

October 19, 2022

VIA TELEFACSIMILE

The Honorable Sandra D. Bruce
Inspector General
U.S. Department of Education
550 12th Street, SW
Washington, DC 20202

Re: Student Loan Debt Cancellation, Self-Certification of Income Eligibility, and Potential Waste, Fraud, and Abuse

Dear Inspector General Bruce:

The Defense of Freedom Institute for Policy Studies (DFI) is a national nonprofit organization dedicated to defending and advancing freedom and opportunity for every American family, student, entrepreneur, and worker and to protecting the civil and constitutional rights of Americans at school and work. Our organization is composed of former U.S. Department of Education (“Department”) employees and other federal agency officials who are experts in education law and policy.

DFI writes because we are deeply concerned that the Biden administration’s recently announced student loan debt cancellation policy lacks basic safeguards against waste, fraud, and abuse. Some of these safeguards could be easily implemented—such as directing borrowers to give the Department permission to confirm income through Internal Revenue Service (IRS) records during the application process.

Despite the relative ease of implementing such measures, the Department relies on debtor self-certifications to verify income eligibility and eschews any real precautions to prevent waste, fraud, and abuse regarding income eligibility. Given that the Congressional Budget Office has estimated that the cost of the Department’s debt cancellation plan is at least \$430 billion, this is simply



unacceptable, particularly where, as here, no statutory requirement or other deadline exists that requires the Department to act with such haste.

Accordingly, we urge your prompt action to request that the Department immediately pause its processing of student loan cancellation applications until the agency has established a system of rigorous safeguards to protect the interests of the taxpayer. Because of the unusual volume of student loan debt at stake and the extraordinary number of debtors—at least \$430 billion owed by more than 40 million borrowers—we also urge you to work with the Department to develop a waste, fraud, and abuse protocol that protects American taxpayers and the integrity of the Title IV student loan program.

The Department's Student Loan Debt Cancellation Policy¹

The roll-out of the Department's student loan debt cancellation policies has been unorthodox. Rather than describe the program through the usual legal processes, the Biden administration has relied on press releases, website posts, blogs, and tweets to explain its policy and execute its plan. Congress did not sanction this massive elimination of a taxpayer asset, and there has been no opportunity for the public to submit, or for the Department to consider, comments on the plan through a rulemaking process.

Rather than engage in deliberate and thoughtful notice-and-comment rulemaking and publish a final rule, the administration has haphazardly sprinkled tidbits of its policy into the public square through a series of media announcements. DFI captures these below:

- On August 24, 2022, President Biden and the Department announced a massive, three-part plan to cancel outstanding student loan debt, including “one-time” “cancellation” of up to \$20,000 in debt for Pell Grant recipients with loans held by the Department and up to \$10,000 for non-Pell Grant borrowers, if their individual annual adjusted gross income is less than \$125,000 or, for married couples, less than

¹ DFI maintains that the Department's student loan cancellation program is unconstitutional and illegal. Given OIG's important statutory role to investigate waste, fraud, and abuse in government programs, however, this letter only addresses the issue clearly within OIG's statutory bailiwick—the Department's inadequate income verification measures and the waste, fraud, and abuse that will certainly follow.



\$250,000.² Boasting that “[n]o one with federally-held loans has had to pay a single dollar in loan payments since President Biden took office,” the White House simultaneously announced a “final” extension of the student loan pause (for repayment and collections) through December 31, 2022.³

- The Department relied on an unpersuasive legal justification for its unilateral loan cancellation policy that contradicts prior guidance to the Secretary of Education from the Department’s Office of the General Counsel (OGC).⁴ In a subsequent memorandum dated August 23, 2022,⁵ OGC reversed course and provided a truly novel interpretation of the Secretary’s authority under the HEROES Act of 2003⁶ to unilaterally exercise administrative authority to “grant relief from student loan requirements” during times of “war, other military operation, or national emergency.” It argued that the COVID-19 pandemic, which had been declared a national emergency in March 2020, qualified as a national emergency under the HEROES Act.⁷
- On September 18, 2022, in a nationally broadcast interview, President Biden unambiguously declared that the “pandemic is over,” effectively removing the Department’s sole legal basis for enactment of its student loan debt cancellation policy.⁸ To DFI’s knowledge, the President’s declaration that the pandemic is over has not resulted in the Department altering its plan to cancel student loan debt or providing a new legal justification for its unprecedented efforts.

² See <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/24/fact-sheet-president-biden-announces-student-loan-relief-for-borrowers-who-need-it-most/>.

³ *Id.*

⁴ Reed Rubinstein, “Memorandum to Betsy DeVos, Secretary of Education, Re: Student Loan Principal Balance Cancellation, Compromise, Discharge, and Forgiveness Authority,” Jan. 12, 2021, <https://static.politico.com/d6/ce/3edf6a3946afa98eb13c210afd7d/ogcmemohealoans.pdf>.

⁵ See <https://www2.ed.gov/policy/gen/leg/foia/secretarys-legal-authority-for-debt-cancellation.pdf>.

⁶ 20 U.S.C. § 1098bb(a)(1).

⁷ *Id.*

⁸ Dan Diamond, “Biden’s Claim that ‘pandemic is over’ complicates efforts to secure funding,” THE WASHINGTON POST (Sept. 19, 2022), <https://www.washingtonpost.com/health/2022/09/18/biden-covid-pandemic-over/>. See also <https://www.nytimes.com/2022/05/20/us/title-42-border-migrants-court.html?searchResultPosition=21>.



- On October 11, 2022, fifty days after first announcing the debt cancellation program, “[s]enior administration officials released a *preview* of the application that most borrowers will be required to fill out to receive the loan forgiveness that President Joe Biden first announced in August. The simple form will be hosted on a .gov website when it goes live later this month, officials said. . . . The application . . . *contains only a handful of questions that seek basic information about borrowers*: name, social security number, date of birth, phone number and email address. Borrowers will be required to check a box that ‘certifies under penalty of perjury’ that they meet the income threshold for the debt relief program.”⁹
- On October 14, 2022, the administration revealed its “beta” version of the application site. There is no evidence that the Office of Management and Budget reviewed, analyzed, or approved this collection of borrower information. As advertised, the application merely requires borrowers to self-certify their income.¹⁰

The result is a program designed to encourage waste, fraud, and abuse. Even though the amount of debt cancellation is contingent on whether the borrower had received a Pell Grant, applicants for loan cancellation are not required to confirm, under penalty of perjury, whether they ever received a Pell Grant. The administration’s FAQs explain this oversight as follows: “We have a record of every student who has ever received a Federal Pell Grant. . . . [W]e’ll check our records to determine if you have a Pell Grant.”¹¹ This statement surely cannot be of comfort to OIG, which is certainly familiar with the state of database systems at the Office of Federal Student Aid (FSA). Just as the agency has experienced the issue of improper payments, the Department can reasonably anticipate many improper cancellations.

⁹ Michael Stratford, “White House unveils application form for Biden’s student debt relief [:] Borrowers will self-certify that they meet the income threshold for the program,” POLITICO, (October 11, 2022), <https://www.politico.com/news/2022/10/11/student-debt-relief-application-unveiled-00061197> (emphasis added).

¹⁰ See <https://studentaid.gov/debt-relief/application>.

¹¹ See <https://studentaid.gov/manage-loans/forgiveness-cancellation/debt-relief-info#income>.



An unnamed senior administration official assured POLITICO that “the application process will contain ‘strict fraud prevention measures’ that are ‘risk-based,’” without identifying what such measures will entail.¹² Even though the new debt cancellation policies are already being implemented, the Department has failed to provide further assurances regarding those “strict fraud prevention measures.” They certainly do not include the most straightforward tool available to the Department. If borrowers agreed to let the IRS confirm that their 2020 and 2021 incomes were below the announced thresholds, the Department would not need to exclusively rely on fraud-prone self-certification. The administration’s false sense of urgency ignores this easily implemented fraud-prevention measure.

Problems with Self-certification of Income

In the wake of federal COVID relief aid, it has become clear that reliance on self-certification of eligibility for a program makes the federal government vulnerable to fraud and abuse. The Inspectors General of several federal agencies, including the Department of Labor and the Small Business Administration, raised alarms about the risks of self-certification within weeks of the first wave of COVID disbursements.¹³ More recently, several investigations have confirmed that self-certification invites fraud and abuse from a small number of people.¹⁴

As you know, the Department is well aware of the potential pitfalls of self-certification, even under penalty of perjury. As the Government Accountability Office (GAO) reported to Congress in June 2019 with regard to Income-Driven Repayment (IDR) plans, disturbingly large numbers of federal student loan borrowers with approved IDR plans had “misrepresented or erroneously reported their income or family size.”¹⁵ GAO noted that “[w]eaknesses in Education’s processes to verify borrowers’ income and family size information limit its ability to detect potential fraud or error in IDR plans” and recommended that the Department should avoid such fraud by systematically implementing certain data

¹² See <https://www.politico.com/news/2022/10/11/student-debt-relief-application-unveiled-00061197>.

¹³ See <https://www.pandemicoversight.gov/news/articles/self-certification-procedures-may-increase-fraud-risk-pandemic-response-programs>.

¹⁴ See, e.g., <https://www.nytimes.com/2022/08/16/business/economy/covid-pandemic-fraud.html?searchResultPosition=3>; <https://www.washingtonpost.com/us-policy/2022/02/17/stimulus-aid-oversight-fraud/>.

¹⁵ See <https://www.gao.gov/assets/gao-19-347.pdf>.



analytic practices and combining them with follow-up procedures to verify information”¹⁶ Debt cancellation is no different.

Despite the well-known pitfalls of self-certification and GAO’s findings and recommendations, the Department appears uninterested in incorporating reasonable fraud- and error-reducing measures. The agency could easily do so, but instead the Biden administration has focused on clearing a path for quick cancellations with no oversight.

Inadequate Income Verification Requirements

The Biden administration has engaged in an unusually rapid roll-out of the Department’s student loan debt cancellation policies and appears intent on expanding the pool of borrower-applicants, no matter whether they truly qualify for the program. The primary strategy is to assure borrowers of the simplicity of the application process and the need to answer as few questions as possible before receiving debt cancellation.

Again, the Department has engaged in this sweeping and unprecedented policy without adhering to rulemaking requirements, including providing a general notice of proposed rulemaking in the *Federal Register*, which, among other things, would have addressed the Department’s legal authority for the proposed rulemaking and offered the public an opportunity to submit data and comments.¹⁷ Under such notice-and-comment rulemaking, the Department would have been required to consider the data and respond to public submissions.

The FSA website for processing debt cancellation applications provides the sole portal through which debtors may apply. Before releasing the application, the Department went to great lengths to streamline debt cancellation by foregoing the need to show any meaningful qualification:

The application will be a short online form. You won’t need your FSA ID, and *you won’t need to upload any documents to submit your application*. Our goal is to provide borrowers a seamless and simple

¹⁶ *Id.* at 2.

¹⁷ 5 U.S.C. § 553.



experience, and we're working closely with the services who will process the relief.¹⁸

In short, the Department seeks as many applications as possible, will ask only those questions needed to establish the borrower's identity, and will not verify income eligibility. The Department will offer the greatest single cancellation of taxpayer-funded student loan debt in history in exchange for these minimal application safeguards. An applicant for a credit card, who only seeks a line of credit and not debt amnesty, would almost certainly face higher scrutiny and verification efforts by the lender than the Department has now proposed in exchange for significantly greater financial benefits.

FSA has also unduly simplified the qualification process: in "Step 1: Check if you're eligible," FSA notes that "[y]ou're eligible for student loan debt relief if your annual federal income was below \$125,000 (individual or married, filing separately) or \$250,000 (married, filing jointly or head of household) in 2020 or 2021."¹⁹ FSA notes that borrowers who "meet the income requirements and have eligible loans" will receive "debt relief" depending on outstanding loan balances and whether the borrower received a Pell Grant.²⁰ No further income or other verification is required. If a borrower applies, the Department will "cancel" a large amount of that borrower's debt.

Reportedly, the Department has indicated that eight million borrowers do not even need to apply. FSA explains that "[a]lthough most borrowers will have to apply for debt relief, we have income data on hand for around 8 million borrowers" who will "get the relief without applying, unless they choose to opt out."²¹ The "opt out" provision was added after a recent lawsuit pointed out that some borrowers participating in yet another Department loan forgiveness program would be better off not receiving the one-time debt cancellation due to state tax laws. The Department has not shared with the public the mechanism that it will use to implement this aspect of debt cancellation.

¹⁸ See <https://studentaid.gov/manage-loans/forgiveness-cancellation/debt-relief-info#income> at "Frequently Asked Questions[;] What will I need to complete the application?" (emphasis added) (accessed on Oct. 14, 2022).

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.* ("Will any borrowers receive debt relief without applying?").



To determine the income for these eight million borrowers, FSA advises applicants that it will “use *Free Application for Student Aid* (FAFSA[®]) and income-driven repayment application information to identify borrowers—or, as appropriate, parents—who have submitted income data for tax years 2020 or 2021. We’ll use this data to determine which borrowers meet the income requirements. If we have borrower data for both years, we’ll use the year with the lower income.”²²

In its announcement, the White House stated that its plan would provide “relief to up to 43 million borrowers, including cancelling the full remaining balance for roughly 20 million borrowers.” FSA appears to lack income data on about 35 million of those borrowers,²³ yet it does not intend to verify income for any of them.

Despite the vastness and unprecedented scale of the Biden administration’s student loan debt cancellation plan, award of the debt cancellation relies largely and unwisely on self-certification of income eligibility. Ignoring the likelihood of waste, fraud, and abuse, the Department is offering disturbingly broad and effortless access to debt cancellation to ensure that any applicant who applies for loan forgiveness will receive it.

The Department’s Inconsistency on Self-certification

The Department appears to recognize that in certain circumstances, independent verification of income and other qualifying factors is warranted to eliminate waste, fraud, and abuse. Yet it persists in failing to require such outside verification for its legally challenged and politically charged one-time debt cancellation. In other student loan debt policy areas, which are less financially consequential for the American taxpayer, FSA routinely requires independent evidence beyond self-certification to verify that a borrower meets the required qualifications.

For instance, to qualify under the Public Service Loan Forgiveness program, the borrower-employee may not simply self-certify that he or she held a qualifying public service position. Rather, the borrower-employee applicant must obtain the certification of an employer-official who has access to employee records and whose duties include truthfully certifying the borrower-employee applicant’s

²² See <https://studentaid.gov/debt-relief-announcement/one-time-cancellation>. (“How will I know if I qualify for debt relief without applying?”).

²³ See <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/24/fact-sheet-president-biden-announces-student-loan-relief-for-borrowers-who-need-it-most/>.



qualifying employment. Prudently, FSA does not rely solely on the borrower-employee applicant’s self-certification of qualifying employment. Similarly, with reference to borrower defense to repayment applications, the Department is required to seek a response from the relevant educational institution—to obtain “its side of the story”—regarding a borrower’s allegations underpinning his or her application. The school is entitled to submit not only a narrative response but also documents and witness statements to rebut the borrower’s allegations contained in the application. In short, the Department must develop a record before deciding an application for borrower defense relief. The agency’s debt cancellation policy has none of these safeguards.

Previous Widespread Failure to Independently Verify Income

Failure to properly verify borrower incomes evokes the memory of “no-documentation loans” made by subprime lenders leading to America’s last significant financial crisis. Here and now, the Biden administration has a selfish interest in seeing the greatest numbers of beneficiaries successfully apply for and receive debt cancellation. The concern may be that independently verifying income instead of using self-certification would slow the process, diminishing the final tally of those borrowers benefiting from “cancelled” debt. The Department’s income verification policies may net the maximum volume of program beneficiaries, but they will not ensure that only properly qualified applicants benefit from the program. If reasonable safeguards slowed the process and protected taxpayer dollars when hundreds of billions are at stake, the slight delay would be well worth it. Waste, fraud, and abuse involving enormous sums of money would be prevented.

In its January 2011 report on the causes of the financial and economic crisis of 2008–09 in the United States,²⁴ the Financial Crisis Inquiry Commission noted that consumer groups had long lobbied banks “to invest in and loan to low- and moderate-income communities and that, succumbing to the pressure, banks would ‘either sign agreements with community groups or else unilaterally pledge to lend to and invest in specific communities or populations.’”²⁵ As a result of those pressures, many of America’s most esteemed financial firms engaged in, and profited from, trading in high-risk mortgages often made to borrowers with poor

²⁴ See <https://www.govinfo.gov/content/pkg/GPO-FCIC/pdf/GPO-FCIC.pdf>.

²⁵ *Id.* at 97.



or unsubstantiated qualifying credit.²⁶ The Department has learned none of the hard-earned lessons of the 2008 financial crisis. Indeed, its inadequate safeguards seem to ignore those lessons and encourage fraud by some borrowers.

The timing of the debt forgiveness announcement, the unorthodox process for effecting the policy, and the woefully inadequate fraud-prevention protocols give ample reasons for heightened oversight efforts by OIG.

The Department's Anti-Fraud Standards

The Department's regulations place system safeguard responsibilities on recipients of taxpayer funding (*i.e.*, educational institutions), including the collection of "documents, including any copies of State and Federal income tax returns, that are normally collected by the institution to verify information received from the student or other sources."²⁷ The Department's regulations correctly place an important emphasis on the evaluation of procedural safeguards used by educational institutions to determine the adequacy of financial aid delivery systems, such as the collection of independent documentation to verify income and other important qualifying factors.

Indeed, the Department's regulations require it to carefully review the adequacy of an educational institution's fraud-prevention safeguards to verify from different sources the accuracy of a student's application for financial aid.²⁸ In addition, the Department requires that for an educational institution to have adequate administrative capability, such that the Department may consider disbursing taxpayer dollars to it, the institution must have, among other requirements, "written procedures" for or written information indicating the responsibilities of the institution's offices responsible for the approval, disbursement, and delivery of Title IV and HEA program assistance.²⁹

The Department has failed to institute safeguards similar to those it typically uses for student aid to ensure eligibility to its massive student loan debt cancellation

²⁶ See <https://www.federalreservehistory.org/essays/subprime-mortgage-crisis>.

²⁷ 34 C.F.R. § 668.16(f)(2).

²⁸ 34 C.F.R. § 668.16(f).

²⁹ 34 C.F.R. § 668.16(b)(4).



program. The double standard opens the door to potentially massive fraud against American taxpayers.

The Department's Recent PIIA Compliance Failures

OIG's fraud-prevention responsibilities were already enormous before the pandemic. With the various COVID relief packages implemented since March 2020, those responsibilities increased multi-fold as billions of dollars in pandemic relief have flowed through the Department. Although the Congressional Budget Office estimates that the loan cancellation program will cost at least \$430 billion, other nonpartisan estimates reliably place the total cost of the Department's student loan debt cancellation program at approximately \$605.4 billion (between FY 2022–2031).³⁰ Regardless of which estimate one uses, OIG's fraud-prevention responsibilities have grown exponentially with the Department's emerging debt cancellation program.

According to OIG, the Department “disburses financial aid to millions of students, making ED one of the largest financial institutions in the country.”³¹ Notably, this self-assessment of the importance of the Department's powerful position *vis-à-vis* the American economy occurred prior to the announcement of the student loan debt cancellation program.

It is particularly noteworthy that OIG recently found serious deficiencies in the Department's compliance with the Payment Integrity Information Act of 2019 (PIIA) for fiscal year 2021, including insufficient risk assessment methodologies leading to “the Department . . . reporting an improper payment estimate for its two high-priority programs,” the Pell and Direct Loan programs.³²

OIG's investigation revealed that certain Department risk assessments were unreliable and failed to reflect the “true level of risk in the population because the improper payment estimates for the Pell and Direct Loan programs were unreliable.”³³ OIG found that the Department “did not comply with the requirement to report improper payment rates of less than 10 percent for all

³⁰ See <https://budgetmodel.wharton.upenn.edu/issues/2022/8/26/biden-student-loan-forgiveness>.

³¹ See <https://www2.ed.gov/about/offices/list/oig/misc/student-aid-administrator-fraud-awareness.pdf>.

³² *Id.*

³³ See <https://www2.ed.gov/about/offices/list/oig/auditreports/fy2022/a22ga0050.pdf>.



applicable programs” and “reported an improper payment estimate of 14.77 percent for the Title I, Part A programs, which is above the 10 percent threshold”³⁴

PIIA was implemented to identify and reduce improper payments by the Department³⁵ and was created in response to massive improper payments by the federal government, estimated by GAO to have been at least \$281 billion in FY 2021.³⁶ OIG’s findings do not inspire confidence in the Department’s own compliance efforts: “we found that the high-priority programs’ improper payment estimates may not reflect the true level of risk in the population because the improper payment estimates for the Pell and Direct Loan programs were unreliable”³⁷

As indicated by OIG’s previous findings and due to the enormity of the pending student loan debt cancellation program, DFI is concerned that the Department has not implemented adequate safeguards to correctly anticipate and prevent improper debt cancellation. The Department’s vaguely identified “prevention measures” fail to provide adequate procedural safeguards to deter and prevent waste, fraud, and abuse in the debt cancellation program.

OIG’s Fraud-Prevention Efforts

As OIG noted in a recent press release regarding a joint law enforcement investigation of a large fraudulent discharge scheme, “[t]he OIG is committed to fighting student aid fraud in all its forms and we will continue to work with our partners to pursue anyone who participates in these types of crimes.”³⁸

In its “Fraud Reporting Requirements: A Guide for Federal Program Participants and Auditors,” OIG emphasizes the importance of grantees and subgrantees engaging in anti-fraud best practices and fraud reporting—the absence of which may result in “remedies such as the withholding of cash payments [by the Department] or further Federal awards, suspension or termination of the award,

³⁴ *Id.* at 17.

³⁵ 31 U.S.C. §§ 3351–3358.

³⁶ See <https://www.gao.gov/improper-payments>.

³⁷ *Id.* at 21.

³⁸ See <https://www.justice.gov/usao-ndga/pr/lithonia-man-operating-federal-student-loan-discharge-scam-sentenced-federal-prison>.



and suspension or debarment from Federal assistance programs or activities.”³⁹ In noting the seriousness of preventing fraud, OIG states that it “relies on entities that participate in Department programs and their auditors to be on alert to opportunities for fraud involving those programs.”⁴⁰

In its publication entitled “Stop the Crooks: Report Fraud, Waste, and Abuse in U.S. Department of Education Programs,” OIG presents a series of risk factors indicating that fraud may be present in a federal student aid program. One of the factors is a “lack of written policies and procedures” and another is the “reluctance to provide information to auditors.”⁴¹ Those same risk factors are accurate in characterizing the Department’s currently inadequate safeguards regarding income verification in order to receive significant student loan debt cancellation benefits. The Department’s debt cancellation policy and program are, according to the Department as discussed above, designed to provide a remarkably simplified process involving no need to substantiate income eligibility:

The application will be a short online form. You won’t need your FSA ID, and *you won’t need to upload any documents to submit your application*. Our goal is to provide borrowers a seamless and simple experience, and we’re working closely with the services who will process the relief.⁴²

In response to the 2008 Financial Crisis, federal and state government-led investigators spent years and vast resources to investigate and prosecute deliberate wrongdoing by financial firms. (It is likely that PPP will present a similar vein of work for OIG and others who seek to prevent fraud in government programs.) Some of America’s largest banks paid massive penalties pursuant to civil settlements with the U.S. government.⁴³ It was wrong when the private sector engaged in such shoddy practices, and it is likewise wrong when the very

³⁹ See <https://www2.ed.gov/about/offices/list/oig/misc/fraudreportingrequirements.pdf>.

⁴⁰ *Id.*

⁴¹ See <https://www2.ed.gov/about/offices/list/oig/invtreports/edoigfraudIndicatorsonline.pdf>.

⁴² See <https://studentaid.gov/manage-loans/forgiveness-cancellation/debt-relief-info#income> at “Frequently Asked Questions[;] What will I need to complete the application?” (emphasis added) (accessed on Oct. 14, 2022).

⁴³ See <https://www.justice.gov/opa/pr/bank-america-pay-1665-billion-historic-justice-department-settlement-financial-fraud-leading>.



government that found such wrongdoing by the private sector now chooses to ignore proper income verification safeguards in favor of quick policy results.

Conclusion

The absence of effective income verification safeguards in the Department's debt cancellation program guarantees waste, fraud, and abuse and exposes American taxpayers to risks that they should not bear. Foregoing such simple safeguards is inexcusable, particularly given the straightforward ease of including a requirement in the application authorizing the Department to verify income with the IRS. The American people deserve far better.

DFI respectfully calls on OIG to act now by calling for a pause in the implementation of the Department's student loan debt cancellation program until it can investigate the agency's inadequate fraud-prevention safeguards. During this pause, OIG should draw from its vast anti-fraud investigative experience to work with the agency to develop appropriate protocols to prevent waste, fraud, and abuse in the Department's debt cancellation program.

Please contact us at robert.eitel@dfipolicy.org and jim.blew@dfipolicy.org if you have any questions.

Sincerely yours,

Robert S. Eitel
President & Co-founder

James C. Blew (Oct 18, 2022 22:01 PDT)

James C. Blew
Co-founder

cc:

The Honorable Robert C. "Bobby" Scott, Chairman, Committee on Education and Labor

The Honorable Virginia A. Foxx, Ranking Member, Committee on Education and Labor

The Honorable Carolyn B. Maloney, Chairwoman, Committee on Oversight and Reform

The Honorable James R. Comer, Ranking Member, Committee on Oversight and Reform



The Honorable Patty Murray, Chair, Committee on Health, Education, Labor & Pensions

The Honorable Richard Burr, Ranking Member, Committee on Health, Education, Labor & Pensions

The Honorable Gary C. Peters, Chairman, Committee on Homeland Security and Governmental Affairs

The Honorable Rob Portman, Ranking Member, Committee on Homeland Security and Governmental Affairs

The Honorable Miguel Cardona, Secretary, United States Department of Education