



Office of the President

May 20, 2026

Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Docket: ED-2026-OPE-0100

Dear Under Secretary Kent:

We write in response to the U.S. Department of Education's ("the Department") proposed rule on AHEAD: Student Tuition and Transparency System (STATS) and Earnings Accountability. Our comments focus on timing and the implementation process with the Department. Southern New Hampshire University (SNHU) is a private, nonprofit, accredited institution with a 93-year history of educating traditional-aged students and working adults. SNHU has a unique structure, serving over 200,000 learners online and 3,700 learners on our campus in Manchester, New Hampshire. SNHU also offers competency-based education (CBE) pathways with 11 community partners nationally using a subscription model.

SNHU learners are largely working adults. Sixty-eight percent of our learners are over the age of 25 and 58% of our learners come to SNHU with some prior learning. Many of our learners are seeking further education to make a career change or advance in their career. As such, accurate program level earnings are critical to support their decision-making.

SNHU is supportive of efforts to increase information and transparency for learners, to provide institutions with outcome data for program improvement, and to create accountability regarding low-performing programs and use of federal financial aid. Institutions have experienced numerous efforts to create such an accountability structure over different Congresses and Administrations. We appreciate the effort under the STATS framework for a more streamlined approach to such a process, calculations, reporting and overall structure. We urge the Department to largely maintain the structure outlined in the NPRM.

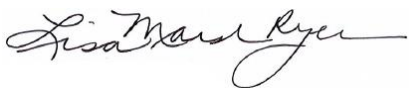
However, we also urge the Department to adjust the initial implementation timeline for STATS to ensure the accuracy of data and efficient and effective processes at both institutions of higher education and the Department. As noted, the STATS framework is not the first federal attempt at implementing accountability based on earnings. In our experience with previous accountability frameworks, there were challenges regarding data quality and accuracy, as well as capacity and technical assistance at the Department. For example, SNHU received inaccurate data that included missing students from cohorts. Additionally, the data submission process did not function properly; and the Department did not have the appropriate structures or capacity for adequate technical assistance.

Specifically, we urge the Department, for the initial cycle of STATS, to add a year between the first year of calculations and the second year of calculations, as well as the required actions. In that time, institutions could review their data for accuracy and ensure they have updated systems to receive, report, and take appropriate action on the data, if necessary. Additionally, the Department could ensure it has created resources and processes to provide institutions with needed guidance, technical assistance and infrastructure to support data accuracy and data submission processes for this new accountability framework. Ensuring that the data is accurate and processes are intact will support the long-term success of STATS and, importantly, ensure students have access to information to make informed decisions when selecting institutions and programs. Ensuring accurate completer lists will also reduce the number of appeals the Department will be required to process.

We are aware of the timelines set out by Congress in the authorizing legislation but believe adding a year to initial implementation would meet legislative timeframes to begin implementation for July 1, 2026. Additionally, this adjustment on implementation reflects similar changes and reasoning regarding value-added earning implementation on the recently released Workforce Pell regulation.

Thank you for your consideration of our comments on these matters.

Sincerely,

A handwritten signature in black ink that reads "Lisa Marsh Ryerson". The signature is fluid and cursive, with the first name "Lisa" being the most prominent.

Lisa Marsh Ryerson
President