



National Association of
Independent Colleges and
Universities

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April 22, 2024

Manager of the Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave.
SW, LBJ, Room 6W203
Washington, DC 20202-8240.

Re: Docket ID ED-2024-SCC-0030

Dear Manager:

I am writing on behalf of the National Association of Association of Independent Colleges and Universities (NAICU) and the undersigned associations in response to the information collection request related to the Financial Value Transparency (FVT) and Gainful Employment (GE) regulations, slated to go into effect on July 1, 2024.

First and foremost, while NAICU appreciates both the opportunity to comment on the collection requirements and the 60-day delay in reporting deadlines until October 1, 2024, institutions still lack sufficient time to properly report on the required and proposed data, despite the adjusted timeline. I therefore reiterate the request I made on March 14, in a [letter](#) to Secretary Cardona asking that the July 1, 2024 implementation date for the FVT/ GE and related regulatory packages be delayed by one year. This request was made primarily because of the incredible pressure institutions are under due to the continued delays in implementing the new FAFSA. Time and time again, our member institutions have said this burden must be lifted if they are to successfully deal with the FAFSA debacle.

NAICU has long recognized the need for appropriate levels of federal data collection. We have historically supported efforts to provide useful and reliable information to students and families that at the same time protects their privacy and recognizes the diversity and integrity of our higher education institutions.

Nevertheless, we cannot overstate our concerns about the strain that FVT and GE reporting will place on institutions. We believe that the regulatory package substantially underestimates the impact of reporting this amount of information in such a short period of time, particularly for colleges with limited staff, infrastructure, and/or resources that will need additional time to collect, organize, and verify disparate data across multiple departments, an integrated collection for which there is limited or no precedent.

Our institutions appreciate the recent Department releases that have afforded clarification and look forward to more guidance soon, but we believe the proposed timeframe is inadequate as we anticipate implementation will be lengthy. After the new specifications are released and adequately understood (i.e., privacy, reporting standards), colleges and universities will need time to develop new processes, including automation and integration, that will ensure submitted data are error free and properly tested. The additional time requested will result in more reliable and valid data, bolstering the initial release and guaranteeing students and their families the accurate information they need.



Our concerns about the breadth and coordination of reporting of this information are exacerbated by the current logistical and staffing difficulties institutions are facing resulting from the delay in FAFSA implementation. Schools are currently overwhelmed, and we believe that current reporting requirements will prevent institutions, particularly financial aid offices, from focusing their limited resources on providing students the information they need to make informed choices regarding higher education enrollment in the upcoming year. Other campus offices, such as institutional research, will also need sufficient time to incorporate this extensive request into already substantial reporting requirements.

This information collection request itself is an indication that the definitions and systems required for collections are not ready. By the time the Department of Education has reviewed the comments and adapted the reporting requirements, more months will have passed, thus making it even less likely that institutions will be able to submit reports by October 1.

While an additional delay to allow institutions to prepare for proper implementation is the most important step the Department could take to ensure accurate and responsible reporting of FVT and GE data, there are a number of issues with the proposal itself. Among the greatest concerns are an increase in the reporting elements since negotiated rulemaking, the need to report on information schools may not have access to or no longer have and on programs that no longer exist, proposed reporting requirements that are intended to implement regulations other than those required for FVT/ GE (including financial responsibility standards), and the potential for inconsistent data collections among institutions. I would also urge the Department to provide financial and/or technical assistance to colleges and universities as they seek to implement these complex reporting requirements.

Our institutions and the families we serve have been asked for continued patience on the FAFSA delay to the point that students' postsecondary education and institutional solvency are now at risk. As a result, we believe it is the responsibility of the Department to slow this collection process down to both increase data accuracy and to guarantee our collective focus is on ensuring that students who wish to attend college this fall are not denied the opportunity because of the continued delays in FAFSA processing.

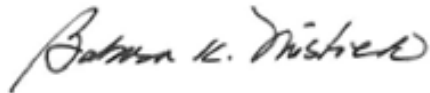
NAICU serves as the unified voice for the 1,700 private, nonprofit colleges and universities in our nation. Founded in 1976, NAICU is the only national membership organization solely focused on representing private, nonprofit higher education on public policy issues in Washington, DC. NAICU's membership reflects the diversity of private, nonprofit higher education in the U.S. Our member institutions include major research universities, faith-based colleges, Historically Black Colleges and Universities, Hispanic-Serving Institutions and other Minority-Serving Institutions, art and design colleges, conservatories of music, traditional liberal arts and science institutions, women's colleges, work colleges, two-year colleges and schools of law, medicine, engineering, business and other professions.

Each year, private, nonprofit colleges and universities graduate more than 1.2 million students. Additionally, the economic impact of the private, nonprofit sector of higher education for academic year 2022-23 totaled \$652 billion, and the sector generated \$99 billion in tax revenues

and supported and sustained 3.4 million jobs. Despite the critical employment opportunities provided by the independent sector, recent employment data is flat, indicating that institutions that had to lay off staff during the pandemic are having to do more with less, which adds to the workload and retention concerns for staff already affected by the FAFSA delays.

Thank you for the opportunity to comment on this issue.

Sincerely,



Barbara K. Mistick, D.B.A.
President

On behalf of:

AARTS - Association of Advanced Rabbinical and Talmudic Schools
Alabama Association of Independent Colleges and Universities
American Association of Presidents of Independent Colleges and Universities
Association for Biblical Higher Education
Association of Catholic Colleges and Universities
Association of Chiropractic Colleges
Association of Independent California Colleges and Universities (AICCU)
Association of Independent Colleges & Universities in Massachusetts
Association of Independent Colleges & Universities of Rhode Island
Association of Independent Colleges and Universities in Pennsylvania
Association of Independent Colleges and Universities of Ohio
Association of Independent Colleges of Art & Design
Association of Independent Kentucky Colleges and Universities
Association of Jesuit Colleges and Universities
Association of Presbyterian Colleges and Universities
Association of Private Colleges and Universities of Puerto Rico / Asociación de Colegios y Universidades Privadas de Puerto Rico (ACUP)
Association of Vermont Independent Colleges
CCCU - Council for Christian Colleges & Universities
Church of the Nazarene, International Board of Education
Conference for Mercy Higher Education
Connecticut Conference of Independent Colleges
Consortium of Hospital Affiliated Colleges and Universities
Consortium of Universities of the Washington Metropolitan Area
Council of Independent Colleges
Council of Independent Colleges in Virginia, Inc.
Council of Independent Nebraska Colleges



Federation of Independent Illinois Colleges and Universities
General Board of Higher Education and Ministry (GBHEM)
Georgia Independent College Association
Great Lakes Colleges Association
Independent Colleges and Universities of Florida
Independent Colleges and Universities of Missouri
Independent Colleges and Universities of Texas
Independent Colleges of Washington
International Association of Baptist Colleges and Universities
Iowa Association of independent colleges and universities
Kansas Independent College Association
Louisiana Association of Independent Colleges and Universities
Maryland Independent College and University Association
Michigan Independent Colleges & Universities
Minnesota Private College Council
Mississippi Alliance of Independent Colleges and Universities
Network of ELCA Colleges and Universities
New American Colleges and Universities
North American Association of Methodist Schools, Colleges and Universities (NAAMSCU)
North Carolina independent Colleges and Universities
Oregon Alliance of Independent Colleges and Universities
South Carolina Independent Colleges & Universities
Tennessee Independent Colleges and Universities Association
The Associated Colleges of the Midwest
The Commission on Independent Colleges and Universities in New York (CICU)
West Virginia Independent Colleges and Universities
Wisconsin Association of Independent Colleges and Universities
Work Colleges Consortium
Yes We Must Coalition