

May 20, 2026

Joe Massman
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Docket ID: ED-2026-OPE-0100

Dear Mr. Massman:

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), we respectfully submit comments on the Notice of Proposed Rulemaking, “Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Student Tuition and Transparency System (STATS) and Earnings Accountability.”

About AACRAO

AACRAO is a nonprofit, voluntary professional association dedicated to making higher education more responsive to learners. AACRAO’s membership includes more than 22,000 higher education professionals at approximately 2,100 institutions, collectively representing more than 16.4 million enrolled learners. The association provides research, policy-based guidance, and training to support learners at every stage of their educational journey. AACRAO’s membership is primarily composed of registrars, admissions officers, and enrollment management professionals who play a central role in student access, learning mobility, progression, credentialing, and compliance.

§668.406 Reporting Requirements

We are supportive of the Department’s decision to consolidate the Gainful Employment and Financial Value Transparency frameworks within the new, statutorily required framework of STATS. We share the Department’s commitment to ensuring learners have meaningful, actionable information when choosing a program. It is for this reason that we urge the Department to focus the reporting on data elements that directly inform student decision-making and accurately measure program outcomes. When institutions are required to collect and report data that does not improve the precision of earnings accountability metrics or the clarity of information available to students, the result is not greater transparency. Instead, we see greater complexity, which can delay reporting timelines, introduce data inconsistencies, and ultimately undermine the reliability of the consumer-facing information STATS is designed to produce. For example, requiring institutions to report the name of a programmatic accrediting agency does not change how a program's earnings threshold is calculated, nor does it provide students with a more accurate picture of a program's value. That determination is already captured through the earnings and debt metrics at the heart of STATS. Similarly, granular breakdowns of cost-of-attendance allowances for books, supplies, housing, and food introduce reporting variables that differ significantly across institutions and student populations, making cross-program comparisons less reliable rather than more.

The Department should also carefully consider the cumulative impact of these requirements alongside existing federal reporting obligations, such as IPEDS. Expanding reporting beyond what is operationally necessary increases the risk of inconsistent reporting, data quality concerns, and institutional compliance errors while diverting necessary resources away from student services and learner support. A more targeted reporting framework would reduce duplication across systems while remaining sufficient to calculate the required metrics.

Finally, limiting reporting to those fields necessary for metric calculation would mitigate concerns related to student privacy and federal data governance. Narrowly tailoring reporting requirements would better balance accountability goals with institutional capacity, data minimization principles, and the need to maintain trust in federal higher education data systems.

§668.404 Restoring eligibility

We support the comments submitted by the American Council on Education that recommended the Department not allow for the loss of all Title IV aid for programs that do not meet the earnings test. Congress's intent was to deny only Direct Loan eligibility for programs that did not meet the earnings threshold, rather than eligibility for all federal financial student aid programs. Removing Title IV eligibility from an entire institution will result in harm to students in programs that do meet applicable accountability metrics by disrupting students' educational progress from completing their programs.

However, if the Department is intent on removing eligibility for all Title IV aid programs at institutions that do not meet the earnings threshold, then it must establish stronger guardrails and clearer standards governing the reestablishment of Direct Loan eligibility for programs that previously lost eligibility due to low earnings outcomes. While the proposed two-year waiting period is an important safeguard, additional protections are needed to ensure that institutions do not rapidly repackage or minimally modify programs without meaningfully addressing the underlying issues that contributed to low student earnings outcomes. Students should be able to have confidence that a program restored to Direct Loan eligibility has demonstrated substantive improvement in program quality, labor market alignment, student support and outcomes, rather than merely satisfying procedural requirements for reestablishment.

The Department should consider requiring institutions seeking to reestablish eligibility for a previously failed program to provide evidence of material changes to the program, such as a revised curriculum, strengthened employer partnerships, improved support structures for program completion, or a demonstrated increase in labor market demand. Programs that do not significantly improve may repeatedly reopen under the same structure or model, thereby consuming valuable resources that could otherwise be better directed toward other initiatives.

Finally, the Department should consider implementing provisional participation requirements for programs that regain eligibility after previously losing eligibility. Because students enrolling in restored programs may continue to face elevated risk, additional oversight during the initial years following reestablishment of eligibility would help ensure that programs maintain improved outcomes and continued compliance with accountability standards. These additional guardrails would strengthen the integrity of the accountability framework while better protecting students from repeated enrollment in programs with a history of poor outcomes. Implementing stronger protections governing the reestablishment of program eligibility will help ensure that students retain continued access to Title IV financial aid resources and additional students are not harmed by programs that previously failed

accountability standards and subsequently continue to produce poor outcomes after reestablishment potentially placing students at risk for losing access to Title IV aid.

Conclusion

AACRAO appreciates the opportunity to comment on this Notice of Proposed Rulemaking and supports efforts to improve accountability, transparency, and student success in higher education. As the Department moves forward with this regulatory framework, we encourage careful consideration of the operational, administrative, and student-centered implications of this proposal's requirements. This is particularly important with respect to reporting burden, data governance, institutional implementation, and the impact on learners. We respectfully urge the Department to adopt a balanced approach that maintains flexibility, protects student privacy, and minimizes unnecessary administrative complexity.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melanie Gottlieb", with a long, sweeping flourish extending to the right.

Melanie Gottlieb
Executive Director, AACRAO