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January 29, 2025

Ms. Denise L. Carter  
Acting Secretary  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20202

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

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

Association of Jesuit Colleges and Universities  
Association of Jesuit Colleges and Universities