



May 20, 2026

Mr. Joe Massman
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Ave. SW,
Washington, DC 20202

RE: Docket ID ED-2026-OPE-0100

Dear Mr. Massman:

The National College Attainment Network (NCAN) is a nonpartisan, nonprofit membership organization representing over 500 organizations that provide postsecondary access and success support to students across the country. Many NCAN members work directly with students and families, helping them access federal student aid, persist and attain a degree or credential, and enter into high-paying, in-demand jobs after graduation. NCAN members can be found in every state in the country.

NCAN appreciates the opportunity to provide feedback on the Department of Education (the Department)'s Notice of Proposed Rulemaking (NPRM) for Accountability in Higher Education and Access through Demand-Driven Workforce Pell: Student Tuition and Transparency System (STATS) and Earnings Accountability. We commend the Department's efforts to strengthen accountability and transparency in higher education through these proposed regulations.

We also strongly support the Department's proposal to replace debt-to-earnings (D/E) metrics with median high school wage comparisons as the primary accountability measure. With the expansion of accountability measures to all programs, we are pleased to see the Department moving away from debt-to-earnings ratios in favor of a framework that evaluates real earnings outcomes for programs at the associate, bachelor's, and graduate levels. This approach provides a clearer and more equitable measure of program value for students and taxpayers.

In addition, we encourage the Department to harmonize the treatment of currently enrolled students across both Workforce Pell and Accountability provisions, particularly with respect to data collection and calculation methodologies. Applying consistent standards across these

related frameworks would reduce administrative complexity and improve clarity for institutions and students alike.

Finally, regarding the proposed program information website, we note that much of the required programmatic information already exists through the College Scorecard platform. Rather than creating an entirely new website, we encourage the Department to expand and enhance the existing College Scorecard infrastructure to incorporate the additional disclosure requirements outlined in the NPRM. Leveraging an established platform would minimize duplication and reduce implementation burden. This would provide students with a more centralized and user-friendly source of information without unnecessary disruption and/or unintended confusion.

If you have any questions regarding these comments, please contact us or NCAN's Senior Director for Policy & Advocacy, Catherine Brown, brownc@ncan.org.