

April 22, 2024

Manager, Strategic Collections and Clearance
Governance and Strategy Division
U.S. Department of Education
400 Maryland Ave., SW LBJ Building, Room 6W203
Washington, D.C. 20202

Re: Gainful Employment/Financial Value Transparency Reporting Requirements
Docket ID: ED-2024-SCC-0030-000

To Whom It May Concern,

Thank you for the opportunity to comment on the U.S. Department of Education's (ED) proposed information collection request related to the financial value transparency and gainful employment regulations. The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit research, policy, and advocacy organization committed to driving systemic change in higher education to advance equitable outcomes and generational impact for communities historically marginalized on the basis of race, ethnicity, or income. We lead the Postsecondary Data Collaborative and provide timely, evidence-based, and student-centered research to inform policy decisions, with a particular focus on improving racial and socioeconomic equity, postsecondary value, and postsecondary data quality.

We strongly support the implementation of the Financial Value Transparency framework, which will empower students and families to make more informed educational decisions, provide additional data, and support institutional improvement efforts. ED's forthcoming program information website will provide prospective and current students with more information than ever before about program costs and outcomes. Even before the disclosure requirements take effect, prospective and current students and their families will benefit from information about key metrics, such as debt-to-earnings ratios, earnings premiums, the published length of each program, the total cost of attendance, and median student loan debt. Many of these program-level data elements will be available for the first time across all sectors and levels of higher education, presenting new opportunities for comparisons and clear understanding of outcomes. The new information will also help inform data-driven decision-making among institutions and policymakers at all levels—ultimately enabling students to reap greater returns from their postsecondary investment.

As champions for high-quality postsecondary data, IHEP seeks to support the Financial Value Transparency framework's implementation by recommending specific clarifications on data elements related to Classification of Instructional Programs (CIP) code reporting, licensure reporting, and program enrollment. This information will help institutions accurately report data and ensure the timely rollout of the framework.

We further urge ED to implement reporting no later than October 1, 2024, and provide publicly available metrics no later than January 2025. ED's action to push back the reporting deadline from July 31, 2024, to October 1, 2024 allows ED to provide additional guidance, enables institutions to accurately report information, and ensures they understand and fully comply with all regulatory requirements. However, we strongly recommend not delaying the reporting deadline beyond October 2024 to ensure the metrics can be calculated and available for public release as soon as possible and no later than January 2025, as planned. Timely collection and public availability of this information is crucial for achieving greater transparency and fostering institutional improvement.

Recommended Clarifications on Data Reporting Elements:

CIP Code Reporting (Section 1, Annual Program Information)

- The data element "CIP Code (Six Digit)" does not specify whether programs should be reported using the 2010 or 2020 CIP classification. ED should clarify how institutions still using 2010 CIP codes for some programs should report these programs. ED should also provide timely and appropriate crosswalks to meet the requirements of program reporting, as needed.

Licensure Reporting (Section 1, Annual Program Information)

- Licensure Preparation (Geographies): The data element "states in [metropolitan statistical areas] (MSA) in which program does not prepare students for licensure" calls for an institution to indicate which states are in its MSA. Some institutions, including many of those located in rural areas, are not situated within metropolitan statistical areas, rather, they are in micropolitan statistical areas (μ SA). The distinction between metropolitan and micropolitan statistical areas could lead to inconsistencies in licensure reporting. Even though institutions might be geographically close and serve similar student populations and labor markets, they could face different licensure reporting requirements based solely on their location. ED should clarify how institutions not located within MSAs should report this element.
- Licensure Requirements (Indexing): The data element "program meets licensure requirements" does not specify what requirements institutions are expected to index against. For example, this could reference requirements at the college level, those of the accrediting agency, or state or occupational licensure requirements. ED should clarify what type of licensure requirements this element is intended to capture.

- Total Number of Graduates Passing Licensure Exams: Not all institutions and programs uniformly collect data on licensure exam outcomes due to limitations that make collecting this information challenging. Additionally, data availability of the number of graduates passing licensure exams in the most recently completed award year may not comply with FVT reporting requirements, as those data may be delayed beyond cohort reporting deadlines. ED should clarify how institutions that lack or experience delays in obtaining student-level licensure outcome data should report this element. For example, ED could allow institutions to report those data for the most recent year of data available, rather than the most recently completed award year.

Total Enrolled Students by Program (Section 1, Annual Program Information)

- The definition for the element “total number of enrolled students” is unclear. ED should specify if total enrolled students should include students who were enrolled in a program at all levels (e.g., first year, second year, third year, etc.) or only those who were expected to graduate in the most recently completed award year (i.e., students in their final year of the program). The current definition could be interpreted to encompass all students, regardless of year or graduation status, enrolled in a program in the most recently completed award year.

We commend ED for its commitment to transparency and look forward to continued collaboration to improve postsecondary data quality. For questions about this letter, please contact Taylor Myers, Assistant Director of Research and Policy (tmyers@ihep.org) at the Institute for Higher Education Policy.

Sincerely,

Taylor Myers
Assistant Director of Research and Policy
Institute for Higher Education Policy (IHEP)