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While I perhaps should have slept on my prior comment about ED's motives, I feel the need to expand on them primarily for the public record/OMB. I do not believe ED cares, though it should.

Let's dissect ED's boilerplate response to the many, many requests for extension:

1) ED added transitional reporting. While true, this occurred during the rulemaking stage, not in this later round of public comment. It is misleading in this context where it suggests additional grace has been given in light of the FAFSA debacle overburdening schools.

While I do appreciate the transitional option, the other issue here is the choice between transitional and standard may be high stakes, and transitional itself was initially described in a manner that was confusing. So yes, transitional if selected does reduce the hours required to report somewhat though I think not as much as ED projects here for most institutions. Also with the tradeoff that it requires additional research time for an institution to make that decision at all. ED is both overstating and misrepresenting this concession, particularly given that it did not allow schools to mix methods by program.

2) The Oct 1 deadline coincides with the FISAP deadline, as well as the Pell closeout deadline in line with the end of the federal FY. This has not exactly been moved to a quiescent time in the schedule, and those deadlines have not been pushed back. And for many of us on quarter systems, it also coincides with the start of our fall quarter. The suggestion that Oct 1 is some great gift is vastly overstated.

3) ED says "While we are mindful that some commenters have expressed a preference for additional time, we believe the current timeline provides the time needed for institutions to compile the necessary data for reporting, while also carrying out their other responsibilities."

I am quite confident there are well resourced institutions who will successfully meet this timeline, no question. But ED's assertion of belief here that "institutions" broadly have reasonable time/capacity to get up to speed and do this is based on ...what? A statement of this sort should be grounded in at least some data, and ED offers none but "belief."

It's clear they have not been talking to a wide range of institutions, or if so, they have not been listening to the real human costs that will be felt. Polling? No. Research? No. Just assertion. Institutions, broadly, are not fine. Everyone I know will attempt to comply, at high personal cost.

While I have only advocated for a pushback to winter 2025, vs. many of my peers request to push back a full year, or to 2026, ED is being woefully irresponsible here and to the extent OMB has authority, they should reign them in or refer the matter to the OIG or other authority.

4) "In addition, we think the current timeline balances the importance of making meaningful data available to prospective students, current students, and the public to help inform decision-making and evaluate the financial value of programs."

This is an odd argument. ED is intending to publish the data from this collection in July, 2026, a full 19 months after this "urgent deadline" set on schools in order to make "make meaningful data available."

ED gets time; schools don't. It's weak. The disconnect feeds the perception the timeline is driven only by a concern about the fall presidential election, and that the defense of fall reporting is purely and disingenuously political.