



★ FROM THE OFFICE OF THE PRESIDENT ★

May 16, 2012

The Honorable John Boehner
Speaker of the House
U. S. House of Representatives
Washington, DC 20515

The Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives
Washington, DC 20515

Dear Speaker Boehner and Minority Leader Pelosi:

On behalf of the National Association of Student Financial Aid Administrators (NASFAA), the Coalition of Higher Education Assistance Organizations (COHEAO), and the undersigned organizations, I urge you to alter language in the “Digital Accountability and Transparency Act” (H.R. 2146) that would greatly impede the U.S. Department of Education (ED) from offering vital and mandated training to staff in colleges and universities across the country.

We support efforts to create greater transparency and accountability in government spending; however, we believe the construction of the current language could have serious unintended harmful effects on ED’s ability to train and update those in the student aid profession who administer more than \$160 billion in federal student aid to more than 16 million students each year.

Specifically, we support the following modifications to the proposed amendments, as put forth by American Society of Association Executives (ASAE):

- **Definition of a Conference:** Section 1(D) defines “conference” as a meeting “sponsored by 1 or more agencies, 1 or more organizations that are not agencies, or a combination of such agencies or organizations.” This definition would encompass every conference held by one of our professional associations at the national, regional, and state level. Our recommendation is to revise this definition to a meeting “sponsored by 1 or more federal agencies” so that it is strictly tied to federal conferences. Professional associations provide low-cost ways for federal agencies to provide regulatory updates and implementation guidance for those charged with ensuring compliance with the regulations.
- **Conference Limitations:** The final section of the amendment, Section 4, limits any agency from expending funds on “more than a single conference sponsored or organized by an organization

during any fiscal year, unless the agency is the primary sponsor and organizer of the conference.” This provision is highly problematic for associations that invite government employees to conferences for training purposes. A reasonable reading of this provision would mean that if ED employees attend a regional conference, they would then be prohibited from attending any other training sponsored by that association. ED employs an entire department of federal trainers for the express purpose of ensuring that different people working within a university (such as financial aid, business, or admissions officers) receive necessary training and timely regulatory updates. We recommend deleting this limitation because it is too broad and does not take into account the diverse structure of associations and the primary purpose of association conferences.

We are also concerned about the amendment to H.R. 2146 that caps annual travel expenses to no greater than 80 percent of FY2010 expenditures. We believe a significant decrease in ED’s travel budget, which has already been reduced, would negatively impact training opportunities for our members. Schools that participate in the Title IV programs are required to have an adequate number of qualified persons to administer the federal student aid programs and to designate a capable individual to coordinate student financial assistance. An individual may be considered capable in part based upon completion of ED training. This amendment would contradict these existing regulatory requirements and negatively affect our members’ ability to administer Title IV funds. We recommend that it be deleted and that each agency retain responsibility for the efficient administration of its administrative funding.

We respectfully ask you to consider the above modifications to ensure that this important piece of legislation does not create negative consequences.

Sincerely,



Justin Draeger
NASFAA President

Sincerely,



Harrison Wadsworth
COHEAO Executive Director

American Association of Community Colleges
 American Association of State Colleges and Universities
 American Council on Education
 National Association of College and University Business Officers
 National Association of Independent Colleges and Universities

CC:

The Honorable John Kline
The Honorable George Miller
The Honorable Darrell E. Issa
The Honorable Dan Burton
The Honorable John Mica
The Honorable Michael Turner
The Honorable Patrick McHenry
The Honorable Jim Jordan
The Honorable Jason Chaffetz
The Honorable Connie Mack
The Honorable Tim Walberg
The Honorable James Lankford
The Honorable Justin Amash
The Honorable Ann Marie Buerkle
The Honorable Paul Gosar
The Honorable Paul Labrador
The Honorable Pat Meehan
The Honorable Scott DesJalais
The Honorable Joe Walsh
The Honorable Trey Gowdy
The Honorable Dennis Ross
The Honorable Frank Guinta
The Honorable Blake Farenthold
The Honorable Mike Kelly
The Honorable Edolphus Towns
The Honorable Carolyn Maloney
The Honorable Eleanor Holmes Norton
The Honorable Dennis Kucinich
The Honorable John Tierney
The Honorable Wm. Lacy Clay
The Honorable Stephen Lynch
The Honorable Jim Cooper
The Honorable Gerald Connolly
The Honorable Mike Quigley
The Honorable Danny Davis
The Honorable Bruce Bradley
The Honorable Peter Welch

The Honorable John Yarmuth
The Honorable Christopher Murphy
The Honorable Jackie Speier