

## About this checklist

This checklist is a pocket tool for presidents and institution leaders. It accompanies the federal regulations overview matrix and other materials developed by NAICU related to the fall 2023 Department of Education regulations.

This list is not exhaustive. Rather, it provides a framework and starting point as you work with your team to comply with the new regulations, which take effect on July 1, 2024.

These regulations are broad in scope and will impact staff across your campus. As a first step, it is worth ensuring that your staff have access to resources, information, and training so that they can best help you comply with these changes.

More background and information can be found on the NAICU and Department of Education websites.

The NAICU website will be regularly updated with new information and materials as they become available. When relevant webinars and materials are released, NAICU staff will also send notifications to campus leaders.

Please do not hesitate to reach out with questions as they arise.



**Questions? Contact us!**

1025 Connecticut Ave. N.W, Suite 700  
Washington, D.C. 20036

For more information, please contact:  
governmentrelations@naicu.edu

www.naicu.edu



## Federal Higher Education Regulations

### Checklist 2024

Key action items for college and university leaders to implement new regulations from the Department of Education on financial value transparency, gainful employment, and accountability.



## Financial Value Transparency (FVT) & Gainful Employment (GE)

- Assign a person or team on campus to lead the data collection efforts for FVT & GE. This team will likely include institutional research, financial aid, IT, and the registrar's office.
- Provide campus reporting staff (institutional research and financial aid) with materials, information on training, and other resources, including time/space to learn the requirements.
- Ensure that relevant campus staff are registered for training and part of email distribution lists for updates on the rules.
- Determine a reporting plan for FVT and GE that aligns with your institution's IPEDS, NSLDS, and state reporting cadence.
- Work with your team if they believe any of your programs will not pass either the earnings premium or debt/earnings ratio metrics. Understand potential repercussions and how your institution might address the challenges.
- Develop a response plan for when ED provides EP and D/E rates on each program.

## Transcript Withholding

- Review and update internal transcript withholding practices if your institution withholds transcripts for students with an outstanding balance.

## Financial Aid Counseling

- Conduct an internal audit of financial aid communications to evaluate if your institution is already in compliance with the updated requirements.
- If needed, have financial aid staff update student communication materials to include all relevant information required for Title IV certification.

## Licensure Program State Compliance

- For licensure programs offered via distance education, task program leaders with evaluating licensure rules in states other than your own. Consider hiring outside assistance if this task cannot be completed internally.
- If your distance education program is out of compliance with licensure rules in states where your program is offered, take steps to bring the program into compliance or to limit where the program is offered.
- For all programs leading to licensure, update program websites and student communications to ensure accurate information about whether such programs meet or do not meet licensure rules in other states is available to students incoming July 1, 2024 or later.
- Evaluate the length of non-degree programs that lead to state licensure in a given occupation/skill. If a program exceeds your state minimum, adjust program length beginning July 1, 2024.

## Financial Responsibility Metrics

- Work with your CFO, leadership team, and financial management staff to review the updated list of mandatory and discretionary triggers. Evaluate your institution's position prior to Title IV recertification so that you are aware of potential red flags that may arise.
- If you determine that your institution could be flagged for additional data, review the potential data requests that could arise and ensure that you have access to the required information or a plan on how to respond.

## Career Services & Experiential Education Requirements

- Work with HR and career services staff to compile career services staffing, student utilization, and business partnership data.
- Evaluate promised career services assistance to students. If information provided to students is not accurate in practice, update student communications about services.
- Audit your institution's system for placing students in externships and clinical experiences for occupations that require those experiences. Even distance education students must be provided with geographically reasonable placements.
- If your institution does not comply with the new requirement for externship and clinical placement opportunities for all (face-to-face and distance) students, update your institution's practices and/or enrollment plans starting with the students entering July 1, 2024.