

WASHINGTON UPDATE

NOVEMBER 2018

Senator Wyden Expresses Concerns Over Department's Payment Vehicle Account Pilot Program

On November 1, 2018, Senate Finance Committee Ranking Member Ron Wyden (D-OR) sent a letter to Secretary of Education Betsy DeVos expressing his concerns that private student aid will be accessed and monetized by private, for-profit financial institutions under the Department's recently proposed Payment Vehicle Account Pilot Program. Under the Pilot Program, the electronic payment method will generate data each time a student uses his/her financial aid to pay bills, purchase goods or withdraw cash. Since this student data will become part of the property of the financial institution issuing the student's financial aid, the transfer of the data would create the potential for abuse and misuse of thousands of students' sensitive data. "Students should not have to sacrifice their privacy as a condition of accessing their federal financial aid in a timely and efficient manner." Senator Wyden requested answers to a number of questions by November 16, 2018.

A copy of the letter is found at:

https://cdn.ymaws.com/www.ncher.us/resource/resmgr/daily_briefing/Wyden_letter.pdf.

Senate and House Education Committee Ranking Members Urge Department to Suspend Upcoming Negotiated Rulemaking Sessions

On October 31, 2018, Senator Patty Murray (D-WA), Ranking Member of the Senate Health, Education, Labor and Pensions Committee, and Congressman Bobby Scott (D-VA), Ranking Member of the House Education and the Workforce Committee, sent a letter to Secretary of Education Betsy DeVos urging her to suspend the upcoming negotiated rulemaking sessions that cover 16 areas for deregulation, including the recognition process of accrediting agencies, according to an agenda that was published in the *Federal Register* on October 15, 2018. The forthcoming rulemaking "could abandon key protections for students and give predatory institutions free reign to take advantage of students and taxpayers." They asked the Secretary to "allow Congress to address these issues comprehensively through the reauthorization of the Higher Education Act (HEA)." Ranking Members Murray and Scott expressed concern about the rulemaking process's overly expansive agenda, which covers 16 areas for deregulation, but only allocates 11 days for negotiation, the Department's use of multiple simultaneous subcommittees that are closed to public participation, and the Department's protocols for who may speak during negotiations. "[T]he Department's proposed procedures for the forthcoming negotiated rulemaking severely limit the number of expert and affected voices at the negotiating table..."

A copy of the letter is found at: https://www.murray.senate.gov/public/_cache/files/88cf7a86-5e36-4ee1-9b6c-e88a21fecbfe/10.31.18-multi-reg-rulemaking-committee-letter.pdf.

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A copy of the press release is found at:

<https://www.help.senate.gov/ranking/newsroom/press/murray-scott-blast-devos-for-deeply-flawed-rulemaking-process-that-could-weaken-key-protections-for-students> .

Congressman Takano Introduces *PRO Students Act*

On October 30, 2018, Congressmen Mark Takano (D-CA), John Garamendi (D-CA), and Pete Aguilar (D-CA) introduced H.R. 7112, the *Protections and Regulation for Our Students Act* or *PRO Students Act* with the goal of improving the *Higher Education Act*. The 85-page bill includes a number of provisions that would restrict the activities of for-profit institutions, including:

- Changing from the 90/10 rule to the 85/15 rule;
- Defining default manipulation as “engaging in a device or practice, including branching, consolidation or manipulation of the identification codes used by OPE to designate campuses and institutions, change of ownership or control, serial forbearance, or any similar device or practice (as determined by the Secretary) when, but for the device or practice, one or more campuses of an institution of higher education would be at risk of cohort default rate sanctions...”;
- Prohibiting the use of Federal funds to pay any person for influencing or attempting to influence an officer or employee of Congress in connection with any Federal actions (i.e., the awarding of any Federal contract, Federal grant, Federal loan, entering into any Federal cooperative agreement, or any extension or continuation of any Federal contract).
- Prohibiting the use of Federal funds to hire a registered lobbyist or to pay any person for securing an earmark;
- Prohibiting the use of revenues derived from Federal educational assistance funds for recruiting or marketing activities;
- Prohibiting the discharge or demotion against a person as retaliation for such person disclosing a violation of any law, rule or regulation by the institution;
- Establishing a complaint tracking system, including a toll-free telephone number and a website, to facilitate the collection and responses to complaints or inquiries;
- Amending terms and conditions to borrower defense provisions, including prohibiting pre-dispute arbitration clauses;
- Expanding consumer disclosures to include information related to the institution’s cohort default rate;
- Expanding prohibition on incentive compensation to include securing any enrollments based on performance in educational coursework, graduation, job placement, or any other facet of a student’s enrollment in an institution;
- Providing civil penalties for substantial misrepresentations, which are further defined;

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- Requiring mandatory program reviews on an annual basis if one or more of criteria is met by the institution:
 - Has more than 15 percent of the students received Direct Unsubsidized Loans during the prior year;
 - Has more than a 20 percent cohort default rate;
 - Has cohort default rate that exceeds national average;
 - Has an aggregate amount of defaulted loans that places the institution in the highest 1 percent of institutions in terms of aggregate amount of defaulted loans;
 - In the case of proprietary institutions, has received more than 80 percent of its revenues from Federal funds during the 2 most recent years;
 - Is among the top 1 percent in terms of numbers or rates of complaints;
 - Is among the top 1 percent in terms of low graduation rates;
 - Has spent more than 20 percent of its revenues on recruiting and marketing activities and executive compensation;
 - Has loan defaults that increased by 50 percent or more as compared to the preceding period or more than 50 percent of the students who received loans;
 - Has publicly acknowledged that the institution is in violation or noncompliance with any provision of a law administered by Federal or State agency; and
 - Is a proprietary institution that has acquired a nonprofit during the 1-year period preceding the date of determination or was a proprietary school and became a nonprofit institution during the 1-year period preceding the date of determination.

- Secretary shall use a risk-based approach to select, on an annual basis, not less than 2 percent of institutions for a program review that has:
 - Received large increases in funding during the 5-year period preceding the date of determination;
 - A large proportion of overall revenue from Federal funds;
 - A significant fluctuation in Direct Loan volume, Federal Pell Grant volume, or any combination;
 - Experienced sharp increases in enrollment;
 - High default rates;
 - A large aggregate dollar amount of loans in default;
 - A high proportion of complaints;
 - Extremely low graduation rates;
 - Poor financial health;
 - Been spending a large percentage of revenues on recruiting and marketing;
 - Large profit margins and profit growth in the case of proprietary schools;
 - Been on notice, warning, or probation from an accrediting agency;
 - Been found to have compliance problems with Federal or State laws;

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- Had a large amount of funds returned under the Return of Title IV formula; and
- Experienced a change in ownership or control.
- In conducting program reviews, the Department must:
 - Establish guidelines to ensure uniformity of practice;
 - Permit an institution 90 days following the issuance of the final program review report to correct or cure errors in accounting or recordkeeping;
 - Inform the relevant Federal and State agencies and accrediting agencies if there is a violation of Title IV;
 - Provide an institution 90 calendar days to review any program review report before any final program review report is issued; and
 - Review an institution's response and issue a final program review determination or a final audit determination no later than 180 days after issuing the program review report.

The text of H.R. 7112 is found at: <https://www.congress.gov/bill/115th-congress/house-bill/7112/text>.

House Democrats Send Letter to Secretary DeVos Criticizing Recent Change to College Scorecard

On October 29, 2018, House Education and the Workforce Ranking Member Bobby Scott (D-VA), House Veterans' Affairs Committee Ranking Member Tim Walz (D-MN), House Committee on Financial Services Ranking Member Maxine Waters (D-CA), and House Committee on Veterans' Affairs Ranking Member Mark Takano (D-CA) sent a letter to Secretary of Education Betsy DeVos expressing concern about a change made to the College Scorecard, which is designed to help students and families make enrollment decisions. On September 28, 2018, ED posted the updated College Scorecard and removed the national median outcome data that allowed students and families to compare academic and financial outcomes across all Title IV-participating institutions. "The elimination of the only national comparison point used on the College Scorecard renders the tool significantly less effective in guiding students' enrollment decisions and requires customers to spend more time doing their own research." Further, "[t]he removal of these data comes fewer than two weeks after the Department closed a comment period on its notice of proposed rulemaking to repeal the Gainful Employment (GE) regulation and put in place better outcomes data on the College Scorecard." The letter urged the Secretary to reverse its recent update.

A copy of the letter is found at: <https://democrats-edworkforce.house.gov/imo/media/doc/2018-10-29%20College%20Scorecard%20Letter%20%28RM%20Scott%2C%20RM%20Walz%2C%20RM%20Waters%2C%20VRM%20Takano%29.pdf>.

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Democratic Lawmakers Ask Secretary DeVos for Documents Used in Recommendation to Restore Recognition of ACICS

On October 19, 2018, Senator Elizabeth Warren (D-MA) and Representative Suzanne Bonamici (D-OR), along with six of their Senate colleagues and six of their House colleagues, sent a letter to Secretary of Education Betsy DeVos requesting information regarding the Department's recommendation to reinstate the Accrediting Council of Independent Colleges and Schools (ACICS) as a federally-recognized accreditor. In their letter, the lawmakers stated that new information indicates that the Senior Designated Official (SDO) "significantly misrepresented the endorsements of multiple accrediting agencies." The lawmakers pointed out that although the SDO claimed that a group of nine accrediting agencies endorsed ACICS, all but one denied ever sending an endorsement. The letter requested that the Secretary release all of the documents used in its recommendation to restore federal recognition of ACICS before she makes a final decision.

A copy of the lawmakers' letter is found at: <https://www.warren.senate.gov/imo/media/doc/2018-10-16%20Letter%20to%20ED%20re%20ACICS2.pdf>.

Four Senate Democrats Urge SSA to Renew Data-Sharing Agreement with ED to Allow the Calculation of the Debt-to-Earnings Rates under the GE Rule

On October 18, 2018, Senators Dick Durbin (D-IL), Patty Murray (D-WA), Elizabeth Warren (D-MA), Sherrod Brown (D-OH), and Richard Blumenthal (D-CT) sent a letter to the Social Security Administration (SSA) urging it to enter into a new data sharing agreement with the Department of Education to allow for the calculation of the debt-to-earnings (D/E) rates under the gainful employment rule. The previous data sharing agreement expired on May 24, 2018. "A new data sharing agreement between SSA and the Department is critical to fulfilling the federal government's legal responsibility under the gainful employment rule to protect students and taxpayers."

A separate letter was sent to Secretary of Education DeVos questioning the Department's delays and misuse of data which led to the data sharing agreement expiring and seeking an update on the Department's progress and timeline for a second round of D/E rates. The Department is at least a year behind the schedule for publishing final rates set by the Department.

A copy of the letter sent to the SSA is found at: <https://www.durbin.senate.gov/newsroom/press-releases/durbin-murray-senators-urge-social-security-administration-to-provide-data-needed-for-gainful-employment->.

A copy of the letter sent to Secretary DeVos is found at: <https://www.durbin.senate.gov/imo/media/doc/RJD%20ED%20GE%20letter%2010.18.18.pdf>.

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House and Senate Democrats Seek Updated Details on PSLF Program from Secretary DeVos

On October 16, 2018, Senate Health, Education, Labor, and Pensions Committee Ranking Member Patty Murray (D-WA), House Education and the Workforce Committee Ranking Member Bobby Scott (D-VA), and more than 150 Democrats sent a letter to Secretary of Education Betsy DeVos asking for information regarding the status of the Public Service Loan Forgiveness (PSLF) program since new data released by the Department indicates that “an alarming number of PSLF borrowers (99.6 percent) are being denied forgiveness.” The letter referenced the September 2018 report by the Government Accountability Office (GAO) that criticized the Department’s management of the PSLF program (GAO-18-547) and objected to the Department providing only “piecemeal guidance” to the federal student loan servicers. The Democrats asked for PSLF implementation data by November 27, 2018.

A copy of the press release is found at: <https://democrats-edworkforce.house.gov/media/press-releases/over-150-democrats-call-on-devos-to-release-more-information-about-the-departments-failure-to-faithfully-implement-the-public-service-loan-forgiveness-program>. The press release includes the text of the letter and the link to the GAO report.

Senate Democrats Introduce *Affordable Loans for Any Student Act of 2018*

On October 11, 2018, a group of Senate Democrats, led by Senator Jeff Merkley (D-OR), introduced S. 3584, the *Affordable Loans for Any Student Act of 2018*. The co-sponsors include Senators Debbie Stabenow (D-MI), Kirsten Gillibrand (D-NY), Tammy Baldwin (D-WI), Richard Blumenthal (D-CT), Brian Schatz (D-HI), Ben Cardin (D-MD), and Catherine Cortez Masto (D-NV). Senator Merkley said: “Higher education should create a path to opportunity, not a millstone of debt hanging around young Americans’ necks.”

The bill addresses several issues related to student loan affordability, complexity, and consumer information:

- Simplification: The bill reduces the number of federal student loan repayment plans to two:
 - An income-based repayment (IBR) plan with a new monthly payment calculation and forgiveness after 20 years; and
 - A fixed 10-year repayment plan with terms identical to the current standard plan, except for a \$25 minimum monthly payment instead of the current minimum of \$50.
- Affordability:
 - Parent PLUS borrowers would be eligible to enroll in the IBR plan;

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- IBR payments would be lower due to the IBR payment calculation;
 - Up to 3 years of interest subsidy for subsidized loans during repayment would be available; and
 - Direct Loan origination fees and interest capitalization would be eliminated.
- Help for Struggling Borrowers:
 - Limits would be set on wage garnishment and tax refund offsets for defaulted borrowers equal to the amount the borrower would be expected to pay under an IBR plan;
 - Borrowers would be permitted to rehabilitate their loans by making 9 consecutive, on-time monthly payments to bring the loan back into current status, twice in each loan's lifetime, rather than once as currently allowed;
 - Current array of deferment and forbearance options would be streamlined into a single "pause payment" process, maintaining all of the current eligibility categories, and using a common application form and terminology;
 - Borrowers who are more than 120 days delinquent in repayment and borrowers whose loans have been rehabilitated would be automatically enrolled into an IBR plan; and
 - Separation of joint consolidation loans would be available.
 - Consumer Information and Counseling:
 - Master Promissory Note would be renamed the student loan contract and would be required to be completed annually;
 - Loan counseling would be completed annually;
 - Loan counseling would include new consumer protection disclosures, such as projected monthly loan payments and recommendations to take advantage of grant aid and work study before borrowing loans; and
 - Consumer testing of loan counseling would be required.

A copy of the press release is found at: <https://www.merkley.senate.gov/news/press-releases/merkley-senate-democrats-introduce-legislation-to-ensure-affordable-student-loans-for-every-borrower>.

Four Senators Introduce Bill to Promote Innovation in Higher Education

On October 11, 2018, Senators Todd Young (R-IN), Maggie Hassan (D-NH), Orrin Hatch (R-UT), and Tim Kaine (D-VA) introduced S. 3596, the *Innovation Zone Act*, which would "replace the experimental sites initiative within the *Higher Education Act* to promote effective, evidence-based innovation in higher education and better prepare students for the workforce." The bill would:

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- Expressly state that experiments must increase student success;
- Provide an opportunity for the public, institutions of higher education and other stakeholders to submit suggestions for experiments;
- Specify the length of a given experiment;
- Require data collection methodology, rigorous evaluation methods, estimated cost, and answerable questions to be established before launching an experiment;
- Require the Secretary of Education to report on the status of experiments every two years that will be published on the Department's website;
- Require a review of existing experiments; and
- Rename the experimental site initiative as innovation zones to better reflect the purpose of the title.

A copy of the press release is found at: <https://www.young.senate.gov/newsroom/press-releases/bipartisan-group-of-senators-introduce-bill-to-promote-innovation-in-higher-ed/>.

U.S. District Court Judge Rejects CAPPS Request For Preliminary Injunction to Delay Borrower Defense to Repayment Rules; BDR Rules in Effect

On October 16, 2018, U.S. District Court for the District of Columbia Judge Randolph Moss issued a ruling that rejected a request for a preliminary injunction made by the California Association of Private Postsecondary Schools (CAPPS) to prevent the borrower defense to repayment rules from being implemented by the Department of Education. Judge Moss stated that CAPPS “failed to carry its burden of demonstrating that any one of its members is likely to suffer an irreparable injury” if the rules went into effect.

While Secretary of Education Betsy DeVos has described the borrower defense to repayment rules as unfair and too costly for schools, the Department announced that it would not seek any further postponement of the final rules. However, the Department is committed to finalizing the proposed revisions to the rule that would create a stricter standard for fraud claims and eliminate the ban on mandatory arbitration agreements. The Department, however, had indicated that it will not meet the November 1, 2018 deadline and, therefore, the revised regulations will not go into effect until July 1, 2020. However, the Secretary could use her authority for an earlier implementation date.

The Department is expected to provide further guidance as to the next steps for implementing the November 1, 2016 borrower defense to repayment regulations.

ED Seeks Proposals from Companies for Student Payment Card Pilot Program

On October 17, 2018, the Department of Education published a notice in the *Federal Register* that it is seeking proposals from companies to develop a new, federally-branded financial services product to allow students to receive their Title IV credit balances without any fees via a mobile app. The notice indicates that the Department plans to enter into an agreement with

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one or more financial services providers to carry out a pilot program called the “FSA Payment Vehicle Account Program” that will provide students with a fee-free option to receive their federal student aid credit balances. The companies will not receive any compensation from the Department to participate in the pilot program and will be prohibited from charging schools or students any fees to use the product. The companies will receive “authority to use the FSA brand” and will be allowed to include Department logos and other branding on their products. The companies will also have access to student information for marketing purposes, although students will have to first opt-in to receive any promotions. The Department will announce its decisions by December 5, 2018.

A copy of the notice is available at: <https://ifap.ed.gov/fregisters/attachments/FR101718.pdf>.

ED Announces Intent to Establish Neg Reg to Develop Proposed Rules Related to Accreditation and Other Issues

On October 15, 2018, the Department of Education published a notice in the *Federal Register* of its intent to establish a negotiated rulemaking committee to develop proposed regulations related to accreditation, distance learning and educational innovation, TEACH grants, and participation by faith-based educational entities. The committee will be divided into 3 subcommittees (Distance Learning and Educational Innovation Subcommittee, the Faith-Based Entities Subcommittee, and the TEACH Grants Subcommittee) with 3 sessions each beginning on January 14, 2019 and ending on March 12, 2019. The Department is soliciting suggestions for individuals who could serve on the neg reg committee. The topics are as follows:

- Requirements for accrediting agencies in their oversight of member institutions and programs;
- Criteria used by the Secretary to recognize accrediting agencies that focus on educational quality and deemphasize those that are anti-competitive;
- Simplification of the Department’s recognition and review of accrediting agencies;
- Clarification of the core oversight responsibilities amongst each entity in the regulatory triad to hold institutions accountable;
- Clarification of the permissible arrangements between an institution and another organization to provide a portion of the educational program;
- The roles and responsibilities of institutions and accrediting agencies in the teach-out process;
- Elimination of regulations related to programs that have not been funded in many years;
- Needed technical changes and corrections;
- Regulatory changes required to ensure equitable treatment of brick-and-mortar and distance education programs; enable expansion of direct assessment programs,

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distance education, and competency-based education; and to clarify disclosure and other requirements of state organizations;

- Protections to ensure that accreditors recognize and respect institutional mission, and evaluate an institution's policies and educational programs based on that mission;
- Simplification of State authorization requirements related to programs offered through distance education or correspondence courses, including disclosures about programs and other State authorization issues;
- Definition of "regular and substantive" interaction;
- Definition of "credit hour;"
- The requirement that an institution demonstrates a reasonable relationship between the length of the program and the entry-level requirements for the recognized occupation for which the program prepares the student;
- The barriers to innovation in postsecondary education and to student completion, graduation, employment, including regulatory barriers; and
- Direct assessment programs and competency-based education, focusing on the ability of institutions to develop and students to progress in innovative programs.

A copy of the notice is found at: <https://ifap.ed.gov/fregisters/attachments/FR101518.pdf>.

21 AGs Ask Secretary DeVos When Loan Discharges for Closed Schools Will Occur

On October 30, 2018, 21 Attorneys General sent a letter to Secretary of Education Betsy DeVos seeking advice as to the Department's plan for effectuating the automatic closed-school discharges mandated by the November 1, 2016 regulations on borrower defense to repayment. The letter pointed out that a recent federal court "invalidated the Department's repeated delay attempts and denied an industry trade group's motion to halt implementation of the regulations." The letter noted that "[a]lthough the Secretary may disagree with the Department's 2016 policy, there is no legitimate basis for the Department to unlawfully withhold agency action where applicable regulations dictate a specific, unequivocal command about which the Secretary has no discretion whatsoever."

A copy of the letter is found at: <https://www.mass.gov/files/documents/2018/10/30/CA-MA%20Multistate%20Letter%20to%20Sec.%20DeVos%20re%20Closed-School%20Discharge.pdf>.

Former Secretary of Education Duncan Argues that ED's Decision to Rescind GE Rules Walks Away from Accountability Standards and Conservative Principles

On October 17, 2018, the Brookings Institution released a report authored, by former Secretary of Education Arne Duncan and David Whitman, Secretary Duncan's former speechwriter, titled "Betsy DeVos and her Cone of Silence on For-Profit Colleges," described their surprise that Secretary DeVos was rescinding the gainful employment rules. They said

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that it ensures that for-profit institutions cannot lose access to federal funds no matter how poorly they perform. Former Secretary Duncan and Mr. Whitman argue that the decision not only walks away from accountability standards, but also conservative principles. “Her elimination of federal sanctions for low-performing programs marks a complete flip-flop from the administrations of Ronald Reagan and George H. W. Bush, which insisted on accountability for federal dollars and regulated outcomes like unfettered student debt in the federal student loan program.” The authors of the report went on to say that the rolling back of the gainful employment regulations is a revival of Democrats’ defense of those same institutions from three decades ago. However, Democrats ended their defense “in the face of overwhelming evidence that recruiting abuses and student debt burdens were heavily concentrated in the for-profit sector, even after taking account of student demographics.”

Former Secretary Duncan and Mr. Whitman said ending the gainful employment sanctions is also an abandonment of a long-held conservative principle of fiscal responsibility since there is no risk of losing federal dollars for poorly performing programs. They also argued that rolling back the regulations would cost the federal government \$5.3 billion in Title IV funds in the next 10 years. Further, they noted that the use of the College Scorecard to hold institutions accountable will not work since research has shown that transparency without sanctions does not have a noticeable impact on student behavior.

A copy of the report is found at: <https://www.brookings.edu/research/betsy-devos-for-profit-colleges-education-america/>.

American Federation of Teachers Sues Navient Over PSLF Program

On October 3, 2018, the American Federation of Teachers (AFT) and its member filed a class-action lawsuit against Navient for allegedly misleading borrowers in public service professions in ways that prevented their access to the Public Service Loan Forgiveness (PSLF) program. The lawsuit claims that Navient provided teachers with incorrect information, which extended the amount of time that they needed to wait before being able to have their loans discharged under the PSLF program. Rather than promoting the loan forgiveness program, Navient recommended forbearance and other less-effective remedies to those borrowers seeking loan relief. AFT President Randi Weingarten issued a press release stating: It is Congress’ “intent when they created PSLF to help those who are helping others.”

A copy of the press release is found at: <https://www.aft.org/press-release/class-action-lawsuit-launched-against-student-loan-servicer-navient-over>.

GAO Releases Report on the Public Service Loan Forgiveness Program

On September 27, 2018, the Government Accountability Office (GAO) released a report titled, “Public Service Loan Forgiveness: Education Needs to Provide Better Information for the Loan Servicer and Borrowers.” (GAO-18-547) As of April 2018, over a million

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borrowers had taken steps to pursue Public Service Loan Forgiveness (PSLF) from the Department of Education, but few borrowers have been granted loan forgiveness to date. The GAO recommended that the Department should develop and publish in a timely manner a comprehensive Public Service Loan Forgiveness manual for staff and servicers, provide a definitive source for servicers to determine if a borrower's employment is eligible for PSLF, and standardize the process of eligible loan payment counting to allow borrowers to track their progress more easily.

A copy of the GAO report is found at: <https://www.gao.gov/products/gao-18-547>.

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
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