



UCGPC

**UC Graduate and Professional Council**  
981 Mission Street, #31, San Francisco, CA 94103  
[www.ucgpc.org](http://www.ucgpc.org)

Via Federal eRulemaking ([www.regulations.gov](http://www.regulations.gov))

The Honorable Nasser Paydar, Ph.D.  
Assistant Secretary for Postsecondary Education  
U.S. Department of Education Office of Postsecondary Education  
LBJ Building, 400 Maryland Ave. SW Washington, DC 20202

*Re: Docket No.: ED-2024-SCC-0030-0001, Agency Information Collection Activities; Comment Request; Gainful Employment/Financial Value Transparency Reporting Requirements.*  
*ICR REFERENCE NUMBER: 202402-1845-004*

Dear Assistant Secretary Dr. Paydar,

We, the undersigned, representing over 63,000 graduate and professional students across the ten diverse campuses of the University of California system, are writing to provide feedback on the proposed Gainful Employment Rule and financial transparency reporting requirements.

We applaud the Department of Education (ED) for its ongoing commitment to student success. Initiatives like Income-Driven Repayment Plans, Public Service Loan Forgiveness, and now the Gainful Employment Rule and Financial Value Transparency reporting all play a crucial role in empowering students to make informed decisions about their educational investments and future careers. These choices impact not only individuals and families but also the communities we serve.

We strongly believe that the Department of Education's collection of program-level data is essential for several reasons. Firstly, this data provides valuable insights into the effectiveness of career preparation programs. By analyzing program-level data, we can ensure that federal financial aid is used efficiently to support programs that demonstrably prepare graduates for successful careers. Additionally, transparency regarding program outcomes is critical for students to make informed choices about their educational pursuits. This data empowers students to make informed decisions about their educational and career paths, helping them choose programs that align with their goals and aspirations.



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**To ensure the effectiveness of this initiative, the Department should consider the following:**

- To address the reporting burdens and ensure timeliness, it is important to find a balance that does not overly burden institutions. One suggestion is to make use of existing data sources held by institutions and government agencies to minimize the need for duplicate reporting. Additionally, allowing institutions to upload data in bulk can significantly reduce administrative burdens, making the reporting process more efficient and less time-consuming.
- The Department should consider offering flexibility for smaller programs by tailoring reporting requirements to account for different institutions' varying capacities. This approach can help minimize the undue burden on smaller programs with limited resources.
- Providing clear and concise guidelines on reportable items will minimize confusion and ensure data consistency across institutions.
- A two-year post-graduation window might not capture the full career trajectory for all fields. Consideration of additional metrics that reflect long-term earning potential is crucial, especially for professions with longer earning ramps (e.g., law, medicine).
- While quantitative data like earnings are important, we need a more qualitative understanding of job obtainment and student satisfaction.

We strongly support the objective of protecting students and ensuring accountability outlined in the Gainful Employment Rule. However, we are concerned about the potential implications for access to financial aid for programs leading to careers with high social value but lower starting salaries, such as teaching and public interest law. Again, degrees in fields like education, social work, and the humanities often lead to careers vital to our communities but may have lower starting salaries. Excluding these programs from federal aid could limit opportunities for students passionate about public service. We also fear this rule may impose undue administrative burdens on understaffed financial aid offices. We urge the Department to consider a balanced approach that considers the social impact of certain professions alongside earnings data.

While we understand the goal of protecting students from predatory programs, this rule may unfairly impact programs that provide important social and cultural benefits that are more



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difficult to quantify economically. Rather than relying solely on debt-to-income metrics, we ask that you consider developing a more holistic approach that accounts for the diverse contributions of different academic disciplines. Protecting students should not come at the cost of restricting access to programs that play a key role in our society.

Thank you for taking the time to review these concerns as you finalize this important policy. We encourage further discussion on this issue. If you have any questions about these comments, please reach out to Ernesto Arciniega, legislative director, at [legislative@ucgpc.org](mailto:legislative@ucgpc.org), or call us at (415) 910-3029.

Sincerely,

Patricia Ordoñez-Kim, UCGPC Executive Director

*In consultation with*

- Dr. Tori Porter, Ph.D., UCGPC Council Chair, AY 2023-2024
- Sonya Brooks, UCGPC Board Director and UCLA Graduate Student Association Vice President of External Affairs AY 2023-2024
- Neven Holland, UCLA Graduate Student Association Director of Legislative Affairs AY 2023-2024