



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.<sup>1</sup> 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

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<sup>1</sup> 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.<sup>2</sup> 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

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<sup>2</sup> 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