



January 7, 2019

Docket ID ED-2018-ICCD-0120-0001

Director, Information Collection Clearance Division
U.S. Department of Education
550 12th St. SW
PCP, Room 9086
Washington, DC 20202-0023

To Whom It May Concern:

The National Association of Student Financial Aid Administrators (NASFAA) submits these comments in response to the Information Collection Request addressing the proposed revision of the Gainful Employment (GE) Institutional Disclosure Template. NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at approximately 3,000 colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.

Our comments will focus on two parts:

1. That knowing whether the Department of Education (ED) has updated the disclosures in an effective way– in accordance with the intent outlined in federal regulations– is impossible without also seeing the results of the consumer testing that precipitated the proposed changes.
2. That ED reconsider the decision to abandon the HTML output document and, instead, format the output document to comply with the strictest state accessibility standard while making use of the template optional.

The single most important consideration in the development of any consumer disclosure is its relevance and utility to the intended audience; in this instance, prospective postsecondary students. The purpose of the gainful employment disclosure is, per Code of Federal Regulations, Title 34- Education, § 668.412 “to enable students to make an informed choice about a gainful employment program by making the disclosures clear, timely, meaningful, and comparable,” but it is not apparent whether those goals are achieved with the proposed 2019 template.

In November, presenters at the Federal Student Aid Training Conference¹, noted that consumer testing on the GE disclosure template had taken place, but no further information

¹ http://www.webcastregister.live/2018fsatc_records/viewv2/1837/

was provided– at the conference or in the request for public comment– as to whether and how that consumer testing informed the 2019 template redesign. Rather, emphasis was placed on the new template’s simplicity for institutions (in completing the template) and for students (in taking in the information) as the anticipated benefits of the revisions. We welcome any and all efforts towards simplification, for both schools and students. However, simplification is not necessarily improvement, especially if critical data that could better inform students’ choices are omitted in the process. Unfortunately, without the details of the consumer testing that was conducted, we find ourselves in the dark. The Department of Education should share the scope of the consumer testing it conducted and how the revised template improved its utility, with the disclosure’s intended purpose and audience in mind. In the future, NASFAA would be happy to partner with ED in testing future iterations of these disclosures.

We are skeptical that certain changes proposed in the revised disclosure would have fared well in consumer testing. For instance, the debt-to-earnings rate failure warning language references two data points– median debt and median earnings of program graduates– that no longer appear on the disclosure. Can prospective students understand the warning without the underlying data that necessitated the warning? Acknowledging the addition of the College Scorecard link to the disclosure, and the fact that much of the data that was removed from the disclosure does appear on the Scorecard, the decision to direct prospective students away from the gainful employment disclosure to another website for debt and earnings information is certainly a less simple solution than including the information directly on the gainful employment disclosure. Further, the link to the Scorecard is provided without context or explanatory language, which raises the question of whether students would follow the link at all. Did consumer testing reveal that prospective students preferred the pared-down GE disclosure with the option to access debt and earnings data via the Scorecard link?

ED’s decision to no longer generate an HTML output document of the gainful employment disclosure is disappointing. While some institutions may prefer the flexibility to create their own GE disclosures, others lack the information technology resources to create their own disclosures for their websites. Understanding the fact that some states have stricter accessibility standards than those of the federal government, updating the HTML output document to be compliant with the strictest state accessibility standard is surely within ED’s ability. We recommend updating the template as an option for schools that prefer it, but not requiring its usage, so that institutions with the desire and resources to create their own disclosures can do so.

The efficacy of the associated disclosures have been questioned since the inception of the GE regulations, and we appreciate ED’s efforts to balance streamlining the disclosure with providing meaningful information to students. But, as we in the financial aid community have learned, disclosures must be relevant to the intended audience, and that can only be

assured by incorporating consumer testing results into disclosures. The process of updating these disclosures would be helped by making public any and all consumer testing. We look forward to working with ED on these efforts in the future.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Draeger". The signature is fluid and cursive, with a long horizontal stroke at the end.

Justin Draeger, President & CEO