WASHINGTON UPDATE

DECEMBER 2019

Senate Clears *Future Act* After House Passes Bipartisan Agreement on *Future Act*

On December 10, 2019, the U.S. Senate passed H.R. 5363, the *Fostering Undergraduate Talent by Unlocking Resources for Education Act (Future Act)*, by unanimous consent, clearing the *Future Act* for the White House and the President's expected signature. Earlier on December 10, 2019, the U.S. House of Representatives passed H.R. 5363, by a vote of 319-96. The House-passed bill is similar to the bill passed by the Senate in the previous week, although it includes more prescriptive language added by the House Ways and Means Committee on when the Internal Revenue Service (IRS) can share taxpayer information for non-tax purposes, which Senate Health, Education, Labor and Pensions (HELP) Committee Chair Lamar Alexander (R-TN) and Ranking Member Senator Patty Murray (D-WA) helped to negotiate.

On December 5, 2019, the Senate passed an amendment to the *FUTURE Act*, which would permanently extend federal funding for Historically Black Colleges and Universities (HBCUs) and Minority Serving Institutions (MSIs) and allow the IRS to share taxpayer information with the Department of Education in order to simplify the Free Application for Federal Student Aid (FAFSA) and streamline income-driven repayment plans for students and their families. The amended bill was the result of a bipartisan agreement between the Senate HELP Committee Chairman Alexander and Ranking Member Murray, along with Senators Tim Scott (R-SC), Doug Jones (D-AL), Richard Burr (R-NC), and Chris Coons (D-DE). The agreement would offset the costs of the permanent HBCU-MSI funding with the passage of the *FAFSA Act.* [See below for information on the *FAFSA Act.]* The *FUTURE Act* passed by unanimous consent and is now on its way to the House of Representatives for consideration.

The bill was an amendment to the House-passed *FUTURE Act* on September 17, 2019, which would extend the annual funding for MSIs for just two years. The Senate version would provide a permanent funding stream to support STEM education at MSIs. Senate leaders determined that they could pay for permanent MSI funding with $2.8 billion in annual savings from improved accuracy in the federal student aid programs as a result of the direct data sharing between IRS and the Department of Education, that would lead to reduced improper payment plans and reduced risk of fraud in income-driven repayment (IDR) from self-certified income.

The *FUTURE Act* would:

- Permanently reauthorize and provide $255 million in annual mandatory funding for Historically Black Colleges and Universities and other Minority Serving Institutions;
- Be fully paid for by including the *FAFSA Act*, which passed the Senate unanimously last year, and which;

- Allows providing tax information only once—Students do not have to give their tax information to the federal government twice;
- Eliminates up to 22 questions—Students give permission to the Department of Education to request tax return data already given to the Internal Revenue Service, which reduces the 108 questions on the FAFSA by up to 22 questions;
- Eliminates the verification nightmare—For most students, the bill eliminates so-called "verification," which is a bureaucratic nightmare that 5.5 million students must go through annually to make sure the information they gave to the U.S. Department of Education is exactly the same as they gave to the IRS;
- Eliminates $6 billion in mistakes—According to the U.S. Department of Education, helps taxpayers by eliminating up to $6 billion each year in mistakes (both overpayments and underpayments) in Pell grants and student loans;
- Enables 7 million applicants who are currently unable to access their IRS data for their FAFSA to verify that they do not file taxes without requesting separate documentation from the IRS; and
- Streamlines income-driven repayment by eliminating burdensome annual paperwork for 7.7 million federal student loan borrowers on income-driven plans; and

Chairman Alexander said about the bill: "First, it provides permanent funding for HBCUs and other Minority-Serving Institutions attended by over 2 million minority students. Second, it takes a big first step in simplifying the FAFSA for 20 million families, including 8 million minority students, and eliminating the bureaucratic nightmare created by requiring students to give the federal government the same information twice."

A copy of Senator Alexander's press release is found at: https://www.alexander.senate.gov/public/index.cfm/pressreleases?ID=8D71256C-C3D3-4EA4-A3D6-E017FD7AE21F.

A copy of Senator Alexander's press release on the FAFSA changes is found at: https://www.alexander.senate.gov/public/index.cfm/pressreleases?ID=B7971BF7-252A-424A-971F-30C2620F75BA.

Chairman of the House Education and Labor Committee Bobby Scott (D-VA) said on the House Floor and in a press release:

> "Unfortunately, despite their outsized role in serving our nation's most underserved students, these schools have historically been under-resourced compared to other institutions of higher education.
>
> "Now, after careful negotiation and compromise, the bill we are voting on today does not just guarantee more than $250 million per year for HBCUs and MSIs, it simplifies the

> Free Application for Student Aid, or FAFSA, and makes it easier for students to access student aid and repay their loans. I would like to give special thanks to Chairman Neal for his dedication and hard work in negotiating to bring this legislation to the floor."

A copy of Congressman Scott's press release is found at: https://bobbyscott.house.gov/media-center/press-releases/scott-praises-passage-of-future-act.

In a December 11, 2019 press release, Senate HELP Chairman Alexander said:

> "First, this legislation provides permanent funding, fully paid for, for Historically Black Colleges and Universities and other Minority Serving Institutions attended by over 2 million minority students. Second, after five years of bipartisan effort, this simplification of the FAFSA removes a huge roadblock for the millions of Americans who apply for federal grants and loans to attend college."

A copy of Senator Alexander's press release is found at:
https://www.alexander.senate.gov/public/index.cfm/pressreleases?ID=BA15A331-D8D3-4A58-84F4-0E9F7D2FE6C0.

House Education and Labor Committee Announces Hearing on Implementation of Borrower Defense to Repayment with Secretary Betsy DeVos

On December 5, 2019, the House Education and Labor Committee announced that it had rescheduled a postponed hearing on borrower defense to repayment at which Secretary of Education Betsy DeVos was invited to testify. The hearing is titled "Examining the Education Department's Implementation of Borrower Defense." The hearing will take place on December 12, 2019.

Senators Introduce Bipartisan Bill to Close 90/10 Loophole; Senator Alexander Supports Bill

On November 14, 2019, Senator Tom Carper (D-DE) led a group of bipartisan Senators, who include James Lankford (R-OK), Bill Cassidy (D-LA), and Jon Tester (D-MT), Ranking Member of the Senate Committee on Veterans' Affairs, in introducing S. 867, the *Protect Veterans' Education and Taxpayer Spending (Protect VETS) Act of 2019.* The bill would:

- Close the 90/10 loophole by counting VA and DoD educational funds on the 90 percent side of the 90/10 formula rather than the 10 percent side;
- Require proprietary schools to provide updated 90/10 data in their audited financial statements that will be included in the Secretary's annual report to Congress;
- Move to a system of tiered penalties for schools that violate the 90/10 rule. Beginning with the 2022-2023 school year, the penalties for violating the 90/10 rule escalate over a three-year time period: Year 1 - no VA and DoD assistance for new student enrollments (to protect the GI Bill); Year 2 – no VA and DoD assistance for new student enrollments

and a total enrollment cap; and Year 3 – loss of access to federal funding for at least two years with the possibility of regaining eligibility after two years;

- Provide an appeal process that grants high-quality proprietary institutions relief from penalties. The limited appeal process gives schools additional time to comply with the 90/10 rule if they are serving military and veterans students and taxpayers well;
- Add a caution flag to the GI Bill Comparison Tool when an institution violates 90/10; and
- Apply the new 90/10 rule for a limited time to for-profit schools after they convert to non-profit status.

House Democrats have expressed their support for the changes to the 90/10 rule. While marking up their bill, the *College Affordability Act* (H.R. 4674) to reauthorize the *Higher Education Act* last month, the House Education and Labor Committee accepted an amendment offered by Congresswoman Donna Shalala (D-FL) to include military benefits in the 90 percent rather than the 10 percent side and to change the ratio to 85/15.

On November 19, 2019, Senator Lamar Alexander (R-TN), Chairman of the Senate Health, Education, Labor and Pensions (HELP) Committee, who is leading the reauthorization effort in the Senate, said that he is planning to include the elements of the *Protect VETS Act*, which would count VA and DoD benefits in the 90 percent side, in a comprehensive HEA bill that will be introduced in the coming weeks. Senator Alexander's unexpected position differs from his earlier position. Senator Alexander stated: "This is a responsible and reasonable step to ensure that all of our military and veteran students are attending quality institutions worth their time and money." In 2018, Senator Alexander took a contradictory view when he requested comments to a White Paper he released in anticipation of drafting his bill to reauthorize the HEA. In the White Paper (page 5), Senator Alexander asserted that "what 90-10 really measures is the socioeconomic status of students enrolled at the school, not the quality of the institution." In the White Paper, he went on to conclude: "If an institution produces valuable outcomes for its students, including that students are able to graduate, get a job, and repay their federal loans, then concerns over the volume of taxpayer dollars as a percentage of revenue becomes less meaningful as an accountability measure."

Congressional Democrats have introduced at least eight bills during this Congress that would include VA and DoD benefits in the 90/10 calculation. Consumer groups and membership organizations for veterans and service members support Senator Alexander's change in his position.

A copy of the press release, which includes the text of the bill, is found at: https://www.carper.senate.gov/public/index.cfm/pressreleases?ID=1F2296F8-2DF9-4F25-8046-C13323F94F6E.

A copy of Senator Alexander's 2018 White Paper is found at: https://www.alexander.senate.gov/public/_cache/files/cfd3c3de-39b9-43dd-9075-2839970d3622/alexander-staff-accountability-white-paper.pdf.

Senator Booker Releases Higher Education Plan which Focuses on HBCUs

In November 2019, Senator Cory Booker (D-NJ) proposed a $100 billion plan for Historically Black Colleges and Universities (HBCUs) and Minority-Serving Institutions (MSI) as part of his campaign for the Democratic nomination for President. The plan would:

- Provide $30 billion to Department of Education grants so that HBCUs and MSIs could expand STEM programs and increase recruitment;
- Provide $30 billion to expand federal grant programs that HBCUs and MSIs could use for infrastructure projects and other capital improvements;
- Spend at least $40 billion from a separate $400 billion "Moonshot Hub" proposal on climate change to programs based at HBCUs and MSIs;
- Double the maximum Pell Grants to $12,400 from $6,200 to help low-income students access postsecondary education;
- Expand the Public Service Loan Forgiveness Program to cancel student loans of workers who enter fields of education, public defense, or the military;
- Forgive the student loans of low-income students who cannot repay their debts or receive their degrees from failed proprietary institutions; and
- Be paid-for by repealing the recent corporate tax cuts included in the *Tax Cuts and Jobs Act* passed in 2017.

Senator Sanders Releases Higher Education Plan with New Funding for HBCUs

In mid-November 2019, Senator Bernie Sanders (I-VT), Democratic candidate for President, released a new higher education plan, College for All, which includes "historic investments in HBCUs and MSIs to strengthen and support those institutions…" Additional support for HBCUs and MSIs will provide:

- $1.3 billion to private, nonprofit HBCUs and MSIs per year to eliminate or significantly reduce tuition and fees;
- $5 billion to create and expand teacher training at HBCUs, MSIs, and tribal colleges and universities to increase educator diversity;
- $5 billion to create and expand medical and dental provider training programs at HBCUs and MSIs;
- Designate federal research funds for HBCUs;
- Double the funding for programs that benefit HBCUs and MSIs authorized under the HEA;
- Double the funding for GEAR UP and TRIO programs to allow HBCUs to establish these programs at their institutions;
- $1 billion to HBCU 1890 Land-Grant Institutions programs; and
- Cancelation of $1.6 billion in existing HBCU debt from the Capital Financing Program authorized under the HEA and $5 billion for capital improvement and infrastructure grants at HBCUs.

Senator Sanders said in announcing his plan: "Historically Black Colleges and Universities have educated generations of African American leaders and helped build and grow the culture of diversity that makes our country what it is today…Unfortunately, too many HBCUs have struggled financially in recent years from a lack of federal resources, a drop-in enrollment, and from crushing institutional debt. Yet the need for HBCUs and the education they provide has never been greater."

A copy of the plan is found at: https://berniesanders.com/issues/supporting-hbcus-and-msis/.

Previously, Senator Sanders introduced S. 1947, the College for All Act of 2019, which includes the following provisions:

- Eliminates tuition and fees at public four-year colleges and universities for those making up to $125,000 and makes community college tuition- and fee-free for all;
- Cuts student loan interest rates in half;
- Allows Americans to refinance student loans at the lowest interest rate possible;
- Prevents the federal government from profiting off of the student loan programs;
- Ensures students can attend college without taking on massive debt;
- Eliminates or reduces tuition and fees for low-income students at private colleges and universities that serve historically underrepresented minorities; and
- Provides funding to eliminate equity gaps in higher education attainment.

The legislation would be paid for by a separate bill to tax stock trades on Wall Street.

A copy of the fact sheet on S. 1947 is found at: https://www.sanders.senate.gov/download/the-college-for-all-act-fact-sheet?id=A2524A5A-CA3F-41F8-8D93-DD10813DC384&download=1&inline=file.

Mayor Buttigieg Releases Higher Education Platform

On November 18, 2019, Democratic Presidential Candidate Peter Buttigieg released his higher education platform. The proposals include:

- $120 billion in additional funding for Pell Grants to increase the maximum award by $1,000 and a notification requirement to students in ninth grade as to their Pell Grant eligibility;
- $1 billion for a new Community College Fund that would reward colleges for meeting "their communities" educational and career goals;
- $2 billion for a pilot to expand the current free- and reduced-price lunch program in the elementary and secondary schools to provide food vouchers to students in community colleges;

- Automatically enrolling students who fall behind in their loan payments in income-driven repayment;
- Altering the Public Service Loan Forgiveness Program (PSLF) to offer earlier loan forgiveness to government and nonprofit workers and improve the management of PSLF; and
- Making tuition at public colleges free for those earning less than $100,000 and providing tuition reductions for those making between $100,000 and $150,000.

A copy of the higher education platform is found at: https://peteforamerica.com/policies/education/.

Secretary of Education Addresses the FSA Annual Training Conference and Calls for FSA to Become Independent for Improved Oversight and Customer Service

On December 3, 2019, Secretary of Education Betsy DeVos addressed the participants in the FSA Training Conference. She thanked the participants for their work in support of students and families. Secretary DeVos described the Department's efforts to modernize FSA in order to improve its oversight and customer service. She said: "From submitting the FAFSA to submitting payments; from seeing what a loan will cost over time to participating in exit counseling – we are updating everything. And we're doing it so that students are better informed borrowers. So that students will be able to see what they owe, what ways they can repay, what they owe, and acknowledge all of that each year before they borrow any more. Surprisingly, students will be able to do that for the first time ever. And if they do have questions – we know they do – they will be able to ask *Aidan*." *Aidan* is the new chatbot, a new robotic assistant, who will be able to answer many of the routine questions borrowers have about their loans.

Secretary DeVos indicated that the Department is revamping the way it connects with students. Last year, the initiative was called "NextGen," but is "NowGen." She said greater detail will be offered by General Mark Brown, the Chief Operating Officer for FSA. She noted that students would not have to deal with countless websites because there will be one website and there will be one phone number. Students will no longer have to complete their FAFSA at a laptop, but can use any of their devices including the new myStudentAid mobile app.

Secretary DeVos also discussed structural changes at FSA that she believes would improve operations and better serve students, including that FSA become "a standalone entity, wholly and entirely separate from the U.S. Department of Education." She suggested that such reforms were needed to better manage since the Department has become the largest lender, with more than $1.6 trillion in outstanding loans to 42 million borrowers. She went on to say that the new proposed model for FSA would be "truly independent from interference, political or otherwise." Secretary DeVos called FSA an "untamed beast." The model would make it better able to manage the complex federal student loan portfolio and provide better customer service to students and families. She concluded by stating that the concept of a standalone FSA "warrants far more discussion," adding that "we should be talking about the benefits of professional, experienced leadership who, as in the private sector, would be responsible for setting strategy for FSA, for overseeing the management of the loan portfolio, for ensuring institutions hold up their end of the bargain, and for reporting to Congress." [Congress would have to change the HEA in order to separate FSA from the Department of Education.]

The full text of Secretary DeVos' speech is found at: https://www.ed.gov/news/press-releases/secretary-devos-shares-vision-better-stronger-federal-student-aid-annual-training-conference.

General Brown Describes New Online Tools for Borrowers

On December 3, 2019, following Secretary DeVos' remarks at the FSA Training Conference, FSA Chief Operating Officer (COO) Mark Brown unveiled the availability of some online tools for student borrowers and financial aid administrators. Two new online tools that will be launched in the next few months include the "Informed Borrower Tool" and "Loan Simulator." According to General Brown, the first tool will be initially hosted on the MyStudentAid website and integrate information from the recently updated College Scorecard. The "Informed Borrower Tool" will help borrowers "know what they are getting into before they take out their student loans." The tool will allow students to see how much they have borrowed, preview what their monthly payments might be, and explain concepts such as capitalization and the difference between federal and private loans. General Brown said that for the 2020-2021 award year, both students and parents will have to certify that they have used the tool before receiving their funds. It will likely be rolled out in April 2020.

General Brown said the Loan Simulator will function as an online wizard that will suggest loan options for students based on their "goals and personal information," and allow them to "test drive and compare personalized scenarios" with regard to repayment. It will also guide students to enroll in the repayment plan they choose.

General Brown also previewed a new online resource for financial aid administrators, the "NextGen PPO," which will be rolled out at next year's training conference and was developed with the input from six institutions. He said that the resource will require a one-time sign-in and will feature "real-time FSA interaction." Financial aid administrators will be allowed to electronically sign-in and upload documents. The interface will include a dashboard with data such as open financial aid cases, the amount of loans disbursed at the institution, the number of students receiving aid at the institution, and the Direct Loans and Pell Grants disbursed and drawn down. "NextGen PPO will be a single gateway for everything financial aid administrators do with federal student aid."

General Brown provided an overview of a new organizational structure with a principle deputy and four deputies including Robin Minor, who is heading Partner Participation. General Brown also discussed upcoming plans to redesign the Federal Student Aid Handbook and the information on the IFAP website. In addition, FSA plans to create a new training model to allow financial aid administrators more flexibility to take FSA classes. He concluded by indicating his desire to be partners with financial aid administrators who will be able to focus on helping students.

ED Issues an Interim Final Rule to Restart Loan Forgiveness Process for Disabled Veterans

On November 26, 2019, the Department of Education issued a final interim regulation in the *Federal Register*, which was issued to amend and update the regulations for total and permanent disability so that it could resume discharging the federal student loans of disabled veterans. The disabled veterans were promised relief under a Presidential Memorandum signed by President Donald Trump on August 21, 2019. Previously, the Department had streamlined the application process, but the application process continued to be an unnecessary hardship for disabled veterans. Under the November 2019 rule, the Secretary will consider a borrower for whom data is obtained from the Department of Veterans Affairs showing that the borrower is "totally and permanently disabled" to be eligible for a loan discharge and will not require further documentation. This action occurred after the Department's attorneys determined in late October that the process of providing automatic loan forgiveness to severely disabled veterans violated its current regulations. The temporary suspension of the automatic loan forgiveness process affected more than 24,000 disabled veterans.

A copy of the interim final regulations is found at: https://www.govinfo.gov/content/pkg/FR-2019-11-26/pdf/2019-25813.pdf.

A copy of the Presidential Memorandum is found at: https://www.whitehouse.gov/presidential-actions/presidential-memorandum-discharging-federal-student-loan-debt-totally-permanently-disabled-veterans/.

ED Announces Implementation of School Notice Requirements Under the 2016 Borrower Defense Regulations

On November 25, 2019, the Department of Education released an announcement regarding the November 1, 2016 final regulations governing the process for evaluating borrower defense to repayment discharge claims. 34 C.F.R. § 685.222(e)(3)(i) and (f)(2)(iv) provide that ED will notify the school associated with the borrower defense application of the claim filing and give the school the opportunity to submit records or a response to the allegations associated with the application. This provision applies to loans first disbursed before July 1, 2020.

The purpose of the announcement is to alert schools that the Department will soon begin sending notices required under the 2016 regulations. The Department will include in the notice the letter and copy of the application from the borrower, and schools will be invited to respond within 30 days.

A copy of the announcement is found at:
https://ifap.ed.gov/eannouncements/112519ImplSchoolNoticeReqUnder2016BorDefenseReg.html.

ED Will Begin Issuing Automatic Closed School Loan Discharge Liability Letters to Schools

On November 25, 2019, the Department of Education announced that it will begin issuing Automatic Closed School Loan Discharge Liability Letters to affected schools that closed on or after November 1, 2013. The letters will assess school liabilities equal to all loan funds discharged through the automatic closed school discharge process. Schools may request reconsideration no later than 20 days following receipt of the letter with written evidence to show that this determination is unwarranted.

A copy of the announcement is found at:
https://ifap.ed.gov/eannouncements/112519LiabilitiesAssocClosedSchoolDischarges.html.

Department Announces Implementation of a New Component to the MPN

On November 21, 2019, the Department of Education announced a modification to the Master Promissory Note (MPN) starting with loans associated with the 2020-21 award year. The new component is called the "Informed Borrowing Confirmation" process, a process that will be managed by Federal Student Aid (FSA). All MPN confirmation processes will require student and parent borrowers to view how much they currently owe in federal student loans and to acknowledge that they have seen this amount before a school can make a first disbursement of the first Direct Loan that a student or parent borrower receives for each new award year.

While FSA is managing the process, a series of announcements will provide operational information about the changes to Direct Loan processing needed to incorporate the new Informed Borrowing Confirmation process.

A copy of the electronic announcement is found at:
https://ifap.ed.gov/eannouncements/112119InformBorrowConfirmModAppMPNConfirmProc.html.

Department Releases College Scorecard with Programmatic Data

On November 20, 2019, the Department of Education released an updated version of the College Scorecard that now includes median earnings and median debt information of a school's graduates by program. Previously, the College Scorecard only included institutional-level median earnings and median debt information. Secretary of Education Betsy DeVos announced that "Thanks to the groundbreaking redesign of the College Scorecard, students can now find customized, accessible, and relevant data on potential debt and earnings based on fields of study,…graduation rates, and even apprenticeships." The total College Scorecard "rethink" builds on President Trumps' Executive Order on Improving Free Inquiry, Transparency, and Accountability at Colleges and Universities, according to Secretary DeVos.

The College Scorecard also "ensures students can make apples-to-apples comparisons by providing the same data about all of the programs a student might be considering without regard to the type of school." The new College Scorecard also includes data on 2,100 institutions that offer only certificates to the existing information on 3,700 degree-granting institutions that the College Scorecard has tracked since 2015.

A copy of the press release, which includes a link to the Executive Order, is found at:
https://www.ed.gov/news/press-releases/secretary-devos-delivers-promise-provide-students-relevant-actionable-information-needed-make-personalized-education-decisions.

A copy of the electronic announcement is found at:
https://ifap.ed.gov/eannouncements/112019CollegeScorecardMetricsbyFieldofStudy.html.

OIG Releases FY 2020 Management Report

In November 2019, the Department of Education's Office of Inspector General (OIG) released its annual report titled, "FY 2020 Management Challenges Facing the U.S. Department of Education." The annual report identified four management challenges at Federal Student Aid (FSA), including improper payments, information technology security, oversight and monitoring, and data quality and reporting. The report said that the Pell Grant and Direct Loan programs are susceptible to improper payments. In FY 2018, the Department reported improper payment of $2.3 billion for the Pell Grant program and $3.8 billion for the Direct Loan program. The annual report stated that the Department expects that pending legislation authorizing disclosure of tax return information directly to the Department would improve the administration of the Title IV programs.

With regard to information technology security, the OIG report found that FSA's information technology control was deficient. Finally, the OIG report indicated that it continues to find issues with FSA's oversight of federal student aid programs, and highlighted a range of problems, from FSA not ensuring that institutions addressed problematic satisfactory academic progress findings to the fact that FSA has not evaluated its FAFSA verification process, which has been flagged for selecting a greater than required number of applications for verification. In response to a Government Accountability Office (GAO) report earlier this year that identified the potential for fraud within income-driven repayment (IDR) plans, the OIG report stated that FSA anticipates undertaking a 12-month pilot project to assess the incidence of error and fraud in determining income-driven repayment plan amounts.

A copy of the OIG report is found at:
https://www2.ed.gov/about/offices/list/oig/misc/mgmtchall2020.pdf.

Grand Canyon Announces to Analysts that ED Does Not Consider it to be a Non-profit for Purposes of Title IV Funding

Some higher education publications reported that the Department of Education ruled that Grand Canyon University will continue to be treated as a for-profit institution of higher education for the purposes of the Higher Education Act. The IRS and Grand Canyon's accreditor, Higher Learning Commission, have approved the institution's conversion from for-profit to non-profit.

A copy of the ED letter to Grand Canyon University is found at:
https://www.documentcloud.org/documents/6548148-Grand-Canyon-University-Decision-on-CIO-11-06-19.html

Sharon H. Bob, Ph.D.
Higher Education Specialist
Powers Pyles Sutter and Verville PC
1501 M Street, NW, Suite 700
Washington, DC 20005
T: 202-872-6772
F: 202-785-1756
December 15, 2019