



April 5, 2018

Secretary Betsy DeVos
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Re: Agency/Docket Number: Docket No. ED-2018-ICCD-0028, Document Number: 2018-06028

Dear Secretary DeVos:

Americans for Financial Reform (“AFR”) is a coalition of more than 200 national, state, and local groups who have come together to advocate for reform of the financial industry. Members of AFR include consumer, civil rights, investor, retiree, community, labor, faith based, and business groups.¹ We are writing to voice our concerns with the burdens placed on higher education institutions seeking access to the \$100 million in emergency relief funds already allocated by the Bipartisan Budget Act of 2018. We specifically oppose the requirement of a pre-application and a full application to access these funds, which are both arbitrary requirements that are not required by the law establishing disaster relief funds.

The Department itself has estimated that the applications will each require at least 40 hours to complete.² Such applications are a burden that will lead to the filtering out those applicants with the greatest need. It is well known that parts of many hurricane-impacted regions remain without access to high-speed internet, electricity, and basic needs making the applications difficult to access and complete in still-distressed areas. Imposing new barriers to access available funds would be particularly challenging for those who have not previously accessed grants before.

While other hurricane guidance is available in Spanish, the proposed applications and the instructions to complete them are not. The failure to provide critical information in Spanish may actively preclude potential applicants in Puerto Rico from accessing needed funds. AFR is a coalition that has convened a Language Access Task Force to advocate for improved language access for borrowers with limited English proficiency. It is imperative that institutes of higher education have access to relief applications in their primary language.

We urge the Department of Education to waive these burdensome application requirements, and to get emergency funds out quickly.

Sincerely,

Americans for Financial Reform

¹ A complete list of Americans for Financial Reform’s coalition members is available at <http://ourfinancialsecurity.org/about/our-coalition/>.

² <https://www.regulations.gov/document?D=ED-2018-ICCD-0028-0002>.