



March 26, 2024

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Secretary Cardona,

I am writing to request information about the implementation of the rules on institutional and programmatic accountability finalized by the Department of Education (the Department) last fall. Specifically, we have concerns about the metrics that the Department will use to determine what constitutes a "failing program" under the new Gainful Employment regulations. According to the Department's press release, programs would have to show that:

- Graduates can afford their yearly debt payments. In particular, the share of their annual earnings needed to devote to paying their debt (i.e., their "debt-to-earnings ratio") must be equal to or less than 8 percent, or equal to or less than 20 percent of their discretionary earnings (i.e., their annual earnings above 150 percent of the Federal poverty guideline).
- At least half of graduates have higher earnings than a typical high school graduate in their state's labor force who never pursued a postsecondary education.

We would like additional information on exactly how the Department plans to gather and analyze this data. Who will be collecting this information and from what sources? Our member institutions believe that they provide an excellent educational foundation for our graduates, preparing them for a career in veterinary medicine. As such, we do not wish to see programs characterized unfairly.

AAVMC member institutions promote and protect the health and wellbeing of people, animals and the environment by advancing the profession of veterinary medicine and preparing new generations of veterinarians to meet the evolving needs of a changing world. Founded in 1966, the AAVMC represents more than 40,000 faculty, staff and students across the global academic veterinary medical community. Our member institutions include Council on Education (COE) accredited veterinary medical colleges and schools in the United States,

Canada, Mexico, the United Kingdom, Europe, Asia, Australia, and New Zealand as well as departments of veterinary science and departments of comparative medicine in the U.S.

Thank you for your attention to this letter. We look forward to working with the Department on these critical issues going forward. If you have any questions, please contact Kevin Cain, Director for Governmental Affairs, at kcain@aavmc.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew T. Maccabe", with a long horizontal flourish extending to the right.

Andrew T. Maccabe, DVM, MPH, JD
Chief Executive Officer