers Lists would be sent to institutions by October 27, 2024 and they would have until January 15, 2025 to review and submit corrections. However, some institutions still had not yet received their Completers List until November, thereby taking away from the time provided for them to review and make corrections. Furthermore, many institutions are still having difficulties finalizing their Completers Lists and are experiencing errors with their data. This has created concerns for institutions to know exactly what data (program data, institutional data, and/or completers list) will actually be accurate by the January 15, 2025 reporting deadline.

Limited Institutional Resources and Reporting Burdens

It should be noted that the regulations call for institutions to report on 26 metrics going as far back as 8-years, including on programs that may no longer exist. Reporting at this level comes at a significant cost, with the Department itself estimating that approximately 4,518 colleges and universities would have a total reporting burden of 5,078,260 hours in the first year and 1,459,604 hours in each subsequent year.

The National Student Clearinghouse (NSC), a non-profit organization that a majority of institutions partner with to assist with National Student Loan Data system (NSLDS) reporting, does have a partial solution for FVT/GE reporting that utilizes the data institutions already share with them. However, NSC has shared that their platform only covers about 50 percent of the data required for FVT/GE reporting. The other 50 percent must be done manually and several AACRAO member institutions using NSC's platform have reported large discrepancies between data sets.

Institutional Calendars

Finally, beyond the burdensome impacts of the FAFSA form and the onerous reporting requirements, there is the issue of institutional operations and staff. Upon looking at timelines and calendars, the Department's initial delay from October 30, 2024 to January 15, 2025 is not as significant as it may seem. As you are aware, many institutions are closed for several weeks during that period for Thanksgiving and Winter break. Furthermore, many individuals take vacation during this time of the year and therefore may be away from campus for even longer than the official institutional breaks.

Conclusion

AACRAO appreciates the Department's previous decision to push back the reporting deadline from October 1, 2024 to January 15, 2025. However, as an association we are concerned that these additional three months will not provide institutions enough time to report accurate, meaningful data. In order to ensure that solid data is collected and reported in a timely manner, I encourage the Department to push back the reporting deadline to a future date. This additional time would provide institutions with the opportunity to meticulously collect data and ensure the validity of what's submitted. We believe that pushing the reporting deadline back would benefit the overall health of the higher education community.

Sincerely,

A handwritten signature in cursive script, reading "Melanie Gottlieb". The signature is written in black ink and is positioned above the typed name and title.

Melanie Gottlieb
Executive Director, AACRAO

CC: Members of the Senate Health, Education, Labor, and Pensions (HELP) Committee
Members of the House Education and the Workforce Committee