June 6, 2024

Members of the California Congressional Delegation
U.S. House of Representatives

Subject: Request to Delay Implementation of U.S. Department of Education
Regulations to Allow for More Accurate Reporting of Data

Dear Congressmember:

On behalf of the Association of Independent California Colleges and Universities (AICCU), I write to respectfully ask that you request the U.S. Department of Education (ED) to delay the implementation of their new Financial Value Transparency (FVT) and Gainful Employment (GE) regulations, currently slated to go into effect on July 1, 2024. While the reporting deadline has been pushed back to October 1, a one-year delay to the implementation would give colleges and universities time and space to properly report on the required and proposed data.

AICCU is the organizational voice for over 85 nonprofit, WASC-accredited higher education institutions in California. Our membership is diverse, ranging from liberal arts colleges to large research institutions, art and design colleges to faith-based universities. In total, AICCU member colleges and universities educate nearly 350,000 students.

This request is made primarily because of the incredible pressure institutions are under due to the avalanche of new regulations, requirements, and delays from the department. Colleges and universities continue to struggle with the consequences of the failed new FAFSA rollout by ED and are working with students to get them enrolled. Additionally, ED recently released new Title IX regulations on sex discrimination and campus sexual assault, set to go into effect on August 1, which will require new campus policies to be developed. Institutions and various departments that have a role in regulatory reporting or implementation are simply overwhelmed.

We recognize the need for appropriate levels of federal-level data collection. The useful and reliable provision of information to students and families acknowledges the diversity and integrity of our higher education institutions. However, we cannot overstate our concerns about the strain that FVT and GE reporting will place on institutions. The regulatory package substantially underestimates the impact of reporting this amount of information in such a short period of time, particularly for institutions with limited staff, infrastructure, and/or resources that will need additional time to collect, organize, and verify disparate data across multiple departments, an integrated collection for which there is limited or no precedence.

Colleges and universities will need time to develop new processes, including automation and integration, that will ensure submitted data are error free and properly tested. The additional
time requested will result in more reliable and valid data, bolstering the initial release and guaranteeing students and their families the most accurate information they need.

Thank you for the consideration of our request. If you have any questions, please contact AICCU Vice President for Policy Thomas Vu (thomas.vu@aiccu.edu).

Sincerely,

Kristen F. Soares
President