

April 29, 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 members of the New England Council I write to share concerns regarding the implementation of the rules on institutional and programmatic accountability finalized by the Department of Education last fall. As you are aware, the New England Council is a non-partisan alliance of businesses, academic and health institutions, and public and private organizations throughout New England formed to promote economic growth and a high quality of life in the New England region. The New England Council's mission is to identify and support federal public policies and articulate the voice of our membership regionally and nationally on important issues facing New England.

Given the past and existing delays with the Free Application for Federal Student Aid (FAFSA) process, and the need for institutions to package student aid properly, we believe that the primary focus at this time should be ensuring the smoothest FAFSA process possible to help students best decide where to pursue their postsecondary education. However, as you know in 2022, the Department embarked on a negotiated rulemaking process focused on institutional and programmatic accountability. The negotiated rulemaking committee covered Financial Value Transparency and Gainful Employment in addition to many other items and policies. While we await further clarification from the Department on how institutions can implement these rules, I respectfully request that you further delay implementation of the Financial Value Transparency and Gainful Employment and related regulatory package to July 1, 2025, and make the first batch of reports due on July 31, 2025.

We thank you for your attention to this letter. It is our hope that you will take these institutional responses into consideration, delay the Financial Value Transparency and Gainful Employment reporting deadline.

Sincerely,

James T. Butt

James T. Brett President & CEO

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