



National Association of
Independent Colleges
and Universities

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March 14, 2024

Honorable Miguel Cardona
Secretary of Education
U. S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Secretary:

On behalf of the member institutions of the National Association of Independent Colleges and Universities (NAICU) and our member associations listed below, I write to ask you to delay the implementation of the Financial Value Transparency (FVT) and Gainful Employment (GE) and related regulatory package by one year, to July 1, 2025, and make the first batch of reports due on July 31, 2025.

To comply with the current reporting deadline of July 31, 2024, will require an unmanageable amount of work by the same financial aid staff who are currently dealing with the now six-month delay of the new FAFSA implementation. It is now apparent that FAFSA delays will extend financial aid packaging and student enrollment decisions well into the summer.

Currently, institutions are expected to submit new and extensive student and program level reports for FVT and GE, backdated for up to 7 years, to the Department on July 31, 2024. This student level data mostly resides in the financial aid office. Financial aid offices should be focused on helping students through the backlog of FAFSA issues rather than diverting resources from students to fulfill these reporting requirements. We appreciate the new regulatory flexibility for institutions regarding various compliance processes related to financial aid. However, we believe that a one-year delay of the new FVT and GE regulations will go even further toward ensuring institutions, particularly financial aid offices, can focus their limited resources on providing students the financial aid packages they need to make informed choices regarding higher education enrollment.

To make matters worse, many of the FVT and GE requirements that institutions must comply with and report on are still not fully defined by the Department. While our sector has been working extensively with the Department to get final clarification, public comments on the proposed requirements are not even due until next month, making it unclear when the final components will be available.

NAICU serves as the unified voice for the 1,700 private, nonprofit colleges and universities in our nation. Founded in 1976, NAICU is the only national membership organization solely focused on representing private, nonprofit higher education on public policy issues in Washington, DC. NAICU's membership reflects the diversity of private, nonprofit higher education in the U.S. Our member institutions include major research universities, faith-based colleges, Historically Black Colleges and Universities, Hispanic-Serving Institutions and other Minority-Serving Institutions, art and design colleges, conservatories of music, traditional liberal arts and science institutions, women's colleges, work colleges, two-year colleges and schools of law, medicine, engineering, business and other professions.



Each year, private, nonprofit colleges and universities graduate more than 1.2 million students. Additionally, the economic impact of the private, nonprofit sector of higher education for academic year 2022-23 totaled \$652 billion, and the sector generated \$99 billion in tax revenues and supported and sustained 3.4 million jobs. Despite the critical employment opportunities provided by the independent sector, recent employment data is flat, indicating that institutions that had to lay off staff during the pandemic are having to do more with less, which adds to the workload and retention concerns for staff already affected by the FAFSA delays.

Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "Barbara K. Mistick". The signature is written in a cursive, flowing style.

Barbara K. Mistick, D.B.A.
President

On behalf of:

AARTS - Association of Advanced Rabbinical and Talmudic Schools
Alabama Association of Independent Colleges and Universities
American Association of Presidents of Independent Colleges and Universities
Associated Colleges of the Midwest
Association for Biblical Higher Education
Association of Catholic Colleges and Universities
Association of Chiropractic Colleges
Association of Independent California Colleges and Universities
Association of Independent Colleges & Universities in Massachusetts
Association of Independent Colleges and Universities of Ohio
Association of Independent Colleges and Universities of Pennsylvania
Association of Independent Colleges and Universities of Rhode Island
Association of Independent Colleges of Art & Design
Association of Independent Kentucky Colleges and Universities (AIKCU)
Association of Jesuit Colleges and Universities
Association of Presbyterian Colleges and Universities
Association of Vermont Independent Colleges
CCCU - Council for Christian Colleges & Universities
Conference for Mercy Higher Education
Connecticut Conference of Independent Colleges
Consortium of Hospital-Affiliated Colleges and Universities (CHACU)
Consortium of Universities of the Washington Metropolitan Area
Council of Independent Colleges
Council of Independent Colleges in Virginia, Inc.
Council of Independent Nebraska Colleges
Federation of Independent Illinois Colleges and Universities
Georgia Independent College Association



Great Lakes Colleges Association
Independent Colleges and Universities of Florida
Independent Colleges and Universities of Missouri
Independent Colleges and Universities of New Jersey
Independent Colleges and Universities of Texas
Independent Colleges of Indiana
Independent Colleges of Washington
Independent Higher Education of Colorado
International Association of Baptist Colleges and Universities
Iowa Association of Independent Colleges and Universities
Kansas Independent College Association
Louisiana Association of Independent Colleges and Universities
Maryland Independent College and University Association
Michigan Independent Colleges & Universities
Minnesota Private College Council
Mississippi Association of Independent Colleges & Universities
NECU- Network of ELCA Colleges and Universities
New American Colleges and Universities
North American Association of Methodist Schools, Colleges, and Universities (NAAMSCU)
North Carolina Independent Colleges and Universities
Oklahoma Independent Colleges and Universities
Oregon Alliance of Independent Colleges and Universities
South Carolina Independent Colleges & Universities
Tennessee Independent Colleges and Universities Association
United Methodist Church, University Senate
West Virginia Independent Colleges & Universities
Wisconsin Association of Independent Colleges and Universities
Work Colleges Consortium
Yes We Must Coalition