FINANCIAL VALUE TRANSPARENCY/GAINFUL EMPLOYMENT

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This presentation and documents were created by Carolyn Sloane Mata, Ph.D based on information and guidance available at the time of creation (May 2024). This is not a product or resource provided by the Department of Education. This resource is not intended to be a substitute for regulatory guidance from the ED, but supplemental information and resources. It is designed to help institutions begin to thinking how to organize their data collection for compliance based on my understanding of the requirements and rule.
THE FINANCIAL VALUE TRANSPARENCY (FVT) REGULATIONS AND THE GAINFUL EMPLOYMENT (GE) REGULATIONS ARE SEPARATE SETS OF REQUIREMENTS THAT APPLY TO DIFFERENT TYPES OF EDUCATIONAL PROGRAMS.

WHAT ARE THE FINANCIAL VALUE TRANSPARENCY/GAINFUL EMPLOYMENT REQUIREMENTS?
ED has released new reporting metrics for all institutions that are similar to the prior GE requirements, which previously impacted only certificate programs at nonprofit and public institutions and all programs offered at for-profit institutions.

The new regulation requires program data and student-level data for federally aided students on completions, withdrawals, debt, costs, and institutional aid by program to be submitted to ED for matching with post-graduate incomes.

Matching the student-level data provided with income data from other federal sources, ED will publish information on each program with two metrics (earnings premium and debt/earnings ratio).
The Department establishes and amends regulations related to gainful employment to address ongoing concerns about educational programs designed to prepare students for gainful employment in a recognized occupation, but that instead leave them with unaffordable amounts of student loan debt in relation to their earnings, or with no gain in earnings compared to others with no more than a high school education.

The Department separately seeks to enhance transparency by providing information about financial costs and benefits to students at nearly all academic programs at postsecondary institutions that are eligible to participate in Title IV of the Higher Education Act of 1965, as amended (HEA). These regulations are effective July 1, 2024.
4/22/2024: NSLDS reports available

7/1/2024: Reporting system opens

Late July 2024: FSA will provide draft “completers” lists that identify cohorts included in metrics

10/1/2024: Reports due

60 days to make corrections to “completers’ list

12/31/2024: Deadline for initial certification for GE programs

Early 2025: Department will publish metrics and notify institutions of failing GE programs

July 2026: Department will make program information system available

7/1/2026: Student acknowledgement and warning requirements begin
## Initial Reporting (2024)

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>FVT/GE Information Type</th>
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<th>Award Years to Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>2024: Enrolled</td>
<td>Program Specific</td>
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<td>2024: Program Specific</td>
<td>Program Specific</td>
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## Subsequent Reporting (Examples 2025 and 2026)

<table>
<thead>
<tr>
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STANDARD VS TRANSITIONAL REPORTING

- The initial standard cohort file includes seven years of undergraduate and eight years of graduate student information.

- If your institution elects to submit the transitional cohort, the data used to calculate the debt-to-earnings rates and earnings premium measures will be determined by
  - The median debt for the most recently completed two-year award period
  - Earnings across the standard cohort period of data
Standard Reporting

- Incorporates when costs were lower
- More info for campuses to see trends
- Apples to apples comparison of cost/debt to income since same students are being used for both

- Higher reporting burden
- Harder to make big changes to metric since data has already been provided to the Department
- You must have all 7 years of data
- Closed programs are included
Transitional Reporting

- Lower reporting burden
  - Greater ability to impact metric quickly since Department does not have historical

- Programs may be more expensive in recent years (higher debt)
  - Trending in limited
- Low enrollment programs may not have enough completers to show the ROI
- Not tracking reported student incomes (using previous cohorts of completers)
Do we have the data going back 7 years?

Do we have the resources to collect and compile ALL the data?

Have costs increased over the last several years?

Has student debt increased over the last several years?

Do you closed programs that didn’t do well?

Do you have low enrollment in programs but they do well?
HOW DO I KNOW IF A PROGRAM QUALIFIES AS A GAINFUL EMPLOYMENT PROGRAM?

- **Private For-Profit:** All educational programs offered by for-profit (proprietary) institutions are GE Programs
  - Except: CTP (comprehensive transition and postsecondary) programs and a limited number of bachelor's degree programs in liberal arts if the institution has been regionally accredited since October 2007 and the program has been offered by the institution since January 2009. These bachelor's degree programs in the liberal arts offered by proprietary institutions are Eligible Non-GE Programs, but are not GE Programs.

- **Public and Private Not-for-Profit:** All nondegree programs (e.g., certificate programs, diploma programs) that lead to recognized credentials at public and private nonprofit institutions are GE Programs
  - Except: CTP *(comprehensive transition and postsecondary)* programs and prison education programs.

Some institutions offer degree programs where students may also be awarded a non-degree credential (e.g., certificate, diploma) after completing a portion of the degree program. Such programs are generally not considered GE Programs at non-profit and public institutions. However, a program where a significant number of the students enrolled in the program do not actually earn the degree and withdraw after obtaining the certificate may be, upon review, determined to be a non-degree program. In that case, the certificate program would then be considered a separate GE Program.
## Classification of Educational Programs Under the Final Rule

<table>
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<tr>
<th>Type of institution</th>
<th>GE programs</th>
<th>Non-GE programs</th>
</tr>
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<tr>
<td>Public</td>
<td>Title IV non-degree programs</td>
<td>Title IV degree programs</td>
</tr>
<tr>
<td>Private non-profit</td>
<td>Title IV non-degree programs</td>
<td>Title IV degree programs</td>
</tr>
<tr>
<td>Proprietary institutions</td>
<td>All Title IV programs</td>
<td>N/A</td>
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DO I STILL NEED TO REPORT IF I DON’T HAVE ANY GE PROGRAMS?

YES
Schools must report to the Department certain information about all of its students (enrolled, completed, or withdrawn) that have received Title IV aid to attend a program, including those who received Federal Pell Grants or loans.

For the most recently completed award year, schools will report on all students (enrolled, completed, and withdrawn), while for previous award years schools will only report on students who have completed or withdrawn, depending on the standard or transitional reporting type option selected.

To identify students as enrolled, completed, or withdrawn for a specific award year, utilize the students’ enrollment status as of June 30 of that award year to provide accurate information.
WHAT IS THE FINANCIAL VALUE TRANSPARENCY?

- The **FVT** regulations are designed to improve the quality and availability of information provided directly to students about the costs, sources of financial aid, and outcomes of students enrolled in all title IV, HEA (Title IV) eligible programs. These regulations establish two measures:
  - The Debt-to-Earnings Measure (D/E)
  - The Earnings Premium Measure (EP)

- The **FVT** regulations also establish performance benchmarks for each measure to determine whether the program may have adverse financial consequences to students. These requirements apply to both Gainful Employment Programs (GE Programs) and Eligible Non-GE Programs, but do not affect program eligibility for Non-GE programs.
Debt-to-Earnings Measure:

- For the purpose of the D/E rates, they will calculate two separate rates: a discretionary income rate and an annual earnings rate.

  - **DISCRETIONARY INCOME RATE** = annual loan payment divided by the discretionary earnings, defined as the median annual earnings of the students included in the applicable cohort less 1.5 times the U.S. Department of Health and Human Services (HHS) Poverty Guideline corresponding to the calendar year for which earnings are obtained.

  - **ANNUAL EARNINGS RATE** = annual loan payment divided by the median annual earnings of the students who completed the program in the applicable cohort.
PASSING OR FAILING THE DEBT-TO-EARNINGS MEASURE

- For the **DISCRETIONARY INCOME RATE**, rates less than or equal to 20% are passing rates, rates greater than 20% but less than or equal to 30% are zone rates, and **rates greater than 30% are failing rates**.

- **ANNUAL EARNINGS RATES** of less than or equal to 8% are considered passing rates. Annual Earnings Rates greater than 8% but less than or equal to 12% are zone rates, and Annual Earnings **Rates greater than 12% are failing rates**.
Earnings Premium Measure:

- The EP measure compares the median annual earnings of graduates of the program to the “earnings threshold” for the program.

  - Earnings Threshold: The earnings threshold for each program is calculated as the median earnings of individuals with only a high school diploma or recognized equivalent, between the ages of 25 to 34, who are either employed or report being unemployed (i.e., looking and available for work), located in the State in which the institution is located, or nationally if the institution is a foreign institution or if fewer than 50 percent of students in the program are from the State where the institution is located.

- The Department determines the earnings thresholds and publishes the thresholds annually through a notice published in the Federal Register.
PASSING OR FAILING THE EARNINGS PREMIUM MEASURE

- A program passes the EP measure if the median annual earnings of the students who completed the program exceed the earnings threshold.

- A program fails the EP measure if the median annual earnings of the students who completed the program are equal to or less than the earnings threshold.
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS D/E MEASURE?

- **Fail D/E**
  - GE Program
    - Warnings to and Acknowledgement by Prospective and Current Students
    - Possible Loss of Title IV Eligibility (if fail 2 of 3 consecutive years)
  - Eligible Non-GE Program
  - Nondegree or Graduate Program
  - Undergraduate Program
- Acknowledgement Required by Prospective and Current Students of N/A
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS EP MEASURE?

Fail EP

GE Program
- Warnings to and Acknowledgement by Prospective and Current Students
- Possible Loss of Title IV Eligibility (if fail 2 of 3 consecutive years)

Eligible Non-GE Program
- N/A
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS?

Notification of Determination

- The Department will send the institution a notice of determination of a GE or Eligible Non-GE program’s final D/E and EP measures and an indication of whether the program is passing or failing each of the measures.
- The notice will also inform the institution whether prospective student acknowledgements are required and, for GE Programs:
  - Whether the institution is required to provide warnings to current and prospective students;
  - Whether the program could become ineligible based on its final D/E rates or EP measure for the next award year for which the D/E rates or the EP measure are calculated for the program; or
  - Whether the program is subject to a loss of eligibility due to failing the D/E rates measure or the EP measure in two out of three consecutive years for which metrics are calculated.
- In addition, when applicable the notice will explain that the institution is prohibited from re-establishing the eligibility of the program, or establishing the eligibility of other substantially-similar GE programs in the same 4-digit CIP Code range, for three years following the date that the program lost eligibility or the institution voluntarily discontinued the program or ended its Title IV eligibility.
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS?

**Required Student Acknowledgments**

- For nondegree and graduate programs with failing D/E rates, prospective students will be required to acknowledge that they have viewed information provided through the Department’s program information website. The Department will be responsible for the content and delivery of the acknowledgements, for collecting the acknowledgment from students, and for informing institutions which students have completed the acknowledgment.

- Acknowledgment requirements apply to all eligible GE and Non-GE programs with failing D/E rates, other than undergraduate degree programs.
  - !!! Note that acknowledgment requirements do not apply if a program fails only the EP measure.

- A prospective student must provide the acknowledgment before the institution enters into an agreement to enroll the student. Prospective students must provide such acknowledgments until the earlier of:
  - The date that the Department notifies the institution that the program has passing D/E rates; or
  - Three years after the institution was last notified that the program had failing D/E rates.

- Student acknowledgement requirements will be effective July 1, 2026.
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS?

Required Student Warnings

An institution must provide warnings to current and prospective students for any year the Department notifies the institution that the GE program could become ineligible in the next award year based on its D/E rates or EP measure.

If a current or prospective student receives a warning but does not seek to enroll until more than 12 months afterward, the institution must again provide the warning unless the program has since passed both the D/E rates and EP measure for the 2 most recent consecutive years the metrics were calculated.

Warnings provided to students must:

- Notify students that the program has not passed standards established by the Department based on the amounts students borrow for enrollment in the program and their reported earnings and that the program could lose access to federal grants and loans based on the next calculated metrics
- Provide relevant information to access the Department’s program information website
- State that the student must acknowledge having viewed the warning through the Department’s program information website before the institution may disburse Title IV funds to the student
- Describe the academic and financial options available to students to continue their education in another program at the institution, including whether the students could transfer their credits to another program at the institution and which credits would transfer
- Indicate whether, if the program loses Title IV eligibility, the institution will continue to provide instruction allowing students to complete the program or refund tuition and fees, and other required charges
- Explain whether students could transfer credits earned in the program to another institution through, for example, an articulation agreement or teach-out plan
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS?

**Required Student Warnings**

- **ENROLLED STUDENTS:** The institution must provide the warning in writing to each enrolled student no later than 30 days after the Department issues the notice of determination. The warning must be delivered in writing, either through hand-delivery, email, or by mail. The warning must be the only substantive content contained in these written communications. The institution must maintain records of its efforts to provide the required warnings.

- **PROSPECTIVE STUDENTS:** An institution must provide the warning to each prospective student or to each third party acting on behalf of the prospective student at the first contact about the program between the institution and the student or the third party. The warning must be provided by:
  - Hand-delivering the warning as a separate document to the prospective student or third party, individually or as part of a group presentation
  - Sending the warning to the primary email address used by the institution for communicating with the prospective student or third party about the program, provided that the warning is the only substantive content in the email and that the warning is sent by a different method of delivery if the institution receives a response that the email could not be delivered
  - Providing the warning orally to the student or third party if the contact is by telephone

- An institution may not enroll, register, or enter into a financial commitment with a prospective student until at least three business days after the institution delivers the warning. Additionally, an institution may not allow a prospective student seeking Title IV funds to sign an enrollment agreement, complete registration, make a financial commitment to the institution, or disburse Title IV funds until the student or prospective student acknowledges having viewed the warning on the Department's program information website.
WHAT HAPPENS IF A PROGRAM AT MY INSTITUTION FAILS?

Loss of Eligibility for GE Programs

- A GE program becomes ineligible for Title IV, HEA program funds if it (1) fails the D/E rates measure for two of any three consecutive award years for which rates were calculated; or (2) for two of any three consecutive award years for which the EP measure was calculated. If this occurs, the program’s participation in the Title IV programs ends upon the earliest of—
  - The issuance of a new Eligibility and Certification Approval Report (ECAR) that does not include that program;
  - The completion of a termination action of program eligibility, if the institution is fully certified; or
  - A revocation of program eligibility if the institution is provisionally certified.

- If the Department does not calculate or issue D/E rates or EP measures for a program for an award year, the program receives no result under the applicable measure for that award year and remains in the same status for that measure as the previous award year. Additionally, the Department disregards any D/E rates or EP measures that were calculated more than five calculation years prior.
WHAT SHOULD I BE CONCERNED ABOUT?
HOW ARE PROGRAMS IDENTIFIED?

- Programs are identified by a combination of an institution's six-digit OPEID number, the program's six-digit Classification of Instructional Programs (CIP) code, as assigned by the institution or determined by the Secretary, and the program's credential level (e.g., associate's degree or bachelor's degree).

- A GE Program or an Eligible Non-GE Program could include multiple eligible programs, if the institution offers multiple distinct programs that have the same six-digit CIP code and credential level.

- Note: If a program does not have enough completers over a cohort period then the Department will combine programs that have the same 4-digit CIP code.
CIP CODE EXAMPLE

Overall Subject  Additional Detail  Maximum Detail

XXX.XXXXX

2-Digit
4-Digit
6-Digit

26.XXXXX - Biological and Biomedical Sciences
26.03XX - Botany/Plant Biology
26.0305 - Plant Pathology/Phytopathology
26.0307 - Plant Physiology
DO WE REPORT SMALL PROGRAMS
(GEN-24-04) Regulatory Requirements for Financial Value Transparency and Gainful Employment (Updated May 28, 2024)

PUBLICATION DATE: March 29, 2024
DCL ID: GEN-24-04
SUBJECT: Regulatory Requirements for Financial Value Transparency and Gainful Employment (Updated May 28, 2024)

SUMMARY: This letter provides an overview of the Financial Transparency and Gainful Employment provisions scheduled to be implemented on July 1, 2024.

Update on May 28, 2024: We have revised the Reporting Requirements section of this Dear Colleague Letter to clarify reporting exclusions due to a small number of completers in a set of substantially similar programs and how reporting might vary depending on whether a set of programs initially qualified for an exclusion but later did not.
Reporting Requirements

The FVT/GE regulations require institutions to annually report two types of data to the Department: program-specific information and student-specific information. Institutions must provide this information for each eligible program if they have any program with a total of at least 30 completers over the four most recently completed award years within any group of substantially similar programs. Substantially similar is defined as all programs in the same four-digit CIP code at an institution.

Exclusions From Reporting Due to Small Numbers of Completers in a Set of Substantially Similar Programs

For any group of substantially similar programs (same four-digit CIP prefix), an institution would not have to report any data for the FVT/GE requirements if there were fewer than 30 total completers over the preceding four award years under 34 668.401(b)(2) and 668.408(a).

If in a later award year, an institution has 30 total completers over the preceding four award years, then the institution would report the necessary information for previous award years for these programs. If this occurs in the 2024-25 reporting cycle, a school that previously elected to use transitional reporting would have to report data for 2021-22 that would not otherwise have been reported.

For a set of programs that initially qualify for the exclusion but later must report, here is an example of how that pattern may apply. Note that institutions will not have to double-report for any award years, so it is possible that an institution will have fewer than four years of reporting related to past award years to complete depending on previous reporting patterns.
Sample distribution for the four most recently completed award years for program 1234xx:

2023-2024 reporting cycle:

<table>
<thead>
<tr>
<th>Award Year</th>
<th>2020-2021</th>
<th>2021-2022</th>
<th>2022-2023</th>
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<tbody>
<tr>
<td>Completer Count</td>
<td>5</td>
<td>5</td>
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</table>

2024-2025 reporting cycle:

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<th>Award Year</th>
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<th>2024-2025</th>
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<tr>
<td>Completer Count</td>
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<td>5</td>
<td>5</td>
<td>16</td>
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### 2025-2026 Reporting Cycle

<table>
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<tr>
<th>Award Year</th>
<th>2022-2023</th>
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<th>2024-2025</th>
<th>2025-2026</th>
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</thead>
<tbody>
<tr>
<td>Completer Count</td>
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<td>5</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>Action</td>
<td>Already reported in 24-25</td>
<td>Already reported in 24-25</td>
<td>Already reported in 24-25</td>
<td>Don’t report in 25-26</td>
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### 2026-2027 Reporting Cycle

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<th>2026-2027</th>
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<tbody>
<tr>
<td>Completer Count</td>
<td>5</td>
<td>16</td>
<td>1</td>
<td>10</td>
</tr>
<tr>
<td>Action</td>
<td>Already reported in 24-25</td>
<td>Already reported in 24-25</td>
<td>Report in 26-27</td>
<td>Report in 26-27</td>
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WHICH PROGRAMS ARE NOT ELIGIBLE PROGRAMS?

- Approved comprehensive transition and postsecondary (CTP) programs
- Approved prison education programs
- Postbaccalaureate teacher certification programs where the institution does not award a credential
- Programs at least two academic years in length that are acceptable for full credit toward a bachelor's degree
- Preparatory coursework for which eligible students may receive Direct Loan funds
WHICH INSTITUTIONS ARE EXCLUDED?

- There are two situations in which institutions and all of their programs are excluded from some or all of the FVT/GE requirements:
  
  - Institutions with no groups of substantially similar programs (same four-digit CIP prefix) that produced at least 30 total completers over the preceding four award years are not subject to any of the FVT or GE provisions.
  
  - Institutions with main campuses located in a U.S. Territory or the Freely Associated States are excluded from the GE accountability provisions and most financial value transparency provisions but must still meet reporting requirements under 34 CFR 668.408.
WHO NEEDS TO BE INVOLVED ON CAMPUS?

- Institutional Research
- Registrar
- Financial Aid
- Bursar
- Student Financial Aid
- IT
- Most Senior Executive
WHAT DATA ARE BEING COLLECTED FROM INSTITUTIONS?

- Program-specific information
- Student-specific information
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The name of the program
The program’s CIP code (six-digit)
The program’s credential level (e.g., bachelor’s degree or first professional degree)
The program’s published length (defined in weeks, months, or years as published by the school)
Published program length unit of measurement (i.e., weeks, months, or years)
Total number of weeks in the program’s Title IV academic year
Whether the program is programmatically accredited and, if so, the name of the agency that accredits the program
The States in the MSA in which the institution’s main campus is located where the program does/does not prepare students for licensure
The total number of students enrolled in a program during the most recently completed award year
The total number of graduates who took a licensure exam in the most recently completed award year
The total number of program graduates who passed a licensure exam in the most recently completed award year
Whether the program is a bachelor’s degree programs in liberal arts and 1) the institution has been regionally accredited since October 2007; 2) the program has been offered by the institution since January 2009; and 3) the institution offering the program is a proprietary institution
Whether the program is a “qualifying graduate program”
Therefore, institutions must report specific information for each student who received Title IV funds for enrollment in a GE or an Eligible Non-GE Program during an award year.

The reporting includes information about each student's enrollment in the program, the amounts of private or institutional loans and other financing received by the student for that enrollment, the amount of institutional grant or scholarship funds received by the student, as well as the amount that was assessed the student for tuition and fees and for books, supplies, and equipment.

While the D/E and EP measures include only those students who received Title IV aid and who completed the program during the applicable cohort period, institutions must report information for all students who received Title IV aid and were enrolled in the GE program during the applicable award years, including those who did not complete the program. This is because the reported information is used by the Department not only for the purpose of calculating the D/E and EP measures, but also for calculating some of the other information the Department will disclose on its website beginning in 2026.

Institutions are required to report information for students who were enrolled at the end of the most recently-completed award year and for students who completed the program or withdrew during the standard or transitional periods.
STUDENT-SPECIFIC INFORMATION (ALL STUDENTS)

- Information needed to identify the student
- The date the student initially enrolled in the program
- Whether the student is enrolled in a CTP program
- Whether the student was enrolled in a prison education program or was incarcerated and enrolled in a program under the Second Chance Pell experiment
- The student's enrollment status code as of the first day the student was enrolled in the program (e.g., full-time, half-time, etc.)
- The enrollment status of the student in the program for the award year being reported
- The student's total annual cost of attendance for the award year being reported
- The total tuition and fees assessed to the student for the award year being reported
- The student's residency tuition status by State or district for the award year being reported (e.g., in-district, in-State, or out-of-State)
- The student's total annual allowance for books, supplies, and equipment from their Cost of Attendance (COA) for the award year being reported
- The student's total annual allowance for housing and food from their COA for the award year being reported
- The amount of institutional grants and scholarships disbursed to the student during the award year
- The amount of other State, Tribal, or private grants or scholarships disbursed to the student during the award year
- The amount of any private education loans disbursed to the student for enrollment in the program that the institution is, or should reasonably be, aware of, including private education loans made by the institution
STUDENT-SPECIFIC INFORMATION (COMPLETED/WITHDRAWN)

- Whether the student withdrew from or completed a CTP program
- Whether the student was enrolled in a prison education program or was incarcerated and enrolled in a program under the Second Chance Pell experiment
- The date the student completed or withdrew from the program
- The total amount the student received from private education loans for enrollment in the program
- The total amount of institutional debt the student owes to the institution or to a party that extended an amount on behalf of the institution after completing or withdrawing from the program
- The total amount of tuition and fees assessed the student for the student's entire enrollment in the program
- The total amount of the allowances for books, supplies, and equipment included in the student's COA for each award year in which the student was enrolled in the program, or a higher amount if assessed the student by the institution for such expenses
- The total amount of institutional grants and scholarships provided for the student's entire enrollment in the program
This is an important resource that outlines how institutions should format their submissions.
STEPS TO COMPLIANCE
Create a reporting team

Determine how you will collect and store sensitive information

Build a documentation file and work plan

Make a list of all programs by CIP and number of completers over last several years

Be prepared to match and correct the completers file the Department will provide

Pull NSLDS reports with cohort and completer information

Determine if reporting standard or transitional

Collect the program level information

Begin augmenting that file with the student level data required ((1) completers/withdrawn for previous and current years and (2) enrolled current year)

Search NSC for completers that may be enrolled elsewhere

Ensure data are complete and error free

Aggregate and present findings o senior leadership and submit file
# Financial Value Transparency Workbook

| Institution Information | Student Enrollment Information | Program Information | Completion
|---|---|---|---
| CRN/ID | Institution Name | Student ID | Student SSN (for NSWLES Identified) | Students Name | Student Start Date at Institution | Program Enrollment Begin Date | Students Admit Status | Student’s Enrollment Status as of the 1st Day of Enrollment in the Program (Rolin in the student’s enrollment status at the start of the program. Values are: P (Past-Terms), T (Present-Term), N (Not-Enrolled)) | Title IV Aid Recipient Flag during the reporting period = a flag indicating the student’s enrollment status and the student’s participation in the program. | Title IV Aid Recipient Flag during the reporting period = a flag indicating the student’s enrollment status and the student’s participation in the program. | Credential Level (> CIP 1) | Credential Level (CIP 2 and above) | Credential Level (CIP 2 and above) | Comprehensive Transition and Postsecondary (CTP) Program Flag | Qualifying Graduate Program Flag: Program requires comprehensive training (graduate program code) | Program Amenity: Shares Due Award Yes
| (CRN/ID) | (Institution Name) | (Student ID) | (Student SSN) | (Students Name) | (Student Start Date) | (Program Enrollment) | (Students Admit Status) | (Student’s Enrollment Status) | (Title IV Aid Recipient Flag) | (Title IV Aid Recipient Flag) | (Credential Level) | (Credential Level) | (Credential Level) | (CTP Program Flag) | (Qualifying Graduate Program Flag) | (Program Amenity: Shares Due Award) |
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**HELPFUL RESOURCES**

- AIR FVT/GE Regulations Resources
- FSA Frequently Asked Questions
- NAICU Financial Value Transparency and Related Regulations Package
- National Student Clearinghouse FAQs

**A copy of this presentation as well as the word document of elements and the workbook I created to help institutions collate their data will be shared in the Forum app.**
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THANK YOU!