



May 20, 2026

The Honorable Linda McMahon  
Secretary of Education  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, D.C. 20202

*Submitted electronically*

**Re: Docket ID: [ED-2026-OPE-0100](#)**

**CC: Nicholas Kent, Under Secretary, U.S. Department of Education**

Dear Secretary McMahon,

Thank you for the opportunity to submit comments regarding the U.S. Department of Education's (ED) proposed regulations related to higher education transparency and accountability. Together, the 29 undersigned members and partners of the [Postsecondary Data Collaborative](#) (PostsecData), a nonpartisan coalition of organizations committed to using high-quality postsecondary data to improve student success and advance strong outcomes for all students, write to express our support for maintaining the transparency provisions in the final rule. We also urge ED to strengthen student warnings when programs fail the earnings premium measure, integrate the program-level data with the College Scorecard, reinstate reporting on the loan debt students owe their institutions, ensure smooth and timely implementation of the Student Tuition and Transparency System (STATS), and publish the data that institutions have already reported.

Program-level information is essential for students navigating their postsecondary education options, where costs and outcomes can vary substantially across programs and institutions. Clear, comprehensive, and comparable program-level data also support institutional improvement and evidence-based policymaking, which can ultimately help students reap greater benefits from their postsecondary investments.

To support transparency and informed decision-making by students and families, we urge ED to:

**1) Maintain the STATS framework.**

The proposed rule largely maintains the [existing](#) Financial Value Transparency (FVT) framework as STATS. The FVT regulations have been [broadly supported](#) by field leaders, including [PostsecData](#).

Under STATS, institutions would report data on their programs and students enrolled in those programs, similar to what colleges have already been doing for FVT. ED would then combine the data reported by institutions with data from its administrative systems and other federal agencies to calculate a set of program-level metrics, including costs, program length, student debt, student earnings after graduation, and an earnings premium measure that evaluates whether program graduates are likely to earn more than a high school graduate (for undergraduate programs) or bachelor's degree recipients (for graduate programs).

STATS would enable program-level insights that are unavailable through existing ED data sources, such as the College Scorecard and the Integrated Postsecondary Education Data System (IPEDS).<sup>1</sup> For the first time, students, policymakers, and institutions would have a much better understanding of the costs and outcomes of programs across the country.

The proposed regulations include a new requirement for institutions to report grants and scholarships received annually and for the duration of each student's enrollment in the program. Program-level cost and grant aid data would allow ED to calculate more detailed and precise net prices by program, giving students a clearer picture of their out-of-pocket costs for pursuing a particular educational pathway. Notably, the proposed regulations would also require ED to calculate a new program-level measure on time to completion, which fills a major gap in publicly available data on how long students take to finish their credentials. We urge ED to retain these STATS provisions in the final regulations.

## **2) Strengthen student warnings to ensure that students are aware when programs fail the earnings premium measure.**

Beyond the general benefits of improved transparency, it is essential to provide information about program outcomes to students when they are making real-time decisions about which program to attend. If a program fails the earnings premium metric, current and prospective students should be notified before they sign an enrollment agreement, complete registration, make a financial commitment to the institution, and receive federal financial aid. Evidence from the new Free Application for Federal Student Aid (FAFSA) low earnings indicator demonstrates how warnings at key decision points can inform student behavior. Between December 2025 and March 2026, ED found that [about 25 percent](#) of students presented with the low earnings flag removed that school from the FAFSA and updated their form with another school.

There are two ways that student warnings should be strengthened in the final regulation.

---

<sup>1</sup> Institutions currently do not report program-level cost data for all of their programs to IPEDS. Only a subset of colleges report program-level cost data to IPEDS, and only for their six largest programs.

In §668.605 of the proposed regulations, colleges would be required to warn current and prospective students about programs that may become ineligible for the Federal Direct Loan program after they have failed the earnings premium measure. We support this requirement and recommend clarifying in §668.605(c)(3) that the acknowledgment must be an “active acknowledgment,” not merely a read receipt on an email. Students should be required to demonstrate that they opened and reviewed the warning by electronically signing or otherwise actively acknowledging that their program could become ineligible for Direct Loans due to its earnings outcomes.

Additionally, we recommend that ED administer and collect student acknowledgments for all programs that fail the earnings premium metric, similar to the requirements in the existing regulations. That section (§668.407 in the existing regulations) was deleted in the proposed rules. Restoring this requirement in the final regulations will better ensure that students receive clear and complete information on program outcomes, before they receive federal financial aid.

**3) Integrate the program-level metrics from STATS with the College Scorecard to provide a one-stop resource for prospective and enrolled students.**

To make the data more accessible to students and families, we urge ED to integrate the program-level metrics from STATS with the College Scorecard. Consolidating this consumer information into a single, comprehensive source would create a one-stop shop for program-level data. Since the College Scorecard already includes some program-level metrics, incorporating the STATS program-level metrics would align with the Scorecard’s core purpose of serving as a student-centered consumer information tool.

The College Scorecard consumer [webtool](#) should include the program-level metrics that are listed in the proposed regulations for the program information website. ED should conduct consumer testing of the College Scorecard, with a focus on the webtool to ensure that program-level information is clear and accessible for students. All of the program-level metrics calculated from STATS should also be made available in a downloadable file and application processing interface (API), like the current processes for College Scorecard data, and updated annually.

**4) Reinstate reporting on the cumulative loan debt students owe their institutions.**

We urge ED to reinstate reporting on the cumulative loan debt students owe their institutions. The proposed rule would require institutions to report annual private loan disbursements, including institutional debt, but removes the requirement to report the total institutional debt students owe after completing or withdrawing from their program. That reporting was part of the FVT framework and should be added to STATS in the final regulations. ED stated during negotiated rulemaking that removing this element was intended to reduce institutional burden. However, the proposed

regulations still require reporting institutional grant aid. Adding institutional loan data would not meaningfully increase burden and is just as critical for understanding students' true costs.

Reinstating this reporting would improve transparency. Cumulative debt reflects the total amount students borrow for the entire program. ED will be able to include federal and private loan amounts in that total, but not institutional loan amounts. Without data on cumulative institutional debt, policymakers, researchers, and students cannot accurately assess the true cost of completing (or attempting) a program.

**5) Ensure smooth and timely implementation of STATS and publish the FVT data that institutions have already reported.**

We appreciate ED's continued commitment to collect program-level data and urge ED to ensure the smooth and timely implementation of STATS. We encourage ED to provide clear and comprehensive guidance, offer robust support and responsive technical assistance to institutions, and staff a dedicated help desk to promptly respond to institutional inquiries and provide ongoing assistance throughout the reporting process. These actions will facilitate streamlined reporting, enhance institutions' ability to meet reporting deadlines, and contribute to the overall success of STATS. To ensure timely STATS implementation, ED should provide draft lists of program completers to institutions for review and provide data reporting guidance in time for institutions to complete their reporting by the annual deadlines.

Additionally, ED should publish the program-level data that colleges have already reported. As part of the FVT framework, colleges were required to report two years of program-level cost and financial aid data to ED by October 1, 2025. Those data have not yet been made public. To provide greater transparency, we urge ED to release those program-level metrics as soon as possible, while ensuring data quality.

We commend ED for its commitment to improving transparency and accountability in higher education and look forward to continued collaboration to improve postsecondary data and support informed student decision-making. For questions about this letter, please contact Jocelyn Salguero, Assistant Director of Policy at the Institute for Higher Education Policy ([jsalguero@ihep.org](mailto:jsalguero@ihep.org)).

Sincerely,

**Organizations:**

AccuRounds  
Agora Education Research  
American Council of Trustees and Alumni  
American Statistical Association  
Arnold Ventures  
Class Action  
Complete College America

Corporation for a Skilled Workforce  
Data Quality Campaign  
EdTrust  
Excelencia in Education  
Georgetown University Center on Education and the Workforce  
Higher Education Consortium for Special Education (HECSE)  
Institute for Higher Education Policy (IHEP)  
National Association for College Admission Counseling  
NCHEMS  
New America, Higher Education Program  
Partnership for College Completion  
Postsecondary Education & Economics Research (PEER) Center  
Teacher Education Division of the Council for Exceptional Children  
The HEA Group  
The Institute for College Access and Success  
Today's Students Coalition  
Veterans Education Success

**Individuals:**

Brian K. Bridges, Former New Jersey Secretary of Higher Education  
Kristine Jan Cruz Espinoza, Assistant Professor, California Lutheran University  
Denisa Gándara, Associate Professor, The University of Texas at Austin  
Lesley J. Turner, Associate Professor, University of Chicago  
Thomas Weko, Former National Center for Education Statistics Associate Commissioner for Postsecondary Education