

To: Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee

From: Eric Atchison and Magnus Noble, representing students who are currently enrolled and receiving assistance from the Title IV, HEA programs;

Tamar Hoffman and Zoe Kemmerling, representing legal assistance organizations that represent students and borrowers, consumer advocates, and civil rights groups that represent students;

Kristin Hultquist and Tonjua Williams, representing public institutions of higher education including institutions eligible to receive federal assistance under Title III and Title V of the HEA, Tribal Colleges and Universities and Historically Black Colleges and Universities

Matthew Feehan and Julie Howell, representing students who are veterans, U.S. military service members or groups representing them

Re: Revised Proposal to enhance transparency

Date: January 7, 2026

Recommendation:

This proposal has been updated to reflect the conversation today with the Department to further describe the categories for food and housing. The updated text is in blue below.

We request the Department make the proposed changes below to § 668.43 to maintain and enhance program and institutional transparency for current and prospective students.

Amended Language:

§ 668.43 Institutional and programmatic information.

(d)(1) Program information website. ~~Beginning on July 1, 2026,~~ The Secretary will establish and maintain an **interoperable and open** website with information about institutions and their educational programs. For this purpose, an institution must provide to the Department such information about the institution and its programs as the Secretary prescribes through a notice published in the Federal Register. The Secretary may conduct consumer testing to inform the design of the website.

...

(D) As calculated by the Secretary, the medians of the total cost of tuition and fees, **and** the total cost of books, supplies, and equipment; **the total cost of transportation; food and housing, disaggregated by on-campus, off-campus with family, and off-campus not with family, where appropriate; child care, if applicable; and miscellaneous expenses;** and the total net cost of attendance paid by students completing the program.

[New] (E) As reported to the Secretary, the availability of emergency grant aid.

...

[Restore the following language] (2) Program webpages. The institution must provide a prominent link to, and any other needed information to access, the website maintained by the Secretary on any web page containing academic, cost, financial aid, or admissions information about the program or institution. The Secretary may require the institution to modify a webpage if the information is not sufficiently prominent, readily accessible, clear, conspicuous, or direct.

Rationale:

(d)(1) This change is intended to explicitly note that this information should not be behind a login portal or other institutional mechanism that would limit access.

(D) This change is aimed at ensuring that prospective and enrolled students understand the total cost of attendance of the program, including the individual cost of each component, so they can assess how it aligns with their expected anticipated expenses and budget. The current language includes only the medians of the total cost of tuition and fees, books, supplies and equipment, but the net cost of attendance (COA). Since COAs often understate the cost of housing and food, students need to see the costs of rent and food that are assumed in the calculation so they can make their own judgment about whether the COA will cover their costs.

(E) This addition is aimed at helping students understand whether emergency aid is available at the institution. This addition will help students understand whether students routinely need more financial aid than they receive through the institution's annual financial aid award process and whether the school is able to meet that need on an emergency basis. Emergency financial assistance can be operationally defined as *'financial assistance provided to students for unanticipated, non-routine expenses that threaten their ability to continue their education.'*

(2) Most students rely on trusted sources – advisors, family, friends, and colleges and universities - to learn about postsecondary programs. Many will not take the step of accessing a federal website if they are sent information about the website in an email. Instead, institutions of higher education, which already must collect and report all this information, should be required to continue to prominently link to the federal website on their websites as a modest step to help ensure more students are fully informed about the cost of the program they are considering.