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To Whom It May Concern:

Thank you for the opportunity to submit comments on the Department's recent announcement of public hearings that will initiate a rulemaking process [Docket ID ED-2025-OPE-0016]. The Postsecondary Education & Economics Research (PEER) Center ([peer-center.org](https://peer-center.org)) generates actionable research to drive policy improvements in postsecondary education. We are pleased to provide comments, as requested, on a potential topic that would improve program integrity and institutional quality: Financial Value Transparency (FVT). We offer our strong support for incorporating FVT reporting that is at least as robust as in the original regulations through any new rules designed to enhance efficiency and accountability in higher education.

The Financial Value Transparency rules currently in effect with implementation already underway, will provide unprecedented new information to students, institutions, and policymakers about the return on investment of postsecondary education, and we urge the Department not to remove the rules or weaken these provisions (including by eliminating any of the required reporting elements). Under the FVT rules, all colleges, across all sectors, will report data needed to calculate whether each of their programs leaves the typical graduate with high debt or low earnings enabling students and their families to make informed decisions about whether and where to enroll in school and what to study, consistent with their goals and interests.<sup>1</sup>

The goals of Financial Value Transparency are not only broadly consistent with the ideals of policymakers across party lines; they are also a direct extension of President Trump's past efforts. In 2019, pursuant to an Executive Order issued by President Trump, the Education Department released the first-ever program-level data on the [debt](#) and [post-college labor market outcomes](#) for every Title IV-participating program in the country – an unprecedented trove of information designed to inform students' choices and increase accountability for low-value programs. Complete information is a

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<sup>1</sup> The Gainful Employment rules will further require all non-degree programs, as well as degree programs offered by proprietary institutions, to meet these standards in order to continue receiving federal financial aid dollars. Members of Congress have [proposed](#) adopting similar standards, and broadening them to apply across sectors. We strongly support maintaining these strong gainful employment rules, in addition to preserving the FVT rules that are the focus of this comment.

necessity for a well-functioning competitive market, and FVT reporting begins to close the informational gaps that generate inefficiency in U.S. higher education.

We are aware that many institutions [continue to argue](#) that the data reporting requirements are too burdensome. While we appreciate that any change to federal requirements requires adjustments to institutional workflows, it is worth reiterating that many of these reporting requirements are not new. The 2014 gainful employment rules – through which nearly half of private nonprofit colleges and almost nine in 10 public colleges reported data for at least one program – included similar reporting requirements; and approximately [2,000 institutions](#) are regularly asked to provide data about their costs and financial aid for the National Postsecondary Student Aid Study. Moreover, these rules were published in October 2023, meaning colleges have already had 18 months to prepare for the reporting; with the Department’s already-granted extension to the end of September 2025, reporting deadlines will have been substantially delayed; in fact, it will have been nearly two years since the rules were finalized.

The Trump Administration now has the opportunity to take the next step in designing rich federal data and getting that information into the hands of students and their families. Already, the Education Department has taken key steps to establish data reporting systems and build the necessary infrastructure to assess performance for every institution and each of their programs. We encourage the Department to move quickly to produce those data, dedicating the necessary staff and resources to the task, and to ensure the data reach the students who need them and generate the transparency needed for a well-functioning market.

### **Maintain Ongoing FVT Reporting**

As the Department continues moving forward implementation of the FVT regulations, we particularly urge the Administration to continue to collect rich, robust data about the debt borrowers take on, the costs students pay to complete a program, and the programs in which students enroll. Maintaining the reporting structures that have already been established is the most efficient way to measure programs’ performance.

In particular, the data that the Department is already collecting from schools will be of significant added value, both to students and to policymakers. As Americans’ concern about the costs of college continues to grow, the information collected via the FVT reporting will provide unprecedented new information about what students *actually* pay to earn their credentials at different institutions and programs. The new data will include the total amount students were charged (both for tuition and fees and for living costs and other expenses), the amount of financial aid provided to students, and the amounts of loans those students took on. These data could provide important insights into the net prices students pay (including at different income levels/Student Aid Indices), how institutions use their aid dollars, and how federal funding could be reallocated more efficiently to ensure higher education remains accessible, affordable, and efficient.

This information is critical for students and their families, and a significant gap in the existing data infrastructure. Outside of the FVT data, there is no way for students to compare what they would pay at different institutions throughout their entire education, with fluctuating tuition and changing grant aid. Because FVT data include information on the net prices paid by each student, the information could enable the Administration to provide radical price transparency: presenting aggregated information to students, for instance, that details what other students at a similar level of federal aid eligibility paid in each year of their studies and how much aid they received..

Policymakers have indicated their desire for this information, as well. The [\*College Cost Reduction Act\*](#) introduced in Congress last year by Rep. Virginia Foxx (R-NC), for example, explicitly retained the data reporting requirements under the Gainful Employment and FVT regulations. It would also use the data reported under that provision for an accountability framework, which would require the Education Department to calculate the total price students are typically charged for a program – the total tuition and fees, less grant and scholarship aid – and the typical earnings of students who completed the program. These data are collected under FVT, but are otherwise not available from any existing data source. At the same time, the [\*Lowering Education Costs and Debt Act\*](#) introduced by Sen. Bill Cassidy (R-LA) would create an earnings test for programs that looks very similar to the earnings premium measure under FVT. If the Department were to discontinue or alter the data reporting under FVT, it would not only undermine students’ access to high-quality information about the prices and value of their programs, but also set back the feasibility of these and other legislative efforts to increase accountability for higher education. The data could also be used to inform important policy questions, like assessing the extent to which increases in federal financial aid like Pell Grants enable students to pay less or whether expansions in aid incentivize colleges to charge higher prices.

These critical use cases for FVT reporting demonstrate the shortcomings of past data transparency efforts that rely exclusively on federally held administrative data, like the College Scorecard. While the Department (including under the Trump Administration) has been able to produce new information for consumers about the post-college outcomes of higher education programs, the government collects shockingly little information about the prices students pay using their federal financial aid.

Without FVT data, the Department will see both logistical and strategic challenges to its goals of driving down the costs of college. Operationally, the FVT data allow the Department to measure and hold institutions accountable for borrowing for direct costs – tuition, fees, books, and supplies – rather than for living costs; without these data, many high-cost and low-value institutions across all sectors will continue to operate unchecked. The larger ambition of this transparency, though, is to enable the market forces needed to put pressure on colleges’ prices and outcomes. New FVT data are the lynchpin to that system: By publishing data that will allow students to easily compare college prices – particularly relative to their earnings outcomes – students will, for the first time, realistically be able to vote with their feet, driving down prices and improving value in college education.

## **Ensure Students Have Access to Key Data**

Under the FVT regulations, the Department committed not only to producing this high-quality information, but also ensuring it gets into the hands of students and families to help them make informed choices. We urge the Department to move forward with those efforts in a timely manner.

More specifically, by July 1, 2026, the FVT rules clarify that the Department will establish and maintain a website – ideally, informed by consumer testing – to house the cost, earnings, and other data relevant to students’ college choices. Institutions will be required to share the site directly via email communication with both prospective and enrolled students. Students will be able to use this information to inform their choices of programs and colleges, as well as in deciding how best to finance their education. For certain high-debt programs, a direct acknowledgement that prospective students are aware of their potential program’s returns will ensure students have understood the potential risks of unfavorable outcomes. Direct engagement with students is critical for ensuring that students use these data to inform their decision-making and ameliorate information gaps in the market.

We encourage the Department to begin this student-facing work in the near term, even as it continues to implement the underlying data reporting and infrastructure. Providing these key data elements to students will equip them to make more informed choices about where to spend their time and money in higher education and ultimately lead to improved efficiency and taxpayer savings over the longer term.

## **Final Considerations**

As the Department embarks on a rulemaking process and simultaneously continues to implement the FVT regulations, the Postsecondary Education & Economics Research (PEER) Center remains available and committed to providing useful and actionable research and policy design insights to help inform an efficient, accountable higher education system that supports strong outcomes for students. If you have questions about these comments or wish to discuss them further, please contact Clare McCann at [cmccann@american.edu](mailto:cmccann@american.edu).

Sincerely,

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