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December 13, 2024

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

Dear Secretary Cardona,

On behalf of the undersigned higher education associations, I write to share the results of a survey of colleges and universities that clearly identifies the challenges they face in meeting the Jan. 15, 2025, deadline for reporting requirements in financial value transparency (FVT) and gainful employment (GE). Given the responses received, and the implications of a change in administration, we ask that the deadline be extended from Jan. 15 to July 2025.

To better understand the concerns of our member institutions, the American Council on Education (ACE) conducted a survey of college and university presidents that was distributed by ACE and other higher education organizations. The survey yielded a total of 355 respondents, with a representative sample coming from public and private, nonprofit institutions and having a broad impact on a diverse array of institutional types.

The survey found that colleges and universities were unclear as to their requirements under the FVT and GE regulations. To be exact, 54 percent of respondents found the sub-regulatory guidance to be just somewhat clear, or remained neutral in their thoughts around this, while 40 percent of respondents felt that the guidance was not clear at all. In addition, 82 percent of respondents believed that their completers lists would not truly be finalized within a five-day period largely due to the fact that the Department allows for institutions to make corrections to their draft completers lists until Jan. 15,<sup>1</sup> and a new administration begins just five days later.

Among other findings:

79 percent

reporting deadline to July 2025.

The attached document summarizes the survey responses and provides more information on how participants responded. We thank you for your attention to this letter. It is our hope that you will take institutional concerns seriously and delay the reporting requirements until July 2025.

Sincerely,

Ted Mitchell  
President

On behalf of:

ACPA-College Student Educators International  
American Association of Colleges of Nursing  
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  
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

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 and Universities  
NASPA-Student Affairs Administrators in Higher Education  
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  
State Higher Education Executive Officers Association  
UPCEA, The Online and Professional Education Association  
WASC Senior College and University Commission  
Wisconsin Association of Independent Colleges and Universities

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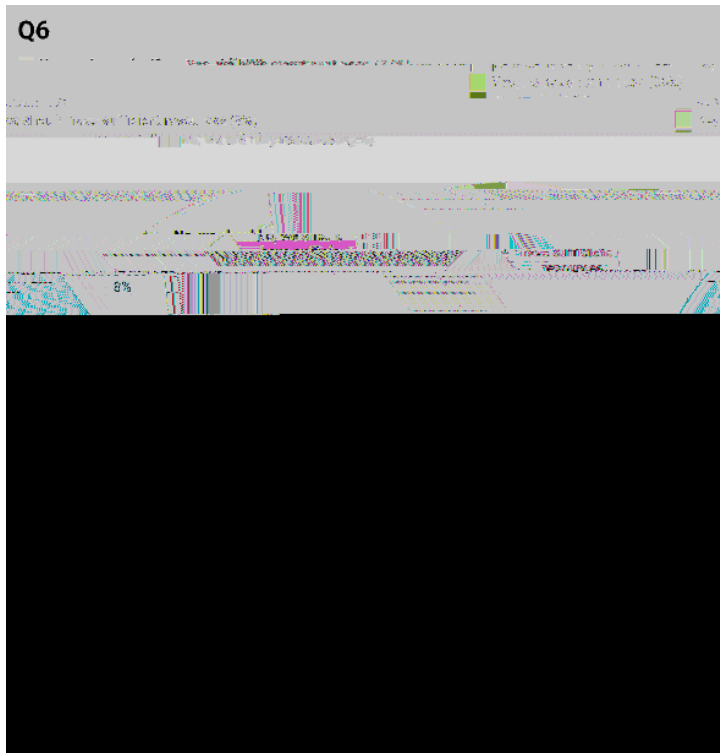
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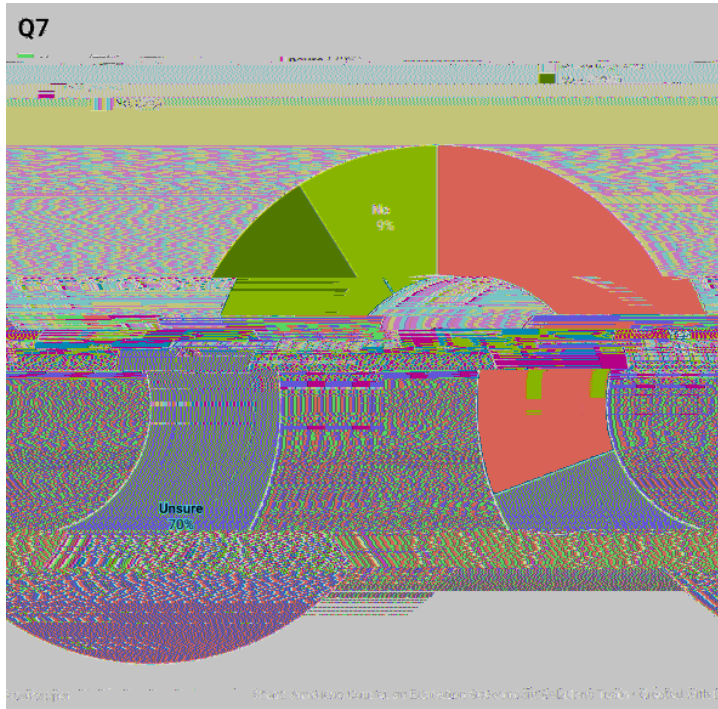
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