



March 26, 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 institutional research and institutional effectiveness (IR/IE) community, I write to ask for a delay in implementing the reporting requirements related to the Financial Value Transparency (FVT) and Gainful Employment (GE) regulations beyond the July 31, 2024 deadline.

AIR joins with the request from other higher education associations in a letter to you on March 14. We concur with the conclusion of our sister associations that institutions of higher education will experience substantial challenges in complying with the reporting requirements for FVT and GE programs due to a lack of clear guidance and insufficient time for the accurate compilation of data. These factors will undermine the quality and utility of the data collected as well as its usefulness to students and their families.

In addition, a significant amount of the responsibility for reporting the information will fall to the IR/IE professionals at each institution. Thus, I wanted to share their distinct voices and perspectives with you.

AIR has hosted two co-sponsored webinars on the reporting requirements of the FVT/GE regulations with over 5,100 registrants. From the approximately 700 comments and questions submitted by attendees, four areas of specific concerns emerged

- The lack of clear and precise definitions of data elements and data definitions that seem to vary from other federal data reporting requirements such as IPEDS.
- Insufficient guidance on what data are required, the time periods of the data, and the student groups represented by the data.
- The significant amount of time and coordination required across multiple institutional departments to gather the data, compile the data, and inspect the quality and accuracy of the data. This includes navigating what student data can be shared between different departments, for example between the financial aid office and the institutional research office.
- Serious concerns about the additional workload and staffing capacity required to understand and comply with the regulations on a compressed schedule, especially for smaller and less-resourced institutions with one- or two-person IR/IE offices.

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I appreciate your attention to the concerns expressed in this letter on behalf of the IR/IE community, and your consideration of our request to delay the July 31 FVT/GE reporting deadline in order to provide additional guidance and sufficient time to facilitate the submission of accurate and meaningful data in the future.

Sincerely,

A handwritten signature in black ink that reads "Christine M Keller". The signature is written in a cursive style with a large initial 'C'.

Christine M Keller, PhD
Executive Director & CEO