



UNIVERSITY
of HAWAII®
SYSTEM

‘Ōnaehana Kulanui o Hawai‘i

June 14, 2024

Office of Information and Regulatory Affairs
Office of Management and Budget
U.S. General Services Administration

Re: Comment Request: Financial Value Transparency and Gainful Employment
Reporting

To Whom It May Concern:

The University of Hawai‘i System (UH System), comprising three universities and seven community colleges across the State of Hawai‘i, is providing comments regarding the upcoming Financial Value Transparency and Gainful Employment (FVTGE) requirements. These requirements, scheduled to take effect on July 1, 2024, with the first reporting requirements due by October 1, 2024, pose significant challenges for our minority-serving institutions that offer a variety of Title IV-eligible programs.

Like many other higher education institutions across the country, UH is very concerned about the lack of a clear implementation plan regarding the new FVTGE requirements. The UH System fully endorses the [NASFAA Letter to Congress Urging Delay of GE/FVT Institutional Reporting Requirements](#), as it echoes our concerns and provides a comprehensive overview of the issues at hand. The current absence of sample data files as of mid-June is causing significant uncertainty for campuses in planning their approach to meeting the compliance requirements. The lack of clarification about the terminology for the extensive data being requested further adds to this uncertainty. Providing sample files would not only enable campuses to understand what is required but also empower them to start planning how to gather that data, thereby alleviating this uncertainty.

Moreover, the simultaneous implementation of a significant number of regulations, including the anticipated release of the 2025-2026 FAFSA on October 1, 2024, is a cause for concern. We believe it is critical to provide our financial aid offices and their campuses with adequate time to properly plan for meeting these various compliance requirements, which are significantly more extensive than those out of the previous iterations of the Gainful Employment rule.

With all due respect, we also question whether the USDOE has the proper capacity to fully implement the new FVTGE requirements, including providing technical assistance and support to campuses once the actual data files are made available.

Our financial aid offices have been challenged greatly by the multiple missteps in the FAFSA rollout and continue to suffer unexpected burdens on their workload associated with the persisting unresolved issues associated with FAFSA as we approach the start of the 2024-2025 academic year. They are diligently striving to do their best to serve students in desperate need

of help under these circumstances. We believe it would be a travesty to subject them to additional chaos if the FVTGE rollout were to occur in a manner anything like what happened with FAFSA. Given the onerous consequences of falling afoul of the rules, our financial aid staff would need to divert effort from helping students to complying with new departmental requirements.

Our UH System office was not set up to operationally support campuses with addressing this new requirement, so we will need to rely heavily on the USDOE to respond promptly and accurately to the many unanswered questions associated with FVTGE implementation details. Therefore, we respectfully request a delay in the implementation of this rule.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Debora Halbert, PhD
Vice President for Academic Strategy