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Department of Education to Distribute Earnings Data for GE Programs

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Institutions with gainful employment (GE) programs will receive the first set of earnings data for those programs' graduates in the coming days according to a new announcement from the Department of Education. This is a prelude to the first set of draft GE rates, which ED intends to distribute later in October.

The earnings data is based on earnings information derived from the Social Security Administration (SSA) for the 2014 calendar year. The data report will include a list of your institution's GE programs with the aggregated mean and median earnings for the graduates of each program. Institutions will not receive individualized earnings data for graduates.

While institutions cannot respond to ED regarding this data, the information will provide them with an advance look at SSA's earnings data to better predict their actual draft GE rates. We strongly encourage institutions to examine the earnings data to assess its accuracy (based on the very limited information institutions might have), and to compare the data with institutional in-house information on student debt to develop a more accurate expectation of the draft rates for GE programs. Institutions will have limited appeal rights after the draft rates are issued and should use this opportunity to prepare for such appeals.

ED also intends to publicly post the 2014 calendar year earnings data for all GE programs with ten or more graduates on the FSA Data Center in the near future. Thus, institutions can expect a wave of media reports on this earnings information.

ED did not provide any further information on the timing of the first set of final and enforceable GE rates, but ED made clear in earlier announcements that it is aiming for January 2017. That date would allow ED very little time to receive and resolve all appeals of draft GE rates, and observers will be closely watching to see if ED can meet that deadline.

Note also that the Department is currently seeking comments on its disclosure template for GE programs, which is also expected to go into use in January 2017. The underlying documents, including the draft template, are available at https://www.regulations.gov/docket?D=ED-2016-ICCD-0100. Comments will be accepted through November 14, 2016, and we would be pleased to assist you in such comments.

Please let us know if you need more information on these issues as ED prepares to issue the first set of draft and final GE rates.

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