

WASHINGTON UPDATE

JUNE 2019

Senator Murphy Releases White Paper Outlining his Priorities for the Reauthorization of the HEA

On June 11, 2019, Senator Chris Murphy (D-CT), who is a member of the Senate Health, Education, Labor and Pensions (HELP) Committee, released a white paper outlining his priorities for the reauthorization of the *Higher Education Act (HEA)*. The white paper, titled "Are You Getting What You Pay For? A New Proposal for Accountability in Higher Education," states that Congress has a "unique and timely opportunity to set the expectation that federal spending on higher education will yield more return on investment for both students and taxpayers."

Senator Murphy's priorities include:

- Committing to Consumer Protection Safeguards:
 - o Maintaining and strengthening the Cohort Default Rate by addressing loopholes, such as schools pushing students into forbearance and deferment; and
 - o Codifying the *Protect Students Act*, introduced by Senators Dick Durbin (D-IL) and Maggie Hassan (D-NH), a bill which strengthens the 90/10 rule.
- Implementing a New Accountability Framework Based on Student Success Outcomes: the Secretary must identify schools that fail either of the following metrics:
 - o Metric 1 Completion; or
 - o Metric 2 Value Is there a return on investment by students and taxpayers?
- Applying Consequences Based Upon the Spending Threshold: Institutions that come up short on student outcomes would face different consequences based upon how much of their resources they devote to success.
- Preserving Access: Bias against low-income students should not be used to limit access.
- Improving Technical Assistance and Best Practice Sharing: Accrediting agencies and the Department should provide ongoing feedback and technical assistance to help institutions address any findings and share best practices.

A copy of the white paper is found at: https://www.murphy.senate.gov/download/hea-white-paper-.



Durbin and Cohen Introduce Bills to Reinstate 85/15

On June 10, 2019, Senator Dick Durbin (D-IL) and Congressman Steve Cohen (D-TN) announced that they were introducing bicameral legislation that would put an end to for-profit colleges' aggressive recruiting of veterans, service members, and their families. The *Protecting Our Students and Taxpayers (POST) Act* would prohibit for-profit colleges and universities from receiving more than 85 percent of their revenue from the federal government and change the calculation of federal revenue to include all federal funds, including Department of Veterans Affairs GI Bill benefits and Department of Defense Tuition Assistance benefits. (S. 1775 and H.R. 3179)

Senator Durbin said: "We can't let this invitation to exploit our veterans and service members continue," and Congressman Cohen said: "Too often, these schools fail their duty to sufficiently prepare graduates for jobs that will enable them to repay these loans, leaving taxpayers to foot the bill."

Along with Senator Durbin, the bill is cosponsored by Senators Richard Blumenthal (D-CT), Sherrod Brown (D-OH), Maggie Hassan (D-NH), Bernie Sanders (I-VT), Brian Schatz (D-HI), Jack Reed (D-RI), and Elizabeth Warren (D-MA). Along with Congressman Cohen, the House bill is cosponsored by Representatives Sheila Jackson Lee (D-TX) and Gil Cisneros (D-CA).

A copy of the press release is found at: https://www.durbin.senate.gov/newsroom/press-releases/durbin-cohen-congress-must-close-loophole-that-encourages-for-profit-colleges-to-target-veterans-and-service-members.

<u>Senator Warren and Two Congressional Democrats Warn Secretary DeVos and Seven</u> Universities about Promoting Income-Share Agreements

On June 4, 2019, Senator Elizabeth Warren (D-MA) and Representatives Ayanna Pressley (D-MA) and Katie Porter (D-CA) sent a letter to Secretary of Education Betsy DeVos expressing concern about reports that ED is exploring an experiment with Income-Share Agreements (ISA), and they are seeking to learn about the Department's plans in order to evaluate whether these plans are in the best interest of students and within the Department's authority under the law. The letter said: "At a time when student debt stands at more than \$1.5 trillion, it is deeply disturbing to see a Department official boosting novel forms of student debt instead of trying to stem the tide of indebtedness – and even more disturbing is to hear the official propose using federal taxpayer dollars to do so."

Income-share agreements offer students financial support while they are in school and require students to repay a portion of their income for a set number of years. Some coding boot camps and some four-year colleges and universities have begun offering their own ISA plans. Separate



letters were sent to seven four-year colleges and universities seeking information on student protections offered in their ISA plans. The letters expressed concern that the terms of ISA contracts can be "predatory and dangerous for students, and ISAs have received little federal oversight." The letters were sent to the presidents of Messiah College, Clarkson University, Colorado Mountain College, Purdue University, University of Utah, Lackawanna College, and the University of California, San Diego.

A copy of the letter sent to Secretary DeVos is found at: https://www.warren.senate.gov/imo/media/doc/Letter%20to%20DeVos%20re%20ISAs.pdf.

Copies of the letters sent to the colleges and universities are found at: https://www.warren.senate.gov/imo/media/doc/Letters%20to%20higher%20ed%20orgs%20re%20ISAs.pdf.

House Education and Labor Subcommittee on Higher Education Holds Hearing on Community Colleges, HBCUs, TCUs, and HSIs

On May 22, 2019, the House Education and Labor Subcommittee on Higher Education and Workforce Investment held a hearing titled, "Engines of Economic Mobility: The Critical Role of Community Colleges, Historically Black Colleges and Universities (HBCUs), and Minority-Serving Institutions in Preparing Students for Success," the fourth hearing related to the reauthorization of the *Higher Education Act*. Chairwoman Susan Davis (D-CA) opened the hearing by stating that federal data released on May 22, 2019, revealed a 50 percentage point gap between low-income students and their wealthy peers. She said that HBCUs, Tribal Colleges and Universities (TCUs), Hispanic-Serving Institutions (HSIs), and community colleges are forced to do more with less. She concluded that "Congress has a responsibility to strengthen and invest in institutions that are promoting economic mobility."

Ranking Member Lloyd Smucker (R-PA) said that as they move toward reauthorization, lawmakers have the opportunity to ensure that the higher education system provides all students equal access to opportunities that offer pathways to success. Each witness highlighted the importance of the role of the particular group they each represented and described the challenges to success faced by their particular group.

House Oversight Subcommittee Holds Hearing on Oversight of For-Profit Colleges

On May 22, 2019, the House Oversight and Reform Subcommittee on Economic and Consumer Policy held a hearing titled, "Examining For-Profit College Oversight and Student Debt." The focus of the hearing was to discuss for-profit school closures, the role of accreditation, and the impact on student debt. The Democrats and Republicans on the Subcommittee took very different positions on how to address accountability, prevention of waste, fraud, and abuse, and student loan debt. While the Democrats pointed to abuses within the for-profit sector and the



Department's attempt to rewrite federal regulations related to for-profit college oversight as a reason for concern, Republicans claimed there have been abuses and poor outcomes in all sectors of higher education.

Subcommittee Chairman Raja Krishnamoorthi (D-IL) opened the hearing by describing the rapid growth of the for-profit college sector followed by the closure of two large for-profit college chains, which prompted increased regulatory oversight in the Obama Administration. One of the witnesses included Diane Auer Jones, Principal Deputy Undersecretary for the Department of Education, who began her testimony by stating that the landscape of higher education continues to change and as enrollments shrink, school closures will be inevitable and will include both for-profit institutions and non-profit institutions. In terms of oversight, Ms. Jones described ED's ability to place institutions on heightened cash monitoring to help protect students and taxpayers as well as the requirement for institutions to submit a letter of credit when failing the financial responsibility composite score requirement. She described the recently concluded negotiated rulemaking session on accreditation and other issues including distance education and state authorization. Ms. Jones asserted that the consensus reached on the proposed regulations would encourage accreditors and the Department to take action sooner.

In response to a question regarding the backlog of outstanding borrower-defense claims, Ms. Jones indicated that the Trump Administration has not taken any action on the claims in almost a year because a federal judge in California blocked the use of a formula for awarding partial debt relief of loans and ED was waiting for a further ruling. Chairman Krishnamoorthi asked Ms. Jones to reconsider her recommendation on ACICS. They disagreed as to whether ACICS' peers had provided sufficient support to meet the federal standard of having "wide acceptance" in the field. She concluded that the Department was making progress in dealing with closures, but she admitted the Department has work to do.

House Education and Labor Committee Members Introduce Stop Student Debt Relief Scams Act

On May 22, 2019, House Education and Labor Committee Representatives Haley Stevens (D-MI) and Lloyd Smucker (R-PA) introduced H.R. 2888, the *Stop Student Debt Relief Scams Act*, which would give the Department of Education and law enforcement agencies the tools needed to identify and shut down third-party debt relief companies. Similar bills were introduced in the Senate by Senators Tammy Baldwin (D-WI) and Mike Braun (R-IN). The bill clarifies that it is a federal crime to access Department of Education information technology systems for fraud, commercial advantage, or private financial gain, and imposes fines on scammers for violations of the law. Representative Stevens said: "Millions of Americans are working to pay off their student loan debt, and they deserve to be protected from scammers who want to take advantage of them for financial gain."

A copy of the press release is found at: https://stevens.house.gov/media/press-releases/reps-stevens-smucker-introduce-legislation-crack-down-student-debt-relief.



Warren, Bonamici and Six Other Senate and House Members Send Letter to CHEA Urging it to Deny Recognition to ACICS

On May 9, 2019, Senator Elizabeth Warren (D-MA) and Congresswoman Susan Bonamici (D-OR), along with six of their Senate colleagues and seven of their House colleagues, sent a letter to the Council for Higher Education Accreditation (CHEA) urging it to deny recognition to the Accrediting Council of Independent Colleges and Schools (ACICS) when CHEA reviews ACICS' status at its June 2019 meeting. The letter urged CHEA to consider ACICS' past non-compliance with CHEA's standards "as well as evidence that ACICS continues to fail to meet basic standards designed to protect students from predatory and low-quality institutions." The letter went on to say that: "ACICS now has the unique distinction of being the sole accrediting agency that has overseen the three largest collapses of institutions of higher education in American history."

A copy of the letter is found at:

 $\frac{https://www.warren.senate.gov/imo/media/doc/2019.05.09\%20Letter\%20to\%20CHEA\%20re\%20ACICS_SIGNED.pdf.$

ED Publishes NPRM on Accreditation and Innovation in the Federal Register

On June 12, 2019, the Department of Education published a notice of proposed rulemaking (NPRM) on accreditation and related matters in the *Federal Register*. The Department is providing a 30-day comment period with comments due on or before July 12, 2019. The NPRM is the result of negotiated rulemaking that took place from January to April 2019 culminating in consensus on April 3, 2019.

The major provisions would:

- Revise the requirements for accrediting agencies in their oversight of member institutions and programs to be less prescriptive and provide greater autonomy and flexibility in order to facilitate responsiveness to innovation;
- Revise the criteria used by the Secretary to recognize accrediting agencies to focus on education quality and allow competition;
- Revise the Department's process for recognition and review of accrediting agencies;
- Clarify the core oversight responsibilities among each entity in the regulatory triad to hold institutions accountable:
- Establish the roles and responsibilities of institutions and accrediting agencies in the teach-out process;
- Establish that the Department recognizes an institution's legal authorization to operate postsecondary educational programs when it is exempt from State authorization under the State constitution or by State law as a religious institution with a religious mission;



- Revise the State authorization requirements for institutions offering distance education or correspondence courses; and
- Remove the regulations for the Robert C. Byrd Honors Scholarship program, which has not been funded in many years.

Because of the long list of issues that were addressed in negotiated rulemaking, the Department has chosen to release the proposed regulations in related buckets similar to the manner that the issues were reviewed by the negotiated rulemaking committee.

Secretary of Education Betsy DeVos said: "These changes, which were developed by consensus from a diverse negotiated rulemaking panel earlier this year, are designed to promote innovation, protect students while ensuring they have access to the higher education options that meet their unique needs, and reduce irrelevant and over burdensome regulations of higher education institutions".

A press release is found at: https://www.ed.gov/news/press-releases/secretary-devos-advances-higher-education-reform-forged-historic-consensus.

A copy of the NPRM is found at: https://www.govinfo.gov/content/pkg/FR-2019-06-12/pdf/2019-12371.pdf.

ED Issues Additional Guidance on Completing the 2019 GE Disclosure Template

On June 7, 2019, the Department of Education issued Electronic Announcement #121, which provides additional guidance on completing the 2019 GE Disclosure Template. Guidance is provided regarding which students to include in the median debt calculation, disclosing information on programs with fewer than ten completers or new programs, and the use of school logos.

A copy of EA #121 is found at:

https://ifap.ed.gov/eannouncements/060719GEEA121AdditionalGuidanceComplet2019GEDisclosureTemplate.html.

IRS Announces Changes to Tax Transcript Retrieval Processes

On June 4, 2019, the Internal Revenue Service (IRS) announced that it will stop its tax transcript faxing service in June and will amend the Form 4506 series to end third-party mailing of tax returns and transcripts in July in an effort to protect taxpayers from identity thieves.

The Department of Education previously announced in a *Federal Register* Notice on May 24, 2019, that institutions will be allowed to accept copies of tax returns and signed statements of Verification of Non-filing (VONF) for the 2020-2021 award year.



A copy of the IRS announcement is found at: https://www.irs.gov/newsroom/irs-takes-additional-steps-to-protect-taxpayer-data-plans-to-end-faxing-and-third-party-mailings-of-certain-tax-transcripts.

A copy of ED's *Federal Register* Notice is found at: https://ifap.ed.gov/fregisters/attachments/FR052419.pdf.

A copy of ED's electronic announcement regarding the IRS changes in its tax transcript service is found at:

https://ifap.ed.gov/eannouncements/061219IRSAnnEndFaxThirdPartyMailTaxTranscripts.html.

ED Releases BDR Questions and Answers

On June 3, 2019, the Department of Education released a Questions and Answers document related to the final regulations published by the Department of Education in the *Federal Register* on November 1, 2016, regarding borrower defense to repayment rules. The information supplements the information found in the electronic announcement issued on March 15, 2019.

A copy of the document is found at: https://ifap.ed.gov/eannouncements/060319Comp2016BD2RypmtRegsQandA.html.

ED Publishes Verification Requirements for the 2020-2021 Award Year in the Federal Register

On May 24, 2019, the Department of Education issued a Notice in the *Federal Register* that includes the FAFSA information that an institution and an applicant, and parent(s) or spouse, if applicable, may be required to verify in the 2020-2021 award year. Also provided is the acceptable documentation that must be provided to an institution for that information to be considered verified.

A copy of the Notice is found at: https://www.govinfo.gov/content/pkg/FR-2019-05-24/pdf/2019-10959.pdf.

ED Releases Expanded College Scorecard

On May 21, 2019, Secretary of Education Betsy DeVos announced major improvements to the College Scorecard. The College Scorecard now includes 2,100 non-degree-granting institutions. Previously, the College Scorecard provided disclosures for about 3,700 degree-granting institutions. The College Scorecard now also includes information on graduation rates for non-first-time and non-full-time students and the percentage of students who transferred or were still enrolled in school. Previously, the site only presented graduation rates for first-time, full-time students, which generally do not represent all students at many institutions.



Finally, building on President Trump's March 2019 Executive Order, the College Scorecard released new preliminary loan data by field of study. For years, the undergraduate loan debt information was only available at the institution-level. The press release noted that this information is preliminary because institutions need time to adjust their historical enrollment data.

Secretary of Education Betsy DeVos stated in a press release: "We committed to students that we would continually improve the College Scorecard so that they can access relevant, accurate an actionable data as they make decisions about their education after high school. The updates released today are another step in fulfilling that promise. We look forward to seeing how students, parents, institutions and researchers utilize this important information."

A copy of the press release is found at: https://www.ed.gov/news/press-releases/secretary-devos-delivers-promise-expand-college-scorecard-provide-meaningful-information-students-education-options-and-outcomes.

An Electronic Announcement issued on May 21, 2019, advised institutions that in mid-July 2019, ED will calculate the data metrics for earnings and debt by field of study using data reported/updated by institutions as of July 10, 2019 and plan to publish updated data this fall. ED strongly encouraged institutions to ensure the accuracy of previously reported program-level enrollment data that was reported to NSLDS on or after July 1, 2014. The Department suggested the use of various resources to evaluate and update previously reported data.

A copy of the Electronic Announcement is found at: https://ifap.ed.gov/eannouncements/052119CorrectHistPrgmEnrollData4Metrics.html.

ED Addresses Questions Regarding Financial Responsibility Provisions of the 2016 BDR Regulations

On May 20, 2019, the Department of Education released an Electronic Announcement reminding institutions of the March 15, 2019 Electronic Announcement that provided "Guidance Concerning Some Provisions of the 2016 Borrower Defense to Repayment Regulations." ED noted that there have been many questions regarding the BDR rules and, until such time when answers can be provided, that the 2016 BDR rules are in effect.

A copy of the Electronic Announcement is found at:

 $\underline{https://ifap.ed.gov/eannouncements/030719GuidConcernProv2016BorrowerDefensetoRypmtRegs.html.}$



ED Announces New Experimental Site to Expand FWS and Expansion of Second Chance Pell Program

On May 20, 2019, the Department of Education announced the launch of a new experimental site on Federal Work-Study (FWS), which will provide institutions with additional flexibility if they want to assist students participating in apprenticeships, internships, and work-based learning programs as well as those students that are completing clinic rotations, externships, and student teaching. Under the experimental site, the Department will waive the current 25 percent cap on the share of FWS that may be used to pay the wages of students employed by a private, for-profit organization and increase the share of wages that the federal program may cover for students working at small businesses from 50 to 75 percent. The Department said it plans to select a limited number of institutions to participate in the experiment.

Separately, the Department announced that it will expand the experimental site that allows Pell Grants to go to incarcerated students by allowing new cohorts of colleges and universities to participate. It is the first expansion of the Second Chance Pell Program since it was launched by the Obama Administration. There are currently 64 schools in 26 states participating in the experiment. However, more than 200 schools submitted applications seeking to participate when it was launched four years ago. Secretary of Education Betsy DeVos said: "We hope that through this expansion, we can reach more students and utilize the information gathered to better inform Congress about future updates to the Higher Education Act."

A copy of Secretary's press release on providing flexibility on the FWS program is found at: https://www.ed.gov/news/press-releases/secretary-devos-builds-rethink-higher-education-agenda-expands-opportunities-students-through-innovative-experimental-sites.

An announcement of the pre-publication of the *Federal Register* Notice inviting institutions to participate in the FWS Experiment was released on May 20, 2019: https://ifap.ed.gov/eannouncements/052019PubofFRFWSExpUnderExpSitesInitiative.html/

A copy of the *Federal Register* Notice is available at: https://www.nasfaa.org/uploads/documents/2019_10811.pdf.

A copy of the Electronic Announcement on expanding the Second Chance Pell Program is found at:

https://ifap.ed.gov/eannouncements/052019InvitationPartSecondChancePellExperUnderESI.html.

ED Reminds Institutions of the July 1, 2019 GE Requirements

On May 23, 2019, the Department of Education released Gainful Employment Electronic Announcement #120, which reminded institutions to comply with two gainful employment provisions. On July 1, 2019, institutions will be required to provide a prospective student, as a



separate document, a copy of the disclosure template before the prospective student signs an enrollment agreement, completes registration, or makes a financial commitment to the institution. The required individual delivery process will require institutions to retain copies of the confirmation in the student file.

In addition, all promotional materials made available by or on behalf of an institution to prospective students that identify a GE program by name, or otherwise promote the program, must include the disclosure template in a prominent manner. If space is limited, an institution may include the Web address (URL) of, or the direct link to, the disclosure template. "That URL or link must be prominent, readily accessible, clear, conspicuous, and direct."

A copy of Electronic Announcement #120 is found at: https://ifap.ed.gov/eannouncements/052319GEEANo120AnnApp2019GECompliDates.html.

ED Releases GE Disclosure Template

On May 9, 2019, the Department of Education released the 2019 GE Disclosure Template in Electronic Announcement #119. Institutions have until July 1, 2019 to update disclosures for each of their Gainful Employment (GE) programs, using the 2019 GE Disclosure Template, and to post the disclosures to their program webpages.

The 2019 GE Disclosure Template has been simplified and streamlined. It now includes:

- Normal time to complete the program;
- Total program costs if completing the program within normal time (including tuition and fees plus books, supplies, and equipment; excluding room, board, or other expenses);
- Median cumulative debt for Title IV students completing the program within the normal time (including Federal, private, and institutional debt);
- Licensure information for the program's target occupation;
- URL for the College Scorecard;
- Warning language if required under 34 C.F.R. § 668.410.

Unlike previous templates, the 2019 GE Disclosure Template is not a web-based application. It will not generate a completed template for institutions. Instead, institutions may copy the text and fill in the information for their GE program(s), fill in the relevant data elements, and post the completed disclosure template to each relevant program webpage.

A copy of Electronic Announcement #119 is found at:

 $\underline{https://ifap.ed.gov/eannouncements/050919GEAnnounce119Release2019GEDisclosureTemplate}.html.$



OIG Releases Audit Report Identifying Problems with FAFSA Verification

On May 16, 2019, the Department of Education's Office of Inspector General (OIG) released a report titled, "Federal Student Aid's Process to Select FAFSA Data Elements and Students for Verification," which asserts that the Department's process for verifying the accuracy of the FAFSA elements provides no reasonable assurance of identifying errors. The OIG report found that Federal Student Aid (FSA) "did not evaluate its process for selecting FAFSA data elements to verify," nor did it "effectively evaluate three of its four processes reviewed for selecting students for verification." The report also noted that FSA did not evaluate the effectiveness of its 30 percent limitation for selected students it required schools to verify. The OIG concluded that "there is no reasonable assurance that the verification processes effectively identified FAFSAs with errors that would result in improper payments."

The OIG recommended that FSA and the Office of Postsecondary Education (OPE) "ensure that the FAFSA data elements that are selected for verification are those that have the greatest impact on the expected family contribution and are most likely to be misreported."

A copy of the OIG report is found at: https://www2.ed.gov/about/offices/list/oig/auditreports/fy2019/a02q0007.pdf.

51 Attorneys General Send Letter to ED Urging it to Refrain From Requiring Unnecessary Paperwork for Disabled Veterans

On May 24, 2019, 51 Attorneys General (AGs) sent a letter to Secretary of Education Betsy DeVos urging the Department of Education to take prompt action to discharge student loans of veterans who are permanently and totally disabled or otherwise unemployable. The AGs indicated that they appreciated ED's recent efforts, including the implementation of a data matching program between the Department of Education and the Department of Veterans Affairs, to make it easier for veterans to have their loans discharged due to their disability. However, the AGs asserted that the Department continues to require veterans to take affirmative steps to secure the loan forgiveness, but the requirements "may prove insurmountable obstacles to relief for many eligible veterans due to the severe nature of their disabilities." The AGs urged the Department to develop an automatic discharge process to ensure that all eligible veterans can have their student loans forgiven.

A copy of the letter is found at: https://www.naag.org/assets/redesign/files/sign-on-letter/NAAG%20Letter%20to%20Sec.%20DeVos.pdf.



<u>Department of Justice Reaches Settlements with Two Christian Universities for Violations of the Incentive Compensation Rules</u>

On June 5, 2019, the Department of Justice issued a news release announcing a settlement reached with Oral Roberts University where the University agreed to pay \$303,502 to resolve allegations under the False Claims Act of submitting false claims to the Department of Education in violation of the federal prohibition on incentive compensation plans. It was reported by *Inside Higher Education* on June 6, 2019, that North Greenville University had settled a similar claim in February 2019 for \$1.5 million.

The press release indicated that Oral Roberts University hired Joined Inc. to recruit students for it. The University allegedly compensated Joined Inc. in part with a "share of the tuition that ORU received from the enrollment of recruited students, in violation of the prohibition on incentive compensation."

A copy of the press release is found at: https://www.justice.gov/opa/pr/oral-roberts-university-pay-over-300000-allegedly-violating-ban-incentive-compensation.

Ringleader of Student Loan Debt Relief Scheme Agrees to FTC Settlement

On May 30, 2019, Tuan Duong, the ringleader of a California-based student loan debt relief scheme, agreed to settle the Federal Trade Commission's (FTC) charges that he "bilked \$1.1 million from consumers who were trying to reduce their student loan monthly payments or get loan forgiveness." The FTC alleged that the defendants charged consumers illegal upfront fees of \$300 or more for these purported debt relief services. He admitted to having violated a 2016 court order, which banned Mr. Duong from advertising, marketing, or promoting debt relief services or misrepresenting any fact material to consumers related to any product or service. The U.S. District Court for the Central District of California issued an order on May 29, 2019 that contains an \$11,000,215.25 judgment as compensatory relief to the FTC and permanently bans Mr. Duong from the telemarketing industry.

A copy of the FTC press release is found at: https://www.ftc.gov/news-events/press-releases/2019/05/ringleader-student-loan-debt-relief-scheme-liable-11-million.

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