

From: Fansmith, Jonathan
Subject: Re: webinar on PSLF waiver for ACE members?
To: Vitez, Kaitlyn
Cc: Harrington, Ashley; Wollard, Kalynn; Gunja, Mushtaq
Sent: June 22, 2022 11:18 AM (UTC-04:00)
Attached: image002.png, image005.png, image007.png, image009.png, image002 (1).png, image005 (1).png, image007 (1).png, image009 (1).png, FSA Limited PSLF Waiver Borrower Fact Sheet.pdf, Limited PSLF Waiver Employer Toolkit.pdf, Limited PSLF Waiver State Toolkit.pdf

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Hi Kaitlyn,

Thanks for sending these and we're happy to share them after the webinar. We were also wondering if it would be ok to also include links to them in our other communications (incl. those that will promote the webinar) before the webinar takes place?

Also, the ACE team is meeting tomorrow to discuss the webinar arrangements, and there are a few questions it would be good to know the answers to for that meeting:

- Is ED ok with the webinar being recorded, and shared later on our website?
- Is ED ok with press being invited?
- Does Ashley intend to take questions, and if so, how would she like to handle them (someone else on to ask them if her? Reading/selecting them though the Q&A feed? Will the questions be visible to the audience?, etc.)?
- Does Ashley have specific questions she'd like prepared to be asked in advance?
- Will the presentation be live video of Ashley, a PowerPoint deck or some combination of the two?
- If it will involve a PowerPoint deck, will Ashley want someone managing that for her or will she handle the transitions between slides herself?
- Is there an official bio for Ashley we can link to in promotional materials?

There will likely be other questions that come out of the meeting, but these basic ones should cover most of what we'll need to prepare.

Thanks,

Jon

Jon Fansmith
Assistant Vice President
Government Relations
American Council on Education

On Jun 21, 2022, at 4:08 PM, Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov> wrote:

Hi Jon, hope you had a good holiday weekend!

I wanted to pass along materials for distribution after our webinar: our borrower handout and two versions of the employer toolkit. The first would be appropriate for institutional leaders, and the second version for states might be appropriate for adaptation by statewide system offices.

Kaitlyn Vitez (she/her)

Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Vitez, Kaitlyn

Sent: Thursday, June 16, 2022 3:26 PM

To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Gunja, Mushtaq <MGunja@ACENET.EDU>

Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>

Subject: RE: webinar on PSLF waiver for ACE members?

It would be great to have some short remarks from Ted or another senior person at ACE!

On the meetings idea – are you referring to the Friday group call? That would be a good option, and might be even better if we could find a way to connect with the CIO, CFO, or other such roles that could act quickly to spread the word to their campus communities.

Kaitlyn Vitez (she/her)

Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>

Sent: Thursday, June 16, 2022 1:38 PM

To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>

Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>

Subject: RE: webinar on PSLF waiver for ACE members?

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Hi Kaitlyn,

The 2 pm time would definitely be better, esp. for west coast participants. We'll tentatively save both times on our end just in case, but that's very helpful. Will Ashley want someone to introduce her, or will it just be her on the webinar? In previous webinars our president introduced Michelle, for example.

Meetings are an area where we may have some options. James Kvaal already spoke about this to the meeting we host of higher ed assn. CEOs, but we have a meeting that's open to assn. and inst. government relations staff that Ashley could join and present to. Let us think where there might be other opportunities.

Thanks,

Jon

Jon Fansmith

Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Thursday, June 16, 2022 9:16 AM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>
Subject: RE: webinar on PSLF waiver for ACE members?

Hi Jon,

Ashley is likely to be the presenter we'd send to do the briefing! She is out sick today, but it seems like she has some availability on Tuesday 7/12 at noon and 2pm. Based on webinars you've done in the past, which do you think would have the best attendance rates?

I've cc'ed in Kalynn, who can share the version of the toolkit most relevant for y'all.

Eager to hear what ideas your comms and marketing folks have to get the word out on this one! In addition to webinars, some other associations are thinking of giving us a speaking slot at upcoming or quarterly meetings to give an abbreviated version of our overview and share materials, or inviting us to offer remarks or table at an upcoming conference.

Kaitlyn Vitez (she/her)

Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Tuesday, June 14, 2022 4:19 PM
To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>
Subject: RE: webinar on PSLF waiver for ACE members?

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Hi Kaitlyn and Ashley,

We checked with the relevant staff on our end, and the last week in June or the week of July 11th are both mostly clear. We could also do the week of the fourth, but Michelle indicated she wanted to avoid that week. Our preference would probably be for the July dates so there's sufficient time to publicize the webinar. Given how open we are, do you know who from ED will be participating, and are there any particular dates that work for your team?

Also, if you could share the toolkit and sample materials, we can see about distributing it through our various channels. We'll huddle with our comms and marketing folks and share what makes sense to us for ways to get the word out.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Wednesday, June 8, 2022 11:16 AM
To: Gunja, Mushtaq <MGunja@ACENET.EDU>; Fansmith, Jonathan <JFansmith@ACENET.EDU>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>
Subject: webinar on PSLF waiver for ACE members?

Hi Mushtaq and Jon, thanks for chatting with Michele, Latricia, and I.

Following up on our discussion on PSLF, and adding Ashley Harrington at FSA. We've run many webinars already with other associations and have a standard presentation we use, so I think we are ready to roll with whatever date(s) you think are best to maximize participation. Let us know a couple dates that might work, and Ashley can check her schedule.

Ashley has toolkits and other sample materials ready for your member institutions to adapt and send out to employees to help them take advantage of the special waiver period. I'll leave it to her to share the appropriate materials with y'all.

Jon, you also mentioned that marketing like podcasts might be a good idea – eager to hear what other suggestions you have to get the word out about the PSLF waiver!

Best,

Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

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Take Advantage of the Public Service Loan Forgiveness Waiver by October 31st!

Until Oct. 31, 2022, federal student loan borrowers can get credit for payments that previously didn't qualify for Public Service Loan Forgiveness (PSLF) or Temporary Expanded Public Service Loan Forgiveness (TEPSLF).

Under the limited PSLF waiver, you can get credit for past payments even if you:

- had or have a Federal Family Education Program (FFEL) loan or Perkins loan
- didn't make the payment on time,
- didn't pay the full amount due, or
- weren't on a the right repayment plan.

Here's what you can do to take advantage of the limited PSLF waiver.

1. Confirm your employer is qualified and submit a PSLF form.

You must work for a qualified employer and submit a PSLF form in order to get PSLF credit. The waiver hasn't changed this requirement. Check if your employer is certified and generate your PSLF form by using our [PSLF Help Tool](#). Note that while we have more than 2.7 million employers in our database, coverage isn't and won't ever be at 100% and your employer may not be listed. Either way, you should still continue the form submission process.

To get started, you must be logged in to your StudentAid.gov account. You'll also need your employer's Federal Employer Identification Number. You can find your EIN in box b of your W-2, or you can get it directly from your employer. To move through the PSLF Help Tool with ease, read "[Becoming a PSLF Help Tool Ninja](#)" before starting.

2. Consolidate your loans if you need to.

To be considered for the limited PSLF waiver, you must have a Direct Loan. If you don't, you have until **Oct. 31, 2022**, to [consolidate your loans](#) into a Direct Loan. Consolidation is when any or all of your federal student loans are combined, giving you one monthly payment. Check out our [consolidation loan application](#) to find out what you'll need to apply.

Keep in mind that there are pros and cons to consolidating. Learn [what consolidating would mean for you](#) before taking action. If you're unsure of the status of your loan(s) or loan type(s), log in and check your [Aid Summary](#).

3. Understand what the PSLF waiver changes.

Our announcement explains [how the limited PSLF waiver works](#) and provides answers to frequently asked questions. But you can check out the table below for a quick summary of some key differences.

Normal PSLF Requirements	Included in Limited PSLF Waiver Until Oct. 31
Direct Loan payments only	Payments on Direct, Perkins, or FFEL Loans
Payments through Standard or income-driven repayment plans only	Payments through any repayment plan (including Graduated, Extended, and others)
Full, on-time payments only	Late or partial payments
Must be employed full-time by a qualified employer at the time of applying for forgiveness	Can get forgiveness if not employed by a qualifying employer at the time of applying for forgiveness

Don't delay!

October 31st may seem far away, but don't wait until the last minute! Give yourself plenty of time to prepare your PSLF form and/or to apply for consolidation. Keep in mind that processing your PSLF form and/or consolidation will take time, too. For more information, check out our [PSLF Limited Waiver page](#). You can always reach out to your [loan servicer](#) with any questions or concerns.

Limited PSLF Waiver: Toolkit for External Partners

On Oct. 6, 2021, the U.S. Department of Education (ED) announced a change to the Public Service Loan Forgiveness (PSLF) program rules for a limited time as a result of the COVID-19 national emergency. **Millions of non-profit and government employees have federal student loans and may now be eligible for loan forgiveness or additional credit through the Limited PSLF Waiver.** Under normal PSLF rules, borrowers must make 120 payments on a Direct Loan while on a qualifying repayment plan and employed by a qualifying public service employer. Now, for a limited period of time, federal student loan borrowers may receive credit for past periods of repayment that would otherwise not qualify for PSLF.

More specifically, under the waiver:

- Borrowers who have Federal Family Education Loans (FFEL), Perkins loans, or other federal student loans, can consolidate their loans into a Direct Consolidation Loan and receive PSLF credit for periods of repayment prior to consolidation. Periods of repayment on parent PLUS loans are not eligible under the limited PSLF waiver. Before consolidating, borrowers should check to see if they work for a qualifying employer using the **PSLF Help Tool**.
- Past periods of repayment will now count regardless of whether a borrower made a payment, or made that payment on time, for the full amount due, or on a qualifying repayment plan.

The waiver will run through October 31, 2022. That means some borrowers will need to consolidate and/or submit a PSLF form—the single application used for a review of employment certification, payment counts, and processing of forgiveness—on or before October 31, 2022, to have previously ineligible payments counted. After October 31, 2022, normal PSLF rules will apply.

What Employers Can Do

Below are ways that public service employers can help public servants receive the loan relief they earned.

- 1) **Promote the Limited PSLF Waiver:** Share the attached sample email throughout your organization and networks. Employers should modify the email as necessary and include the noted organization-specific information. You can also promote the waiver using the attached materials and social media graphics.
- 2) **Answer Borrower Questions:** Work with FSA to set up informational webinars for your staff or networks about PSLF and the waiver. Direct employees with account-specific questions to contact **FedLoan Servicing**. Borrowers may also submit a request through the **Feedback Center** or contact the **Federal Student Aid Ombudsman Group**.
- 3) **Simplify Employment Certification:** Create a process for your employees to easily submit PSLF forms for approval and signature. For example, employers may choose to designate a point of contact in their HR department or set up a designated email address for employees to use for submission. Agencies should also make sure their staff have the correct Federal Employer Identification Number (EIN) for their organization to enable staff to properly complete their forms.
- 4) **Accelerate PSLF Approval:** Make sure your Federal Employer Identification Number (FEINs) is accounted for in our database. FSA currently has a backlog of tens of thousands of employers awaiting approval and this can help push your employees to the front of the line.

Additional Information

Below you will find a sample staff email and resources with additional guidance for external partners. You can find the most up-to-date information on the waiver at **StudentAid.gov/PSLFWaiver**.

Please contact FSA through Ashley Harrington (**ashley.harrington@ed.gov**) with additional questions about the waiver, to set up a webinar, or to discuss other actions your organization can take to support this effort.

Sample Email to Public Service Employees

Do you have federal student loans? Have you been thinking about the Public Service Loan Forgiveness Program (PSLF)? Have you encountered problems interacting with that program?

The PSLF Program forgives the remaining balance on federal Direct Loans after you have made 120 qualifying payments while working full-time for a qualifying employer. The U.S. Department of Education (ED) recently announced a temporary, but significant waiver to PSLF program rules. The waiver, called the "Limited PSLF Waiver," allows those borrowers who had the wrong type of loans or payments to get credit for those past periods. The waiver is available to borrowers until October 31, 2022. You can learn more about the waiver and if it applies to you [here](#). **If you previously applied for PSLF and were denied because of your loan type, we encourage you to try again.**

Here are some of the key improvements available under the Limited PSLF Waiver:

- Borrowers can receive credit for past periods of repayment on loans that would otherwise not qualify for PSLF. If you have Federal Family Education Loans (FFEL), Perkins loans, or other federal student loans, you will need to consolidate your loans into a Direct Consolidation Loan to qualify for PSLF both in general and under the waiver. Before consolidating, make sure to check to see if you work for a qualifying employer using the [PSLF Help Tool](#).
- Past periods of repayment will now count whether or not you made a payment, made that payment on time, for the full amount due, on a qualifying repayment plan.

The waiver is available to borrowers until October 31, 2022. To take advantage of the waiver, you need to:

1. If you don't have one already, register for an FSA ID at StudentAid.gov/fsa-id/create-account.
2. Have or get Direct Loans (including through loan consolidation). You can consolidate your loans if you need to at StudentAid.gov/consolidation.
3. Submit a PSLF form to certify employment for PSLF that you want credit for through the waiver. You can generate a PSLF form for our agency to sign at StudentAid.gov/pslf. In the PSLF Help Tool, it's important to use the appropriate Federal Employer Identification Number (EIN). For our employees, please use the following when searching for our agency, [CUSTOMIZED BY ORGANIZATION]. After the PSLF Help Tool gives you a PDF, please sign and date it and submit it to [ORGANIZATION TO INSERT PROCESS].

There's no specific application for the waiver. Once borrowers have submitted PSLF forms and/or consolidated into the Direct Loan program, they will be automatically opted in and receive forgiveness if they qualify or an increased qualifying payment count.

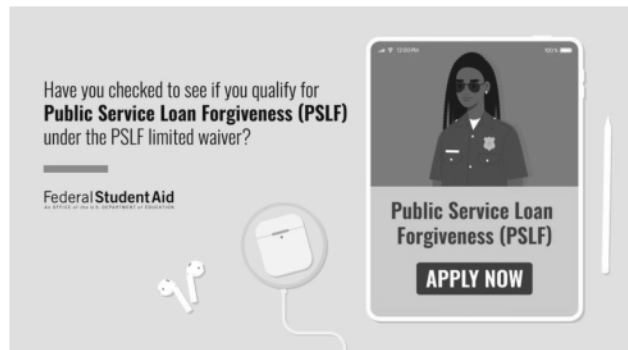
Remember: this opportunity is time sensitive. Some borrowers will need to consolidate their loans and/or submit a PSLF form. **It's important for you to take the steps necessary to qualify for the Limited PSLF Waiver before October 31, 2022.** Learn more about the Limited PSLF Waiver at StudentAid.gov/PSLFWaiver.

Additional Information and Resources

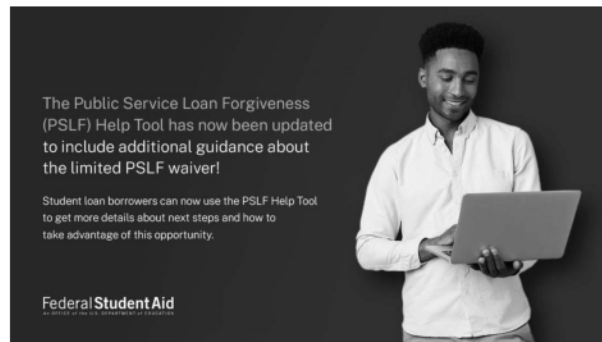
Helpful Resources:

- [Take Advantage of the Public Service Loan Forgiveness Waiver by Oct. 31 – Federal Student Aid](#)
- [PSLF Waiver Offers Way to Get Closer to Loan Forgiveness | Federal Student Aid – PSLF Waiver landing page](#)
- [Fact Sheet: Public Service Loan Forgiveness \(PSLF\) Program Overhaul | U.S. Department of Education](#)
- [Public Service Loan Forgiveness \(PSLF\) Help Tool | Federal Student Aid](#)
- [Become a Public Service Loan Forgiveness \(PSLF\) Help Tool Ninja – Federal Student Aid](#)
- [How to Use the Public Service Loan Forgiveness Help Tool – Federal Student Aid](#)
- [6 Things to Know About Public Service Loan Forgiveness During the COVID-19 Emergency](#)
- [StudentAid.gov/consolidation](#) – The landing page for the consolidation application

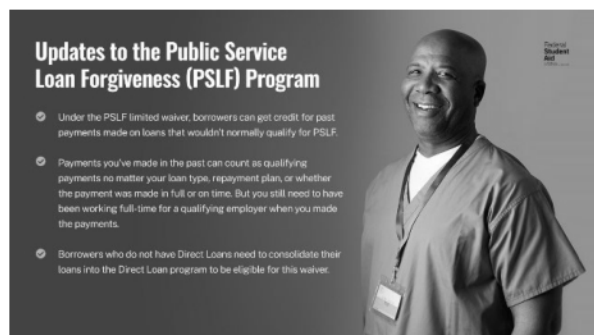
Sample Social Media Posts:



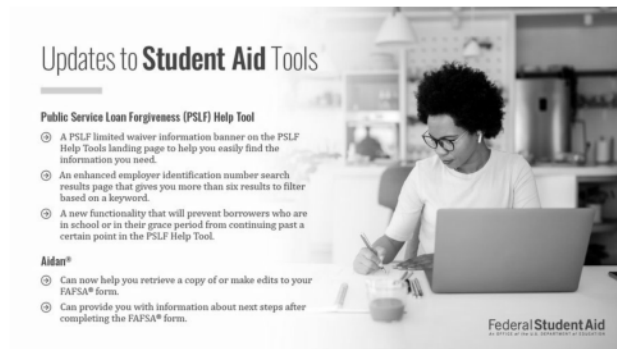
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Limited PSLF Waiver: Toolkit for State Partners

On Oct. 6, 2021, the U.S. Department of Education (ED) announced a change to the Public Service Loan Forgiveness (PSLF) program rules for a limited time as a result of the COVID-19 national emergency. **Millions of state and local government employees have federal student loans and may now be eligible for loan forgiveness or additional credit through the Limited PSLF Waiver.** Under normal PSLF rules, borrowers must make 120 payments on a Direct Loan while on a qualifying repayment plan and employed by a qualifying public service employer. Now, for a limited period of time, federal student loan borrowers may receive credit for past periods of repayment that would otherwise not qualify for PSLF.

More specifically, under the waiver:

- Borrowers who have Federal Family Education Loans (FFEL), Perkins loans, or other federal student loans, can consolidate their loans into a Direct Consolidation Loan and receive PSLF credit for periods of repayment prior to consolidation. Periods of repayment on parent PLUS loans are not eligible under the limited PSLF waiver. Before consolidating, borrowers should check to see if they work for a qualifying employer using the **PSLF Help Tool**.
- Past periods of repayment will now count regardless of whether a borrower made a payment, or made that payment on time, for the full amount due, or on a qualifying repayment plan. Periods of forbearance and deferment do not count unless the borrower is an active duty servicemember.

The waiver will run through October 31, 2022. That means some borrowers will need to consolidate and/or submit a PSLF form—the single application used for a review of employment certification, payment counts, and processing of forgiveness—on or before October 31, 2022, to have previously ineligible payments counted. After October 31, 2022, normal PSLF rules will apply.

What States Can Do

Below are ways that state governments can help public servants receive the loan relief they earned.

- 1) **Promote the Limited PSLF Waiver:** Send the attached sample email to leadership throughout your state agencies and direct them to share it with their employees. Agencies should modify the email as necessary and include the noted agency-specific information. You can also promote the waiver using the attached materials and social media graphics.
- 2) **Answer Borrower Questions:** Work with FSA to set up informational webinars for state personnel or groups about PSLF and the waiver. Direct employees with account-specific questions to contact **FedLoan Servicing**. Borrowers may also submit a request through the **Feedback Center** or contact the **Federal Student Aid Ombudsman Group**.
- 3) **Simplify Employment Certification:** Create a process for state personnel to easily submit PSLF forms for approval and signature. For example, state agencies may choose to designate a point of contact in their HR department or set up a designated email address for employees to use for submission. Agencies should also make sure their staff have the correct Federal Employer Identification Number (EIN) for their agency to enable staff to properly complete their forms.
- 4) **Accelerate PSLF Approval:** Compile all Federal Employer Identification Numbers (FEINs) for state and local government entities so that FSA can update our PSLF employer database and process borrower applications in a timely manner. FSA currently has a backlog of tens of thousands of employers awaiting approval and this list will help push your state employees to the front of the line.
- 5) **Automate Employment Certification:** Consider entering into a data sharing agreement with FSA to match state personnel records with our student loan system to provide automatic PSLF credit to state employees. Later this year, the Department will begin automatically giving federal employees and military borrowers credit for PSLF by matching Department of Education data with information held by other federal agencies about service members and the federal workforce. The Department is also planning to initiate similar matches with state and local government entities.
- 6) **Supervise Loan Servicers:** Communicate with and monitor loan servicers to ensure they are providing accurate and correct information to student loan borrowers in your state.

Additional Information

The attached documents and resources provide additional guidance for state partners. You can find the most up-to-date information on the waiver at StudentAid.gov/PSLFWaiver.

Please contact FSA through Ashley Harrington (ashley.harrington@ed.gov) with additional questions about the waiver, to set up a webinar, or to discuss other actions your state can take to support this effort.

Attachment 1: Sample Email for Agency Staff

Attachment 2: Additional Information and Resources

Sample Email to State Employees

Do you have federal student loans? Have you been thinking about the Public Service Loan Forgiveness Program (PSLF)? Have you encountered problems interacting with that program?

The PSLF Program forgives the remaining balance on federal Direct Loans after you have made 120 qualifying payments while working full-time for a qualifying employer. The U.S. Department of Education (ED) recently announced a temporary, but significant waiver to PSLF program rules. The waiver, called the "Limited PSLF Waiver," allows those borrowers who had the wrong type of loans or payments to get credit for those past periods.

Here are some of the key improvements available under the Limited PSLF Waiver:

- Borrowers can receive credit for past periods of repayment on loans that would otherwise not qualify for PSLF.
- If you have Federal Family Education Loans (FFEL), Perkins loans, or other federal student loans, you will need to consolidate your loans into a Direct Consolidation Loan to qualify for PSLF both in general and under the waiver. Before consolidating, make sure to check to see if you work for a qualifying employer using the [PSLF Help Tool](#).
- Past periods of repayment will now count whether or not you made a payment, made that payment on time, for the full amount due, on a qualifying repayment plan.
- Periods of deferment or forbearance, and periods of default, still do not qualify.

The waiver is available to borrowers until October 31, 2022. To take advantage of the waiver, you need to:

1. If you don't have one already, register for an FSA ID at StudentAid.gov/fsa-id/create-account.
2. Have or get Direct Loans (including through loan consolidation). You can consolidate your loans if you need to at StudentAid.gov/consolidation.
3. Submit a PSLF form to certify employment for PSLF that you want credit for through the waiver. You can generate a PSLF form for our agency to sign at StudentAid.gov/pslf. In the PSLF Help Tool, it's important to use the appropriate Federal Employer Identification Number (EIN). For our employees, please use the following when searching for our agency, [CUSTOMIZED BY AGENCY]. Please note that some state agencies have the same EIN, and you may see several agencies in the PSLF Help Tool once you put in the EIN, be sure to select our agency from the list. After the PSLF Help Tool gives you a PDF, please sign and date it and submit it to [AGENCY TO INSERT PROCESS].

There's no specific application for the waiver. Once borrowers have submitted PSLF forms and/or consolidated into the Direct Loan program, they will be automatically opted in and receive forgiveness if they qualify or an increased qualifying payment count.

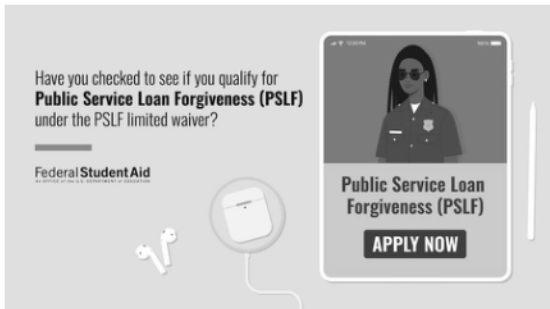
Remember: this opportunity is time sensitive. Some borrowers will need to consolidate their loans and/or submit a PSLF form. **It's important for you to take the steps necessary to qualify for the Limited PSLF Waiver before October 31, 2022.** Learn more about the Limited PSLF Waiver at StudentAid.gov/PSLFWaiver.

Additional Information and Resources

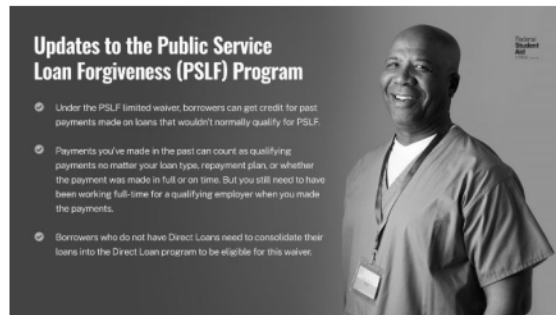
Helpful Resources:

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- **6 Things to Know About Public Service Loan Forgiveness During the COVID-19 Emergency**
- **StudentAid.gov/consolidation** – The landing page for the consolidation application

Sample Social Media Posts:



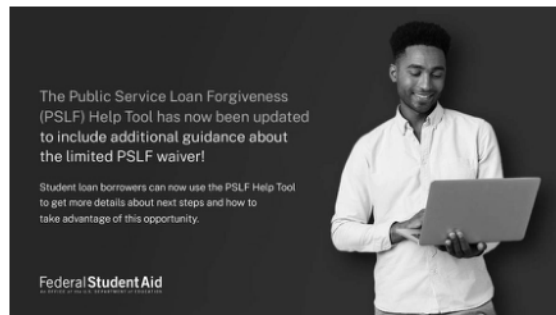
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From: Wollard, Kalynn
Subject: RE: webinar on PSLF waiver for ACE members?
To: Fansmith, Jonathan; Vitez, Kaitlyn
Cc: Harrington, Ashley; Gunja, Mushtaq
Sent: June 22, 2022 12:38 PM (UTC-04:00)
Attached: AH Bio 2021.pdf, ashleyHarringtonHeadshots-0010 (1) (1).pdf, PSLF Presentation Poll Questions .docx

Hi Jonathan,

Thank you for your email! I wanted to follow up and provide some answers to your questions below.

- Is ED ok with the webinar being recorded, and shared later on our website?
 - Absolutely.
- Is ED ok with press being invited?
 - It is okay for press to be invited; we will need to know in advance so we can flag for our communication teams.
- Does Ashley intend to take questions, and if so, how would she like to handle them (someone else on to ask them if her? Reading/selecting them through the Q&A feed? Will the questions be visible to the audience?, etc.)?
 - In previous presentations, we have requested participants utilize the Q&A function for questions. At the end of the presentation questions can be read to Ashley for further explanation.
- Does Ashley have specific questions she'd like prepared to be asked in advance?
 - Please see some sample questions below:
 - I have previously applied for PSLF but was denied, should I apply again?
 - Will I need to certify employment for a previous employer?
- Will the presentation be live video of Ashley, a PowerPoint deck or some combination of the two?
 - Combination of the two! The presentation is a PowerPoint deck. Ashley does appear on video in a smaller box as the presentation and PowerPoint takes place and is in main frame.
- If it will involve a PowerPoint deck, will Ashley want someone managing that for her or will she handle the transitions between slides herself?
 - If someone could advance the slides and poll questions, that would be wonderful! Poll questions are attached.
- Is there an official bio for Ashley we can link to in promotional materials?
 - Yes, attaching bio and headshot!

Kalynn Wollard

Ombudsman Stakeholder Engagement Specialist
U.S. Department of Education
Office of Federal Student Aid



From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Wednesday, June 22, 2022 10:18 AM
To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Subject: Re: webinar on PSLF waiver for ACE members?

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Hi Kaitlyn,

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Also, the ACE team is meeting tomorrow to discuss the webinar arrangements, and there are a few questions it would be good to know the answers to for that meeting:

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Jon

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Assistant Vice President
Government Relations
American Council on Education

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I wanted to pass along materials for distribution after our webinar: our borrower handout and two versions of the employer toolkit. The first would be appropriate for institutional leaders, and the second version for states might be appropriate for adaptation by statewide system offices.

Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Vitez, Kaitlyn
Sent: Thursday, June 16, 2022 3:26 PM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalyann <Kalyann.Wollard@ed.gov>
Subject: RE: webinar on PSLF waiver for ACE members?

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Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>
Subject: RE: webinar on PSLF waiver for ACE members?

Hi Jon,

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I've cc'ed in Kalynn, who can share the version of the toolkit most relevant for y'all.

Eager to hear what ideas your comms and marketing folks have to get the word out on this one! In addition to webinars, some other associations are thinking of giving us a speaking slot at upcoming or quarterly meetings to give an abbreviated version of our overview and share materials, or inviting us to offer remarks or table at an upcoming conference.

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To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>
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Hi Kaitlyn and Ashley,

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Also, if you could share the toolkit and sample materials, we can see about distributing it through our various channels. We'll huddle with our comms and marketing folks and share what makes sense to us for ways to get the word out.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Wednesday, June 8, 2022 11:16 AM
To: Gunja, Mushtaq <MGunja@ACENET.EDU>; Fansmith, Jonathan <JFansmith@ACENET.EDU>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>
Subject: webinar on PSLF waiver for ACE members?

Hi Mushtaq and Jon, thanks for chatting with Michele, Latricia, and I.

Following up on our discussion on PSLF, and adding Ashley Harrington at FSA. We've run many webinars already with other associations and have a standard presentation we use, so I think we are ready to roll with whatever date(s) you think are best to maximize participation. Let us know a couple dates that might work, and Ashley can check her schedule.

Ashley has toolkits and other sample materials ready for your member institutions to adapt and send out to employees to help them take advantage of the special waiver period. I'll leave it to her to share the appropriate materials with y'all.

Jon, you also mentioned that marketing like podcasts might be a good idea – eager to hear what other suggestions you have to get the word out about the PSLF waiver!

Best,

Kaitlyn Vitez (she/her)

Higher Education Liaison

Office of Communications and Outreach

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Ashley Harrington is the senior advisor to the Chief Operating Officer (COO) at the Department of Education's Office of Federal Student Aid (FSA). Ashley advises the COO on policy implementation, operations, and external communications related to the \$1.6 trillion federal student loan portfolio. Prior to FSA, Ashley served as federal advocacy director and senior policy counsel at the Center for Responsible Lending (CRL). Ashley helped shape fair lending and consumer protection reforms to address racial wealth disparities. Her portfolio included a range of consumer lending issues, with a focus on student debt reform. Ashley also previously worked at UNCF (the United Negro College Fund) and in the New York Governor's Office. She is the author of articles and reports on student debt, particularly as it affects Black borrowers; a frequent media contributor; and she has provided testimony before several congressional committees. She received her B.A. in Public Policy Analysis from UNC-Chapel Hill and her J.D. from New York University School of Law. She is admitted to practice law in New York.



Poll Questions:

Before Presentation:

1. Do you have student loans?
2. What percentage of the employees you work with have student loans?
Answer choices: less than 10%, 10-25%, 25-50%, more than 50%.
3. Do you know about the Public Service Loan Forgiveness program?
4. Do you know about the Limited PSLF Waiver?

After Presentation:

1. Will you share this information about Public Service Loan Forgiveness with your employees?
2. Do you think PSLF will help you with employee retention and recruitment?
3. If you have student loans, do you feel motivated to apply for Public Service Loan Forgiveness?

From: Harrington, Ashley
Subject: RE: webinar on PSLF waiver for ACE members?
To: Vitez, Kaitlyn; Fansmith, Jonathan
Cc: Gunja, Mushtaq; Wollard, Kalynn
Sent: June 28, 2022 9:08 AM (UTC-04:00)

That works. Thanks!

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Tuesday, June 28, 2022 8:40 AM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Gunja, Mushtaq <MGunja@ACENET.EDU>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>
Subject: RE: webinar on PSLF waiver for ACE members?

Confirmed! Ashley can do that time.



Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Thursday, June 23, 2022 1:35 PM
To: Wollard, Kalynn <Kalynn.Wollard@ed.gov>; Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Subject: RE: webinar on PSLF waiver for ACE members?

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Kalynn,

Thank you so much for this very helpful information.

I just wanted to confirm that 2 pm on July 12 works as the webinar date? If so, we'll lock it in.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Wollard, Kalynn <Kalynn.Wollard@ed.gov>
Sent: Wednesday, June 22, 2022 12:38 PM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Cc: Harrington, Ashley <Ashley.Harrington@ed.gov>; Gunja, Mushtaq <MGunja@ACENET.EDU>
Subject: RE: webinar on PSLF waiver for ACE members?

Hi Jonathan,

Thank you for your email! I wanted to follow up and provide some answers to your questions below.

- Is ED ok with the webinar being recorded, and shared later on our website?
 - Absolutely.
- Is ED ok with press being invited?
 - It is okay for press to be invited; we will need to know in advance so we can flag for our communication teams.
- Does Ashley intend to take questions, and if so, how would she like to handle them (someone else on to ask them if her? Reading/selecting them through the Q&A feed? Will the questions be visible to the audience?, etc.)?
 - In previous presentations, we have requested participants utilize the Q&A function for questions. At the end of the presentation questions can be read to Ashley for further explanation.
- Does Ashley have specific questions she'd like prepared to be asked in advance?
 - Please see some sample questions below:
 - I have previously applied for PSLF but was denied, should I apply again?
 - Will I need to certify employment for a previous employer?
- Will the presentation be live video of Ashley, a PowerPoint deck or some combination of the two?
 - Combination of the two! The presentation is a PowerPoint deck. Ashley does appear on video in a smaller box as the presentation and PowerPoint takes place and is in main frame.
- If it will involve a PowerPoint deck, will Ashley want someone managing that for her or will she handle the transitions between slides herself?
 - If someone could advance the slides and poll questions, that would be wonderful! Poll questions are attached.
- Is there an official bio for Ashley we can link to in promotional materials?
 - Yes, attaching bio and headshot!

Kalynn Wollard

Ombudsman Stakeholder Engagement Specialist
U.S. Department of Education
Office of Federal Student Aid



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First Name	Last Name	Email	Organization	Job Title	Registration T	Approval Stat
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University	#####	approved		
University	#####	approved		
Fort Wort	#####	approved		
Teachers C	#####	approved		
Pentecost	#####	approved		
Doane Uni	#####	approved		
Heritage C	#####	approved		

(b)(6)	SFSU	(b)(6)	#####	approved
	University		#####	approved
	UT System		#####	approved
	Fort Valley		#####	approved
	University		#####	approved
	University		#####	approved
	Wilson Col		#####	approved
	Tennessee		#####	approved
	Coppin Sta		#####	approved
	The Univer		#####	approved
	The Univer		#####	approved
	The Univer		#####	approved
	University		#####	approved
	UTRGV		#####	approved
	Mesa Com		#####	approved
	UT Dallas		#####	approved
	Diablo Val		#####	approved
	The Texas		#####	approved
	Maryland		#####	approved
	Wilson Col		#####	approved
	Hope Heal		#####	approved
	UT Austin		#####	approved
	Alverno Co		#####	approved
	Belmont U		#####	approved
	University		#####	approved
admission	#####	approved		
PA Depart	#####	approved		
Harold Wa	#####	approved		
Syracuse U	#####	approved		
Georgia Sc	#####	approved		
New Vision	#####	approved		
LOUISIANA	#####	approved		

How long should people expect for the application review process to take for the PSLF?
What is the timeframe for forgiveness since many faculty and administrators, including me, have wa
Is there a different application process for Limited PSLF or is it the same process?
My loans date back to 1994-1999. I do not believe these types of federal loans were covered under thi
Does time spent working as graduate teaching fellow while enrolled as a grad student count? student
How are people in long-term graduate programs (like a PhD) affected?
Are there proposed plans for Student Loan Forgiveness for Healthcare Workers with private loans?
Does Substitute Teaching qualify for PSLF?
none at this time

Can Public School Teachers apply for both the Teacher Loan Forgiveness and the PSLF Limited Waiver?

How do universities effectively share this information?

--

What gaurantees are in place to ensure that the PSLF program will still be active in 10 years time to ful

Can someone still benefit from the Student Loan Forgiveness years after graduation, but who has wor

From: Ashley.Harrington@ed.gov
Subject: Re: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)
To: Fansmith, Jonathan
Cc: Vitez, Kaitlyn; Latreille, Bonnie
Sent: July 13, 2022 8:17 AM (UTC-04:00)
Attached: How PSLF Waiver Can Help Campus_ Transcript_ 07122022.txt, How PSLF Waiver Can Help Campus_AR_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ QA_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ PR_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ Chat_ 07122022.txt

Hi Jon,

That's awesome! We will have a link for a toolkit soon, hopefully by next week. We will send it over then. Thanks so much!

Best,
Ashley

Sent from my iPad

On Jul 13, 2022, at 8:15 AM, Fansmith, Jonathan <JFansmith@acenet.edu> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please see the attached transcripts, etc. from yesterday's webinar. We got a lot of positive feedback already, and really appreciate your work on this.

Also, we've already had a request for the toolkit mentioned on the webinar. Do you have links to where the toolkits are hosted on ED's website? That's an easier way for us to distribute them than the .PDFs you shared earlier.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: NGom, Fatma <FNGom@ACENET.EDU>
Sent: Tuesday, July 12, 2022 4:58 PM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Hamilton, Audrey <AuHamilton@ACENET.EDU>; Arnston, Laurie <LArnston@ACENET.EDU>; Riskind, Jon <JRiskind@ACENET.EDU>; Nicholson, Jack <JNicholson@ACENET.EDU>
Subject: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

Hello,

The final recording from the **How the PSLF Waiver Can Help Your Campus** webinar can be found [here](#).

Below are key edits made-

- Trimmed the beginning and end
- Cleaned up transition to first Poll
- Inserted a view of the Polls over audio, at the two points the Polls were launched during the webinar
- Cleaned up transitions at the end of the meeting

Also, please find attached the Audio Transcript, Attendee report, Q&A report, Polls report and Chat history.

Note: The Attendee report contains duplicate information, and needs to be cleaned up further.

Thank you.

Fatma NGom

Virtual Collaboration Technology Senior Specialist

Information Technology Services

American Council on Education

One Dupont Circle, NW

Washington, DC 20036

Phone: (202) 939-9371

fngom@acenet.edu

www.acenet.edu

Lead innovation across your campus with ACE's Agile Administrator program

PUBLIC SERVICE LOAN FORGIVENESS (PSLF) PROGRAM

TARGETED STUDENT LOAN RELIEF

THE DEPARTMENT HAS APPROVED MORE THAN \$25 BILLION IN DEBT CANCELLATION FOR 1.3 MILLION BORROWERS

- Over \$8 billion for more than 144,690 public servants through improvements to PSLF;
- Over \$8.5 billion for more than 400,000 borrowers who have a total and permanent disability;
- \$7.9 billion for 690,000 borrowers whose institutions took advantage of them through discharges related to borrower defense and school closures.

LIMITED PSLF WAIVER

THE LIMITED PSLF WAIVER HAS IMPACTED HUNDREDS OF THOUSANDS OF BORROWERS

- To date, the Department has approved over **\$8 billion** in forgiveness for **144,690** borrowers through the Limited PSLF Waiver.
- The waiver has brought another 1.1 million borrowers closer to forgiveness, with the average borrower picking up a year's worth of credit.
- More than a quarter of a million borrowers got 2 years or more of additional credit toward forgiveness.
- These numbers will all continue to grow as the Department continues to process paperwork and review files.

AGENDA

1. PSLF Basics
2. Limited PSLF Waiver
3. PSLF Help Tool
4. PSLF Resources

PSLF BASICS

WHAT IS PSLF?

The PSLF Program forgives the remaining balance on your Direct Loans* after you have made 120 qualifying monthly payments under a qualifying repayment plan while working full-time for a qualifying employer.

The PSLF servicer (currently PHEAA/FedLoan Servicing) administers PSLF for all Direct Loan* borrowers. As of July 1, the PSLF servicer will be MOHELA.

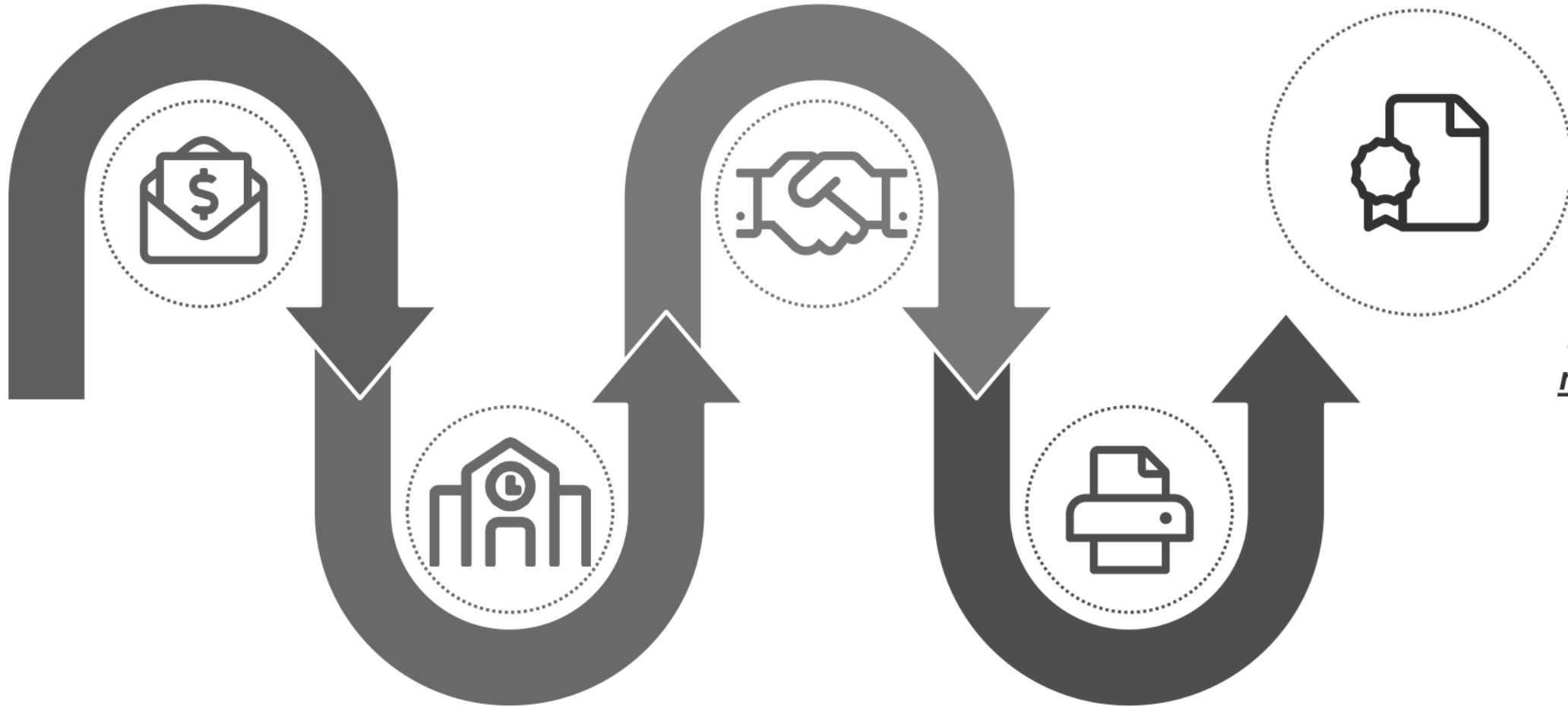
As a result, if you submit a PSLF form and the PSLF servicer determines that your employment qualifies, all of your Direct Loans* as well as any of your FFEL Program loans that are held by the U.S. Department of Education will be transferred to the PSLF servicer.

**On Oct. 6, 2021, the U.S. Department of Education announced a temporary period during which borrowers may receive credit for payments that previously did not qualify for PSLF or TEPSLF.*

PSLF BASICS

120 qualifying payments...

While working for a qualifying employer



...on Direct Loans...

...when applying for and receiving PSLF

Forgiven amount is not taxable income

PSLF BASICS: ELIGIBLE LOAN TYPES



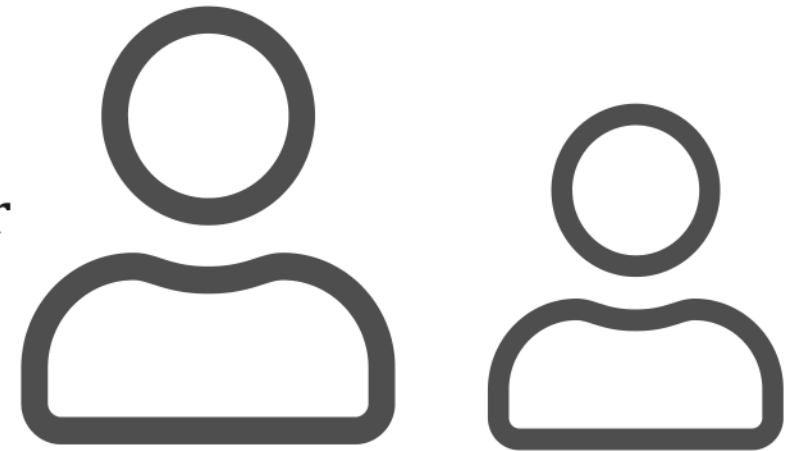
- Direct Loans, including:
 - Consolidation Loans
 - Parent PLUS Loans



- FFEL Program Loans
- Perkins Loans
- Any other federal or private student loan

NOTE ON PARENT PLUS LOANS

- Parent PLUS Loans are not excluded from PSLF, but they are not eligible for all income-driven repayment plans.
- Parent PLUS borrowers can consolidate their debt to access the ICR plan and thus, PSLF. ICR is the least generous of the IDR plans.
- Parent Plus borrowers should use the Loan Simulator to compare how an ICR payment on a consolidation loan would compare to a graduated or extended payment they may currently be making.



PSLF BASICS: ELIGIBLE PAYMENTS



- On-time
- In a Standard Plan or any IDR plan
- For at least the amount due
- Can be non-consecutive



- More than 15 days late
- In a Graduated, Extended, or Alternative plan
- For less than the amount due
- Made when not required (e.g. in-school deferment)

CHANGES TO PAYMENT COUNTS

- Multiple payments in less than the amount due may be counted *only if all smaller payments:*
 - Add up to the amount due and
 - Are paid within 15 days of the due date
- Lump sum payments will be counted as eligible
 - Limited to 12 months or payments or until IDR plan recertification date, whichever comes first
 - Exceptions for Americorps, Peace Corps, and DoD still apply



PSLF BASICS: ELIGIBLE EMPLOYMENT



- Full-time (30 hours/week) or equivalent
- Government (including military)
- All 501(c)3 non-profits
- Some limited exceptions



- Part-time work that does not add up to full-time
- Volunteer work
- For-profit entities
 - Including those that employ essential workers
- Labor unions

PSLF BASICS: ELIGIBLE EMPLOYMENT

- It's all about the employer...
 - All federal, state, and local governments, including public schools and military branches
 - All 501(c)3 non-profit organizations
 - Other non-profit organizations that provide a qualifying service (e.g. public safety)
- Multiple part-time jobs can add up to full-time employment
- 2020 regulatory change means time spent on religious activities (e.g. proselytizing) now count toward the full-time allocation
- Must be employed at an eligible employer when forgiveness is granted

TEMPORARY EXPANDED PSLF

Provides loan forgiveness to those who do not qualify for PSLF ***only*** because some or all their qualifying payments were made on non-qualifying plans



- Extended and Graduated, if:
 - In the 12 months before applying for TEPLSF, the borrower paid at least the amount they would have paid under an IDR plan



- Alternative

COVID-19 FLEXIBILITIES

StudentAid.gov/Coronavirus

- Loans in forbearance due to the payment pause are eligible for PSLF and TEPSLF
- Borrowers do not have to be in an eligible repayment plan if they are in forbearance due to the payment pause
- Borrowers need to submit a PSLF form to receive PSLF credit for any time during the payment pause



NEW UPDATES to Public Service Loan Forgiveness

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION



LIMITED PSLF WAIVER: THROUGH 10/31/22



Payments made prior to consolidation are now eligible

- No matter the loan program (DL, FFEL, Perkins)
- No matter the repayment plan
- No matter the loan type (with the exception of Parent PLUS)



Employment requirements still apply

Must have been employed

- full-time and
 - for a qualifying employer
- when prior payments were made



Borrowers must act now

Borrowers who still have FFEL and Perkins Loans can only get credit for past payments if they consolidate into DL and file PSLF Forms for prior employment before Oct. 31, 2022. After Oct. 31, 2022, normal PSLF/TEPSLF requirements will apply.

PSLF LIMITED WAIVER: BORROWER GROUPS

StudentAid.gov/PSLFWaiver



IF YOU ONLY BORROWED DIRECT LOANS...

File a PSLF Form for each eligible employer you had since you borrowed the loan (or since Oct. 1, 2007, whichever is later)



IF YOU PREVIOUSLY CONSOLIDATED INTO DIRECT LOAN(S)

File a PSLF Form for each eligible employer you had since you borrowed any loans underlying the Direct Consolidation Loan (or since Oct. 1, 2007, whichever is later)



IF YOU STILL HAVE FFEL OR PERKINS LOANS...

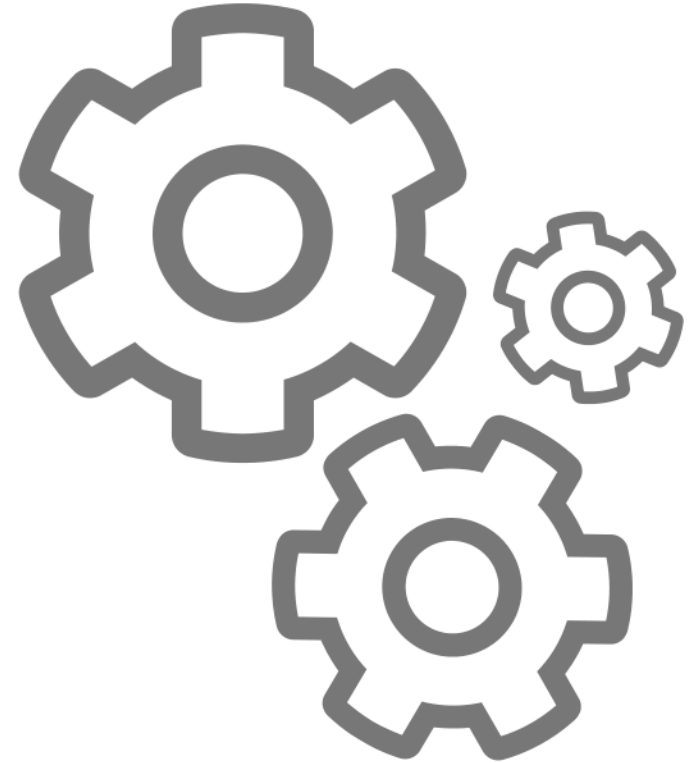
Consolidate your loans into the Direct Loan Program and file a PSLF Form for each eligible employer since you borrowed the loans you are consolidating (or since Oct. 1, 2007, whichever is later)

PARENT PLUS LOANS & PSLF WAIVER

- Parent PLUS Loans are eligible for PSLF but are not eligible to receive additional credits under the waiver.
- Direct Consolidation Loans that include only Parent PLUS Loans are eligible to receive additional credit under the waiver based on time in repayment on the Direct Consolidation Loan but not the time in repayment from the Parent PLUS Loan.
- Direct Consolidation Loans that include Parent PLUS Loans and other loan types are eligible to receive additional credit under the waiver on the Direct Consolidation Loan and the other loan types but not the time in repayment from the Parent PLUS Loan.

TO TAKE ADVANTAGE OF THE WAIVER:

- Confirm your employer is qualified.
- Consolidate your loans if you need to.
- Submit your PSLF form(s).
- By Oct. 31, 2022



FOUR THINGS TO KNOW ABOUT CONSOLIDATION

1. Your monthly payment may go down, but you may have to pay longer.
2. If you have unpaid interest, your principal balance will go up.
3. Your new consolidation loan will generally have a new interest rate.
4. You don't have to consolidate all your federal student loans.

Keep in mind that once your loans are combined into a Direct Consolidation Loan, you can't undo it.

UPDATE: IDR AND PSLF ACCOUNT ADJUSTMENTS

In the coming months, FSA will:

- Conduct a One-Time Revision of IDR Payments to Address Past Inaccuracies
 - Any months in which borrowers made payments will count toward IDR, regardless of repayment plan
 - Any borrower who has made the required number of payments for IDR forgiveness based on this payment-count revision will receive loan cancellation automatically.
 - Count months spent in deferment prior to 2013 toward IDR forgiveness (excluding in-school deferment)
- Conduct a One-Time Account Adjustment to Count Long-Term Forbearances toward IDR and PSLF Forgiveness
 - Count forbearances of more than 12 months consecutive and more than 36 months cumulative toward forgiveness under IDR and PSLF
 - Borrowers who were steered into shorter-term forbearances can seek account review by filing a complaint with the FSA Ombudsman at [StudentAid.gov/feedback](https://studentaid.gov/feedback)

FSA will begin work on implementing these changes immediately, but borrowers may not see the effect in their accounts until the last quarter of 2022.

WHAT TO EXPECT WHEN YOU'RE EXPECTING

(a servicing transfer or loan forgiveness)

FEDLOAN SERVICING TRANSITION

- As of May 1, no new borrowers will be transferred to FedLoan servicing and borrowers who consolidate for PSLF will be directed to choose MOHELA as their loan servicer.
- FedLoan will continue to process PSLF forms and identify borrowers for transfer to MOHELA.
- FedLoan is expected to transfer all borrower accounts to MOHELA by September 2022.


PSLF EMPLOYMENT CERTIFICATION AND FORGIVENESS

- We strongly encourage borrowers to complete a PSLF Form using the PSLF Help Tool.
- If a borrower manually enters an employer using the PSLF Help Tool they will experience delays in receiving their form.
- Borrowers will continue to receive targeted emails about the PSLF Limited Waiver.
- Forgiveness will be automatically processed when possible.

PSLF HELP TOOL OVERVIEW

COUNTING QUALIFYING PAYMENTS

Eligible payments become qualifying payments when a borrower submits a PSLF Form



PUBLIC SERVICE LOAN FORGIVENESS (PSLF) & TEMPORARY EXPANDED PSLF (TEPSLF) CERTIFICATION & APPLICATION
William D. Ford Federal Direct Loan (Direct Loan) Program

OMB No. 1845-0110
Form Approved
Exp. Date 08/31/2023
PSFAP - XBCR

WARNING: Any person who knowingly makes a false statement or misrepresentation on this form or on any accompanying document is subject to penalties that may include fines, imprisonment, or both, under the U.S. Criminal Code and 20 U.S.C. 1097.

SECTION 1: BORROWER INFORMATION

Please enter or correct the following information.
 Check this box if any of your information has changed.

SSN _____
Date of Birth _____
Name _____
Address _____
City _____ State _____ Zip Code _____
Telephone - Primary _____
Telephone - Alternate _____
Email _____

For more information on PSLF, visit StudentAid.gov/publicservice. To apply online, visit StudentAid.gov/PSLF.

SECTION 2: BORROWER REQUEST, UNDERSTANDINGS, AND CERTIFICATION

In November 2020, FSA launched a single form for PSLF, TEPSLF, and employment certification

PSLF HELP TOOL LANDING PAGE

U.S. An official website of the United States government. Help Center Submit a Complaint English | Español

Federal StudentAid UNDERSTAND AID APPLY FOR AID COMPLETE AID PROCESS MANAGE LOANS

Complete the Public Service Loan Forgiveness (PSLF) Form With the PSLF Help Tool

The PSLF Help Tool helps determine whether you work for a qualifying employer for the PSLF or Temporary Expanded Public Service Loan Forgiveness (TEPSLF) programs, suggests actions you can take to become eligible for PSLF, and guides you through the PSLF form and submission process.

Important Limited PSLF Waiver Opportunity

On Oct. 6, 2021, the U.S. Department of Education (ED) announced a temporary period during which borrowers may receive credit for payments that previously did not qualify for PSLF or TEPSLF.

[Learn More About this limited PSLF waiver.](#)

Using the PSLF Help Tool

Use the PSLF Help Tool to search for a qualifying employer, learn what actions you may need to take to become eligible for PSLF or TEPSLF, and generate the form you need. Each time you submit a form, we will evaluate your eligibility for forgiveness, and provide that forgiveness to you if you are eligible. After you submit your form, if you have Direct Loans and work for a qualifying employer, you will receive a count of the number of qualifying payments you have made toward both PSLF and TEPSLF from FedLoan Servicing. For the best experience using this tool, we strongly recommend that you read [Become a Public Service Loan Forgiveness \(PSLF\) Help Tool Ninja](#) before getting started.

The PSLF Help Tool has been modified to align with the conditions under COVID-19 relief measures and the limited PSLF waiver through Oct. 31, 2022. To get the most accurate information, make sure to carefully read any section titled "Special Notice for the COVID-19 Emergency" and [check out the limited PSLF waiver announcement](#).

[Learn more about PSLF and TEPSLF.](#)

[Start](#)



SECTION 1: EMPLOYMENT HISTORY

Using the Employer Search Feature

Public Service Loan Forgiveness (PSLF) Help Tool

1 Employment History 2 Loan Tips 3 Application Details 4 Personal Information 5 Review & Save

My Employers

Add your past and current employers below to determine whether they qualify for PSLF and TEPSLF during the time of your employment.

Note: 1) Only add your employment history since your last approved employment certification (if applicable). If you've certified an employment period in the past, then you do not need to do so again.

2) If at least one day of your employment falls within a period during which we determined your employer to be eligible, you will be able to complete the PSLF Help Tool even if the employer was not an eligible employer for the entire period you entered. However, the PSLF Servicer will conduct a comprehensive review of the specific dates of your employment for eligibility with the submission of a PSLF form. Please note that periods of employment prior to October 2, 2007, cannot qualify for PSLF even if they were with a qualifying employer.

 You have not added any employers.

[+ Add Employer](#)

[Previous](#) [Next Section](#)

Public Service Loan Forgiveness (PSLF) Help Tool

1 Employment History 2 Loan Tips 3 Application Details 4 Personal Information 5 Review & Save

Search for Employer

Employer Identification Number (EIN)

How do I find my EIN?

This is my current employer

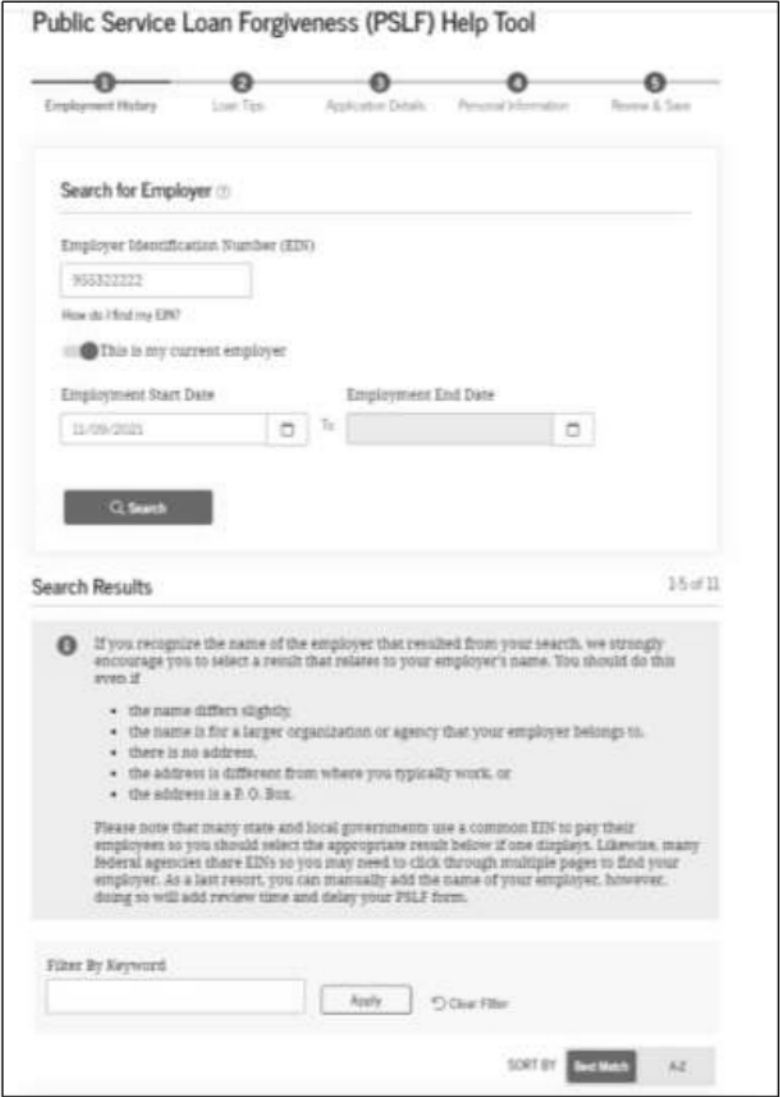
Employment Start Date To Employment End Date

[Previous](#) [Continue](#)

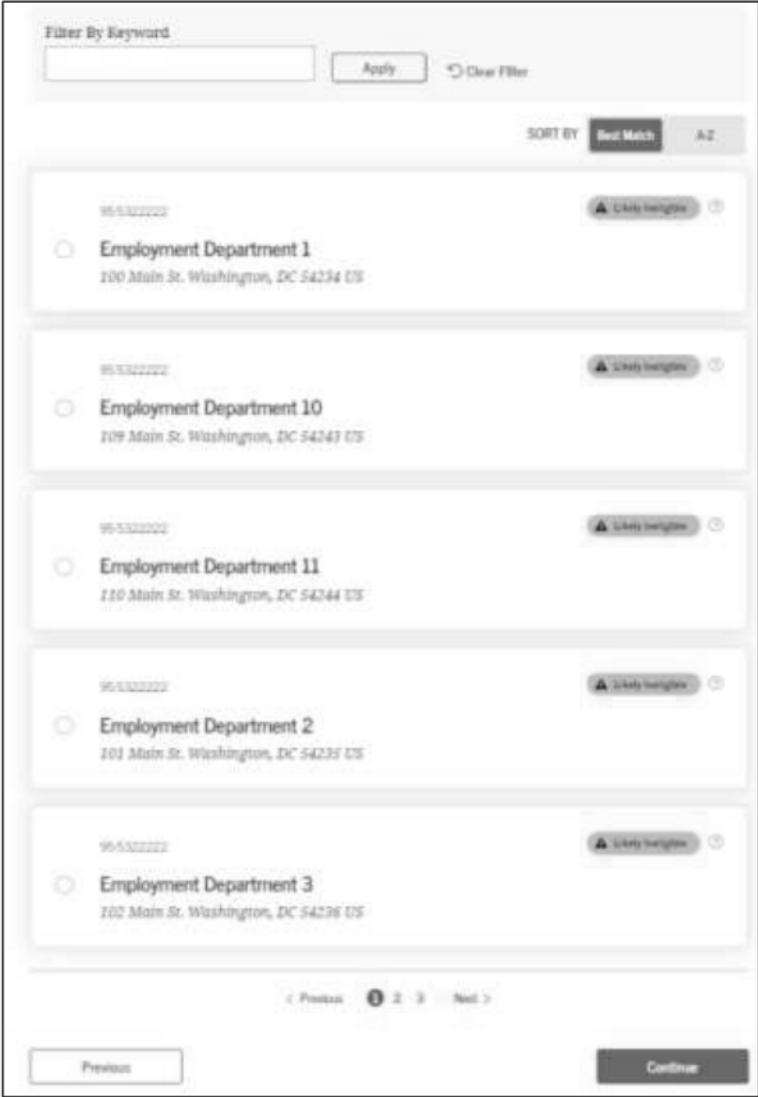
PSLF HELP TOOL IMPROVEMENTS

ENHANCED EMPLOYER SEARCH

Improved usability of the employer search function within the Help Tool by providing borrowers with the ability to filter results by name.



Top of Page



Bottom of Page

SECTION 2: LOAN TIPS

My Loan Actions

The Department of Education announced a limited-time change to PSLF program rules as a result of the COVID-19 national emergency.


Loan Eligibility Changes:

Now, for a limited period that goes through October 31, 2022, borrowers may receive credit for past payments made on loans that would otherwise not qualify for PSLF. As a result, we have modified the PSLF Help Tool experience for you to complete the form. Please continue to the next section, Application Details.

Public Service Loan Forgiveness (PSLF) Help Tool

✓ 2 3 4 5
Employment History Loan Tips Application Details Personal Information Review & Save


New Loan Eligibility Rules

 **Loan Eligibility Changes Through October 31, 2022**


On Oct. 6, 2021, the U.S. Department of Education (ED) announced a limited PSLF waiver period as a result of the COVID-19 national emergency. From Oct. 6, 2021, through Oct. 31, 2022, borrowers may receive credit for past payments made on loans that would otherwise not qualify for PSLF.

[Learn More About the New Rule](#)


What this Means for You

 **Loan Consolidation**

If you have Federal Family Education Loan (FFEL) Program loans, Federal Perkins Loan, or other types of federal student loans, [you must consolidate those loans](#) into the Direct Loan program by Oct. 31, 2022.

 **Employment Certification**

You must have been employed full-time at a qualifying employer when prior payments were made. You can receive credit only for payments made after October 1, 2007, since that is when the PSLF program began. At the end of this flow, you must print, sign, and submit your PSLF form to the PSLF servicer for any period where you may receive additional qualifying payments. This employment certification must be submitted by Oct. 31, 2022.

 **COVID-19 Emergency Relief**

As part of the COVID-19 emergency relief, federal student loan payments were paused. Payments will restart after Jan. 31, 2022. [Find info about this payment pause and other COVID-19 emergency relief](#) for student loans. In order to qualify for PSLF during the COVID-19 payment pause, you do not need to remove your loans from deferment or forbearance. As long as you are employed full-time for a qualifying employer, you will receive credit toward PSLF.

Previous
Next Section

SECTION 3: APPLICATION DETAILS

In Section 3, the borrower is asked to provide additional details about the number of qualifying payments that he or she believes have been made.

If the information on file indicates that the borrower has not made 120 payments, the radio button will default to **No**.

If a borrower indicates that he or she has made 120 payments, but the information on file contradicts this, the borrower will not be able to continue until he or she selects **No**.

SECTION 4: PERSONAL INFORMATION

The borrower will be able to enter and edit mailing information and contact information.

Note: If a borrower wants to update his or her contact information, and selects the **visit your Account Settings** link, he or she will be taken to account settings to update the information.

The screenshot displays the 'Public Service Loan Forgiveness (PSLF) Help Tool' interface. At the top, a progress bar shows five steps: Employment History, Loan List, Application Details, Personal Information (the current step), and Review & Submit. The 'Personal Information' section is divided into two main areas: 'Your Permanent Address' and 'Your Contact Information'. The address section includes fields for Address Line 1 (123 Cherry Ln.), Address Line 2 (optional), City (Nowhere), State (IDAHO), ZIP Code (34243), and Country (UNITED STATES). The contact section includes fields for Email, Mobile Phone, and Alternate Phone, all containing redacted information (b)(6). A link 'visit your Account Settings' is highlighted in a box, and a 'Previous' button is visible at the bottom left.

Public Service Loan Forgiveness (PSLF) Help Tool

Employment History Loan List Application Details **Personal Information** Review & Submit

Your Permanent Address

Address Line 1
123 Cherry Ln.

Address Line 2 - optional

City
Nowhere

State
IDAHO

ZIP Code
34243

Country
UNITED STATES

Your Contact Information

Email
(b)(6)

Mobile Phone
(b)(6)

Alternate Phone

To update your contact information, visit your Account Settings.

Previous

SECTION 5: REVIEW & SAVE

In Section 5, the borrower will be able to review and make any final edits to his or her information.

Selecting **Save** will complete the Help Tool flow and save the borrower's information.

Public Service Loan Forgiveness (PSLF) Help Tool

Progress: Employment History ✓, Loan Tips ✓, Application Details ✓, Personal Information ✓, **Review & Save** 5

Employment History [Edit]

Department of Motor Vehicles 10.3454455

Application Type [Edit]

120 Qualifying Payments
 Yes

Forbearance
 No, I don't want a forbearance

Personal Information [Edit]

Permanent Address
 (b)(6)

Email Address
 (b)(6)

Mobile Phone Number
 (b)(6)

Previous Save

CONFIRMATION

After selecting Save, the borrower will be taken to a Confirmation page with a warning banner that states “You’ve completed the PSLF Help Tool, but your application has not been submitted.” For the application to be complete, the borrower must complete the application form and submit it using one of the methods provided:

- Secure upload to MyFedLoan.org
- By Postal Mail
- Or by Fax

The screenshot shows the Federal Student Aid website interface. At the top, there is a navigation bar with the Federal Student Aid logo and several menu items: UNDERSTAND AID, APPLY FOR AID, COMPLETE AID PROCESS, and MANAGE LOANS. There are also links for Help Center, Submit a Complaint, and language options (English | Español). A search icon and a user profile icon are also visible.

The main content area features a large warning icon (a triangle with an exclamation mark) and the following text:

You've completed the PSLF Help Tool, but your application has not been submitted.

To complete your application, you must complete the PSLF Application Form, get signatures from your employer, and submit it via one of the methods found below.

Below this text is a link: [Download the PSLF Application Form](#)

The next section is titled **Print, Sign and Submit Your Form** and includes the following instructions:

You must print, sign your PSLF form, have your employer(s) sign your form, and submit it to the PSLF servicer using one of the methods below.

After you have submitted the signed form, it will take time for the PSLF servicer to review and process it. You can expect to receive a letter from FedLoan with your status in the coming months.

Important: *Please follow the [guidelines for accepted signatures](#) to avoid processing delays.*

Three submission methods are listed in separate boxes:

- Secure Upload:** MyFedLoan.org/FileUpload Only Available with PHEAA Servicer
- Mail:** U.S. Department of Education FedLoan Servicing, P.O. Box 69184, Harrisburg, PA 17106-9184
- Fax:** (717) 720-1628

CONFIRMATION

Signature Examples

Signature Type	Yes/No
Hand drawn from signature pad, mouse, or finger	✓
Typed using a cursive font or any other font	x
A scanned photo of a signature that was hand-drawn on paper	✓
Digital certificate-based signature	x
A wet signature that was drawn in ink and sent to us in its original format	✓

A reminder about digital signatures: Digital signatures from you or your employer must be hand drawn (from a signature pad, mouse, finger, or by taking a picture of a signature drawn on a piece of paper that you then scan and embed on the signature line of the PSLF form) to be accepted. Typed signatures, even if made to mimic a hand-drawn signature, or security certificate-based signatures are not accepted.

Send the completed form, with your employer’s certification, to FedLoan Servicing, the U.S. Department of Education’s federal loan servicer for the PSLF Program. You may mail the form to this address:

U.S. Department of Education
 FedLoan Servicing
 P.O. Box 69184
 Harrisburg, PA 17106-9184

You may also fax your PSLF form to 717-720-1628. If FedLoan Servicing is already your servicer, [you may upload your PSLF form on their website.](#)

PAYMENT COUNTS ON MYFEDLOAN.ORG

Public Service Loan Forgiveness (PSLF)

Track your loan forgiveness progress

Find out if your payments qualify for PSLF and the Temporary Expanded Public Service Loan Forgiveness (TEPSLF) opportunity.

CHECK MY PROGRESS



Public Service Loan Forgiveness (PSLF) Payment Tracking



Payment assessment in progress

Your payment counts may update when the following assessments have been completed:

- You have at least one pre-paid payment period that will not be assessed until the payment period has passed and the next bill is generated.

Please continue to make on-time monthly payments. We'll notify you when we have completed our assessment.





Payment Counts

Eligible Payments

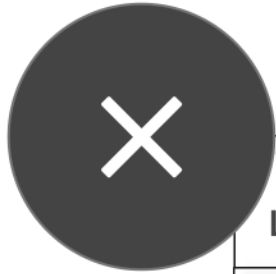
Ineligible Payments

PAYMENT COUNTS ON MYFEDLOAN.ORG



Loan	Period	Amount Due	Program	Status	Action
2 DIRECT SUB STAFFORD LOAN	10/2021	--	PSLF, TEPSLF	Employment Not Certified	Hide Details 
This payment period is eligible but requires approved employment in order to qualify.					
2 DIRECT SUB STAFFORD LOAN	09/2021	--	PSLF, TEPSLF	Employment Not Certified	View Details 

PAYMENT COUNTS ON MYFEDLOAN.ORG



Loan	Period	Amount Due	Program	Status	Action
2 DIRECT SUB STAFFORD LOAN	03/2014	--	PSLF, TEPSLF	You Do Not Have A Bill Due For This Payment Period	Hide Details ^
<p>In order for a payment to qualify, it must have been a payment you were required to make.</p> <p>You were not required to make any payments during the following periods:</p> <ul style="list-style-type: none"> • In your grace period • In a deferment • In a forbearance <p>Note: A payment period may have multiple reasons for not qualifying, however, only the primary reason is listed. If you have any additional questions, please contact us.</p>					
2 DIRECT SUB STAFFORD LOAN	02/2014	--	PSLF, TEPSLF	You Do Not Have A Bill Due For This Payment Period	View Details v

PAYMENT COUNTS ON STUDENTAID.GOV

LOAN TYPE

Direct Graduate PLUS

ALABAMA AGRICULTURAL & MECHANICAL UNIVERSITY OPE ID: 00100200



Loans
\$23,000
Total Balance ?

- \$20,000 Principal ?
- \$3,000 Interest ?

LOAN PERIOD ?
06/01/2014 - 06/01/2015

LOAN STATUS ?
● In Repayment
[View loan status history](#)

INTEREST RATE ?
5.00% (fixed)

REAFFIRMATION DATE ?
N/A

PSLF CUMULATIVE MATCH MONTHS ?
60 months
[Learn more about loan forgiveness](#)



Loan Information as of 05/03/2019

PSLF INFORMATION AND RESOURCES

PSLF INFORMATION AND RESOURCES



LIMITED PSLF WAIVER

[StudentAid.gov/pslfwaiver](https://studentaid.gov/pslfwaiver)



PSLF HELP TOOL

[StudentAid.gov/pslf](https://studentaid.gov/pslf)



GENERAL PSLF INFORMATION

[StudentAid.gov/publicservice](https://studentaid.gov/publicservice)

- Make sure to review the FAQs!
- The PSLF Servicer is currently **FedLoan Servicing**, who is still managing the program. Later this year, PSLF will transition to MOHELA. More information to come!

Poll Questions:

Before Presentation:

1. Do you have student loans? Y/N
2. What percentage of the employees you work with have student loans?
Answer choices: less than 10%, 10-25%, 25-50%, more than 50%.
3. Do you know about the Public Service Loan Forgiveness program? Y/N
4. Do you know about the Limited PSLF Waiver?Y/N

After Presentation:

1. Will you share this information about Public Service Loan Forgiveness with your employees? Y/N
2. Do you think PSLF will help you with employee retention and recruitment? Y/N/NA
3. If you have student loans, do you feel motivated to apply for Public Service Loan Forgiveness?
Y/N/ NA

From: Fansmith, Jonathan
Subject: RE: Follow-up_ ACE and The Department of Education Webinar
To: Vitez, Kaitlyn; Harrington, Ashley
Cc: Latreille, Bonnie
Sent: July 11, 2022 1:54 PM (UTC-04:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Great – besides Ashley, who else should I introduce?

How important are the poll questions? I have been told we're not doing them, and that there would be problems adding them at this point.

I would assume a transcript of both the webinar and the chat/q&a can be provided, but I will check.

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Monday, July 11, 2022 11:32 AM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: RE: Follow-up_ ACE and The Department of Education Webinar

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Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Monday, July 11, 2022 11:05 AM
To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: RE: Follow-up_ ACE and The Department of Education Webinar

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From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Monday, July 11, 2022 10:27 AM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Harrington, Ashley <Ashley.Harrington@ed.gov>
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Subject: RE: Follow-up_ ACE and The Department of Education Webinar

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Need anything else from us?



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From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Friday, July 8, 2022 12:02 PM
To: Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Wollard, Kalynn <Kalynn.Wollard@ed.gov>
Subject: FW: Follow-up_ ACE and The Department of Education Webinar

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We think we're all set on our end, but let me know if there are any issues you'd like to address.

Have a great weekend.

Best,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs

American Council on Education (ACE)

From: NGom, Fatma <FNGom@ACENET.EDU>

Sent: Friday, July 8, 2022 11:49 AM

To: Arnston, Laurie <LArnston@ACENET.EDU>; Fansmith, Jonathan <JFansmith@ACENET.EDU>; Hamilton, Audrey <AuHamilton@ACENET.EDU>; Riskind, Jon <JRiskind@ACENET.EDU>; Nicholson, Jack <JNicholson@ACENET.EDU>; Peek, Audrey <APeek@ACENET.EDU>

Subject: RE: Follow-up_ ACE and The Department of Education Webinar

Hello,

There are 219 registrants for the **How the PSLF Waiver Can Help Your Campus** webinar.

Attached is the registration report.

Thank you.

Fatma NGom

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Are informational flyers, promotional materials available to share?

Are payments made after the required 120 payments reimbursed if approved for the PSLF program?

Are there any helpful provisions for those who have not yet made 10 years of payments?

Are there proposed plans for Student Loan Forgiveness for Healthcare Workers with private loans?

Can Public School Teachers apply for both the Teacher Loan Forgiveness and the PSLF Limited Waiver?

Can someone still benefit from the Student Loan Forgiveness years after graduation, but who has worked in higher ed for 8 yrs.?

Can you apply for PSLF without applying for loan consolidation?

Can you receive credit for months enrolled in school but worked full time?

Does Substitute Teaching qualify for PSLF?

Does time spent working as graduate teaching fellow while enrolled as a graduate student count?

How are people in long-term graduate programs (like a PhD) affected?

How can the PSLF process be used to retain faculty and administrators?

How do I know what loans could qualify for this forgiveness?

How do universities effectively share this information?

How long does the approval process take? How can we better streamline when there are "errors" on the PSLF application?

How long should people expect for the application review process to take for the PSLF?

I would like to know if it is required to make over 100 payments in order to qualify for PSLF

If I have Stafford loans that currently do not qualify, can they be consolidated with my Direct loans (that currently qualify)?

If the Biden administration forgives \$10, 000 of student loan debt (or more) how will that affect folks under PSLF?

IS PSLF only available for loan cost incurred with undergraduate education? Is it available for graduate (master and doctorate)?

Is there a certain number of years working in public service needed? Is there a number of consecutive payments needed to apply?

Is there a different application process for Limited PSLF or is it the same process?

Is there any discussion about continuing the waiver beyond October of this year?

Loan forgiveness for public school educators

My loans date back to 1994-1999. I do not believe these types of federal loans were covered under this program previously.

Please advise what Student Loan Forgiveness is available to working professionals (in public service / higher education)?

What guarantees are in place to ensure that the PSLF program will still be active in 10 years' time to fulfill this promise?

What happens if an employee leaves during the application process?

What is the status of the legislation to allow spousal consolidations to be separated (and eligible for Direct Loans/PSFL)?

What is the timeframe for forgiveness since many faculty and administrators, including me, have waited so long?

Why does this only apply to direct loans and how do you convert over your loan to qualify?

Will it take the full 90 days for applicants to hear back?

From: Vitez, Kaitlyn
Subject: RE: Follow-up_ ACE and The Department of Education Webinar
To: Fansmith, Jonathan; Harrington, Ashley
Cc: Latreille, Bonnie
Sent: July 12, 2022 1:28 PM (UTC-04:00)

Thank you for passing those along, Jon! And yes, that agenda and Bonnie's role for the call you lined out seems right to me.

Bonnie says she does not need a full introduction like Ashley, you can simply introduce her as the Federal Student Aid Ombudsman who will assist with Q&A, and any specific follow up questions from the audience after the webinar ends.

As a flag, Ashley will be joining us right at 2pm, as she is booked back to back on another PSLF webinar. Bonnie and I will get on a little early!



Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Tuesday, July 12, 2022 10:26 AM
To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: RE: Follow-up_ ACE and The Department of Education Webinar

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FYI – attached is a list of the questions that have been submitted in advance.

And just confirming, after I introduce Ashley, Bonnie will manage reviewing, selecting and advancing questions during the webinar, and Ashley will close out the webinar, correct?

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Fansmith, Jonathan
Sent: Monday, July 11, 2022 5:42 PM
To: 'Vitez, Kaitlyn' <Kaitlyn.Vitez@ed.gov>; 'Harrington, Ashley' <Ashley.Harrington@ed.gov>
Cc: 'Latreille, Bonnie' <Bonnie.J.Latreille@ed.gov>
Subject: RE: Follow-up_ ACE and The Department of Education Webinar

As an update, we now will have the poll questions available, with the Before Presentation Questions available throughout most of the webinar, and the After Presentation poll questions made available towards the end of the webinar.

We will also share the transcript, final recording, Attendee Report, Q&A Report, Chat History after the webinar, as soon as they're available.

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Assistant Vice President, Government Affairs

American Council on Education (ACE)

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American Council on Education (ACE)

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To: Arnston, Laurie <LArnston@ACENET.EDU>; Fansmith, Jonathan <JFansmith@ACENET.EDU>; Hamilton, Audrey <AuHamilton@ACENET.EDU>; Riskind, Jon <JRiskind@ACENET.EDU>; Nicholson, Jack <JNicholson@ACENET.EDU>; Peek, Audrey <APeek@ACENET.EDU>
Subject: RE: Follow-up_ ACE and The Department of Education Webinar

Hello,

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Thank you.

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From: Harrington, Ashley
Subject: Re: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)
To: Fansmith, Jonathan
Cc: Vitez, Kaitlyn; Latreille, Bonnie
Sent: July 13, 2022 8:17 AM (UTC-04:00)
Attached: How PSLF Waiver Can Help Campus_ Transcript_ 07122022.txt, How PSLF Waiver Can Help Campus_AR_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ QA_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ PR_ 07122022.xlsx, How PSLF Waiver Can Help Campus_ Chat_ 07122022.txt

Hi Jon,

That's awesome! We will have a link for a toolkit soon, hopefully by next week. We will send it over then. Thanks so much!

Best,
Ashley

Sent from my iPad

On Jul 13, 2022, at 8:15 AM, Fansmith, Jonathan <JFansmith@acenet.edu> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please see the attached transcripts, etc. from yesterday's webinar. We got a lot of positive feedback already, and really appreciate your work on this.

Also, we've already had a request for the toolkit mentioned on the webinar. Do you have links to where the toolkits are hosted on ED's website? That's an easier way for us to distribute them than the .PDFs you shared earlier.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: NGom, Fatma <FNGom@ACENET.EDU>
Sent: Tuesday, July 12, 2022 4:58 PM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Hamilton, Audrey <AuHamilton@ACENET.EDU>; Arnston, Laurie <LArnston@ACENET.EDU>; Riskind, Jon <JRiskind@ACENET.EDU>; Nicholson, Jack <JNicholson@ACENET.EDU>
Subject: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

Hello,

The final recording from the **How the PSLF Waiver Can Help Your Campus** webinar can be found [here](#).

Below are key edits made-

- Trimmed the beginning and end
- Cleaned up transition to first Poll
- Inserted a view of the Polls over audio, at the two points the Polls were launched during the webinar
- Cleaned up transitions at the end of the meeting

Also, please find attached the Audio Transcript, Attendee report, Q&A report, Polls report and Chat history.

Note: The Attendee report contains duplicate information, and needs to be cleaned up further.

Thank you.

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Host Details		
Attended	User Name (Original Name)	Email
Yes	American Council on Education	acwebinars@acenet.edu

Panelist Details		
Attended	User Name (Original Name)	Email
Yes	Jack Nicholson	JNicholson@ACENET.EDU
Yes	Jon Riskind	JRiskind@ACENET.EDU
Yes	Jon Fansmith	jfansmith@acenet.edu
Yes	Audrey Hamilton (ACE) (Audrey	AuHamilton@ACENET.EDU
Yes	Bonnie Latreille (Ashley Harringt	Ashley.Harrington@ed.gov
Yes	Kaitlyn Vitez (Ashley Harrington)	Ashley.Harrington@ed.gov
Yes	Ashley Harrington	Ashley.Harrington@ed.gov

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Other Attendees		
User Name	Join Time	Leave Time
17132595337	7/12/2022 14:05	7/12/2022 14:17
9034656030	7/12/2022 14:03	7/12/2022 14:41

Join Time		Leave Time			
7/12/2022 13:11		7/12/2022 14:51			
Join Time		Leave Time			
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7/12/2022 13:32		7/12/2022 14:51			
7/12/2022 13:32		7/12/2022 14:51			
7/12/2022 13:46		7/12/2022 14:51			
7/12/2022 13:55		7/12/2022 14:51			
Attendee Details					
Last Name	Email	Organization	Job Title	Registration T	Approval Stat
(b)(6)		ACE	(b)(6)	#####	approved
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		William Jes		#####	approved
		LIT		#####	approved
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		UALR		#####	approved
		Ringling Co		#####	approved
		life univers		#####	approved
		Chattahoo		#####	approved
		Arcadia Un		#####	approved
		Virginia Te		#####	approved
		NCMC		#####	approved
		University		#####	approved
		Augusta Ur		#####	approved
		Chattahoo		#####	approved
		Texas TRIO		#####	approved
		The Univer		#####	approved
		Ogeechee		#####	approved
		Clarke Univ		#####	approved
		Navajo Tec		#####	approved
		UR		#####	approved
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Ogeechee		#####	approved		
University		#####	approved		
Indiana Un		#####	approved		
Delta State		#####	approved		
Stevens &		#####	approved		

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	University	#####	approved	
	Luther Coll	#####	approved	
	University	#####	approved	
	University	#####	approved	
	University	#####	approved	
	Trinity Sch	#####	approved	
	CSUN	#####	approved	
	University	#####	approved	
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How long should people expect for the application review process to take for the PSLF?	
What is the timeframe for forgiveness since many faculty and administrators, including me, have waited so long?	
Is there a different application process for Limited PSLF or is it the same process?	
My loans date back to 1994-1999. I do not believe these types of federal loans were covered under this program.	
How are people in long-term graduate programs (like a PhD) affected?	
Are there proposed plans for Student Loan Forgiveness for Healthcare Workers with private loans?	
none at this time	
Can Public School Teachers apply for both the Teacher Loan Forgiveness and the PSLF Limited Waiver?	
What guarantees are in place to ensure that the PSLF program will still be active in 10 years time to fulfill this promise?	

Can someone still benefit from the Student Loan Forgiveness years after graduation, but who has worked in hig	
I would like to know if it is required to make over 100 payments in order to qualify for SLF	
Can you receive credit for months enrolled in school but worked full time?	
Loan forgiveness for public school educators	
If the Biden administration forgives \$10, 000 of student loan debt (or more) how will that affect folks under PSL	
N/A	
How long does the approval process take? How can we better streamline when there are "errors" on the PSLF	
Will covid-19 forbearance count towards payments.	

No	
Are there any helpful provisions for those who have not yet made 10 years of payments?	
Can you apply for PSLF without applying for loan consolidation?	
Is there a certain number of years working in public service needed? Is there a number of consecutive payments needed?	
Please advise what Student Loan Forgiveness is available to working professionals (in public service / higher education)	
Does time spent working as graduate teaching fellow while enrolled as a grad student count? student	
Does Substitute Teaching qualify for PSLF?	
How do universities effectively share this information?	

How do I know what loans could qualify for this forgiveness?	
If I have Stafford loans that currently don't qualify, can they be consolidated with my Direct loans (that current	
How can the PSLF process be used to retain faculty and administrators?	
What is the status of the legislation to allow spousal consolidations to be separated (and eligible for Direct Loan	

14:03:11 From American Council on Education to Hosts and panelists:ire
We are now live. Jon, you can start when ready. Thank you!

14:03:49 From American Council on Education to Everyone:
Welcome! Please submit questions/comments through the Q&A.

14:05:13 From American Council on Education to Hosts and panelists:
Ashley, 10more secs

14:11:48 From Audrey Hamilton (ACE) to Everyone:
Here in the chat, we will be providing and answering questions that were submitted during registration:

14:12:32 From Audrey Hamilton (ACE) to Everyone:
What happens if an employee leaves during the application process?

14:13:02 From Bonnie Latreille to Everyone:
What happens if an employee leaves during the application process?
Under normal rules, you need to be employed in public service while making the 120 qualified payments AND at the time of receiving loan forgiveness. However, under the PSLF waiver, you no longer need to be currently working in public service to receive loan forgiveness. Once you're at 120 qualified payments, you can leave public service employment while you await discharge. But please remember this is only under the PSLF waiver, which expires October 31, 2022.

14:13:40 From Audrey Hamilton (ACE) to Everyone:
Are payments made after the required 120 payments reimbursed if approved for the PSLF program?

14:13:52 From Bonnie Latreille to Everyone:
Are payments made after the required 120 payments reimbursed if approved for the PSLF program?
Yes! It takes about 6-10 weeks after loan discharge to receive your refund. It will be processed automatically.

14:14:21 From Audrey Hamilton (ACE) to Everyone:
How do I know what loans could qualify for this forgiveness?

14:14:31 From Bonnie Latreille to Everyone:
How do I know what loans could qualify for this forgiveness?
Only Direct Loans count are eligible for PSLF. You can figure out what type of federal student loans you have by calling your servicer, or by logging into StudentAid.gov.

14:14:44 From Audrey Hamilton (ACE) to Everyone:
I would like to know if it is required to make over 100 payments in order to qualify for PSLF

14:14:55 From Bonnie Latreille to Everyone:
I would like to know if it is required to make over 100 payments in order to qualify for PSLF
You are required to make 120 qualified payments (10 years) to earn loan forgiveness.

14:15:21 From Audrey Hamilton (ACE) to Everyone:
If I have Stafford loans that currently do not qualify, can they be consolidated with my Direct loans (that currently qualify)?

14:15:33 From Bonnie Latreille to Everyone:
If I have Stafford loans that currently do not qualify, can they be consolidated with my Direct loans (that currently qualify)?
Yes! You can consolidate all of your loans and get credit for all of your payments, as long as you do so before the PSLF waiver expires in October 2022. Here's the link to start your consolidation application:
<https://studentaid.gov/app/launchConsolidation.action>. Make sure to choose MOHELA as your student loan servicer.

14:16:14 From Audrey Hamilton (ACE) to Everyone:
Is there a certain number of years working in public service needed? Is there a number of consecutive payments needed to apply?

14:16:34 From Bonnie Latreille to Everyone:
Is there a certain number of years working in public service needed? Is there a number of consecutive payments needed to apply?
It needs to be 120 qualified payments (payments made while working in public service) cumulatively, but they DO NOT need to be consecutive. For example, you can work in public service for 7 years, take a break, and then come back to public service for 3 years to earn loan forgiveness.

14:17:00 From Audrey Hamilton (ACE) to Everyone:
My loans date back to 1994-1999. I do not believe these types of federal loans were covered under this program previously.

14:17:33 From Bonnie Latreille to Everyone:
My loans date back to 1994-1999. I do not believe these types of federal loans were covered under this program previously.
Loans from this time period are most likely older Federal Family Education Loans. These are only eligible for PSLF if you consolidate them into new Direct Loans. Under the PSLF waiver, any payments made on these loans after October 2007 (the start of the PSLF program) will count towards the required 120 needed for loan forgiveness, provided you were also working in public service at the time.

14:19:57 From Audrey Hamilton (ACE) to Everyone:
Reminder--if you would like to ask a question during this webinar, please submit those questions/comments through the Q&A. Be sure to check if your question was answered in the answered column.

14:22:32 From Bonnie Latreille to Everyone:
Link to submit a complaint: <https://studentaid.gov/feedback-center/>

14:39:51 From Bonnie Latreille to Everyone:
FSAengagement@ed.gov

14:44:14 From Audrey Hamilton (ACE) to Everyone:
All attendees will receive an email from ACE with a link to today's recording sometime within the next week.

14:50:57 From American Council on Education to Hosts and panelists:
Ashley, the Poll results are on the screen.

14:51:13 From American Council on Education to Hosts and panelists:
Click on the Poll icon.

14:51:17 From Bonnie Latreille to Everyone:
For more questions, call Federal Student Aid at 1-800-433-3243

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1. Will you share this information about Public Service Loan Forgiveness with your employees?

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2.Do you think PSLF will help you with employee retention and recruitment?

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2.What percentage of the employees you work with have student loans?
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3.If you have student loans, do you feel motivated to apply for Public Service Loan Forgiveness?

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#	Question	Asker Name	Asker Email
1	I have personally applied	(b)(6)	
2	How to account for en		
2	How to account for en		
3	I've got loans from 199		
4	I initially had loans for		
5	Will you be sending th		
6	Will we have access to		
7	How about k12 public		
8	Do I need to submit a		
9	This presentation seen		
10	How long does the act		
11	So should we only verif		
12	What if you have not s		
13	This is very fast. Will s		
14	I just submitted for co		
15	My loans were switche		
16	Are loans for classes th		
17	What guarantee is the		
18	What's the reasoning t		
19	I've already applied an		
20	Is EduStaff a qualifying		
21	What about FFELP loa		
22	How long does the PSI		
23	You mentioned earlier		
24	If you have questions		
25	thank you —		
26	Should I wait until my		
27	One of my employers		
28	Can you verify if you a		
29	If I am currently in the		
30	Thank You!		
31	Can we do this Employ		
32	How do we know if/w		
33	Thank you!		
34	Will this presentation		
35	Got it - that makes ser		
36	yes! learn from my mi		
37	Greetings. Is there a v		
38	If we have questions a		
39	prior to a 2022 consol		
40	IS this program only fo		
41	Would the 71 qualifyir		
42	But what if you did no		
43	I am confused on how		
44	For Direct Grad Loan c		
45	How long does it take		

46	Are school counselors	(b)(6)
47	Who can we speak to f	
48	If someone just hit the	
49	If a borrower worked f	
50	I was in \$0 payment ju	
51	I've been on defermen	
52	Will a student with stu	
53	If accepted, when will	
54	Is there a process to ha	
55	How can we find the to	
56	If I do not have access	
57	Chat disabled on my Zc	
57	Chat disabled on my Zc	
57	Chat disabled on my Zc	
58	After November 1, doe	
59	I submitted PSLF form	
60	thank you	
61	Is EduStaff a qualifying	
62	If I worked for a qualif	
63	I'm currently in gradua	
64	I've worked in public s	
65	Do the months during	
66	Is the recording throug	
67	I work at a Christian co	
68	How do we opt out of	
69	I would like to share th	
70	I have attended a coup	
71	What about consolidat	
72	Can a FEEL Loan and Fe	
73	What guarantee is the	
74	What is or was the CO	
75	If we are a large emplo	
76	will there be a recordi	
77	Who do I contact to ho	
78	If I have been in deferr	
79	will we be able to shar	
80	Who can I ask this que	
81	Will the slide deck also	

Answer
xas.edu
live answered
Hi (b)(6) Ashley will talk about this more during the presentation, but the genera
H(b)(6) Ashley will address this during the presentation, but the PSLF waiver wil
ltec.edu
Yes, we will share the recording and we plan to post it on ACE's website.
Yes, we will share the recording and we plan to post it on our website.
Yes! Public schools are qualifying employers for PSLF.
Yes
Yes, but there is some updated information in this presentation.
Yes, the date they became full time. If the borrower is trying to get credit for the
J
Yes, we will share the recording and we plan to post it on ACE's website.
du
No - everything will transfer over to the new servicer.
Total loan - your eligibility for loan forgiveness is unrelated to the school you atte
on.edu
Here's the link to start your consolidation application: https://studentaid.gov/ap
du
Yes, you should consolidate
If your loans have been transferred, call MOHELA - https://www.mohela.com/DL
du
I generally recommend waiting until the consolidation is completed.
You can pursue the PSLF reconsideration process to have that employer re-revie
Good! Those are most likely scam calls. If you're ever concerned something is a s
jcd.edu
.edu
I generally recommend consolidating first because if you submit the employmen
MOHELA will send you a welcome email once your loans are transferred.
Yes, we will share the recording and we plan to post it on ACE's website.
.edu
Yes! Visit our PSLF Help Tool and look up the employer: https://studentaid.gov/p
If your loans are with FedLoan still - contact them directly.
live answered
du
pcv.edu
J
You should be able to go to the HR office at each college to get them to sign off c
er@augustatech.edu

Yes! Any full-time employee of the school is eligible.
live answered
ocv.edu
live answered
live answered
Reach out to FSAengagement@ed.gov and we can coordinate a webinar!
ACE will send a recording and links to materials after the webinar! We will also b
We will be sending an email with the link to the recording to all attendees and re
You can consolidate all of your loans and get credit for all of your payments, as lo
Link to submit a complaint: https://studentaid.gov/feedback-center/
FSAengagement@ed.gov
live answered
live answered
jc.edu
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live answered
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March 2020 through present.
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Question Time	Answered Time
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00:00:15.269 --> 00:00:23.610

Jon Fansmith: hello, and welcome to this webinar on how the ps1 F waiver can help your campus i'm john Smith with ACS government and public affairs team.

2

00:00:23.940 --> 00:00:28.230

Jon Fansmith: And we're excited to offer this webinar in partnership with the United States Department of Education.

3

00:00:28.800 --> 00:00:37.170

Jon Fansmith: In particular, I am pleased to introduce Ashley harrington, who is the senior advisor to the chief operating officer at the Department of Education office of federal student aid.

4

00:00:37.680 --> 00:00:45.120

Jon Fansmith: In that role Ashley advises on policy implementation operations and external communications related to the federal student loan portfolio.

5

00:00:45.750 --> 00:00:52.380

Jon Fansmith: Prior to her time at FSA actually worked at the Center for responsible lending at unc F and then the New York governor's office.

6

00:00:52.770 --> 00:01:00.180

Jon Fansmith: actually brings great expertise and understanding to student loan policy we were glad to have her today have her join us today to discuss this important topic.

7

00:01:00.750 --> 00:01:05.130

Jon Fansmith: In addition, Ashley has joined by her colleague bonnie latrell, who is the federal student aid Ombudsman.

8

00:01:05.670 --> 00:01:16.500

Jon Fansmith: bonnie will be assisting with questions during the webinar as well as any specific follow up questions from the audience after the webinar concludes welcome, and thank you both for joining us and with that i'll turn it over to you Ashley.

9

00:01:19.890 --> 00:01:27.000

Ashley Harrington: Thank you so much john and thank you so much to ace for setting this up and for all of you for being here really excited to share this information.

10

00:01:27.420 --> 00:01:38.160

Ashley Harrington: And so first thing we want to do is start off with a poll just to get a sense of who is in the virtual room, so if I could ask if we could launch that first set of questions.

11

00:01:40.260 --> 00:01:44.160

Ashley Harrington: Thank you, so please just take a second and fill this out.

12

00:01:46.560 --> 00:01:50.880

Ashley Harrington: will give you about 30 seconds, we try to keep it pretty simple but we really want to know.

13

00:01:52.140 --> 00:01:54.480

Ashley Harrington: Who we're talking to and the kind of level set.

14

00:02:05.100 --> 00:02:08.220

Ashley Harrington: And I cannot tell how many people have completed it so.

15

00:02:13.020 --> 00:02:14.040

Ashley Harrington: When we're ready.

16

00:02:15.360 --> 00:02:19.170

Ashley Harrington: When you think we've got a you know critical mass, we can do that.

17

00:02:20.820 --> 00:02:21.480

Ashley Harrington: Great.

18

00:02:23.580 --> 00:02:24.480

Ashley Harrington: 10 more seconds.

19

00:02:30.390 --> 00:02:33.960

Ashley Harrington: awesome so it looks like the good majority of you have student loans.

20

00:02:36.090 --> 00:02:47.790

Ashley Harrington: Good percentage work with at least 10% or more, many of you 25% of your employees have displays you work with have student loans make sense, many of you are well worth psl live love to see it.

21

00:02:49.590 --> 00:02:59.010

Ashley Harrington: goes about 5050 on Luna psl of waiver, so we have a lot to cover today, I hope it will be helpful, some of it will be a refresher because we are going to spend some time talking about normal PSI left today.

22

00:03:00.000 --> 00:03:07.680

Ashley Harrington: And it's going to be a lot of information, but i'm joined by my excellent colleagues money and caitlin who are going to be helpful in the chat and we'll have some time for questions at the end.

23

00:03:08.220 --> 00:03:18.900

Ashley Harrington: So bear with us if it's stuff you already know doesn't hurt to hear it again and we will, it will not be that long of a presentation okay let's get started next slide.

24

00:03:22.350 --> 00:03:28.440

Ashley Harrington: So this effort is really the limit as a lift waiver that we're going to talk about today is a part of this administration.

25

00:03:29.040 --> 00:03:36.360

Ashley Harrington: effort to provide targeted student loan relief to make the programs that we have worked better and to realize the promise for ps1 left purposes.

26

00:03:36.690 --> 00:03:51.330

Ashley Harrington: of public service loan forgiveness through all the public servants who have earned forgiveness and so already, we are seeing the effects of this waiver more almost 150,000 public servants have gotten actually over \$9 billion forgiveness, because they have some updated numbers.

27

00:03:52.350 --> 00:04:00.120

Ashley Harrington: Through these improvements in a PSA left program many of you may know, you may have heard that prior to this prior to this way we're only 7000 people had actually gotten forgiveness.

28

00:04:00.570 --> 00:04:08.040

Ashley Harrington: Through PS 1f and we've increased that number, the number of approvals for forgiveness over 2,000% so that's a big deal next slide.

29

00:04:09.780 --> 00:04:17.340

Ashley Harrington: And in addition to that those updates, you know, over a million other borrowers have gotten closer to forgiveness so they've gotten closer to the one or 220 payments.

30

00:04:17.520 --> 00:04:27.660

Ashley Harrington: required for forgiveness picking up an average i'm an additional years worth of credit, so the changes that we are making are real people have heard bad things about ps1 left or have had a bad experience before.

31

00:04:27.960 --> 00:04:40.410

Ashley Harrington: Our biggest message and our biggest takeaway is try again for those here who have tried it try again for the folks you talk to try again because these changes are real and they matter and we've seen them transform lives already next slide.

32

00:04:41.700 --> 00:04:50.370

Ashley Harrington: So today we'll talk about ps1 of basics then we'll talk about this exciting limited ps1 a waiver then we'll talk a little bit about the help tool which is how you apply for ps1 F.

33

00:04:50.700 --> 00:04:56.700

Ashley Harrington: And then we'll go into a little bit of resources and, at the end, we will have time for some questions next slide.

34

00:04:58.710 --> 00:05:05.940

Ashley Harrington: Next slide so as a reminder for those of us, I know, most of us here know about psl left the permissive psl F is really.

35

00:05:07.170 --> 00:05:17.910

Ashley Harrington: You get the remaining balance on your federal direction loans forgiven after having made 120 qualifying monthly payments under a qualifying repayment plan, while working full time for a qualifying employer.

36

00:05:18.120 --> 00:05:31.590

Ashley Harrington: This is a program that was created by Congress back in October 2007 so it's only for employment after that date, and you had to meet all these characteristics, if you wanted to get PSI left again we're talking about normal PSI left under normal rules.

37

00:05:32.610 --> 00:05:42.570

Ashley Harrington: In, then you could, if you didn't have direct loans, you could consolidate to the direct loan program but, once you did that you started fresh working towards that 10 years or 120 payments next slide.

38

00:05:43.890 --> 00:05:49.680

Ashley Harrington: This is just a little infographic that explains what we mean make 120 qualifying payments on your direct loans.

39

00:05:49.950 --> 00:06:00.090

Ashley Harrington: While you're working for a qualifying employer when you're applying for and receiving PS lf, then you get it forgiven and I forgiven them out it's not taxable still talking about normal basic psl left next slide.

40

00:06:01.680 --> 00:06:07.710

Ashley Harrington: So FSA let's say you have to have the right loan, with the right repayment with the right job and so we'll talk about each of those in return.

41

00:06:08.310 --> 00:06:15.990

Ashley Harrington: For the right loan wasn't eligible loan for psl if you had to have a direct loan that does include consolidation loans and it does include parent plus loans.

42

00:06:16.200 --> 00:06:22.050

Ashley Harrington: The parent plus loans have a little asterisk beside it and we'll talk about how parent plus loans differ from other loans in just a second.

43

00:06:22.560 --> 00:06:28.080

Ashley Harrington: It doesn't include fail program loans that we just that I just mentioned, so it doesn't include federal family education program loans.

44

00:06:28.320 --> 00:06:33.570

Ashley Harrington: These are loans that are guaranteed by the Federal Government

were rejected by private lenders like you may have had Sallie Mae.

45

00:06:34.050 --> 00:06:42.660

Ashley Harrington: or JP Morgan or Wells Fargo it also doesn't include Perkins loans many of your institutions may have been part of Perkins loan program so you know that these are.

46

00:06:43.230 --> 00:06:52.740

Ashley Harrington: loans that are guaranteed by the Federal Government but originated by institutions of higher education and it doesn't include any other type of federal or private student loan next slide.

47

00:06:54.990 --> 00:07:02.370

Ashley Harrington: Just a note on the parent plus loan so parent plus loans are not excluded from PS If I know that's a that's a bit of a confusion out there.

48

00:07:02.610 --> 00:07:12.720

Ashley Harrington: it's just that they're not eligible for all income driven repayment plans on the next slide we're going to talk about how an eligible payment under PSL F is one that's leading to a standard plan or an income driven repayment plan.

49

00:07:12.990 --> 00:07:20.400

Ashley Harrington: But the standard plan for student loans, the 10 year fully amortizing plan, meaning that at the end you wouldn't have anything to forgive towards PSL left.

50

00:07:20.760 --> 00:07:29.400

Ashley Harrington: So you really want to be on an ID our plan, the only way for parent plus borrowers to get access to an income driven repayment plan is for them to consolidate their loan.

51

00:07:29.730 --> 00:07:36.960

Ashley Harrington: Then they have a direct consolidation loan with an underlying parent plus and that new loan has access to one of the income driven repayment plans.

52

00:07:37.410 --> 00:07:47.850

Ashley Harrington: I see our that's income contingent repayment, it is the least generous of income based repayment plans, but it is the one that is accessible apparent plus borrowers activate consolidate.

53

00:07:48.600 --> 00:07:53.460

Ashley Harrington: So parent plus borrowers looking to work towards PSI left want to consolidate and get on ice are.

54

00:07:53.700 --> 00:07:59.130

Ashley Harrington: But they want to use our loan simulator first because I car is is sometimes a very unaffordable plan.

55

00:07:59.340 --> 00:08:12.150

Ashley Harrington: And it may not make sense for that parent in the short term, when they could be making a lower payment under a graduated or extended repayment plan or some other option right, and so you want to use our loan simulator and make the choice that makes the most sense for you next slide.

56

00:08:14.280 --> 00:08:20.850

Ashley Harrington: So you had to have the right repayment so that's the repayment that was on time, which we which we say within 15 days of the due date.

57

00:08:21.240 --> 00:08:31.950

Ashley Harrington: had to be on a standard plane or any ID our plan, you may hear me say income driven repayment or income based repayment ADR I br use them interchangeably sometimes but we may repayment plans based on income.

58

00:08:32.700 --> 00:08:45.090

Ashley Harrington: has to be for at least the amount due and they can be not consecutive you don't have to make 120 payments in a row, it can take you 10 years to get to 120 it can take you 15 years to get to 120 we don't care we just want you to get to 120 payments.

59

00:08:45.900 --> 00:08:51.630

Ashley Harrington: It doesn't count it was more than 15 days late it doesn't kind of was made on a graduated extended or alternative plan.

60

00:08:52.110 --> 00:09:06.090

Ashley Harrington: It doesn't count if it was made for less than the amount do it doesn't count if it was made when not required So if you were in school and your loan the deferred or your neck grace period falling when you leave school that will not count towards your pls next slide.

61

00:09:08.280 --> 00:09:16.800

Ashley Harrington: You can make multiple payments in a month, and as long as it equals out to the amount due and it's within 15 days of the due date and will count, so if your payment is \$100 for the month.

62

00:09:17.070 --> 00:09:25.890

Ashley Harrington: You pay \$50 on the fifth and \$50 on the 15th and it was due on the 15th you've made you've paid \$100 by the 15th and you've satisfy your obligation, you can get credit for that month.

63

00:09:26.430 --> 00:09:35.520

Ashley Harrington: We also do accept lump sum payments, but it is limited to 12 months or until your ID or recertification date, you do have to restart it by your income every year.

64

00:09:35.910 --> 00:09:51.930

Ashley Harrington: For IBM er and so it's limited to that 12 months or two that ID

our date whichever comes first and it doesn't mean you're speeding up forgiveness, you can pay in advance, but you still have to work all of those 120 corresponding months in your psl of eligible employment next slide.

65

00:09:54.000 --> 00:09:57.690

Ashley Harrington: So we talked about the right loan the right repayment let's talk about the right job.

66

00:09:58.290 --> 00:10:05.820

Ashley Harrington: It has to be full time 30 hours a week or more of the equivalent at a government agency that's federal state local tribal or military.

67

00:10:06.300 --> 00:10:14.940

Ashley Harrington: It includes all 501 C three nonprofits and include some other nonprofits if they provide a qualifying public service that's things like public safety.

68

00:10:15.300 --> 00:10:22.380

Ashley Harrington: Early childhood education emergency management or things like that it doesn't include part time work unless it adds up to full time.

69

00:10:22.800 --> 00:10:32.910

Ashley Harrington: It doesn't include volunteer work, so if you're not getting paid it doesn't count it doesn't include any for profit entities and it doesn't include Labor unions are partners and political organizations next slide.

70

00:10:34.950 --> 00:10:42.090

Ashley Harrington: So we like to say it's it's about the employer it's not about the job we're not going to ask you what you do for that organization or that university.

71

00:10:42.450 --> 00:10:47.820

Ashley Harrington: We just want to know is the employer, the the the organization that pays you the one that's on your w two.

72

00:10:48.090 --> 00:10:58.890

Ashley Harrington: One is on your pay Stub does it meet the criteria for psl if we don't care how much you make you don't care what you do there if you have student loans and you work at a qualifying employer, you can potentially work towards PS 1f.

73

00:10:59.730 --> 00:11:09.690

Ashley Harrington: Multiple part time jobs can add up to full time employment, so if I work 15 hours a week at a State Agency and 15 hours a week at a private nonprofit college.

74

00:11:10.650 --> 00:11:17.790

Ashley Harrington: That has up to 30 hours a week they're both eligible employers and that can count towards my mother back and count towards my month of PSI left

service.

75

00:11:19.290 --> 00:11:27.030

Ashley Harrington: i'm an unknown PS liberals, you do have to be employed and eligible employer when that forgiveness is granted next slide.

76

00:11:30.750 --> 00:11:37.080

Ashley Harrington: So there's also something called temporary expanded psl let not to be confused with the limited PS lf waiver that we're going to talk about in just a second.

77

00:11:37.380 --> 00:11:48.570

Ashley Harrington: This is something that was also created by Congress through appropriations, and it was only to help borrowers if they weren't on and if they weren't on the right repayment plan so they weren't extended or graduated plan get access to pls.

78

00:11:49.200 --> 00:11:53.010

Ashley Harrington: So that is an appropriate just limited program but that exists as well next slide.

79

00:11:55.050 --> 00:12:01.320

Ashley Harrington: So just a note on the coven 19 flexibilities if you have to the loan, many of us here have been on a payment off since March of 2020.

80

00:12:02.400 --> 00:12:09.510

Ashley Harrington: And we want to make clear that you can get credit for every single one of those months every single month is march 2020.

81

00:12:09.780 --> 00:12:18.540

Ashley Harrington: towards pls as long as you also have been started by employment as long as you were still employed and meet the pls eligible psl of employment requirements.

82

00:12:18.810 --> 00:12:28.890

Ashley Harrington: You will submit forms are all of that time, and you can get credit for every single one of those months and that puts you like over a fifth of the way towards your 120 already next slide.

83

00:12:30.690 --> 00:12:45.450

Ashley Harrington: scenario talk about the good stuff the limited pls waiver is exciting these exciting changes that we have implemented under this administration that have got us from 7000 250,000 borrowers that over a million bars, those are forgiveness next slide.

84

00:12:47.580 --> 00:12:58.050

Ashley Harrington: So limited pls waiver, the biggest thing we want you to know is that it ends, it is time limited it ends October 31 2022 so many borrowers have steps that they are going to have to take.

85

00:12:58.440 --> 00:13:04.290

Ashley Harrington: Before the end of October of this year, if they want to fully take advantage of the waiver Barbara they're going to have to do this, you.

86

00:13:04.800 --> 00:13:12.420

Ashley Harrington: should do this, even if they're not at 120 even if they've only been a repayment for a few years it doesn't hurt to go ahead and get your maximum amount of credit in.

87

00:13:12.720 --> 00:13:16.770

Ashley Harrington: and start working towards pls get the forms in now that's your best practice.

88

00:13:17.160 --> 00:13:26.250

Ashley Harrington: And so, this is a really big deal because now under this waiver, you can get credit for time that normally wouldn't qualify under psl if you can get credit, even if you had the wrong loan.

89

00:13:26.760 --> 00:13:30.000

Ashley Harrington: You if you didn't make a payment, even if you're on the wrong repayment plan.

90

00:13:30.480 --> 00:13:39.960

Ashley Harrington: Even if your payment was late or for less than the amount do we don't care if you made a payment we're not looking at where what we're payment plan you were on and we're not looking at really most cases, what type of luck.

91

00:13:40.560 --> 00:13:43.230

Ashley Harrington: And we'll talk a little bit about parent plus because they're always special just a second.

92

00:13:43.500 --> 00:13:52.590

Ashley Harrington: But we just want to know where are you an active repayment status and we define that very generously right you can't have been in default you can't have been on a in school.

93

00:13:52.920 --> 00:13:59.790

Ashley Harrington: In you can have been in school or in a grace period or even accepting some difference in forbearance is and we'll talk about that a little bit.

94

00:14:01.110 --> 00:14:09.930

Ashley Harrington: It could have been late, you could have missed the payment altogether, it could have been not the right amount we're not looking at that we just want to know where you an active repayment status.

95

00:14:10.320 --> 00:14:16.590

Ashley Harrington: And were you working with a qualifying employer, because we

didn't change them in the employment requirements so even if you had a fell loan.

96

00:14:17.040 --> 00:14:26.100

Ashley Harrington: And you can now consolidate and get credit for time prior to consolidation, you have a Perkins loan, you can now consolidate and get credit for time prior to consolidation.

97

00:14:26.460 --> 00:14:32.700

Ashley Harrington: If you had previously consolidated feller Perkins loans, you can submit forms to get credit for that time spent prior to consolidation.

98

00:14:33.030 --> 00:14:39.870

Ashley Harrington: I know you heard that you have to start at zero consolidation under the waiver, that is not the case, and that is a very big deal.

99

00:14:40.350 --> 00:14:47.910

Ashley Harrington: And so borrowers have to act now if you need to consolidate because you still have you do have to consolidate into the direct loan program to get pls.

100

00:14:48.330 --> 00:14:50.700

Ashley Harrington: need to do that by October 31 2022.

101

00:14:51.030 --> 00:15:00.480

Ashley Harrington: and submit a piece of left form by that deadline as well that's you effectively raising your hand and say i'm trying to work through psl left, because I know that, after that, the normal rules will apply.

102

00:15:00.720 --> 00:15:06.480

Ashley Harrington: And it will not be the same, and I will not be able to get credit for the time before consolidation next slide.

103

00:15:09.570 --> 00:15:19.290

Ashley Harrington: So you may fall into one of three groups, you may only have direct loans if that's the case you want to make sure you have a psl a form on file that's that's how you certify employment we're going to talk about that next.

104

00:15:20.190 --> 00:15:27.240

Ashley Harrington: by the deadline, if you previously consolidate it you want to get forms in for the time prior to consolidation, so you can get that extra credit.

105

00:15:27.630 --> 00:15:36.840

Ashley Harrington: If you still have seller Perkins loans, you need, you have the most to do you got to consolidate and submit a psl form all by October 31 way, so the next slide.

106

00:15:39.000 --> 00:15:45.570

Ashley Harrington: So, just a quick note on parent, plus a plus loans and the

waiver because we talked about people getting additional credit for time prior to consolidation.

107

00:15:45.840 --> 00:15:55.080

Ashley Harrington: You may also remember that I said parent plus borrowers need to consolidate for pls purposes they can get access to income contingent repayment the least generous of the ID our plans.

108

00:15:56.190 --> 00:16:08.190

Ashley Harrington: That is all true but, under the waiver parent plus loans don't get additional credit, so you will not get additional credit for a parent plus loan that you've already consolidated, for the time when it was just a pure parent plus loan.

109

00:16:08.520 --> 00:16:18.030

Ashley Harrington: You could get additional credit for the time after you consolidated it right, if you missed a payment or relate, you could additional credit for that time, but not for the time prior to consolidation.

110

00:16:18.990 --> 00:16:28.080

Ashley Harrington: Unless you are, you have already consolidated that parent plus loan with another student loan or you consolidate that parent plus loan now if another student loan that is older.

111

00:16:28.350 --> 00:16:35.730

Ashley Harrington: You would get additional credit for the consolidation loan for the other loan the other underlying loan the student loan, but not for the parent plus loan.

112

00:16:36.000 --> 00:16:46.590

Ashley Harrington: But still remember that once you thought a parent plus loan us to consolidate it with other student loan you still are going to have to use income contingent repayment and you want to make sure that that makes sense for you next slide.

113

00:16:49.110 --> 00:16:53.370

Ashley Harrington: So i'm going to It may sound repetitive our recap this quite a bit, but taking into the waiver.

114

00:16:54.090 --> 00:16:57.300

Ashley Harrington: One you want to confirm your employer's qualifying and we're going to talk in a second about that.

115

00:16:57.960 --> 00:17:11.700

Ashley Harrington: You need to consolidate your loans, if you need to So if you still have feller Perkins loan or somebody obscure older federal student loans that that exists, and then you want to submit a psl a form and you want to do it all by October 31 2022 next slide.

116

00:17:13.500 --> 00:17:22.590

Ashley Harrington: So a couple things to note about consolidation, because while many folks are going to have to consolidate take advantage of this waiver to get access to this release because automation is not without.

117

00:17:23.340 --> 00:17:31.260

Ashley Harrington: You know consequences right, so your monthly payment may go down, but you may have to pay longer because essentially a new long new loan for new repayment period.

118

00:17:31.500 --> 00:17:35.520

Ashley Harrington: Now if you're working towards guess I left that likely won't bother you because you're just trying to get to 120.

119

00:17:36.090 --> 00:17:45.570

Ashley Harrington: If you have unpaid interest your principal balance will go up because that unpaid interest will get capitalized again if you're working towards pls that may not bother you because you're going to get that forgiven.

120

00:17:46.680 --> 00:17:55.410

Ashley Harrington: Your new consolidation loan will generally have a new interest rate it'll be a weighted average of your loans and so again, this may not bother you if you're working towards that 120.

121

00:17:55.980 --> 00:18:08.880

Ashley Harrington: And just know you don't have to consolidate all of your federal student loans, you can do one loan, you can do to load, you can do five loans it doesn't matter even the thought as many laws together as fuel together as you want, but once you do it, you can't undo it next slide.

122

00:18:11.250 --> 00:18:17.850

Ashley Harrington: So we also announced, more recently, I think it was April that we were doing some massive adjustments to income driven repayment accounts.

123

00:18:18.480 --> 00:18:25.290

Ashley Harrington: It really aligns with what we're doing under the waiver, but the most important thing that we want folks to know for psl left purposes is that.

124

00:18:26.280 --> 00:18:35.010

Ashley Harrington: For borrowers, who were steered into long term for forbearance is so 12 months or more consecutive or 36 months of working with him, which we know, has happened to a lot of borrowers.

125

00:18:35.250 --> 00:18:39.150

Ashley Harrington: They are able to get that credit applied towards income based repayment and PS.

126

00:18:39.750 --> 00:18:44.340

Ashley Harrington: PS I love you still have to submit for for that time, but that

will give a lot of folks additional credit.

127

00:18:44.670 --> 00:18:55.140

Ashley Harrington: And if you have a shorter term forbears that doesn't quite meet that cut off, but you still you were steered into that you can reach out to bonnie who is on here and her team as student aid that goes actually back, which I know she will drop into the chat.

128

00:18:55.500 --> 00:19:00.840

Ashley Harrington: and say they will help you if you had a longer term if you had a shorter term forbearance that won't be that will.

129

00:19:01.590 --> 00:19:12.780

Ashley Harrington: be taken care of by this adjustment, we are doing these adjustments automatically, but that will happen later this year, so you may not see that reflected in your account for a while, but please stay tuned and we know that it will help many borrowers.

130

00:19:13.290 --> 00:19:17.040

Ashley Harrington: Who who who had to deal with this issue next slide.

131

00:19:21.240 --> 00:19:23.760

Ashley Harrington: So just a note about what to expect when you're expecting.

132

00:19:24.150 --> 00:19:33.900

Ashley Harrington: You may know that our current our will not even our current anymore, because as of July 1 fed loan servicing, also known as via is no longer the official PS lf servicer.

133

00:19:34.200 --> 00:19:42.930

Ashley Harrington: It is now a company called mozilla so going forward if you submit a psl left form it will go to mozilla and they will process you if you're currently.

134

00:19:43.230 --> 00:19:51.210

Ashley Harrington: A psl F bar where you've had fear fed loan servicing you are going to we're going to be transferred to mozilla and all of those will be done by September 2022.

135

00:19:51.630 --> 00:19:56.760

Ashley Harrington: And so, right now, you if you're currently with that loan and you submit a form they may be reviewed by fear.

136

00:19:57.060 --> 00:20:04.770

Ashley Harrington: or they may go ahead and be submitted to mow healer it, we will not lose paperwork, you will not lose credit everything's going to move over there terms, he was gonna say the same.

137

00:20:04.980 --> 00:20:09.420

Ashley Harrington: For payment costs are going to stay the same, we are monitoring this to make sure everything goes well.

138

00:20:09.720 --> 00:20:18.210

Ashley Harrington: But I still always encourage people keep track of everything keep track of your records it doesn't hurt to to help yourself be your own advocate if you have your own backups, just in case.

139

00:20:19.320 --> 00:20:26.460

Ashley Harrington: And then we're trying to do everything automatically where we can so a lot of the discharges that we talked about earlier, the hundred and 50,000 people.

140

00:20:26.700 --> 00:20:36.030

Ashley Harrington: we've done that automatically where we can we want to provide relief automatically and we're constantly thinking of more ways to make this process easier for borrowers and other stakeholders.

141

00:20:37.380 --> 00:20:37.920

Ashley Harrington: Next slide.

142

00:20:39.150 --> 00:20:45.660

Ashley Harrington: So now we're going to talk about the pls help tool, this is a tool that you're going to use to submit a psl a form.

143

00:20:46.350 --> 00:20:53.670

Ashley Harrington: That you're going to generate it you're using it to generate a form that looks basically like this, you may have seen this before as an ECM employer certification form.

144

00:20:53.880 --> 00:20:59.100

Ashley Harrington: Now we just have one form, so you may hear someone say ECM or pls form it's the same form.

145

00:20:59.370 --> 00:21:05.970

Ashley Harrington: We want you to submit it through the help tool that is the best place to start it's on student a.gov do nick.gov slash PSI left.

146

00:21:06.270 --> 00:21:09.600

Ashley Harrington: And then, as always, your best place to start when you're trying to manage your student loans.

147

00:21:09.810 --> 00:21:17.970

Ashley Harrington: So you need that God is where you're going to go consolidate is where you're going to use loan simulator is where you going to use to help tool is where you're going to send a note to bonnie about it long term short term forbearance.

148

00:21:18.270 --> 00:21:24.960

Ashley Harrington: Student a.gov is the best place to start and is definitely the best place to start so certify your employment for PSI left purposes next slide.

149

00:21:26.340 --> 00:21:37.950

Ashley Harrington: So to do that you're going to go student a.gov slash PS I left, I will say that, in our beta we're going to send out some updated slides after this we recently launched a employer help an employer.

150

00:21:38.910 --> 00:21:47.250

Ashley Harrington: employer tool, where you don't have to right now under the help, so you have to sign into your students that have account to put in your employer and check eligibility.

151

00:21:47.640 --> 00:21:55.860

Ashley Harrington: As of Monday, we have a separate tool, where you don't have to log in, and you can use it to see if your employer in there, or if you see an issue you don't have you can it's free standing.

152

00:21:56.130 --> 00:22:03.630

Ashley Harrington: But, for if you're trying to submit a form, you want to use you want to log into your account and so will populate with all your information, and you can submit that form.

153

00:22:04.050 --> 00:22:11.370

Ashley Harrington: But you're going to use to help tool you're going to click start it's going to ask you to enter your student a dog of information and then it's going to log into your account next slide.

154

00:22:13.170 --> 00:22:17.190

Ashley Harrington: and the first thing is going to ask you, because, as I left the most important thing we need to figure out from you is.

155

00:22:17.520 --> 00:22:26.100

Ashley Harrington: Do you have qualifying employment we don't have that information right you're gonna have to put in your employment history and the thing that you're going to need for your employment history is something called an ei.

156

00:22:26.880 --> 00:22:37.140

Ashley Harrington: employer identification number, the Federal yeah in this is the tax number that is on your pay Stub it's on your w two and is what we need for every single employer, that you are trying to certify.

157

00:22:37.440 --> 00:22:43.140

Ashley Harrington: You can see on this page we don't ask you for the name of the company or organization or university we asked you for the if.

158

00:22:43.410 --> 00:22:51.930

Ashley Harrington: You need that yeah and for every single employer that you're trying to get credit for towards the 120 you'll put that in and you'll put your start and end dates next slide.

159

00:22:53.580 --> 00:22:58.050

Ashley Harrington: And then we'll get a list or maybe a list, maybe just one hopefully it pops up.

160

00:22:58.500 --> 00:23:07.080

Ashley Harrington: Our database is ever growing and we're probably making changes like having a free standing one, but we still know that it is not have every single employer in the country.

161

00:23:07.320 --> 00:23:19.560

Ashley Harrington: and definitely doesn't have every single ps1 of eligible employer and it may not have it all figured out so we may be in there and it may come up as likely and eligible, which just means undetermined or in eligible, which means we think.

162

00:23:20.220 --> 00:23:22.380

Ashley Harrington: We think it might be like a for profit, like Coca Cola.

163

00:23:22.680 --> 00:23:30.240

Ashley Harrington: But even, but if you don't agree with one of those don't be discouraged continue with the process submitted it just may take your forms a little bit longer to get reviewed.

164

00:23:30.480 --> 00:23:40.710

Ashley Harrington: Because they have to go through our employee education process or it could pop up is eligible it's already in our system, we already know it's good, and that is even better, it will go through faster, but no matter the case.

165

00:23:41.250 --> 00:23:46.830

Ashley Harrington: You want to continue with the help tool and continue working and continue trying to get your application process for pls.

166

00:23:47.130 --> 00:23:51.630

Ashley Harrington: So you can, and you can put in multiple employers, at one time, but again you're going to need that yeah in.

167

00:23:51.870 --> 00:24:02.580

Ashley Harrington: If you work for a State Agency or a federal agency just know that some of them share diane so you may have to look through an entire list and find the right he is I mean and find the right organization.

168

00:24:03.000 --> 00:24:06.090

Ashley Harrington: And if it's not in there, all you may have to manually enter some information.

169

00:24:06.300 --> 00:24:19.410

Ashley Harrington: And again, that will have to go through our process, but you should still continue our database is not perfect it's not infallible and we're constantly working to improve it and you might help us improve it, because you put a new employer in there that we don't have next slide.

170

00:24:21.420 --> 00:24:32.130

Ashley Harrington: is going to talk to you about loan chips slightly different during the payment pause and because of the waiver, and so it may tell you things like need to consolidate or submit a form and just give you some helpful information next slide.

171

00:24:34.410 --> 00:24:40.740

Ashley Harrington: going to ask you for application details really just asking you have you made 120 payments, yes or no towards pls.

172

00:24:41.130 --> 00:24:49.890

Ashley Harrington: You have to put in, whatever our system think so, you may think you have 120 because you know that you made all these payments are to consolidation, but our system has not caught up with that yet.

173

00:24:50.190 --> 00:24:59.820

Ashley Harrington: So you have to put you still have to put know to move forward, it does not impact your application is just but you do have to do that answer this question to get it processed next slide.

174

00:25:01.710 --> 00:25:10.140

Ashley Harrington: Then it's going to pop up your present information you log in as the name.gov so it's going to populate with whatever is already in your account, but you can change it, if you need to next slide.

175

00:25:11.880 --> 00:25:23.850

Ashley Harrington: is going to ask you to review and say if you're going to review that everything is right, maybe you have multiple employers drink and that employment history place at the top going to ask you verify that all your personal information is correct and you're going to click save next slide.

176

00:25:25.920 --> 00:25:31.890

Ashley Harrington: you're going to get this confirmation page and it's going to tell you need to print sign and submit your form and here comes the fun part.

177

00:25:32.250 --> 00:25:39.090

Ashley Harrington: you're going to have to literally print and I did say Brent because you're going to have to get a signature and maybe under printed if you.

178

00:25:39.780 --> 00:25:45.480

Ashley Harrington: have the ability to sign on a trackpad or have a photo of a signature, but in general, if you're going to do a wet signature.

179

00:25:45.690 --> 00:25:51.240

Ashley Harrington: you're going to we don't allow docusign or electronic signatures like that we're working to do that next year, so stay tuned.

180

00:25:51.540 --> 00:25:59.220

Ashley Harrington: But you would have to print it, you have to sign it, the employer has to sign it, for every single employee you're trying to get certified, it has to have your signature and their signature.

181

00:25:59.610 --> 00:26:07.440

Ashley Harrington: And then you're going to have to mail or fax it in if you are not already with the PS lf servicer which this is that loan, but we know it's now mahela.

182

00:26:07.920 --> 00:26:18.000

Ashley Harrington: Or, if you have mattila you'll be able to upload it directly online to that, but you are going to have to get signatures for each and every one of those inquires next slide.

183

00:26:19.800 --> 00:26:28.410

Ashley Harrington: So just remember on the signatures, you can hand draw it on a mouse, you can put a scan photo in there are you can do a wet signature you can't use curse the font you can't use a digital.

184

00:26:29.310 --> 00:26:35.370

Ashley Harrington: certificate based signature like docusign please listen to me, I tried that whole cursive fun thing it doesn't work, they will send it back.

185

00:26:35.640 --> 00:26:48.810

Ashley Harrington: And it will slow down your process, but once you get once your signatures meet these requirements you'll be able to send it in to mozilla that says fed loan servicing it will be mahela and you will have that correct information next slide.

186

00:26:51.180 --> 00:26:53.760

Ashley Harrington: And once you do that, you will be able to once you start.

187

00:26:54.180 --> 00:27:03.780

Ashley Harrington: working towards PSI left you will be able to track your payment counts on the Left services website which, right now, you may still have fed loan, and you can still see it or will be mozilla.

188

00:27:04.020 --> 00:27:07.560

Ashley Harrington: And it will allow you to see check your progress which payments are getting counted.

189

00:27:07.890 --> 00:27:16.410

Ashley Harrington: Why are they not getting counted, or why are they getting

candidates, you can make sure that you're on track, or something gets you to fix it or something wrong, you can see it, you can monitor it next slide.

190

00:27:17.640 --> 00:27:26.310

Ashley Harrington: It may look something like this it will tell you why and the Multi site will look something like this will probably you know, a different color scheme slightly different arrangement next slide.

191

00:27:27.540 --> 00:27:28.110

Ashley Harrington: Next slide.

192

00:27:29.520 --> 00:27:35.610

Ashley Harrington: you're also able to look at a student a.gov because again today.gov is a great place to start for all things managing your student loans.

193

00:27:35.850 --> 00:27:40.260

Ashley Harrington: and on your dashboard for your loans you'll be able to see how many months, you have towards ps1 so.

194

00:27:40.530 --> 00:27:50.910

Ashley Harrington: If you're like me, even if you're not at 120 sometimes I like to look at those numbers and feel like i'm getting closer to the finish goal finish line of piazza left and i'm managing my loans correctly.

195

00:27:52.050 --> 00:27:53.040

Ashley Harrington: Next slide.

196

00:27:55.320 --> 00:28:01.020

Ashley Harrington: So now piece of information and resources just recapping some of the websites, we talked about next slide.

197

00:28:01.830 --> 00:28:09.720

Ashley Harrington: The best place to get information about the waiver, we have great faqs and even even more information, I gave today as students, go flash PS lf waiver.

198

00:28:10.530 --> 00:28:19.110

Ashley Harrington: For the help tool, which is where you want to submit your form we really encourage you to go there don't paper form try to start with this, the help to first do name.gov slash pls.

199

00:28:19.530 --> 00:28:34.080

Ashley Harrington: And for general psm information because remember after October 31 the limited way, the rules turn into a pumpkin and we go back to normal PS left rules soon a.gov slash public service, and now we will turn it over for some live question.

200

00:28:35.400 --> 00:28:36.510

Ashley Harrington: And we can stop sharing.

201

00:28:39.450 --> 00:28:48.210

Bonnie Latreille: Thanks Ashley So the first question we have is our informational flyers promotional to or promotional materials available to share.

202

00:28:49.680 --> 00:28:58.650

Ashley Harrington: Absolute absolutely we have toolkits for you, with sample emails we have social media posts, we have whatever you need, and we would really appreciate your for your help, helping get this information out.

203

00:28:59.340 --> 00:29:04.320

Ashley Harrington: Also, you know, helping make it easy for people at your universities to sign up and apply.

204

00:29:04.680 --> 00:29:15.990

Ashley Harrington: To make sure they know their aim, make sure they know where they need to go to get a signature right so help us get the word out to employees to alumni to everyone, send it far and wide and we will send you all the toolkits and tools that you need.

205

00:29:19.680 --> 00:29:29.130

Bonnie Latreille: Great you mentioned earlier that the timing during the code payment pause since March 2020 qualifies for the PS left waiver provided you were.

206

00:29:29.610 --> 00:29:40.860

Bonnie Latreille: eligible plans, but you also mentioned that the time during in school to firm it doesn't count towards the program what happens is someone went back to school, since 2020 and both of those conditions apply at the same time.

207

00:29:41.820 --> 00:29:54.000

Ashley Harrington: yeah what's a good question so if you went back to school and you are in in school deferment, even though you that time that time would not count, because you weren't in the copilot forbearance your loans were in deferment.

208

00:29:54.480 --> 00:30:06.480

Ashley Harrington: Right, so you could opt out of that deferment and consolidate those new loan with some older loans that you may have had, and then you can put it all together for PSI left and take full advantage of the waiver.

209

00:30:06.840 --> 00:30:16.710

Ashley Harrington: But you literally have to opt out of that because you can't even consolidate when your loans are on in school deferment, but if it was both the code forbearance and the install the firm, because you went back to school.

210

00:30:16.950 --> 00:30:22.770

Ashley Harrington: Then you would not get credit for those times for that time period, unless you opt out of it.

211

00:30:26.910 --> 00:30:33.060

Bonnie Latreille: Okay, can public school teachers apply for both the teacher loan forgiveness program and the PS left limited lever.

212

00:30:33.720 --> 00:30:39.000

Ashley Harrington: That is another really good question, because one of the exciting thing is, you can get credit for both.

213

00:30:40.020 --> 00:30:45.270

Ashley Harrington: Under normal PS lf rules, you can only get credit for one or the other, you can't get talf MPs LM.

214

00:30:45.600 --> 00:30:54.960

Ashley Harrington: Under the waiver, you can submit your stuff for pls and you can get credit for both under the waiver go ahead and get him back and in even if you're not at 120, as I said.

215

00:30:55.650 --> 00:31:09.000

Ashley Harrington: Though the credit you lock in under the waiver is not going to go away on October 31 just the flexibilities will so as long as you raise your hand, you will get that credit towards PSI live in auntie and even if it was teacher loan forgiveness credit as well.

216

00:31:11.880 --> 00:31:16.350

Bonnie Latreille: Right, can you apply for PS left without applying for a loan consolidation.

217

00:31:19.710 --> 00:31:28.860

Ashley Harrington: That depends, if you have direct loans you don't have to consolidate and, yes, you can submit your pls form, if you still if you don't have direct loans and you still have fell or Perkins loans.

218

00:31:29.610 --> 00:31:42.030

Ashley Harrington: Your PSA left form will be held until you get direct loans So yes, you would have to consolidate to get pls so you can still submit submitted, but just know that it will be will be held until you have direct long.

219

00:31:46.260 --> 00:31:50.220

Bonnie Latreille: Can you receive credit for months enrolled in school, but you worked full time.

220

00:31:51.990 --> 00:32:00.060

Ashley Harrington: If you were on it in school deferment, so your loans weren't in repayments, that is, even though you were working you can't get credit, so if you're thinking about that in the future.

221

00:32:00.390 --> 00:32:05.160

Ashley Harrington: You may want to think about opting out of the in school

deferment, so you can continue to get credit for that full time work.

222

00:32:07.980 --> 00:32:10.380

Bonnie Latreille: to substitute teaching qualify for PSI.

223

00:32:13.920 --> 00:32:24.090

Ashley Harrington: And isn't good question i'm good i'm not completely sure about substitution but i'm going to assume that if you were a full time substitute teacher for however many months.

224

00:32:24.510 --> 00:32:30.870

Ashley Harrington: If the school if the HR for the school is willing to sign that you worked for them and we're paid by them.

225

00:32:31.500 --> 00:32:39.600

Ashley Harrington: For those for those hours for whatever time period, yes, that would count as long as you weren't paid by like a for profit employer and you can and you.

226

00:32:39.870 --> 00:32:52.470

Ashley Harrington: were full time and you have the HR is willing to certify it, yes, it can count because we're not going to ask you were you a substitute teacher or a regular teacher we just want to know, do you did you have a qualifying employer, and that was your employer.

227

00:32:55.020 --> 00:33:06.660

Bonnie Latreille: And i'm going to combine two questions here, how can universities more effectively share this information, and how can time, how can the pcl process be used for teen faculty and administrators.

228

00:33:07.920 --> 00:33:13.710

Ashley Harrington: I mean, I think it's one of the biggest things that you know the public sector has so many people to your loans these days.

229

00:33:13.950 --> 00:33:20.460

Ashley Harrington: Advertising that you can get forgiveness after 10 years by working with us right, I think, is a big deal, and we want to make sure people know about it.

230

00:33:20.790 --> 00:33:26.760

Ashley Harrington: And so you can effectively help us by making sure you're using our toolkits putting information up on your website.

231

00:33:27.060 --> 00:33:34.770

Ashley Harrington: The waiver will end but PS lf will still exist, so it's something that you should put on your your HR website as a benefit working here gives you great interest psl left.

232

00:33:34.950 --> 00:33:44.490

Ashley Harrington: You can link back to our website there's so many ways, you can highlight this but absolutely I think it's a retention tool, because this is something that you can help help your employees know.

233

00:33:45.420 --> 00:33:54.990

Ashley Harrington: we're going to help you we're helping you manage your loans, because we're making sure that you know that you can get ps1 left credit we're going to help you get that path of that credit we're going to make it easy for you to submit your form we're going to do all of that.

234

00:33:55.350 --> 00:33:58.560

Ashley Harrington: And this is something that you don't have access to in the private sector.

235

00:34:01.920 --> 00:34:11.430

Bonnie Latreille: Is ps1 only available for loan costs incurred with undergraduate education or can be used for graduate including masters and doctorate degrees yep.

236

00:34:11.640 --> 00:34:18.870

Ashley Harrington: In all federal loans, we don't care what yeah doesn't matter, but just for undergrad or Grad I got a lot of law school loans and i'm working towards yes Hello.

237

00:34:20.790 --> 00:34:26.010

Bonnie Latreille: Just time spent working as a graduate teaching fellow while enrolled in school as a graduate student account.

238

00:34:27.630 --> 00:34:36.420

Ashley Harrington: If your loans were in deferment, it will not count, you would have had to opt it out, and if you were working the equivalent of the.

239

00:34:36.840 --> 00:34:44.670

Ashley Harrington: 30 hours a week and you can and it's all about what your employment with your employer were certified they're going to certify that you were full time or if you.

240

00:34:44.880 --> 00:34:56.100

Ashley Harrington: Were part time there and part time somewhere else that was qualifying and it equals out three hours a week that's Okay, but your loans had to have been in repayments, that is, and so it sounds like if you're in school, they were in deferment, that is, he would have had to opt out of that.

241

00:34:59.130 --> 00:35:03.360

Bonnie Latreille: Why does this only apply to direct loans and how do you convert your loan over to qualify.

242

00:35:04.410 --> 00:35:09.000

Ashley Harrington: So bonnie is going to lock it up, I want to direct loans,

because that's how Congress created it.

243

00:35:09.450 --> 00:35:16.560

Ashley Harrington: But he's going to drop a link in the chat for consolidation, so if you have those non direct loans you're going to consolidate into the direct loan Program.

244

00:35:16.860 --> 00:35:30.720

Ashley Harrington: And under the waiver, you can still get credit for time prior to consolidation, under normal lose you wouldn't be able to So this is the time, this is it has never been a better time to consolidate never been a better time to apply for PS I left and right now, this moment don't miss out.

245

00:35:32.040 --> 00:35:36.720

Bonnie Latreille: And the link is already in the chat just scroll up a little bit the questions and you'll see the link.

246

00:35:39.180 --> 00:35:46.890

Bonnie Latreille: Is there a different application process for psl F tps left the limited psl flavor or is it the same process.

247

00:35:47.460 --> 00:35:53.190

Ashley Harrington: it's the same process is the same form that you'll get there to help tool that form that we showed you it's the same form.

248

00:35:53.640 --> 00:36:01.620

Ashley Harrington: it's just that, right now, the way when she when you apply the way we're looking at your account in your service is different.

249

00:36:01.860 --> 00:36:07.560

Ashley Harrington: than what we would, under normal rules but it's all the same form it's not a special application, if you previously a Popper psl so.

250

00:36:07.800 --> 00:36:20.970

Ashley Harrington: that you are going to get credit towards the waiver, you should have already begin to see a bit of payment counts in your account if it applies to you, so no it's the same application, but doing it right now, ensures that you get the benefits of the waiver.

251

00:36:23.850 --> 00:36:26.490

Bonnie Latreille: How can we find the toolkit you've been referencing.

252

00:36:27.720 --> 00:36:30.990

Ashley Harrington: Well, our good friends at AC are going to help us laugh it out.

253

00:36:36.510 --> 00:36:37.170

Bonnie Latreille: and

254

00:36:39.600 --> 00:36:44.520

Bonnie Latreille: Is there a process to have Ashley present for our college and our surrounding school districts.

255

00:36:45.480 --> 00:36:56.910

Ashley Harrington: Yes, you can email us, we want to do we're trying to get the burnouts far and wide as possible, please let us know bonnie you have to make her bonnie is available to help me, but we will be there, or someone remember, they will.

256

00:36:57.930 --> 00:37:03.240

Bonnie Latreille: And I dropped a email address in the chat if you are interested in having hosting a webinar.

257

00:37:06.840 --> 00:37:09.750

Bonnie Latreille: Okay i'm just scrolling through some additional questions that came in.

258

00:37:12.630 --> 00:37:28.800

Bonnie Latreille: Okay, if a borrower work for qualifying and player, for several years resubmit there EC their employer certification from every here does that borrower have to go back to their old employer and fill out a bunch of new forms to qualify under the psl employed a PS lever.

259

00:37:29.370 --> 00:37:39.030

Ashley Harrington: If you've already gotten credit and we've already logged those forms, then no, you do not have to resubmit them, so if you've been watching your account go up, you can see, you know you've you've gotten those approved.

260

00:37:39.300 --> 00:37:48.690

Ashley Harrington: No, you do not have to resubmit those times, but is it, but thank you for flagging that that is a great practice we really encourage people to submit a psl form every year or every time they change jobs.

261

00:37:48.930 --> 00:37:52.440

Ashley Harrington: You don't have to but it's a really good best practice, to make sure you're staying on track.

262

00:37:54.570 --> 00:38:01.050

Bonnie Latreille: Is this program only for loans taken out between 2007 to present or does this include loans from prior to 2007.

263

00:38:01.680 --> 00:38:07.500

Ashley Harrington: Another great Question No it's not about when the loan was taken out, it can be it can have been taken out whenever we know, many people have been.

264

00:38:08.610 --> 00:38:21.150

Ashley Harrington: Dealing with student loans for a very long time, you just can

only get credit towards ps1 left for time after October 2007 because before that it didn't exist, so your loan could have existed, but no credit will exist until October 2007.

265

00:38:24.120 --> 00:38:30.930

Bonnie Latreille: So this this before I say this question, I just want to like this question is about the students dug up interface and.

266

00:38:31.410 --> 00:38:36.690

Bonnie Latreille: Probably the servicer account interface so maybe you can speak a little bit to that versus how we are reviewing accounts.

267

00:38:37.050 --> 00:38:47.820

Bonnie Latreille: So prior to the 2022 consolidation, I saw payments in the ineligible tab on the feminine side now post consolidation nothing prior to my transfer to felonious listed.

268

00:38:48.210 --> 00:38:58.860

Bonnie Latreille: not eligible or ineligible I worry those payments are missing, but I was told by a fellow REP via phone that the Department of Education can still review my payments prior to the transfer.

269

00:39:00.720 --> 00:39:07.050

Ashley Harrington: Yes, so i'm just a little bit more about the process right a lot of it.

270

00:39:08.610 --> 00:39:14.160

Ashley Harrington: The way that we're doing this waiver, it requires several different contractors several different services and a lot of.

271

00:39:14.430 --> 00:39:20.610

Ashley Harrington: FSA in the mill so we're working to identify the payment that count, we send those over to the server server and they.

272

00:39:20.940 --> 00:39:31.410

Ashley Harrington: And they match them up, so you may get multiple communications that they different payment counts in may temporarily look like you have a lower number on the website and then it'll eventually go up.

273

00:39:31.740 --> 00:39:39.270

Ashley Harrington: So give that some time for it to fully process, particularly if you have to consolidate or your first time first time PS lf applicant.

274

00:39:40.320 --> 00:39:42.300

Ashley Harrington: So that takes a little bit of time.

275

00:39:43.530 --> 00:39:57.480

Ashley Harrington: If, after you know, a month or two after you've done your part,

it still looks the same you have anything to update account either us today.gov or on a service or website, we have something called a reconsideration process where you can submit a.

276

00:39:57.630 --> 00:40:08.250

Ashley Harrington: concert submitted at submit your account information and issue you can describe the problem and someone will take another look at it, but give us give us time to fully implement this because it.

277

00:40:08.640 --> 00:40:17.400

Ashley Harrington: goes through a special process where multiple parties are involved, and so it will get it will likely get updated it's just not updated yet on even the answer the question.

278

00:40:18.540 --> 00:40:25.650

Bonnie Latreille: Yes, and on that same note we're getting a lot of questions about people who submitted documents and then.

279

00:40:27.660 --> 00:40:35.190

Bonnie Latreille: And then got notification of their transfer so, can you talk a little bit about what borrowers need to do if they have already submitted stuff and they're getting transferred tequila.

280

00:40:35.880 --> 00:40:39.240

Ashley Harrington: yeah i'm getting I got the notification to so we're in the same boat.

281

00:40:39.450 --> 00:40:45.150

Ashley Harrington: This is just the luck, of the order was going to be transcribed September and you've already submitted stuff and you're being transferred.

282

00:40:45.480 --> 00:40:49.320

Ashley Harrington: All of that stuff is going to be transferred with you to mow heal and then multi level evaluated.

283

00:40:49.500 --> 00:40:58.320

Ashley Harrington: So give it time for your transfer to go through once you're able to set up your mo he'll account if you see something wrong there, then you want to come to reconsideration, or you would have kind of bonnie's team, but.

284

00:40:58.680 --> 00:41:10.260

Ashley Harrington: You shouldn't have any problems is happening to all of us it's apart people loan transfers happen all the time and so it's just a process and you just happen to be in this post this first cohort of people getting transferred.

285

00:41:12.750 --> 00:41:17.730

Bonnie Latreille: after November 1 as a borrower need to be in an idea or plan to qualify for pls.

286

00:41:19.110 --> 00:41:32.580

Ashley Harrington: standard or I Dr plan, but yes so after November 1 to put yourself in the best position to continue working towards income source psl if you want to be on an income based repayment plan you can use loan simulator if you know.gov to find the plan that works best for you.

287

00:41:37.980 --> 00:41:41.070

Bonnie Latreille: For direct graduate loans, do you have to consolidate.

288

00:41:42.180 --> 00:41:50.010

Ashley Harrington: If you have if you also you know.gov and it says direct you do not necessarily have to consolidate the only time where it may be beneficial to you to consolidate is if.

289

00:41:50.280 --> 00:41:57.120

Ashley Harrington: You have older loans like maybe an undergrad loans or you have multiple sets of grab loans and they have different repayment periods.

290

00:41:57.420 --> 00:42:06.300

Ashley Harrington: Under the waiver when you can follow the loans together the new consolidation loan gets the benefit of all of that time and repayment so you'll get the maximum amount of credit for any of those loans.

291

00:42:06.510 --> 00:42:15.750

Ashley Harrington: And so, you may they may want to consolidate, but if they're all the same age and they had been in repayment the amount of time you don't necessarily have to consolidate know you want to make sure you have a psl lift from one file.

292

00:42:18.330 --> 00:42:24.000

Bonnie Latreille: To months during the pandemic forbearance count towards the 120 payments needed even have no payments were made.

293

00:42:26.970 --> 00:42:27.270

Ashley Harrington: It one or.

294

00:42:28.950 --> 00:42:35.370

Bonnie Latreille: Two months during the pandemic forbearance count towards the 120 even if no payments were made during that time.

295

00:42:35.940 --> 00:42:43.500

Ashley Harrington: Yes, as long as you were still employed for qualifying employer you're still gonna have to certify that employment, which are going to go to help to create that form get it signed and submitted.

296

00:42:43.740 --> 00:42:48.180

Ashley Harrington: But yes, you can get credit for every single one of these months so every single person who.

297

00:42:48.480 --> 00:42:53.220

Ashley Harrington: Had the entire payment policy was employed the whole time by qualifying player is at least a fifth of the way.

298

00:42:53.520 --> 00:43:05.430

Ashley Harrington: towards public service loan forgiveness, if not more, because I had payment before that, but yes, I know it sounds like it doesn't make sense and it sounds too good to be true, you can get credit for every single one of these months you just have to start it by employment.

299

00:43:12.690 --> 00:43:21.540

Bonnie Latreille: And there are a couple of questions about the process to opt out of a deferment, so can you talk about that, and how borrowers can do that.

300

00:43:22.320 --> 00:43:34.170

Ashley Harrington: You will literally have to contact our loan servicer and talk and tell them you want to opt out and they'll send you some sort of paperwork i'm sure you have to sign and certified but you'll have to literally call them and do it through them.

301

00:43:37.290 --> 00:43:43.830

Bonnie Latreille: I work at a Christian college and my supervisor told me that people who work in the Bible department for example Bible professors are.

302

00:43:44.970 --> 00:43:49.230

Bonnie Latreille: are not eligible for PS law is that still correct or has that changed.

303

00:43:51.390 --> 00:43:59.700

Ashley Harrington: Well, I don't know that that really was was ever correct, but no it's absolutely not correct, you can get your employer is the College and they are.

304

00:44:00.150 --> 00:44:05.940

Ashley Harrington: A nonprofit by Wednesday, three you can get credit we're not going to ask you what kind of progress of your are we're not going to ask you what you teach.

305

00:44:06.480 --> 00:44:17.070

Ashley Harrington: We also now you know church leaders can get credit if they're working full time at a church, we just want to know who pays you we don't want to know what you do there so absolutely you can get credit used to get your format.

306

00:44:20.370 --> 00:44:27.120

Bonnie Latreille: And, and do you just want to reiterate that some of the changes we've made about for borrowers working in religious fields.

307

00:44:28.350 --> 00:44:41.610

Ashley Harrington: Yes, so there was a time when like if you time spent proselytizing so preaching or things like that would not have counted, you had to separate those hours out for pci purposes, a rule change in 2020 means that is no longer the case.

308

00:44:42.270 --> 00:44:53.550

Ashley Harrington: So maybe the Bible professorship was that, but that is no longer the case so it's just about the employer we're not going to actually break out those those times here, you can get credit towards pls pastors can get pls.

309

00:44:54.900 --> 00:44:59.730

Ashley Harrington: People across phase can get creditors pls even for that time we're not going to ask you to break that out.

310

00:45:02.850 --> 00:45:08.490

Bonnie Latreille: Will a person with a student loan, that has not yet entered repayment qualify for loan forgiveness.

311

00:45:10.440 --> 00:45:18.750

Ashley Harrington: Well you're going to have to have 10 years of meeting 120 payments of meeting the requirements after you enter repayment if you're not a repayment right now.

312

00:45:19.080 --> 00:45:26.010

Ashley Harrington: You just when you enter repayment that's when you're 10 years will start you want to start working towards, yes I love and making sure you're doing all the right things.

313

00:45:35.100 --> 00:45:36.030

Bonnie Latreille: Okay, and.

314

00:45:37.260 --> 00:45:40.440

Bonnie Latreille: Just Okay, I think that covers the questions.

315

00:45:41.910 --> 00:45:52.920

Ashley Harrington: awesome well this was really great Thank you um Oh, we have well let's do the final survey, thank you all for listening, if you could please fill out this last survey.

316

00:45:53.310 --> 00:45:57.450

Ashley Harrington: Just so we know where we are we're going to share a lot of materials after this and I want to thank.

317

00:45:58.260 --> 00:46:08.220

Ashley Harrington: AC and and the entire team again for helping us put this together and helping us get this word out and thank you all of you for helping us get this word out as well, we hope, it was helpful to you and we hope it will be helpful.

318

00:46:08.220 --> 00:46:09.900

Ashley Harrington: To the folks that you work with and interact.

319

00:46:09.900 --> 00:46:10.170

With.

320

00:46:13.890 --> 00:46:15.480

Ashley Harrington: That please take a moment to do the poll.

321

00:46:21.150 --> 00:46:26.340

Bonnie Latreille: And while filter doing the plight I didn't want to find a couple of questions for our as hosts.

322

00:46:27.630 --> 00:46:29.040

Bonnie Latreille: Maybe you want to clarify.

323

00:46:30.570 --> 00:46:32.280

Bonnie Latreille: How the recording can be accessed.

324

00:46:33.420 --> 00:46:37.290

Bonnie Latreille: and any questions about how to access the Q amp a after we wrap up.

325

00:46:46.080 --> 00:46:58.680

Audrey Hamilton (ACE): yeah I was i've been posting in the Q amp a and in the chat that we will be sending out a recording of sending out the recording of this webinar to everyone who registered for the webinar including.

326

00:46:58.800 --> 00:47:02.760

Audrey Hamilton (ACE): Obviously, the people who attended and the people who registered to attend the webinar.

327

00:47:03.840 --> 00:47:05.250

Audrey Hamilton (ACE): Probably within the next week.

328

00:47:06.930 --> 00:47:21.660

Audrey Hamilton (ACE): We, I am not sure how to send the QA to access the Q amp a fatma is that I do you know if that's possible to save that somewhere where will that all come through and the recording i'm assuming when we send that as well, yes.

329

00:47:22.050 --> 00:47:24.060

American Council on Education: And they will also be saved as well.

330

00:47:24.150 --> 00:47:26.250

Audrey Hamilton (ACE): Okay, great so yeah so all the questions.

331

00:47:26.250 --> 00:47:27.450

Audrey Hamilton (ACE): And answers that bonnie was.

332

00:47:27.540 --> 00:47:37.650

Audrey Hamilton (ACE): was answering throughout the recording should be there when we when we get send the recording will also post the recording on our website, so the link will be shareable.

333

00:47:51.990 --> 00:48:00.090

Ashley Harrington: Okay, can we see those last poll questions and then Thank you will I guess we'll close out the answers her responses.

334

00:48:07.980 --> 00:48:13.410

Bonnie Latreille: i'm also going to drop the one 800 number for the person, a call Center if you have additional questions.

335

00:48:17.700 --> 00:48:30.060

Ashley Harrington: Oh, thank you, I see the postcards now great yay we got 100% of people saying they're going to share it so we I call that a success, so thank you so much, everyone, and we look forward to continued working with all of you.

336

00:48:30.600 --> 00:48:33.900

Ashley Harrington: On this on this great program and to get the word out thanks so much.

From: Vitez, Kaitlyn
Subject: RE: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)
To: Fansmith, Jonathan; Harrington, Ashley
Cc: Latreille, Bonnie
Sent: July 14, 2022 8:11 AM (UTC-04:00)

It is! Thank you.



Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Fansmith, Jonathan <JFansmith@ACENET.EDU>
Sent: Wednesday, July 13, 2022 4:38 PM
To: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Harrington, Ashley <Ashley.Harrington@ed.gov>
Cc: Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: RE: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kaitlyn,

The marketing email for the webinar went out twice to 6,625 people, and we also put it in our news list which goes to 4,050 people. There's some overlap between the two lists, but I was told it's not a significant amount.

Hope this helps.

Best,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>
Sent: Wednesday, July 13, 2022 3:40 PM
To: Harrington, Ashley <Ashley.Harrington@ed.gov>; Fansmith, Jonathan <JFansmith@ACENET.EDU>
Cc: Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: RE: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

Thank you so much, Jon! This will be very helpful as I update our FAQs in response to these webinars.

For our own internal tracking purposes - would you be able to estimate the size of the email list that this webinar invite / information about PSLF went to?

Best,



Kaitlyn Vitez (she/her)
Higher Education Liaison
Office of Communications and Outreach
U.S. Department of Education
(202) 550-7359

From: Harrington, Ashley <Ashley.Harrington@ed.gov>
Sent: Wednesday, July 13, 2022 8:17 AM
To: Fansmith, Jonathan <JFansmith@acenet.edu>
Cc: Vitez, Kaitlyn <Kaitlyn.Vitez@ed.gov>; Latreille, Bonnie <Bonnie.J.Latreille@ed.gov>
Subject: Re: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

Hi Jon,

That's awesome! We will have a link for a toolkit soon, hopefully by next week. We will send it over then. Thanks so much!

Best,
Ashley

Sent from my iPad

On Jul 13, 2022, at 8:15 AM, Fansmith, Jonathan <JFansmith@acenet.edu> wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Please see the attached transcripts, etc. from yesterday's webinar. We got a lot of positive feedback already, and really appreciate your work on this.

Also, we've already had a request for the toolkit mentioned on the webinar. Do you have links to where the toolkits are hosted on ED's website? That's an easier way for us to distribute them than the .PDFs you shared earlier.

Thanks,

Jon

Jon Fansmith
Assistant Vice President, Government Affairs
American Council on Education (ACE)

From: NGom, Fatma <FNGom@ACENET.EDU>
Sent: Tuesday, July 12, 2022 4:58 PM
To: Fansmith, Jonathan <JFansmith@ACENET.EDU>; Hamilton, Audrey <AuHamilton@ACENET.EDU>; Arnston, Laurie <LArnston@ACENET.EDU>; Riskind, Jon <JRiskind@ACENET.EDU>; Nicholson, Jack <JNicholson@ACENET.EDU>
Subject: Recording and Reports_ How the PSLF Waiver Can Help Your Campus (7/12)

Hello,

The final recording from the **How the PSLF Waiver Can Help Your Campus** webinar can be found [here](#).

Below are key edits made-

- Trimmed the beginning and end
- Cleaned up transition to first Poll
- Inserted a view of the Polls over audio, at the two points the Polls were launched during the webinar
- Cleaned up transitions at the end of the meeting

Also, please find attached the Audio Transcript, Attendee report, Q&A report, Polls report and Chat history.

Note: The Attendee report contains duplicate information, and needs to be cleaned up further.

Thank you.

Fatma NGom

Virtual Collaboration Technology Senior Specialist

Information Technology Services

American Council on Education

One Dupont Circle, NW

Washington, DC 20036

Phone: (202) 939-9371

fngom@acenet.edu

www.acenet.edu

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Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC 20004
T +1 202 637 5600
F +1 202 637 5910
www.hoganlovells.com

July 28, 2023

By Electronic Mail

Leah Travis
General Attorney, Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Leah.Travis@ed.gov

Re: Case Western Reserve University – 20 U.S.C. § 1011f Investigation and Record Request

Dear Leah:

Thank you for the Department’s follow-up questions regarding Case Western Reserve University’s (“CWRU” or the “University”) compliance with the foreign gift and contract reporting requirements of Section 117 of the Higher Education Act of 1965, as amended (20 U.S.C. § 1011f) (“Section 117”). As you know, on July 13, 2020, CWRU provided to the investigation team an initial response to the Department’s May 27, 2020 notice of investigation and record request. I now write with the University’s supplemental response to the written request that you sent to me and Joel Buckman via e-mail on June 28, 2023 (the “2023 Request”).

For ease of reference, reproduced below are the Department’s follow-up requests, along with the University’s response.

(b)(4)

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

Sincerely,

(b)(6)

Stephanie Gold, Partner
stephanie.gold@hoganlovells.com
(202) 637-5496

Enclosure: CWRU_ED_002

Cc: Peter M. Poulos, Vice President, General Counsel, Secretary of the Corporation, and
Chief Risk Management Officer
Hilary Malawer, Deputy General Counsel, U.S. Department of Education
Lisa Wells Harris, Attorney, U.S. Department of Education
Alexandra Sweeney, General Attorney, U.S. Department of Education
Joel Buckman, Partner, Hogan Lovells

From: Harris, Lisa (OGC)
Subject: Fordham University - Section 117 investigation
To: mball@fordham.edu
Cc: Rosenfelt, Phil; Malawer, Hilary; Delbridge, Kristin
Sent: November 2, 2022 1:51 PM (UTC-04:00)

Good afternoon, Ms. Ball –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's August 10, 2020 notice of investigation into compliance by Fordham University with Section 117 of the Higher Education Act. I am coordinating the Department's review of the investigation and would like to arrange a call with you to discuss status.

I will be joined on the call by one of our Deputy General Counsels, either Phil Rosenfelt or Hilary Malawer, and Kristin Delbridge, the attorney assigned to review the Fordham investigation. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: Section 117 Inquiry - University of New Mexico
To: LPMartinez@salud.unm.edu; AriVazquez@salud.unm.edu
Cc: Rosenfelt, Phil; Malawer, Hilary; Travis, Leah
Sent: January 20, 2023 12:56 PM (UTC-05:00)

Good afternoon, Ms. Martinez and Ms. Vazquez –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's January 15, 2021, notice of preliminary inquiry into compliance by the University of New Mexico (UNM) with Section 117 of the Higher Education Act. I am coordinating the Department's review of the inquiry and would like to arrange a call with you to discuss status. In light of the upcoming Section 117 reporting deadline of January 31, 2023, it would be helpful if we could speak before then, if possible.

I will be joined on the call by Leah Travis, the attorney assigned to review the UNM inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov

From: Donna L McGee
Subject: RE: Section 117 Inquiry - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Rosenfelt, Phil; Malawer, Hilary; Travis, Leah
Sent: January 20, 2023 2:27 PM (UTC-05:00)

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Hi Ms. Harris:

I would be happy to participate in a call. I am available next Thursday the 26th, Friday the 27th, Monday the 30th and Tuesday the 31st anytime between 8:30-5 pm central time. If those days do not work for you, I can provide you with additional availability. I believe that UWM has already completed its 2022 reporting, but we can amend it, if need be, based upon our discussion.

Thanks,
Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Friday, January 20, 2023 11:50 AM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: Section 117 Inquiry - University of Wisconsin-Milwaukee

Good afternoon, Ms. McGee –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's January 15, 2021, notice of preliminary inquiry into compliance by the University of Wisconsin-Milwaukee (UWM) with Section 117 of the Higher Education Act. I am coordinating the Department's review of the inquiry and would like to arrange a call with you to discuss status. In light of the upcoming Section 117 reporting deadline of January 31, 2023, it would be helpful if we could speak before then, if possible.

I will be joined on the call by Leah Travis, the attorney assigned to review the UWM inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,

Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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From: Harris, Lisa (OGC)
Subject: RE: Section 117 Inquiry - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Rosenfelt, Phil; Malawer, Hilary; Travis, Leah
Sent: January 20, 2023 3:01 PM (UTC-05:00)

Hi Donna – Thank you so much for the quick reply. We will check our schedules here against those days/times and be back in touch with a meeting invitation. And thank you for the information about the status of UWM’s 2022 reporting.

Have a good weekend.

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Friday, January 20, 2023 2:27 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: Section 117 Inquiry - University of Wisconsin-Milwaukee

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Hi Ms. Harris:

I would be happy to participate in a call. I am available next Thursday the 26th, Friday the 27th, Monday the 30th and Tuesday the 31st anytime between 8:30-5 pm central time. If those days do not work for you, I can provide you with additional availability. I believe that UWM has already completed its 2022 reporting, but we can amend it, if need be, based upon our discussion.

Thanks,
Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Friday, January 20, 2023 11:50 AM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: Section 117 Inquiry - University of Wisconsin-Milwaukee

Good afternoon, Ms. McGee –

I am an attorney in the Department of Education’s Office of the General Counsel and am writing concerning the

Department's January 15, 2021, notice of preliminary inquiry into compliance by the University of Wisconsin-Milwaukee (UWM) with Section 117 of the Higher Education Act. I am coordinating the Department's review of the inquiry and would like to arrange a call with you to discuss status. In light of the upcoming Section 117 reporting deadline of January 31, 2023, it would be helpful if we could speak before then, if possible.

I will be joined on the call by Leah Travis, the attorney assigned to review the UWM inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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From: Harris, Lisa (OGC)
Subject: RE: Section 117 Inquiry - University of New Mexico
To: Ariadna Vazquez; Loretta Martinez
Cc: Rosenfelt, Phil; Malawer, Hilary; Travis, Leah; Marlene C Armijo
Sent: January 20, 2023 3:03 PM (UTC-05:00)

Hi Ari – Thank you so much for your quick reply. We will look forward to hearing about your availability for a call.

Have a good weekend.

Lisa

From: Ariadna Vazquez <AriVazquez@salud.unm.edu>
Sent: Friday, January 20, 2023 2:27 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Loretta Martinez <LPMartinez@salud.unm.edu>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>; Marlene C Armijo <marmij24@salud.unm.edu>
Subject: RE: Section 117 Inquiry - University of New Mexico

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Ms. Harris,

Thank you for reaching out, we would be happy to meet with you and your colleagues to discuss this matter. UNM would be very open to a process that would result in the resolution of this matter.

I am adding Marlene Armijo here who will email you separately and provide you with our availability over the next two weeks.

Look forward to our discussion,
Ari

Ariadna Vazquez
Deputy University Counsel
Office of the University Counsel
University of New Mexico
MSC 05 3440
1 University of New Mexico
Albuquerque, NM 87131-0001
505-277-3443 (office)
505-277-4154 (fax)



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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Friday, January 20, 2023 10:56 AM
To: Loretta Martinez <LPMartinez@salud.unm.edu>; Ariadna Vazquez <AriVazquez@salud.unm.edu>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: Section 117 Inquiry - University of New Mexico

[[-- External - this message has been sent from outside the University --]]

Good afternoon, Ms. Martinez and Ms. Vazquez –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's January 15, 2021, notice of preliminary inquiry into compliance by the University of New Mexico (UNM) with Section 117 of the Higher Education Act. I am coordinating the Department's review of the inquiry and would like to arrange a call with you to discuss status. In light of the upcoming Section 117 reporting deadline of January 31, 2023, it would be helpful if we could speak before then, if possible.

I will be joined on the call by Leah Travis, the attorney assigned to review the UNM inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov

From: Harris, Lisa (OGC)
Subject: RE: Section 117 - University of Wisconsin-Milwaukee
To: mcgeed@uwm.edu; Malawer, Hilary; Travis, Leah
Sent: January 27, 2023 10:37 AM (UTC-05:00)

Hi Donna – We appreciated the opportunity to speak with you this morning. We thought that it was a productive and helpful discussion, and as promised, we will be following up soon with an email summarizing our responses to your questions and our additional requests. This is just a quick email to provide you with the information about how to make corrections to prior disclosure reports:

Institutions must send an email to the Foreign Gifts Access Team (ForeignGiftsAccess@ed.gov) that includes:

- the OPEID of the institution;
- the approximate date of the incorrect submission (if known); and
- the Application ID number for the incorrect submission (which can be found on the home page of the reporting portal under “My Submitted Entries,” in the first column next to the incorrect submission).

Again, thank you, and have a good weekend.

Lisa

-----Original Appointment-----

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, January 23, 2023 11:30 AM
To: Harris, Lisa (OGC); mcgeed@uwm.edu; Malawer, Hilary; Travis, Leah
Subject: Section 117 - University of Wisconsin-Milwaukee
When: Friday, January 27, 2023 9:30 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where:

Good morning, Donna - We hope this time works, and we look forward to speaking with you on Friday at 9:30 eastern, 8:30 central.

Lisa

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From: Harris, Lisa (OGC)
Subject: RE: Fordham University - Section 117 investigation
To: 'mball@fordham.edu'
Cc: Rosenfelt, Phil; Malawer, Hilary; Delbridge, Kristin
Sent: February 17, 2023 12:36 PM (UTC-05:00)

Good afternoon, Ms. Ball –

I hope that you are well. I am following up on the email below. We would like to schedule a call with you and/or your staff. If you could please let me know of your availability within the next two weeks, I will arrange a Microsoft Teams meeting. We look forward to speaking with you soon.

Thank you,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Sent: Wednesday, November 2, 2022 1:51 PM
To: mball@fordham.edu
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Fordham University - Section 117 investigation

Good afternoon, Ms. Ball –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's August 10, 2020 notice of investigation into compliance by Fordham University with Section 117 of the Higher Education Act. I am coordinating the Department's review of the investigation and would like to arrange a call with you to discuss status.

I will be joined on the call by one of our Deputy General Counsels, either Phil Rosenfelt or Hilary Malawer, and Kristin Delbridge, the attorney assigned to review the Fordham investigation. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney

Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Margaret Ball
Subject: Re: Fordham University - Section 117 investigation
To: Harris, Lisa (OGC)
Cc: Rosenfelt, Phil; Malawer, Hilary; Delbridge, Kristin
Sent: February 27, 2023 9:52 AM (UTC-05:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Harris,

My apologies for the lengthy delay in responding to your request. I would be happy to meet with you this week. Here are some possible times:

Tuesday, Feb 28 after 3 pm
Wednesday, March 1 after 2 pm
Friday, March 3 after noon

If none of those times work, let me know what would, and I'll try to rearrange my schedule.

I look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Fri, Feb 17, 2023 at 12:35 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Ms. Ball –

I hope that you are well. I am following up on the email below. We would like to schedule a call with you and/or your staff. If you could please let me know of your availability within the next two weeks, I will arrange a Microsoft Teams meeting. We look forward to speaking with you soon.

Thank you,

Lisa Harris

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

From: Harris, Lisa (OGC)

Sent: Wednesday, November 2, 2022 1:51 PM

To: mball@fordham.edu

Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Fordham University - Section 117 investigation

Good afternoon, Ms. Ball –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's August 10, 2020 notice of investigation into compliance by Fordham University with Section 117 of the Higher Education Act. I am coordinating the Department's review of the investigation and would like to arrange a call with you to discuss status.

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Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,

Lisa Harris

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

From: Margaret Ball
Subject: Re: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Delbridge, Kristin; Daniel Correll
Sent: March 3, 2023 11:18 AM (UTC-05:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Harris,

I have asked Dan Correll, our Associate General Counsel who worked with me on these investigations, to join the call. His email is dcorrell@fordham.edu. I would appreciate it if you would add him to your list.

Thanks very much. Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Thu, Mar 2, 2023 at 8:03 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Updated with confirmation that Hilary Malawer will be the Deputy General Counsel joining the call.

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From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: Margaret Ball
Cc: Malawer, Hilary; Delbridge, Kristin; Daniel Correll
Sent: March 3, 2023 11:20 AM (UTC-05:00)

Good morning, and thank you for letting me know. I will add him to the meeting invitation now. We look forward to talking with you both this afternoon.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Friday, March 3, 2023 11:18 AM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>; Daniel Correll <dcorrell@fordham.edu>
Subject: Re: Section 117 Investigation - Fordham University

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Dear Ms. Harris,

I have asked Dan Correll, our Associate General Counsel who worked with me on these investigations, to join the call. His email is dcorrell@fordham.edu. I would appreciate it if you would add him to your list.

Thanks very much. Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Thu, Mar 2, 2023 at 8:03 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Updated with confirmation that Hilary Malawer will be the Deputy General Counsel joining the call.

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From: Harris, Lisa (OGC)
Subject: Section 117 Investigation - Fordham University
To: Margaret Ball; Daniel Correll
Cc: Malawer, Hilary; Delbridge, Kristin
Sent: March 6, 2023 4:30 PM (UTC-05:00)

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).
- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.
- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).
- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education

400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: March 6, 2023 4:53 PM (UTC-05:00)
Attached: Attachment to UWM summary email_PRIVILEGE.CONFIDENTIAL (final 3.6.2023).docx

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. As promised, we are following up with you from our call of Friday, January 27. We appreciated the opportunity to meet you and to discuss the status of the University of Wisconsin-Milwaukee (UWM) Section 117 investigation and how the Department is approaching this work to move toward the mutual goals of UWM’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to achieve these two goals. To that end, to assist you in compliance and facilitate our continued assessment under this investigation, in the attached document we address the questions you posed in UWM’s response to the Department’s January 2021 notice of preliminary inquiry. As we discussed, our responses to your questions may lead to some additional or corrected reporting by UWM.

In addition, we are also requesting that UWM provide the following:

(b)(4)

We anticipate that UWM’s responses to the above and follow-up based on the guidance that we have provided in the attached will assist UWM and the Department in moving toward completing this Section 117 investigation. We would be happy to have a follow-up call with you soon if that would be helpful. Please let us know of your availability within the next two weeks, and we can send a meeting invitation. We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Donna L McGee
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: March 7, 2023 10:57 AM (UTC-05:00)

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Hi Lisa:

I am writing to acknowledge receipt of your email. If it works for you, I will plan to circle back with you in a few days as to whether a meeting would be helpful once I have had a chance to work through your email/attachment.

Thanks,
Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, March 6, 2023 3:53 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

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From: Harris, Lisa (OGC)
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: March 7, 2023 10:59 AM (UTC-05:00)

Hi Donna – Thank you for your acknowledgment and reply. Yes, that is absolutely fine!

Have a good day!

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Tuesday, March 7, 2023 10:57 AM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

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Hi Lisa:

I am writing to acknowledge receipt of your email. If it works for you, I will plan to circle back with you in a few days as to whether a meeting would be helpful once I have had a chance to work through your email/attachment.

Thanks,
Donna

Donna L. McGee
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P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, March 6, 2023 3:53 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

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with you to achieve these two goals. To that end, to assist you in compliance and facilitate our continued assessment under this investigation, in the attached document we address the questions you posed in UWM's response to the Department's January 2021 notice of preliminary inquiry. As we discussed, our responses to your questions may lead to some additional or corrected reporting by UWM.

In addition, we are also requesting that UWM provide the following:

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We anticipate that UWM's responses to the above and follow-up based on the guidance that we have provided in the attached will assist UWM and the Department in moving toward completing this Section 117 investigation. We would be happy to have a follow-up call with you soon if that would be helpful. Please let us know of your availability within the next two weeks, and we can send a meeting invitation. We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Regards,
Lisa

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U.S. Department of Education
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From: Margaret Ball
Subject: Re: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC)
Cc: Daniel Correll; Malawer, Hilary; Delbridge, Kristin
Sent: March 7, 2023 4:46 PM (UTC-05:00)

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

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 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

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- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,

Lisa

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: Margaret Ball
Cc: Daniel Correll; Malawer, Hilary; Delbridge, Kristin
Sent: March 7, 2023 4:58 PM (UTC-05:00)

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,
Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Tuesday, March 7, 2023 4:46 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Margie Ball

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

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 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).
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 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
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We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
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Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Donna L McGee
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: March 9, 2023 3:56 PM (UTC-05:00)

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Hi Lisa:

I reviewed the materials you sent and think it would be helpful for me to talk through our agreement with (b)(4) to make sure I am clear on how to report it. Otherwise, I think I have a handle on everything else we need to correct with our past reporting. If you are still amenable to a call, I have the following blocks of time available next week (Central time): Monday 11-2:30; Wed 9-12:30 or 2-5; Thurs. 12-5; Friday I am pretty wide open 9-5. If none of those times work, I do have other availability, just in smaller blocks between other meetings.

Thank you,
Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Tuesday, March 7, 2023 9:59 AM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

Hi Donna – Thank you for your acknowledgment and reply. Yes, that is absolutely fine!

Have a good day!

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Tuesday, March 7, 2023 10:57 AM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

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Thanks,
Donna

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Sent: Monday, March 6, 2023 3:53 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

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Regards,

Lisa

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Email: lisa.harris@ed.gov
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From: Harris, Lisa (OGC)
Subject: Section 117 Investigation - Rutgers University
To: jhoffman@ogc.rutgers.edu
Cc: Rosenfelt, Phil; Malawer, Hilary; Torres, Joanna
Sent: March 21, 2023 3:15 PM (UTC-04:00)

Good afternoon, Mr. Hoffman –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's July 3, 2019, notice of investigation into compliance by Rutgers University with Section 117 of the Higher Education Act. I am coordinating the Department's review of the investigation and would like to arrange a call with you to discuss status.

More specifically, the Department would like to work with Rutgers to follow up on the requests in our July 3, 2019, notice of investigation and Rutgers' responses thereto. We believe that a call will facilitate the goal of ensuring that Rutgers understands its obligations under, and comes into compliance with, Section 117 and will allow us to identify a process to work toward resolution of the investigation.

I will be joined on the call by Joanna Torres, the attorney assigned to review the Rutgers investigation, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect this initial call to be fairly brief.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: Section 117 Inquiry - Auburn University
To: jsh0073@auburn.edu
Cc: Rosenfelt, Phil; Malawer, Hilary; Lozupone, Kristina
Sent: March 21, 2023 3:16 PM (UTC-04:00)

Good afternoon, Ms. Hammer –

I am an attorney in the Department of Education’s Office of the General Counsel and am writing concerning the Department’s January 15, 2021, notice of preliminary inquiry into compliance by Auburn University with Section 117 of the Higher Education Act. I am coordinating the Department’s review of the inquiry and would like to arrange a call with you to discuss status.

I will be joined on the call by Kristina Lozupone, the attorney assigned to review the Auburn inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

Please kindly let me know of your availability within the next two weeks, and I will arrange a Microsoft Teams meeting. Thank you, and we look forward to speaking with you soon.

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Jaime Hammer
Subject: Re: Section 117 Inquiry - Auburn University
To: Harris, Lisa (OGC)
Cc: Rosenfelt, Phil; Malawer, Hilary; Lozupone, Kristina; Jennifer Wynn
Sent: March 21, 2023 5:28 PM (UTC-04:00)

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Good afternoon, Ms. Harris. I would be glad to speak with you about this matter. I am available on March 30 between 12:30-3:00 CT, or March 31 between 9:00-10:00 CT. Would either of those windows work for you and your team?

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

This electronic message transmission contains information from the General Counsel of Auburn University which may be confidential or privileged. This information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify me by telephone (334-844-5176) or by electronic mail at the above indicated address immediately.

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Date: Tuesday, March 21, 2023 at 2:16 PM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Rosenfelt, Phil <Phil.Rosenfelt@ed.gov>, Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>
Subject: [EXT] Section 117 Inquiry - Auburn University

CAUTION: Email Originated Outside of Auburn.

Good afternoon, Ms. Hammer –

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's January 15, 2021, notice of preliminary inquiry into compliance by Auburn University with Section 117 of the Higher Education Act. I am coordinating the Department's review of the inquiry and would like to arrange a call with you to discuss status.

I will be joined on the call by Kristina Lozupone, the attorney assigned to review the Auburn inquiry, as well as one of our Deputy General Counsels, Phil Rosenfelt or Hilary Malawer. We expect the call to be fairly brief and to focus on a process that should enable us to work toward resolution.

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U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Margaret Ball
Subject: Re: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC)
Cc: Daniel Correll; Malawer, Hilary; Delbridge, Kristin
Sent: April 12, 2023 1:01 PM (UTC-04:00)

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6)
Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my

email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Tuesday, March 7, 2023 4:46 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.

Vice President and General Counsel

Fordham University

Cunniffe House, Room 111

441 East Fordham Road

Bronx, NY 10458

Phone: (718) 817-3110

Fax: (718) 817-3115

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department’s August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

- With respect to Request Nos. 2 and 3 in the Department’s August 10, 2020 investigation letter, and consistent with Fordham’s response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham’s Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham’s end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,

Lisa

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: Margaret Ball; Daniel Correll
Cc: Malawer, Hilary; Delbridge, Kristin
Sent: April 12, 2023 4:36 PM (UTC-04:00)

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham’s former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Wednesday, April 12, 2023 1:01 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

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I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,
Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Tuesday, March 7, 2023 4:46 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable

transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham’s Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham’s end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Daniel Correll
Subject: Re: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC)
Cc: Margaret Ball; Malawer, Hilary; Delbridge, Kristin
Sent: April 13, 2023 12:00 PM (UTC-04:00)
Attached: Section 117 Reporting Procedures.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Lisa,

The following is Fordham University's ("Fordham") response to the queries posed in your email below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

Response: Fordham reports that there were no such statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present.

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

Response: Fordham reports that no additional information or documentation was located since its October 9, 2020 response.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

Response: Fordham will make all appropriate filings for the previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, but seeks guidance from the Department as to how to do so appropriately.

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham's internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,
Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

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Subject: Re: Section 117 Investigation - Fordham University

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We'll look forward to hearing from you.

Margie Ball

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Sent: Tuesday, March 7, 2023 4:46 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.

Vice President and General Counsel

Fordham University

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those

requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,

Lisa

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

--

Daniel Correll, Esq.
Associate General Counsel
Fordham University
Office of Legal Counsel
Cunniffe House, Room 111
Bronx, New York 10458
Telephone: 718.817.5810
Fax: 718.817.3115
dcorrell@fordham.edu

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Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: Daniel Correll
Cc: Margaret Ball; Malawer, Hilary; Delbridge, Kristin
Sent: April 13, 2023 4:11 PM (UTC-04:00)

Good afternoon, Dan –

Thank you for your response. We will review, and we look forward to speaking again with you and Margie next week.

Best,
Lisa

From: Daniel Correll <dcorrell@fordham.edu>
Sent: Thursday, April 13, 2023 12:00 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Margaret Ball <mball@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Lisa,

The following is Fordham University’s (“Fordham”) response to the queries posed in your email below:

- With respect to Request No. 1 in the Department’s August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

Response: Fordham reports that there were no such statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present.

- With respect to Request Nos. 2 and 3 in the Department’s August 10, 2020 investigation letter, and consistent with Fordham’s response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

Response: Fordham reports that no additional information or documentation was located since its October 9, 2020 response.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

Response: Fordham will make all appropriate filings for the previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, but seeks guidance from the Department as to how to do so appropriately.

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham's internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,
Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Wednesday, April 12, 2023 1:01 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Tuesday, March 7, 2023 4:46 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

--

Daniel Correll, Esq.
Associate General Counsel
Fordham University
Office of Legal Counsel
Cunniffe House, Room 111
Bronx, New York 10458
Telephone: 718.817.5810
Fax: 718.817.3115
dcorrell@fordham.edu

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From: Harris, Lisa (OGC)
Subject: RE: Florida State University - Section 117 Investigation
To: Lisa Scoles
Cc: Torres, Joanna; Malawer, Hilary
Sent: April 19, 2023 12:01 PM (UTC-04:00)

Hello, Ms. Scoles – Thank you for providing your availability. I will schedule our call for Wednesday, 4/26, from 10:00-11:00. We look forward to speaking with you then.

Best,
Lisa

From: Lisa Scoles <lscoles@fsu.edu>
Sent: Wednesday, April 19, 2023 9:39 AM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Torres, Joanna <Joanna.Torres@ed.gov>
Subject: RE: Florida State University - Section 117 Investigation

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Ms. Harris - I can be available during the following days and blocks of time, so please let me know your preference for a meeting or call:

- Monday, 4/24: 10-12, 3-5
- Tuesday, 4/25: 3-5
- Wed., 4/26: 9-5

Lisa Scoles
Florida State University
850-644-4440

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Tuesday, April 18, 2023 3:15 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Torres, Joanna <Joanna.Torres@ed.gov>
Subject: RE: Florida State University - Section 117 Investigation

Dear Ms. Scoles:

We hope that you are well. We are writing to follow up on the last communication from Ms. Blank from a few months ago. We are aware that she has moved to a position at another university, and we would like to arrange a time to meet with you to discuss how to proceed with the FSU Section 117 investigation. If you could let us know whether you might have availability toward the end of this week or early next week, we would appreciate it and can then follow up with a meeting invitation. Please also let us know if there is anyone else whom we should include on the meeting invitation.

Thank you, and we look forward to hearing from you.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel

U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Robyn Blank <robyn.blank@fsu.edu>
Sent: Wednesday, January 25, 2023 6:05 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Lisa Scoles <lscoles@fsu.edu>; Torres, Joanna <Joanna.Torres@ed.gov>
Subject: RE: Florida State University - Section 117 Investigation

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(b)(7)(A)

(b)(7)(A)

Robyn

Robyn Blank
Chief Compliance and Ethics Officer
Florida State University
Westcott Building, Room 418
222 South Copeland Street
P.O. Box 3061400
Tallahassee, Florida 32306-1400
Office: 850-644-5238
Fax: 850-644-8973
Email: robyn.blank@fsu.edu
compliance@fsu.edu
Website: compliance.fsu.edu

“Integrity and Excellence Always, In All Ways”

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Sent: Tuesday, January 17, 2023 12:48 PM

To: Lisa Scoles <lscoles@fsu.edu>; Robyn Blank <robyn.blank@fsu.edu>; Torres, Joanna <Joanna.Torres@ed.gov>

Subject: RE: Florida State University - Section 117 Investigation

(b)(7)(A)

(b)(7)(A)

Regards,
Lisa Harris

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Sent: Tuesday, December 6, 2022 4:59 PM
To: Lisa Scoles <lscoles@fsu.edu>; Torres, Joanna <Joanna.Torres@ed.gov>
Cc: Robyn Blank <robyn.blank@fsu.edu>
Subject: RE: Florida State University - Section 117 Investigation

(b)(7)(A)

Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Lisa Scoles <lscoles@fsu.edu>
Sent: Tuesday, December 6, 2022 2:54 PM
To: Torres, Joanna <Joanna.Torres@ed.gov>; Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Robyn Blank <robyn.blank@fsu.edu>
Subject: RE: Florida State University - Section 117 Investigation

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(b)(7)(A)

Lisa Scoles
Florida State University
850-644-4440

From: Torres, Joanna <Joanna.Torres@ed.gov>
Sent: Tuesday, October 18, 2022 2:23 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Robyn Blank <robyn.blank@fsu.edu>
Subject: RE: Florida State University - Section 117 Investigation

Ms. Scoles,

Thank you for providing the Department with your availability. I will follow up with a Microsoft Teams meeting invitation once the Department confirms a time internally.

Thank You,

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers
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From: Lisa Scoles <lscoles@fsu.edu>
Sent: Monday, October 17, 2022 4:39 PM
To: Torres, Joanna <Joanna.Torres@ed.gov>
Cc: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Robyn Blank <robyn.blank@fsu.edu>
Subject: RE: Florida State University - Section 117 Investigation

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Ms. Torres – Robyn Blank and I can be available the week of October 31 on the following days during the following timeframes:

- 10/31/22, Monday: 11-12
- 11/03/22, Thursday: 12-5
- 11/04/22, Friday: 10-4

Hopefully, these options will allow you to select a day and time that will work for you and your colleagues as well. Thank you.

Lisa Scoles
Florida State University
850-644-4440

From: Lisa Scoles
Sent: Monday, October 17, 2022 10:44 AM
To: Torres, Joanna <Joanna.Torres@ed.gov>
Cc: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Subject: RE: Florida State University - Section 117 Investigation

Ms. Torres – Thanks for your email. I am out next week (Oct. 24-28), and I also need to consult with Robyn Blank, FSU's Chief Compliance Officer, regarding her schedule since she will need to attend the call with me. I'll be back in touch soon with our availability for the week of October 31, so that you can set up a virtual meeting. Thanks.

Lisa Scoles
Florida State University
850-644-4440

From: Torres, Joanna <Joanna.Torres@ed.gov>

Sent: Monday, October 17, 2022 9:45 AM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Subject: Florida State University - Section 117 Investigation

Good Morning Attorney Scoles,

I am an attorney in the U.S. Department of Education's Office of the General Counsel and am writing with regard to the Department's January 15, 2021, notice of investigation into compliance by Florida State University (FSU) with Section 117 of the Higher Education Act. I understand that in your capacity as Deputy General Counsel for FSU, you were representing FSU in connection with this matter. I would like to arrange a call with you to discuss the status of the investigation and FSU's obligations under Section 117.

In your February 5, 2021, letter to the Department, you asserted that (b)(4)

(b)(4)

Section 117 requires that an institution file a disclosure report with the Department by certain reporting deadlines whenever the institution is "owned or controlled by a foreign source," or when it "receives a gift from or enters into a contract with a foreign source, the value of which is \$250,000 or more, considered alone or in combination with all other gifts from or contracts with that foreign source within a calendar year." 20 U.S.C. § 1011f(a). The Department has clarified the scope of this requirement in two respects relevant to your February 5, 2021 letter.

First, an institution may be required to report contracts with a foreign source entered into by a legal entity other than the institution in certain circumstances. For purposes of Section 117, where a legal entity operates substantially for the benefit, or under the auspices, of an institution, there is a rebuttable presumption that when that entity receives a gift or enters into a contract with a foreign source, it is for the benefit of the institution and must be disclosed (if it otherwise meets the Section 117 reporting requirements).

Second, the value of a contract for reporting purposes is the total value of the contract at the time the institution enters into the contract. Section 117 requires institutions to file disclosure reports (by the reporting deadlines) whenever an institution enters into a contract with a foreign source that meets the \$250,000 reporting threshold. Consistent with 20 U.S.C. § 1011f(a), in calculating contract value, an institution should use a reasonable valuation methodology based on information available at the time it entered into the contract and applicable to the duration of the contract, not based on the average value of the contract on an annual basis.

In light of the above, the Department would like to work with FSU to follow up on the requests in our January 15, 2021 notice of investigation and to ensure FSU understands its obligations under, and comes into compliance with, Section 117. We believe a call will facilitate those goals and allow us to identify a process to work towards resolution. I will be joined on the call by one of our Deputy General Counsels, either Phil Rosenfelt or Hilary Malawer, and Lisa Harris, who is coordinating the Department's review of the investigation. Please let me know of your availability during the week of October 24 or 31, and I will arrange a meeting via Microsoft Teams. Thank you, and we look forward to speaking with you soon.

Best Regards,

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers

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From: Harris, Lisa (OGC)
Subject: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: April 19, 2023 1:23 PM (UTC-04:00)

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. We are following up with you from our call on Friday, March 17. We appreciated your questions and your commitment to understanding how to report tuition payments received by UWM. Below, we have included some guidance on preferred methods for reporting different tuition transactions with foreign sources.

(b)(4)

(b)(4)

We hope this answers any remaining questions you have about reporting tuition agreements and payments. We would be happy to have a follow-up call with you soon if that would be helpful.

We also looked into your question about how long it takes to correct prior reporting, including withdrawal of a prior disclosure followed by an updated reporting of the transaction. When an institution submits a request to withdraw a previously disclosed transaction, the Department flags the item for withdrawal upon receipt of the request and notifies the institution. The institution may either wait until receiving the notification before submitting its update or may submit its update prior to receiving that notification.

And finally, we look forward to receiving responses to the following requests included in our email of March 6, 2023:

(b)(4)

(b)(4)

We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Donna L McGee
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: April 19, 2023 2:41 PM (UTC-04:00)

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Thank you. I will let you know if I have any questions on the below. Your clarifications are much appreciated.

Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Wednesday, April 19, 2023 12:23 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. We are following up with you from our call on Friday, March 17. We appreciated your questions and your commitment to understanding how to report tuition payments received by UWM. Below, we have included some guidance on preferred methods for reporting different tuition transactions with foreign sources.

(b)(4)

(b)(4)

(b)(4)

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And finally, we look forward to receiving responses to the following requests included in our email of March 6, 2023:

(b)(4)

We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

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distribute or copy it. Please reply to the sender that you have received the message in error, then delete it. Thank you for your cooperation.

From: Harris, Lisa (OGC)
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: April 19, 2023 2:44 PM (UTC-04:00)

You're very welcome!

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Wednesday, April 19, 2023 2:41 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

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Thank you. I will let you know if I have any questions on the below. Your clarifications are much appreciated.

Donna

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Phone: (414) 229-5197
Fax: (414) 229-3919

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Subject: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. We are following up with you from our call on Friday, March 17. We appreciated your questions and your commitment to understanding how to report tuition payments received by UWM. Below, we have included some guidance on preferred methods for reporting different tuition transactions with foreign sources.

(b)(4)

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From: Harris, Lisa (OGC)
Subject: Section 117 - Florida State University
To: lscoles@fsu.edu
Cc: Malawer, Hilary; Torres, Joanna
Sent: April 26, 2023 5:35 PM (UTC-04:00)

Good evening, Ms. Scoles –

Thank you for speaking with us this morning. As noted during our call, we are working to move the Section 117 investigations forward as expeditiously as possible. To that end, we are focusing more intently on compliance going forward and requesting more recent transactions data from institutions as a result. Accordingly, we have revised our prior requests for information from FSU and are prioritizing the following information that we believe is necessary for us to assess FSU's Section 117 compliance:

- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). In producing this information, please include the following: (1) the foreign source's name; (2) the foreign source's country; (3) the type of transaction (gift or contract); (4) the transaction amount; (5) the receipt or start date; (6) whether the transaction is conditional or restricted (and if so, a brief description of the conditions or restrictions); (7) if a contract, the end date; (8) any amendments/extensions to the transaction (including the date, any change to the transaction amount, and any changes to the terms that make the transaction conditional/restricted); and (9) whether the transaction was reported (and if so, when).
- A copy of the most recent version of FSU's Section 117 compliance policy or procedures, or if such a document has not been developed, a description of the process that FSU follows in addressing Section 117 requirements. This should include matters such as how FSU gathers information across the institution about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.

We request that you provide this information to us no later than May 10. However, we understand that FSU is facing some challenges in staffing its compliance office following Ms. Blank's move to another university. As we discussed, if you believe that you will be unable to submit information to us by May 10, please let us know and provide a date that you believe is feasible, yet consistent with the Department's plan for a faster pace in reviewing and bringing these investigations to closure.

On our end, we will search for FSU's Section 117 disclosure report that would have been due January 31, 2023 and will then follow up with you.

We appreciate your continued cooperation with us. Please contact Joanna or me at any time if you have any questions.

Best,
Lisa

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Pronouns: she/her/hers

From: Lisa Scoles
Subject: RE: Section 117 - Florida State University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Torres, Joanna; Undra Baldwin
Sent: April 28, 2023 4:41 PM (UTC-04:00)

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Ms. Harris – I appreciate the clarification and your revised request for (1) a list of the gifts/contracts from/with foreign sources for the period 1/1/2020 - 12/31/2022 and (2) a copy of FSU's procedures/process for Section 117 compliance, as detailed below. Immediately after our call, we began working to identify and gather the information requested. However, for all of the reasons and challenges that I expressed on our 4/26/23 call, I need to request additional time for FSU's response. After consultation with my colleagues, we believe that we should be able to provide the list and FSU's procedures/process no later than Friday, May 26, 2023. However, if either/both of these items are available prior to that date, my plan would be to provide it/them to you right away. Thank you for your consideration, Lisa Scoles

Lisa Scoles
Florida State University
850-644-4440

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Wednesday, April 26, 2023 5:35 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>
Subject: Section 117 - Florida State University

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On our end, we will search for FSU's Section 117 disclosure report that would have been due January 31, 2023 and will then follow up with you.

We appreciate your continued cooperation with us. Please contact Joanna or me at any time if you have any questions.

Best,
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Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: RE: Section 117 - Florida State University
To: Lisa Scoles
Cc: Malawer, Hilary; Torres, Joanna; Undra Baldwin
Sent: May 2, 2023 7:14 PM (UTC-04:00)

Good evening, Ms. Scoles –

We appreciated our conversation with you last week. Thank you for your email and for providing a date that you believe is feasible for responding to our requests. We will look forward to receiving your response no later than May 26, 2023 and also encourage you, if possible, to submit information to us on a rolling basis – e.g., as you gather the list of gifts/contracts for one year, you might provide us with that information as you move on to the next year.

Thank you for your continued cooperation, and please let us know if you have any questions as you prepare your response.

Best,
Lisa

From: Lisa Scoles <lscoles@fsu.edu>
Sent: Friday, April 28, 2023 4:41 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
Subject: RE: Section 117 - Florida State University

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Florida State University
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Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>
Subject: Section 117 - Florida State University

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Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Harris, Lisa (OGC)
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: 'Donna L McGee'
Cc: Malawer, Hilary; Travis, Leah
Sent: May 5, 2023 3:08 PM (UTC-04:00)

Hi Donna – I hope you're doing well. I realized that we hadn't discussed a timeline for your response to the information requested below, so I wanted to check in and ask when you anticipate being able to provide a response, particularly with respect to the three bulleted items near the end of the email. Your response will help us keep moving in the direction of closing the investigation.

We look forward to hearing from you. Have a good weekend.

Best,
Lisa

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Sent: Wednesday, April 19, 2023 2:44 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
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UWM Office of Legal Affairs
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Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

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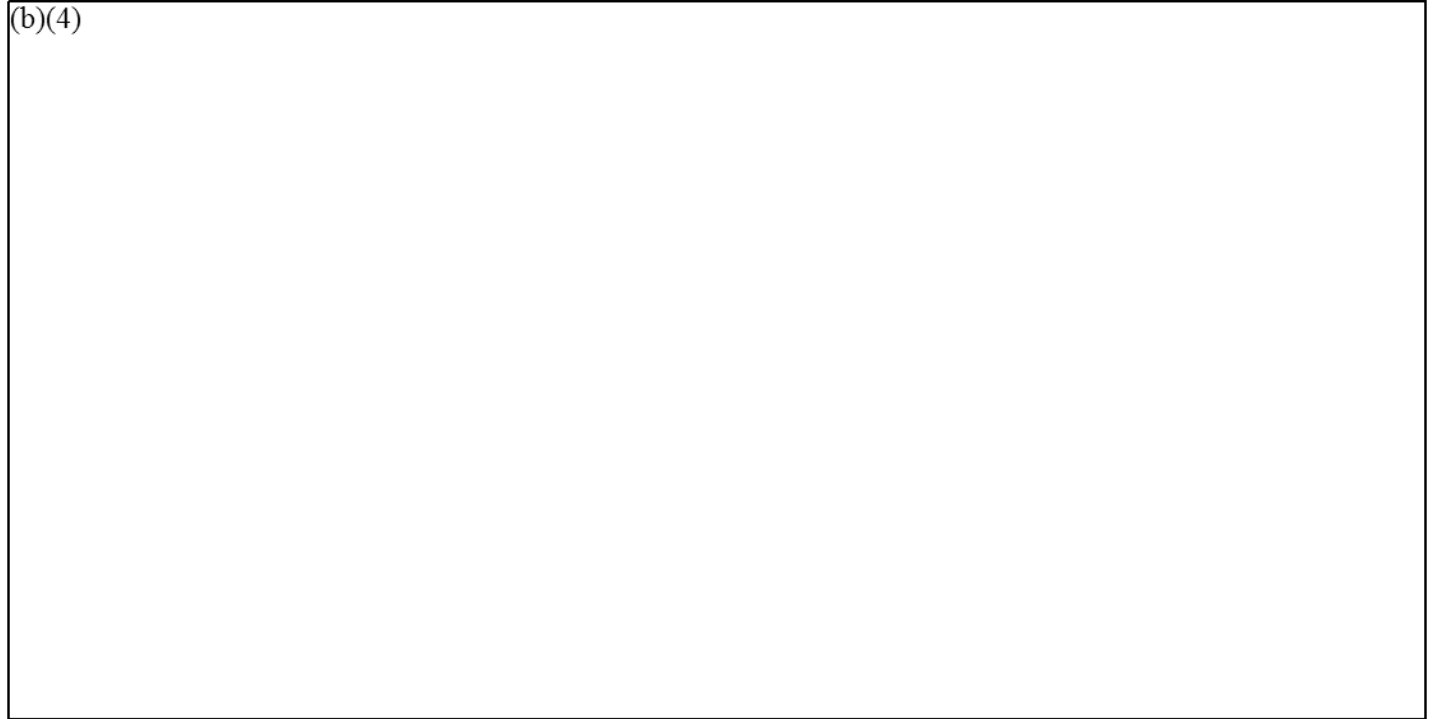
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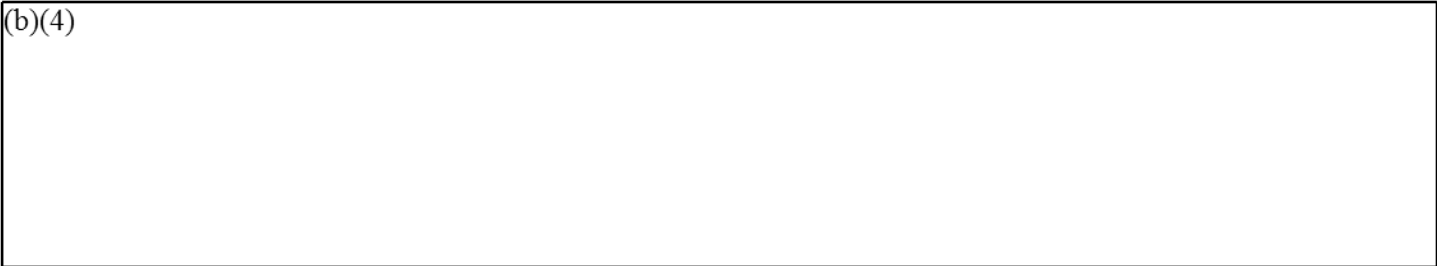
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(b)(4)



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Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: May 5, 2023 3:29 PM (UTC-04:00)

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Hi Lisa:

Apologies for the delay. I have not forgotten about this. Our contract submission deadline for our June Board of Regents meeting was today and I am the lead attorney on two big projects that were submitted. I do have a draft response already in progress and will aim to try to have it to you by next Friday if that works. We share your desire to close this out!

Have a good weekend,
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Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

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Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: May 5, 2023 5:15 PM (UTC-04:00)

Hi Donna – No apologies necessary! This was just a check-in on timing, and next Friday sounds great. With all that's been on your plate, I hope you get a chance to rest and enjoy the weekend!

Thank you.

Lisa

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From: Donna L McGee <mcgeed@uwm.edu>
Sent: Wednesday, April 19, 2023 2:41 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

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Thank you. I will let you know if I have any questions on the below. Your clarifications are much appreciated.

Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Wednesday, April 19, 2023 12:23 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. We are following up with you from our call on Friday, March 17. We appreciated your questions and your commitment to understanding how to report tuition payments received by UWM. Below, we have included some guidance on preferred methods for reporting different tuition transactions with foreign sources.

(b)(4)

(b)(4)

We hope this answers any remaining questions you have about reporting tuition agreements and payments. We would be happy to have a follow-up call with you soon if that would be helpful.

We also looked into your question about how long it takes to correct prior reporting, including withdrawal of a prior disclosure followed by an updated reporting of the transaction. When an institution submits a request to withdraw a previously disclosed transaction, the Department flags the item for withdrawal upon receipt of the request and notifies the institution. The institution may either wait until receiving the notification before submitting its update or may submit its update prior to receiving that notification.

And finally, we look forward to receiving responses to the following requests included in our email of March 6, 2023:

(b)(4)

We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney

Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

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From: Donna L McGee
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: May 5, 2023 5:22 PM (UTC-04:00)

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Thanks. That is my plan!

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Friday, May 5, 2023 4:15 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

Hi Donna – No apologies necessary! This was just a check-in on timing, and next Friday sounds great. With all that's been on your plate, I hope you get a chance to rest and enjoy the weekend!

Thank you.

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Friday, May 5, 2023 3:29 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

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Hi Lisa:

Apologies for the delay. I have not forgotten about this. Our contract submission deadline for our June Board of Regents meeting was today and I am the lead attorney on two big projects that were submitted. I do have a draft response already in progress and will aim to try to have it to you by next Friday if that works. We share your desire to close this out!

Have a good weekend,
Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Friday, May 5, 2023 2:08 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

Hi Donna – I hope you’re doing well. I realized that we hadn’t discussed a timeline for your response to the information requested below, so I wanted to check in and ask when you anticipate being able to provide a response, particularly with respect to the three bulleted items near the end of the email. Your response will help us keep moving in the direction of closing the investigation.

We look forward to hearing from you. Have a good weekend.

Best,
Lisa

From: Harris, Lisa (OGC)
Sent: Wednesday, April 19, 2023 2:44 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

You’re very welcome!

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Wednesday, April 19, 2023 2:41 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

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Thank you. I will let you know if I have any questions on the below. Your clarifications are much appreciated.

Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Wednesday, April 19, 2023 12:23 PM

To: Donna L McGee <mcgeed@uwm.edu>

Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>

Subject: (CONTAINS CUI) Section 117 - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. We are following up with you from our call on Friday, March 17. We appreciated your questions and your commitment to understanding how to report tuition payments received by UWM. Below, we have included some guidance on preferred methods for reporting different tuition transactions with foreign sources.

(b)(4)

We hope this answers any remaining questions you have about reporting tuition agreements and payments. We would be happy to have a follow-up call with you soon if that would be helpful.

We also looked into your question about how long it takes to correct prior reporting, including withdrawal of a prior disclosure followed by an updated reporting of the transaction. When an institution submits a request to withdraw a previously disclosed transaction, the Department flags the item for withdrawal upon receipt of the request and notifies the institution. The institution may either wait until receiving the notification before submitting its update or may submit its update prior to receiving that notification.

And finally, we look forward to receiving responses to the following requests included in our email of March 6, 2023:

(b)(4)

(b)(4)

We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

**Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris**

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From: Lisa Scoles
Subject: RE: Section 117 - Florida State University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Torres, Joanna; Undra Baldwin
Sent: May 11, 2023 11:58 AM (UTC-04:00)
Attached: FSU SOPs for Section 117 Reporting (May 2023).pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Harris – Attached please find FSU’s standard operating procedures for Section 117 reporting, per your request. We are continuing to gather information on the gifts/contracts and will provide the requested list no later than May 26, 2023. Thank you.

Lisa Scoles
Florida State University
850-644-4440

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Tuesday, May 02, 2023 7:14 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
Subject: RE: Section 117 - Florida State University

Good evening, Ms. Scoles –

We appreciated our conversation with you last week. Thank you for your email and for providing a date that you believe is feasible for responding to our requests. We will look forward to receiving your response no later than May 26, 2023 and also encourage you, if possible, to submit information to us on a rolling basis – e.g., as you gather the list of gifts/contracts for one year, you might provide us with that information as you move on to the next year.

Thank you for your continued cooperation, and please let us know if you have any questions as you prepare your response.

Best,
Lisa

From: Lisa Scoles <lscoles@fsu.edu>
Sent: Friday, April 28, 2023 4:41 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
Subject: RE: Section 117 - Florida State University

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Harris – I appreciate the clarification and your revised request for (1) a list of the gifts/contracts from/with foreign sources for the period 1/1/2020 - 12/31/2022 and (2) a copy of FSU’s procedures/process for Section 117 compliance, as detailed below. Immediately after our call, we began working to identify and gather the information requested. However, for all of the reasons and challenges that I expressed on our 4/26/23 call, I need to request additional time for FSU’s response. After consultation with my colleagues, we

believe that we should be able to provide the list and FSU's procedures/process no later than Friday, May 26, 2023. However, if either/both of these items are available prior to that date, my plan would be to provide it/them to you right away. Thank you for your consideration, Lisa Scoles

Lisa Scoles
Florida State University
850-644-4440

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Wednesday, April 26, 2023 5:35 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>
Subject: Section 117 - Florida State University

Good evening, Ms. Scoles –

Thank you for speaking with us this morning. As noted during our call, we are working to move the Section 117 investigations forward as expeditiously as possible. To that end, we are focusing more intently on compliance going forward and requesting more recent transactions data from institutions as a result. Accordingly, we have revised our prior requests for information from FSU and are prioritizing the following information that we believe is necessary for us to assess FSU's Section 117 compliance:

- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). In producing this information, please include the following: (1) the foreign source's name; (2) the foreign source's country; (3) the type of transaction (gift or contract); (4) the transaction amount; (5) the receipt or start date; (6) whether the transaction is conditional or restricted (and if so, a brief description of the conditions or restrictions); (7) if a contract, the end date; (8) any amendments/extensions to the transaction (including the date, any change to the transaction amount, and any changes to the terms that make the transaction conditional/restricted); and (9) whether the transaction was reported (and if so, when).
- A copy of the most recent version of FSU's Section 117 compliance policy or procedures, or if such a document has not been developed, a description of the process that FSU follows in addressing Section 117 requirements. This should include matters such as how FSU gathers information across the institution about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.

We request that you provide this information to us no later than May 10. However, we understand that FSU is facing some challenges in staffing its compliance office following Ms. Blank's move to another university. As we discussed, if you believe that you will be unable to submit information to us by May 10, please let us know and provide a date that you believe is feasible, yet consistent with the Department's plan for a faster pace in reviewing and bringing these investigations to closure.

On our end, we will search for FSU's Section 117 disclosure report that would have been due January 31, 2023 and will then follow up with you.

We appreciate your continued cooperation with us. Please contact Joanna or me at any time if you have any questions.

Best,
Lisa

Lisa Wells Harris

Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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(b)(4)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

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of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

From: Donna L McGee
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Travis, Leah
Sent: May 11, 2023 1:21 PM (UTC-04:00)
Attached: Appendices to UWM 5.11.23 Letter.zip, UWM Follow-Up Letter to DOE re Section 117 5.11.23.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa:

Attached please find UWM's response to the follow-up questions contained in your below email.

If you have any questions on the attached, please don't hesitate to reach out.

I note that I am actively working with UWM's Bursar to review UWM's past reporting on foreign tuition payments to ensure it is accurate in light of the additional guidance you provided. I anticipate that UWM will have a few other reporting corrections to make based upon our prior discussions. We plan to make all of the corrections at once as soon as our tuition payment review is complete.

Thanks for your continued assistance and patience as we have worked through this.

Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, March 6, 2023 3:53 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. As promised, we are following up with you from our call of Friday, January 27. We appreciated the opportunity to meet you and to discuss the status of the University of Wisconsin-Milwaukee (UWM) Section 117 investigation and how the Department is approaching this work to move toward the mutual goals of UWM's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to achieve these two goals. To that end, to assist you in compliance and facilitate our continued assessment under this investigation, in the attached document we address the questions you posed in UWM's response to the Department's January 2021 notice of preliminary inquiry. As we discussed, our responses to your questions may lead to some additional or corrected reporting by UWM.

In addition, we are also requesting that UWM provide the following:

(b)(4)

We anticipate that UWM's responses to the above and follow-up based on the guidance that we have provided in the attached will assist UWM and the Department in moving toward completing this Section 117 investigation. We would be happy to have a follow-up call with you soon if that would be helpful. Please let us know of your availability within the next two weeks, and we can send a meeting invitation. We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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Controlled by Department of Education, Office of the General Counsel, Lisa Harris

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Finance & Administrative
Affairs

Office of Legal Affairs

Chapman Hall 380
P.O. Box 413
Milwaukee, WI
53201-0413
414-229-4278 phone
414-229-3919 fax

May 11, 2023

SENT VIA EMAIL

Lisa Wells Harris
Attorney
Office of General Counsel
U.S. Department of Education
Lisa.Harris@ed.gov

Leah Travis
Attorney
Office of General Counsel
U.S. Department of Education
Leah.Travis@ed.gov

Hilary Malawer
Deputy General Counsel
Office of General Counsel
U.S. Department of Education
Hilary.Malawer@ed.gov

Re: University of Wisconsin-Milwaukee – Preliminary Inquiry

Dear Mses. Harris, Travis, and Malawer:

I write on behalf of the University of Wisconsin-Milwaukee (“*UWM*”) in response to your March 6, 2023, email requesting additional information from UWM in connection with the U.S. Department of Education (“*DOE*”) Office of General Counsel’s January 15, 2021, preliminary inquiry into UWM’s compliance with Section 117 of the Higher Education Act of 1965.

(b)(4)

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(b)(4)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

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(b)(4)

of the Freedom of Information and Privacy Act

Withheld pursuant to exemption

(b)(4)

of the Freedom of Information and Privacy Act

(b)(4)

If you have any questions about the above or any of the information contained in the Appendices, please do not hesitate to contact me. I can be reached at 414-229-5197 or via email at mcgeed@uwm.edu.

Sincerely,

(b)(6)

Donna L. McGee
Deputy Chief Legal Counsel

Cc: Mark Mone, Chancellor
Scott Gronert, Interim Provost & Vice Chancellor for Academic Affairs
Robin Van Harpen, Vice Chancellor for Finance & Administrative Affairs
Joan Nesbitt, Vice Chancellor for University Advancement
Drew Knab, Associate Vice Chancellor for Business & Finance Services
Mark Harris, Vice Provost for Research
Patrick Kessenich, Chief Operations Officer / Director of Major & Planned Gifts
Joely Urdan, Chief Legal Counsel

From: Harris, Lisa (OGC)
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee
To: Donna L McGee
Cc: Malawer, Hilary; Travis, Leah
Sent: May 11, 2023 4:12 PM (UTC-04:00)

Hi Donna – Thank you for this response and for updating us on your review of UWM’s reporting of foreign tuition payments. We will review the information in your response and will get back to you as soon as we can. Much appreciated.

Lisa

From: Donna L McGee <mcgeed@uwm.edu>
Sent: Thursday, May 11, 2023 1:21 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: RE: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

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Hi Lisa:

Attached please find UWM’s response to the follow-up questions contained in your below email.

If you have any questions on the attached, please don’t hesitate to reach out.

I note that I am actively working with UWM’s Bursar to review UWM’s past reporting on foreign tuition payments to ensure it is accurate in light of the additional guidance you provided. I anticipate that UWM will have a few other reporting corrections to make based upon our prior discussions. We plan to make all of the corrections at once as soon as our tuition payment review is complete.

Thanks for your continued assistance and patience as we have worked through this.

Donna

Donna L. McGee
Deputy Chief Legal Counsel
UWM Office of Legal Affairs
P.O. Box 413
Milwaukee, WI 53201
Phone: (414) 229-5197
Fax: (414) 229-3919

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, March 6, 2023 3:53 PM
To: Donna L McGee <mcgeed@uwm.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Travis, Leah <Leah.Travis@ed.gov>
Subject: (CONTAINS CUI) Section 117 Investigation - University of Wisconsin-Milwaukee

CONTROLLED UNCLASSIFIED INFORMATION

Good afternoon, Donna –

We hope that all is well. As promised, we are following up with you from our call of Friday, January 27. We appreciated the opportunity to meet you and to discuss the status of the University of Wisconsin-Milwaukee (UWM) Section 117 investigation and how the Department is approaching this work to move toward the mutual goals of UWM's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to achieve these two goals. To that end, to assist you in compliance and facilitate our continued assessment under this investigation, in the attached document we address the questions you posed in UWM's response to the Department's January 2021 notice of preliminary inquiry. As we discussed, our responses to your questions may lead to some additional or corrected reporting by UWM.

In addition, we are also requesting that UWM provide the following:

(b)(4)

We anticipate that UWM's responses to the above and follow-up based on the guidance that we have provided in the attached will assist UWM and the Department in moving toward completing this Section 117 investigation. We would be happy to have a follow-up call with you soon if that would be helpful. Please let us know of your availability within the next two weeks, and we can send a meeting invitation. We appreciate your continuing cooperation, and please feel free to contact Leah or me if you have any questions.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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From: Harris, Lisa (OGC)
Subject: (CUI) Section 117 - Auburn University
To: Jaime Hammer
Cc: Malawer, Hilary; Lozupone, Kristina
Sent: May 17, 2023 5:47 PM (UTC-04:00)
Attached: Section 117 - Auburn - Attachment to email (5.17.2023).zip

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Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn’s compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Auburn’s end, including the previous submissions in response to the initial investigation letter. We also want to note that as we have been working through a number of Section 117 investigations, we have been refining our approach in various ways with an eye toward moving more quickly, but efficiently, through each investigation. Consequently, it is our hope that you will be able to respond to these requests no later than June 16, 2023. If it would be helpful, we would be happy to schedule a follow-up call to discuss timing, or alternatively, please let us know if a response by June 16 would be possible. We also encourage you to submit information on a rolling basis, as you are able to gather it, in advance of the June 16 deadline.

In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Harris, Lisa (OGC)
Subject: Section 117 - Auburn University
To: Jaime Hammer
Cc: Malawer, Hilary; Lozupone, Kristina
Sent: May 17, 2023 5:51 PM (UTC-04:00)

Hi Jaime – Here is the password to decrypt the zip folder attached to my previous email:

(b)(6)

If you have any difficulties accessing the file, please let me know. Thank you.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Lisa Scoles
Subject: RE: Section 117 - Florida State University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Torres, Joanna; Undra Baldwin
Sent: May 24, 2023 12:00 PM (UTC-04:00)
Attached: Report to OCR of FSU Foreign Gifts and Contracts Summary - Jan. 1 2020 to Dec. 31 2022.xlsx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Harris – Attached please find the list of the gifts/contracts from/with foreign sources for the period 1/1/2020 - 12/31/2022, per your request. At this point, I believe that FSU has fully responded to your requests of 4/26/23 (below), but, of course, let us know if you have any questions or need something additional. Thank you.

Lisa Scoles
Florida State University
850-644-4440

From: Lisa Scoles
Sent: Thursday, May 11, 2023 11:58 AM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
Subject: RE: Section 117 - Florida State University

Ms. Harris – Attached please find FSU’s standard operating procedures for Section 117 reporting, per your request. We are continuing to gather information on the gifts/contracts and will provide the requested list no later than May 26, 2023. Thank you.

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Sent: Tuesday, May 02, 2023 7:14 PM
To: Lisa Scoles <lscoles@fsu.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
Subject: RE: Section 117 - Florida State University

Good evening, Ms. Scoles –

We appreciated our conversation with you last week. Thank you for your email and for providing a date that you believe is feasible for responding to our requests. We will look forward to receiving your response no later than May 26, 2023 and also encourage you, if possible, to submit information to us on a rolling basis – e.g., as you gather the list of gifts/contracts for one year, you might provide us with that information as you move on to the next year.

Thank you for your continued cooperation, and please let us know if you have any questions as you prepare your response.

Best,
Lisa

From: Lisa Scoles <lscoles@fsu.edu>
Sent: Friday, April 28, 2023 4:41 PM
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Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>; Undra Baldwin <ub22@fsu.edu>
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Ms. Harris – I appreciate the clarification and your revised request for (1) a list of the gifts/contracts from/with foreign sources for the period 1/1/2020 - 12/31/2022 and (2) a copy of FSU’s procedures/process for Section 117 compliance, as detailed below. Immediately after our call, we began working to identify and gather the information requested. However, for all of the reasons and challenges that I expressed on our 4/26/23 call, I need to request additional time for FSU’s response. After consultation with my colleagues, we believe that we should be able to provide the list and FSU’s procedures/process no later than Friday, May 26, 2023. However, if either/both of these items are available prior to that date, my plan would be to provide it/them to you right away. Thank you for your consideration, Lisa Scoles

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Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>
Subject: Section 117 - Florida State University

Good evening, Ms. Scoles –

Thank you for speaking with us this morning. As noted during our call, we are working to move the Section 117 investigations forward as expeditiously as possible. To that end, we are focusing more intently on compliance going forward and requesting more recent transactions data from institutions as a result. Accordingly, we have revised our prior requests for information from FSU and are prioritizing the following information that we believe is necessary for us to assess FSU’s Section 117 compliance:

- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). In producing this information, please include the following: (1) the foreign source’s name; (2) the foreign source’s country; (3) the type of transaction (gift or contract); (4) the transaction amount; (5) the receipt or start date; (6) whether the transaction is conditional or restricted (and if so, a brief description of the conditions or restrictions); (7) if a contract, the end date; (8) any amendments/extensions to the transaction (including the date, any change to the transaction amount, and any changes to the terms that make the transaction conditional/restricted); and (9) whether the transaction was reported (and if so, when).
- A copy of the most recent version of FSU’s Section 117 compliance policy or procedures, or if such a document has not been developed, a description of the process that FSU follows in addressing Section 117 requirements. This should include matters such as how FSU gathers information across the institution about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.

We request that you provide this information to us no later than May 10. However, we understand that FSU is facing some challenges in staffing its compliance office following Ms. Blank's move to another university. As we discussed, if you believe that you will be unable to submit information to us by May 10, please let us know and provide a date that you believe is feasible, yet consistent with the Department's plan for a faster pace in reviewing and bringing these investigations to closure.

On our end, we will search for FSU's Section 117 disclosure report that would have been due January 31, 2023 and will then follow up with you.

We appreciate your continued cooperation with us. Please contact Joanna or me at any time if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

GIFTS AND CONTRACTS FROM A FOREIGN SOURCE

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From: Harris, Lisa (OGC)
Subject: RE: Section 117 - Florida State University
To: Lisa Scoles
Cc: Malawer, Hilary; Torres, Joanna; Undra Baldwin
Sent: May 24, 2023 12:47 PM (UTC-04:00)

Good afternoon, Ms. Scoles – We appreciate your response to our requests. We will review the information that you have submitted as soon as possible and will follow up with you thereafter. Thank you.

Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
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Subject: RE: Section 117 - Florida State University

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To: Lisa Scoles <lscoles@fsu.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Torres, Joanna <Joanna.Torres@ed.gov>

Subject: Section 117 - Florida State University

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On our end, we will search for FSU's Section 117 disclosure report that would have been due January 31, 2023 and will then follow up with you.

We appreciate your continued cooperation with us. Please contact Joanna or me at any time if you have any questions.

Best,
Lisa

Lisa Wells Harris
Attorney
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U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

From: Jaime Hammer
Subject: Re: (CUI) Section 117 - Auburn University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Lozupone, Kristina
Sent: June 2, 2023 5:36 PM (UTC-04:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Lisa. Thank you for your email, and please accept my apologies for the delayed response. The end of the semester, preparation for an annual Board of Trustees meeting, and my own unusually hectic professional schedule have resulted in it taking longer than usual to get the appropriate people together to discuss how Auburn can work with the Department to provide the requested information. I have a meeting scheduled next week with the campus representatives who should be able to address the items raised in your letter. After that meeting, I will reach out to you to let you know whether/to what extent we will be able to meet the requested June 16 deadline. It is possible that we may need to request an extension of time to provide the requested information, but I should have a better estimate of that later next week.

Thank you again for your patience. I'll be in touch soon with more updated information.

Thank you,
Jaime

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

This electronic message transmission contains information from the General Counsel of Auburn University which may be confidential or privileged. This information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify me by telephone (334-844-5176) or by electronic mail at the above indicated address immediately.

IRS CIRCULAR 230 DISCLOSURE: Unless explicitly stated to the contrary, this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending to another party any transaction or matter addressed herein.

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Date: Thursday, May 18, 2023 at 7:42 AM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>
Subject: [WARNING: MESSAGE ENCRYPTED][EXT] [WARNING: AMP - ATTACHMENT UNSCANNED][WARNING: MESSAGE ENCRYPTED](CUI) Section 117 - Auburn University

CAUTION: Email Originated Outside of Auburn.

CONTROLLED UNCLASSIFIED INFORMATION

Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn’s compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Auburn’s end, including the previous submissions in response to the initial investigation letter. We also want to note that as we have been working through a number of Section 117 investigations, we have been refining our approach in various ways with an eye toward moving more quickly, but efficiently, through each investigation. Consequently, it is our hope that you will be able to respond to these requests no later than June 16, 2023. If it would be helpful, we would be happy to schedule a follow-up call to discuss timing, or alternatively, please let us know if a response by June 16 would be possible. We also encourage you to submit information on a rolling basis, as you are able to gather it, in advance of the June 16 deadline.

In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Jaime Hammer
Subject: Re: (CUI) Section 117 - Auburn University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Lozupone, Kristina; Steven Taylor; JAIME HAMMER
Sent: June 7, 2023 6:10 PM (UTC-04:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Lisa. I wanted to write with an update on Auburn's efforts to respond to the additional requested documents and information in this inquiry. First, thank you again for your patience. As I mentioned to you in my previous email, it has taken some time to get the right people in the room to review and discuss the Department's follow up requests. In addition, by copy of this message I would like to introduce to you Dr. Steve Taylor. Dr. Taylor recently was appointed Senior Vice President for Research and Economic Development, effective June 1.

The various subject matter experts met to review and discuss the Department's requests for additional materials and clarifications, and how we could best respond. We want to make sure that Auburn addresses outstanding questions related to materials already submitted to the Department, and then uses that information to ensure the additional materials provided will meet the requirements of Section 117. With that in mind, our team would like to schedule a Zoom meeting with you to walk through the questions raised in your letter regarding materials submitted in the original (2021) submission, as well as the regular submissions since that time. Once we have clarity on where our submissions "missed the mark" or were unclear, we will be in a better position to ensure that the additional materials you have requested will comply with the applicable regulations.

If you all are agreeable to this approach, we would like to propose a Zoom meeting sometime in late June or early July. While I know this extends the timeline beyond your requested June 16 deadline, Auburn would be grateful for your courtesy in extending the process so that we can thoroughly review our previous submissions, be fully prepared to respond to the questions raised in your letter, and be in the best position to ensure that the additional documents you have requested (and our reporting going forward) will meet expectations under Section 117.

I look forward to hearing from you regarding availability in late June/early July. My colleagues and I look forward to this conversation and collaboration.

Sincerely,
Jaime Hammer

Jaime S. Hammer
Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

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5176) or by electronic mail at the above indicated address immediately.

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Date: Thursday, May 18, 2023 at 7:42 AM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>
Subject: [WARNING: MESSAGE ENCRYPTED][EXT] [WARNING: AMP - ATTACHMENT UNSCANNED][WARNING: MESSAGE ENCRYPTED](CUI) Section 117 - Auburn University

CAUTION: Email Originated Outside of Auburn.

CONTROLLED UNCLASSIFIED INFORMATION

Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn’s compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Auburn’s end, including the previous submissions in response to the initial investigation letter. We also want to note that as we have been working through a number of Section 117 investigations, we have been refining our approach in various ways with an eye toward moving more quickly, but efficiently, through each investigation. Consequently, it is our hope that you will be able to respond to these requests no later than June 16, 2023. If it would be helpful, we would be happy to schedule a follow-up call to discuss timing, or alternatively, please let us know if a response by June 16 would be possible. We also encourage you to submit information on a rolling basis, as you are able to gather it, in advance of the June 16 deadline.

In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Jaime Hammer
Subject: Re: (CUI) Section 117 - Auburn University
To: Harris, Lisa (OGC)
Cc: Malawer, Hilary; Lozupone, Kristina; Steven Taylor; JAIME HAMMER
Sent: June 13, 2023 6:04 PM (UTC-04:00)

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Good afternoon, Lisa. As our team is working to address the items raised in your letter, we believe it would be most helpful for us to access the original submission that was provided to the Department in 2021. The attorney who was responsible for that file, Grant Garber, is no longer with Auburn. Mr. Garber appears to have been the only University representative with password access to the Box folder where Auburn's materials were uploaded.

Because Mr. Garber is no longer here, our team is uncomfortable accessing the folder with his credentials. Can you provide a new access link so that we are able to view the entirety of the Box folder housing Auburn's 2021 submission?

Thank you for your assistance,
Jaime Hammer

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

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From: Jaime Hammer <jsh0073@auburn.edu>
Date: Wednesday, June 7, 2023 at 5:09 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>, Steven Taylor <taylost@auburn.edu>, JAIME HAMMER <jhammer@auburn.edu>
Subject: Re: (CUI) Section 117 - Auburn University

Good afternoon, Lisa. I wanted to write with an update on Auburn's efforts to respond to the additional requested documents and information in this inquiry. First, thank you again for your patience. As I mentioned to you in my previous email, it has taken some time to get the right people in the room to review and discuss the Department's follow up requests. In addition, by copy of this message I would like to introduce to you Dr. Steve Taylor. Dr. Taylor recently was

appointed Senior Vice President for Research and Economic Development, effective June 1.

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Sincerely,
Jaime Hammer

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Date: Thursday, May 18, 2023 at 7:42 AM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>
Subject: [WARNING: MESSAGE ENCRYPTED][EXT] [WARNING: AMP - ATTACHMENT UNSCANNED][WARNING: MESSAGE ENCRYPTED](CUI) Section 117 - Auburn University

Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn’s compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

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In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Harris, Lisa (OGC)
Subject: RE: (CUI) Section 117 - Auburn University
To: Jaime Hammer
Cc: Malawer, Hilary; Lozupone, Kristina; Steven Taylor; JAIME HAMMER
Sent: June 13, 2023 7:47 PM (UTC-04:00)

Good evening, Jaime – I hope you are well. First, my apologies for taking a while to respond to your email of last week. I was out Thursday and Friday and am playing a bit of catch up.

We greatly appreciate your commitment to providing updates and to working with us to address Auburn’s Section 117 compliance. I’m happy to look into how you might access the folder housing Auburn’s 2021 submission and will get back to you as soon as I can. In addition, I will check on our availability in late June/early July and will provide you with some possible dates for a virtual meeting.

Thank you, and have a good evening.

Lisa

From: Jaime Hammer <jsh0073@auburn.edu>
Sent: Tuesday, June 13, 2023 6:04 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Lozupone, Kristina <Kristina.Lozaupone@ed.gov>; Steven Taylor <taylost@auburn.edu>; JAIME HAMMER <jhammer@auburn.edu>
Subject: Re: (CUI) Section 117 - Auburn University

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Good afternoon, Lisa. As our team is working to address the items raised in your letter, we believe it would be most helpful for us to access the original submission that was provided to the Department in 2021. The attorney who was responsible for that file, Grant Garber, is no longer with Auburn. Mr. Garber appears to have been the only University representative with password access to the Box folder where Auburn’s materials were uploaded.

Because Mr. Garber is no longer here, our team is uncomfortable accessing the folder with his credentials. Can you provide a new access link so that we are able to view the entirety of the Box folder housing Auburn’s 2021 submission?

Thank you for your assistance,
Jaime Hammer

Jaime S. Hammer
Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

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From: Jaime Hammer <jsh0073@auburn.edu>

Date: Wednesday, June 7, 2023 at 5:09 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozupone@ed.gov>, Steven Taylor <taylost@auburn.edu>, JAIME HAMMER <jhammer@auburn.edu>

Subject: Re: (CUI) Section 117 - Auburn University

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I look forward to hearing from you regarding availability in late June/early July. My colleagues and I look forward to this conversation and collaboration.

Sincerely,
Jaime Hammer

Jaime S. Hammer

Auburn University General Counsel

334.844.5176

jhammer@auburn.edu

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Date: Thursday, May 18, 2023 at 7:42 AM

To: Jaime Hammer <jsh0073@auburn.edu>

Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozaupone@ed.gov>

Subject: [WARNING: MESSAGE ENCRYPTED][EXT] [WARNING: AMP - ATTACHMENT UNSCANNED][WARNING: MESSAGE ENCRYPTED](CUI) Section 117 - Auburn University

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CONTROLLED UNCLASSIFIED INFORMATION

Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn’s compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn’s compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Auburn’s end, including the previous submissions in response to the initial investigation letter. We also want to note that as we have been working through a number of Section 117 investigations, we have been refining our approach in various ways with an eye toward moving more quickly, but efficiently, through each investigation. Consequently, it is our hope that you will be able to respond to these requests no later than June 16, 2023. If it would be helpful, we would be happy to schedule a follow-up call to discuss timing, or alternatively, please let us know if a response by June 16 would be possible. We also encourage you to submit information on a rolling basis, as you are able to gather it, in advance of the June 16 deadline.

In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel

U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Margaret Ball
Subject: Re: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC)
Cc: Daniel Correll; Malawer, Hilary; Delbridge, Kristin
Sent: June 22, 2023 1:03 PM (UTC-04:00)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon, Lisa,

I just wanted to follow up on our last conversation. You had nicely offered to send us an email with the items you were requesting at the meeting referenced below. Because of that, Dan and I were free to listen and not try to scribble things down while you spoke so we're struggling trying to recall exactly what you had requested. Apologies if you sent them and somehow they got misdirected but neither of us seem to have received anything. Would you be able to send the notes to us?

Also, at the last meeting we learned the wonderful news that the (b)(6) investigation has been closed. You were going to look into whether we might get something in writing (a really brief one sentence statement is just fine) that we could share with our accreditors who have been following this investigation.

Thanks so much. Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Thu, Apr 13, 2023 at 4:10 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Dan –

Thank you for your response. We will review, and we look forward to speaking again with you and Margie next week.

Best,

Lisa

From: Daniel Correll <dcorrell@fordham.edu>

Sent: Thursday, April 13, 2023 12:00 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Margaret Ball <mball@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

The following is Fordham University's ("Fordham") response to the queries posed in your email below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

Response: Fordham reports that there were no such statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present.

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or

conditional gifts or contracts with the entities mentioned in that request.

Response: Fordham reports that no additional information or documentation was located since its October 9, 2020 response.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

Response: Fordham will make all appropriate filings for the previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, but seeks guidance from the Department as to how to do so appropriately.

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham's internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,

Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Wednesday, April 12, 2023 1:01 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.

Vice President and General Counsel

Fordham University

Cunniffe House, Room 111

441 East Fordham Road

Bronx, NY 10458

Phone: (718) 817-3110

Fax: (718) 817-3115

mball@fordham.edu

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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Tuesday, March 7, 2023 4:46 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.

Vice President and General Counsel

Fordham University

Cunniffe House, Room 111

441 East Fordham Road

Bronx, NY 10458

Phone: (718) 817-3110

Fax: (718) 817-3115

mball@fordham.edu

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

- With respect to Request Nos. 2 and 3 in the Department’s August 10, 2020 investigation letter, and consistent with Fordham’s response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham’s Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham’s end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,

Lisa

Lisa Wells Harris

Attorney

Office of the General Counsel

U.S. Department of Education

400 Maryland Ave., SW

Washington, DC 20202-2110

Phone: 202-401-6042

Email: lisa.harris@ed.gov

Pronouns: she/her/hers

--

Daniel Correll, Esq.

Associate General Counsel

Fordham University

Office of Legal Counsel

Cunniffe House, Room 111

Bronx, New York 10458

Telephone: 718.817.5810

Fax: 718.817.3115

dcorrell@fordham.edu

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From: Malawer, Hilary
Subject: RE: Section 117 Investigation - Fordham University
To: Margaret Ball
Cc: Harris, Lisa (OGC); Delbridge, Kristin
Sent: June 23, 2023 12:42 PM (UTC-04:00)

Good afternoon, Ms. Ball—

On March 3, 2023, you inquired about the Department's August 20, 2020, notice of investigation under 20 U.S.C. 1094 concerning then-student (b)(6) and Fordham's compliance with its stated institutional policies regarding freedom of speech. On April 20, 2023 we relayed to you that the Department no longer considers the matter to be an active investigation and that you should consider it closed. We are providing this status update in response to your April 20, 2023, request for written confirmation.

As a reminder, the Department's regulations require that private institutions of higher education must comply with their stated institutional policies regarding freedom of speech, including academic freedom, as a material grant condition for certain programs authorized under the Higher Education Act. 34 C.F.R. 75.500(c) (Direct Grant Programs); 34 C.F.R. 76.500(c) (State-Administered Grant Programs). If a State or Federal court issues a final, non-default judgment finding that Fordham violated its stated policies, then your institution must submit to the Department a copy of the judgment no later than 45 calendar days after such judgment is entered.

Lisa Harris will follow up with regard to the requested notes. Please do not hesitate to let us know if you have any questions or concerns.

Sincerely,

Hilary Malawer
Deputy General Counsel
Regulations, Legislation, and Ethics
Office of the General Counsel
U.S. Department of Education

From: Margaret Ball <mball@fordham.edu>
Sent: Thursday, June 22, 2023 1:03 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Good Afternoon, Lisa,

I just wanted to follow up on our last conversation. You had nicely offered to send us an email with the items you were requesting at the meeting referenced below. Because of that, Dan and I were free to listen and not try to scribble things down while you spoke so we're struggling trying to recall exactly what you had requested. Apologies if you sent them and somehow they got misdirected but neither of us seem to have received anything. Would you be able to send the notes to us?

Also, at the last meeting we learned the wonderful news that the (b)(6) investigation has been closed. You were going to look into whether we might get something in writing (a really brief one sentence statement is just fine) that we could share with our accreditors who have been following this investigation.

Thanks so much. Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: Margaret Ball
Cc: Daniel Correll; Malawer, Hilary; Delbridge, Kristin
Sent: June 23, 2023 2:26 PM (UTC-04:00)

Good afternoon, Margie – Thank you so much for your email. I know that Hilary responded to you separately today concerning the (b)(6) investigation, and as she noted, I am responding about the follow-up email that we owe you. First, please do not apologize. Rather, please accept my apologies for the delay in getting our requests to you. Kristin and I are meeting on Monday and will be sending you an email shortly thereafter. In the meantime, one of the other matters that we had discussed during our call was offering a Section 117 “mini-training” for you and Dan (and anyone else on Fordham’s staff you believe should join). If you are interested, we would like to provide this as soon as is convenient and by July 21, if possible. If you could let us know of your availability, we would be happy to schedule this. I would suggest a 90-minute block of time to be safe.

Thank you again for reaching out, and you will hear from us again next week with our requests for information. Have a good weekend.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Thursday, June 22, 2023 1:03 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much. Margie Ball

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On Thu, Apr 13, 2023 at 4:10 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Dan –

Thank you for your response. We will review, and we look forward to speaking again with you and Margie next week.

Best,
Lisa

From: Daniel Correll <dcorrell@fordham.edu>

Sent: Thursday, April 13, 2023 12:00 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Margaret Ball <mball@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

The following is Fordham University's ("Fordham") response to the queries posed in your email below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

Response: Fordham reports that there were no such statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present.

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and

consistent with Fordham's response of October 9, 2020:

- Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

Response: Fordham reports that no additional information or documentation was located since its October 9, 2020 response.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

Response: Fordham will make all appropriate filings for the previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, but seeks guidance from the Department as to how to do so appropriately.

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham's internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,
Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Wednesday, April 12, 2023 1:01 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,
Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Tuesday, March 7, 2023 4:46 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6). We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).
- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.
- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).
- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your

availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
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From: Harris, Lisa (OGC)
Subject: RE: Section 117 Investigation - Fordham University
To: 'Margaret Ball'
Cc: 'Daniel Correll'; Malawer, Hilary; Delbridge, Kristin
Sent: June 26, 2023 3:46 PM (UTC-04:00)

Good afternoon, Margie – I hope that you had a good weekend. Kristin and I met today to revisit and summarize the request that we discussed during our last meeting with you and Dan. We request the following:

- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period). We had previously requested a list of statutorily defined (i.e., reportable) gifts and/or contracts with foreign sources. This expanded request for a list that includes all gifts and contracts with foreign sources during the period in question would allow us to review and assess whether Fordham is properly aggregating transactions for purposes of Section 117 reporting.

In addition, we request confirmation as to whether Fordham has filed disclosure reports that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, specifically the reportable transactions for which Fordham provided the Department with information in its October 2020 response to the original Section 117 investigation letter.

Please let us know if you have any questions about these requests. Thank you for your continued cooperation.

Lisa

From: Harris, Lisa (OGC)
Sent: Friday, June 23, 2023 2:26 PM
To: Margaret Ball <mball@fordham.edu>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: RE: Section 117 Investigation - Fordham University

Good afternoon, Margie – Thank you so much for your email. I know that Hilary responded to you separately today concerning the (b)(6) investigation, and as she noted, I am responding about the follow-up email that we owe you. First, please do not apologize. Rather, please accept my apologies for the delay in getting our requests to you. Kristin and I are meeting on Monday and will be sending you an email shortly thereafter. In the meantime, one of the other matters that we had discussed during our call was offering a Section 117 “mini-training” for you and Dan (and anyone else on Fordham’s staff you believe should join). If you are interested, we would like to provide this as soon as is convenient and by July 21, if possible. If you could let us know of your availability, we would be happy to schedule this. I would suggest a 90-minute block of time to be safe.

Thank you again for reaching out, and you will hear from us again next week with our requests for information. Have a good weekend.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Thursday, June 22, 2023 1:03 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
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On Thu, Apr 13, 2023 at 4:10 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Dan –

Thank you for your response. We will review, and we look forward to speaking again with you and Margie next week.

Best,
Lisa

From: Daniel Correll <dcorrell@fordham.edu>

Sent: Thursday, April 13, 2023 12:00 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Margaret Ball <mball@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin

<Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

The following is Fordham University's ("Fordham") response to the queries posed in your email below:

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to how to do so appropriately.

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham's internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,
Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Wednesday, April 12, 2023 1:01 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on

that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,
Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Tuesday, March 7, 2023 4:46 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation

regarding Fordham student (b)(6) We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) attorney. (b)(6) also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting

period).

- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

--
Daniel Correll, Esq.
Associate General Counsel
Fordham University
Office of Legal Counsel

Cunniffe House, Room 111
Bronx, New York 10458
Telephone: 718.817.5810
Fax: 718.817.3115
dcorrell@fordham.edu

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From: Margaret Ball
Subject: Re: Section 117 Investigation - Fordham University
To: Malawer, Hilary
Cc: Harris, Lisa (OGC); Delbridge, Kristin
Sent: June 27, 2023 1:49 PM (UTC-04:00)

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Thanks very much. I appreciate the written confirmation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Fri, Jun 23, 2023 at 11:41 AM Malawer, Hilary <Hilary.Malawer@ed.gov> wrote:

Good afternoon, Ms. Ball—

On March 3, 2023, you inquired about the Department's August 20, 2020, notice of investigation under 20 U.S.C. 1094 concerning then-student (b)(6) and Fordham's compliance with its stated institutional policies regarding freedom of speech. On April 20, 2023 we relayed to you that the Department no longer considers the matter to be an active investigation and that you should consider it closed. We are providing this status update in response to your April 20, 2023, request for written confirmation.

As a reminder, the Department's regulations require that private institutions of higher education must comply with their stated institutional policies regarding freedom of speech, including academic freedom, as a material grant condition for certain programs authorized under the Higher Education Act. 34 C.F.R. 75.500(c) (Direct Grant Programs); 34 C.F.R. 76.500(c) (State-Administered Grant Programs). If a State

or Federal court issues a final, non-default judgment finding that Fordham violated its stated policies, then your institution must submit to the Department a copy of the judgment no later than 45 calendar days after such judgment is entered.

Lisa Harris will follow up with regard to the requested notes. Please do not hesitate to let us know if you have any questions or concerns.

Sincerely,

Hilary Malawer

Deputy General Counsel

Regulations, Legislation, and Ethics

Office of the General Counsel

U.S. Department of Education

From: Margaret Ball <mball@fordham.edu>

Sent: Thursday, June 22, 2023 1:03 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Good Afternoon, Lisa,

I just wanted to follow up on our last conversation. You had nicely offered to send us an email with the items you were requesting at the meeting referenced below. Because of that, Dan and I were free to listen and not try to scribble things down while you spoke so we're struggling trying to recall exactly what you had requested.

Apologies if you sent them and somehow they got misdirected but neither of us seem to have received anything. Would you be able to send the notes to us?

Also, at the last meeting we learned the wonderful news that the (b)(6) investigation has been closed. You

were going to look into whether we might get something in writing (a really brief one sentence statement is just fine) that we could share with our accreditors who have been following this investigation.

Thanks so much. Margie Ball

Margaret T. Ball, Esq.

Vice President and General Counsel

Fordham University

Cunniffe House, Room 111

441 East Fordham Road

Bronx, NY 10458

Phone: (718) 817-3110

Fax: (718) 817-3115

mball@fordham.edu

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From: Torres, Joanna
Subject: Section 117 Investigation - Georgia State University
To: Kerry Heyward
Cc: nealbateman@gsu.edu; Joi Mindingall; Harris, Lisa (OGC); Malawer, Hilary; Sweeney, Alexandra
Sent: July 6, 2023 11:59 AM (UTC-04:00)

Good Morning,

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's preliminary inquiry into Georgia State University's compliance with Section 117 of the Higher Education Act. We appreciated the opportunity to meet with Neal and Joi on February 2 to discuss the status of the GSU Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of GSU's compliance with Section 117 and finalizing and closing the investigation. We apologize for the delay in reaching out to you following our February call.

As discussed during the February 2 call, we have prioritized some requests for submission of additional information that we believe is necessary to assess GSU's compliance. As promised, a written summary of those requests is below:

- A copy of the most recent version of GSU's Section 117 compliance policy or procedures, or if such a document has not been developed, a description of the process that GSU follows in addressing Section 117 requirements. This should include matters such as how GSU gathers information across the institutions about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.
- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). During our call, GSU indicated that GSU compiles spreadsheets for each reporting period, through which each office reports gifts from or contracts with foreign sources to the Office of Legal Affairs, and that GSU would provide the Department with such spreadsheets.

The Department has adopted a plan for a faster pace in reviewing and bringing its Section 117 investigations to closure. To ensure that the investigation moves forward at an expeditious pace, we are requesting the information above by July 27. However, we appreciate that before our call, some time had passed since the Department was last in contact with you and that additional time has passed since our February 2 call, and so it may take some time for you to review the status of the investigation on GSU's end. If you believe you will be unable to submit information to us by July 27, please let us know and provide a date that you believe is feasible.

If you have any questions, please feel free to contact Lisa or me (or Hilary). Thank you for your cooperation, and we look forward to connecting with you again soon.

Best Regards,
Joanna

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers

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From: Lozupone, Kristina
Subject: RE: (CUI) Section 117 - Auburn University
To: Jaime Hammer
Cc: Malawer, Hilary; Steven Taylor; JAIME HAMMER; Harris, Lisa (OGC)
Sent: July 6, 2023 12:27 PM (UTC-04:00)

Good afternoon, Jaime,

Thank you for your patience. We are still working on seeing if we can provide you access to the folder containing Auburn's 2021 submission. In the meantime, we've reviewed our availability to meet to discuss any questions you may. We are available July 18th through July 21st and July 24th through July 28th. Please let us know if any of these dates work and if there is a particular time of day that works best for you and your team. However, if you'd like to hold off on meeting until your team has had an opportunity to review Auburn's 2021 submission (assuming we're able to provide you access to the folder) then we completely understand and can table the discussion. Please let us know either way.

Thank you,

Kristina Lozupone

General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
400 Maryland Avenue, SW
Washington, DC 20202-2110
Cell: (b)(6)
E-mail: Kristina.Loizupone@ed.gov

From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Tuesday, June 13, 2023 7:47 PM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Lozupone, Kristina <Kristina.Loizupone@ed.gov>; Steven Taylor <taylost@auburn.edu>; JAIME HAMMER <jhammer@auburn.edu>
Subject: RE: (CUI) Section 117 - Auburn University

Good evening, Jaime – I hope you are well. First, my apologies for taking a while to respond to your email of last week. I was out Thursday and Friday and am playing a bit of catch up.

We greatly appreciate your commitment to providing updates and to working with us to address Auburn's Section 117 compliance. I'm happy to look into how you might access the folder housing Auburn's 2021 submission and will get back to you as soon as I can. In addition, I will check on our availability in late June/early July and will provide you with some possible dates for a virtual meeting.

Thank you, and have a good evening.

Lisa

From: Jaime Hammer <jsh0073@auburn.edu>
Sent: Tuesday, June 13, 2023 6:04 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>; Lozupone, Kristina <Kristina.Loizupone@ed.gov>; Steven Taylor <taylost@auburn.edu>; JAIME HAMMER <jhammer@auburn.edu>
Subject: Re: (CUI) Section 117 - Auburn University

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Good afternoon, Lisa. As our team is working to address the items raised in your letter, we believe it would be most helpful for us to access the original submission that was provided to the Department in 2021. The attorney who was responsible for that file, Grant Garber, is no longer with Auburn. Mr. Garber appears to have been the only University representative with password access to the Box folder where Auburn's materials were uploaded.

Because Mr. Garber is no longer here, our team is uncomfortable accessing the folder with his credentials. Can you provide a new access link so that we are able to view the entirety of the Box folder housing Auburn's 2021 submission?

Thank you for your assistance,
Jaime Hammer

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

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From: Jaime Hammer <jsh0073@auburn.edu>

Date: Wednesday, June 7, 2023 at 5:09 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Loizupone@ed.gov>, Steven Taylor <taylost@auburn.edu>, JAIME HAMMER <jhammer@auburn.edu>

Subject: Re: (CUI) Section 117 - Auburn University

Good afternoon, Lisa. I wanted to write with an update on Auburn's efforts to respond to the additional requested documents and information in this inquiry. First, thank you again for your patience. As I mentioned to you in my previous email, it has taken some time to get the right people in the room to review and discuss the Department's follow up requests. In addition, by copy of this message I would like to introduce to you Dr. Steve Taylor. Dr. Taylor recently was appointed Senior Vice President for Research and Economic Development, effective June 1.

The various subject matter experts met to review and discuss the Department's requests for additional materials and clarifications, and how we could best respond. We want to make sure that Auburn addresses outstanding questions related to materials already submitted to the

Department, and then uses that information to ensure the additional materials provided will meet the requirements of Section 117. With that in mind, our team would like to schedule a Zoom meeting with you to walk through the questions raised in your letter regarding materials submitted in the original (2021) submission, as well as the regular submissions since that time. Once we have clarity on where our submissions “missed the mark” or were unclear, we will be in a better position to ensure that the additional materials you have requested will comply with the applicable regulations.

If you all are agreeable to this approach, we would like to propose a Zoom meeting sometime in late June or early July. While I know this extends the timeline beyond your requested June 16 deadline, Auburn would be grateful for your courtesy in extending the process so that we can thoroughly review our previous submissions, be fully prepared to respond to the questions raised in your letter, and be in the best position to ensure that the additional documents you have requested (and our reporting going forward) will meet expectations under Section 117.

I look forward to hearing from you regarding availability in late June/early July. My colleagues and I look forward to this conversation and collaboration.

Sincerely,
Jaime Hammer

Jaime S. Hammer

Auburn University General Counsel
334.844.5176
jhammer@auburn.edu

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Date: Thursday, May 18, 2023 at 7:42 AM
To: Jaime Hammer <jsh0073@auburn.edu>
Cc: Malawer, Hilary <Hilary.Malawer@ed.gov>, Lozupone, Kristina <Kristina.Lozupone@ed.gov>
Subject: [WARNING: MESSAGE ENCRYPTED][EXT] [WARNING: AMP - ATTACHMENT UNSCANNED][WARNING: MESSAGE ENCRYPTED](CUI) Section 117 - Auburn University

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Hello Jaime –

We hope all is well. Thank you for speaking with us on Friday, March 31. We appreciated the opportunity to meet you and to discuss the status of the Auburn Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Auburn's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our January 15, 2021, notice of investigation, and subsequent responses from Auburn, that we believe are necessary to assess Auburn's compliance. We promised to provide a written summary of those requests, with some clarifications and examples based on our discussion. These are in the attached encrypted zip file; the password to decrypt the zip file will follow under separate cover.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Auburn's end, including the previous submissions in response to the initial investigation letter. We also want to note that as we have been working through a number of Section 117 investigations, we have been refining our approach in various ways with an eye toward moving more quickly, but efficiently, through each investigation. Consequently, it is our hope that you will be able to respond to these requests no later than June 16, 2023. If it would be helpful, we would be happy to schedule a follow-up call to discuss timing, or alternatively, please let us know if a response by June 16 would be possible. We also encourage you to submit information on a rolling basis, as you are able to gather it, in advance of the June 16 deadline.

In the meantime, if you have any questions, please feel free to contact Kristina or me. Thank you for your cooperation, and we look forward to hearing from you again soon.

Best,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

Sensitive in accordance with 32 CFR 2002
Controlled by Department of Education, Office of the General Counsel, Lisa Harris

From: Kerry Heyward
Subject: RE: Section 117 Investigation - Georgia State University
To: Torres, Joanna
Cc: Edwin Neal Bateman, III; Joi Mindingall; Harris, Lisa (OGC); Malawer, Hilary; Sweeney, Alexandra
Sent: July 6, 2023 3:55 PM (UTC-04:00)

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Dear Joanna,

I appreciate you following up from the meeting on February 2. We are happy to provide the requested information but would ask for a brief extension of time to respond due to summer travel schedules. If you're agreeable, I would propose a response date of August 10.

We will work on gathering the responsive documents and will be back in touch if we have any questions before then.

Best,
Kerry

Kerry L. Heyward
University Attorney

Georgia State University
Office of Legal Affairs
PO Box 3987
Atlanta, Georgia 30302

404-413-0500

From: Torres, Joanna <Joanna.Torres@ed.gov>
Sent: Thursday, July 6, 2023 11:59 AM
To: Kerry Heyward <kheyward@gsu.edu>
Cc: Edwin Neal Bateman, III <nealbateman@gsu.edu>; Joi Mindingall <jmindingall1@gsu.edu>; Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Sweeney, Alexandra <Alexandra.Sweeney@ed.gov>
Subject: Section 117 Investigation - Georgia State University

You don't often get email from joanna.torres@ed.gov. [Learn why this is important](#)

Good Morning,

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's preliminary inquiry into Georgia State University's compliance with Section 117 of the Higher Education Act. We appreciated the opportunity to meet with Neal and Joi on February 2 to discuss the status of the GSU Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of GSU's compliance with Section 117 and finalizing and closing the investigation. We apologize for the delay in reaching out to you following our February call.

As discussed during the February 2 call, we have prioritized some requests for submission of additional information that we believe is necessary to assess GSU's compliance. As promised, a written summary of those requests is below:

- A copy of the most recent version of GSU's Section 117 compliance policy or procedures, or if such a document

has not been developed, a description of the process that GSU follows in addressing Section 117 requirements. This should include matters such as how GSU gathers information across the institutions about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.

- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). During our call, GSU indicated that GSU compiles spreadsheets for each reporting period, through which each office reports gifts from or contracts with foreign sources to the Office of Legal Affairs, and that GSU would provide the Department with such spreadsheets.

The Department has adopted a plan for a faster pace in reviewing and bringing its Section 117 investigations to closure. To ensure that the investigation moves forward at an expeditious pace, we are requesting the information above by July 27. However, we appreciate that before our call, some time had passed since the Department was last in contact with you and that additional time has passed since our February 2 call, and so it may take some time for you to review the status of the investigation on GSU's end. If you believe you will be unable to submit information to us by July 27, please let us know and provide a date that you believe is feasible.

If you have any questions, please feel free to contact Lisa or me (or Hilary). Thank you for your cooperation, and we look forward to connecting with you again soon.

Best Regards,
Joanna

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers

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From: Torres, Joanna
Subject: RE: Section 117 Investigation - Georgia State University
To: Kerry Heyward
Cc: Edwin Neal Bateman, III; Joi Mindingall; Harris, Lisa (OGC); Malawer, Hilary; Sweeney, Alexandra
Sent: July 7, 2023 8:16 AM (UTC-04:00)

Good Morning,

Thank you for your email and for proposing a date by which you believe it is feasible for GSU to respond to our requests. Your proposed date is acceptable and we look forward to receiving GSU's response no later than August 10. If possible, we ask that you submit information to us on a rolling basis (e.g., if you gather GSU's Section 117 compliance policies and procedures before gathering spreadsheets, you might submit those policies and procedures to us before or while gathering spreadsheets).

If you have any questions or concerns, please do not hesitate to let us know. Thank you for your cooperation with this investigation.

Best Regards,
Joanna

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers

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From: Kerry Heyward <kheyward@gsu.edu>
Sent: Thursday, July 6, 2023 3:55 PM
To: Torres, Joanna <Joanna.Torres@ed.gov>
Cc: Edwin Neal Bateman, III <nealbateman@gsu.edu>; Joi Mindingall <jmindingall1@gsu.edu>; Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Sweeney, Alexandra <Alexandra.Sweeney@ed.gov>
Subject: RE: Section 117 Investigation - Georgia State University

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Dear Joanna,

I appreciate you following up from the meeting on February 2. We are happy to provide the requested information but would ask for a brief extension of time to respond due to summer travel schedules. If you're agreeable, I would propose a response date of August 10.

We will work on gathering the responsive documents and will be back in touch if we have any questions before then.

Best,
Kerry

Kerry L. Heyward
University Attorney

Georgia State University

Office of Legal Affairs
PO Box 3987
Atlanta, Georgia 30302

404-413-0500

From: Torres, Joanna <Joanna.Torres@ed.gov>
Sent: Thursday, July 6, 2023 11:59 AM
To: Kerry Heyward <kheyward@gsu.edu>
Cc: Edwin Neal Bateman, III <nealbateman@gsu.edu>; Joi Mindingall <jmindingall1@gsu.edu>; Harris, Lisa (OGC) <Lisa.Harris@ed.gov>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Sweeney, Alexandra <Alexandra.Sweeney@ed.gov>
Subject: Section 117 Investigation - Georgia State University

You don't often get email from joanna.torres@ed.gov. [Learn why this is important](#)

Good Morning,

I am an attorney in the Department of Education's Office of the General Counsel and am writing concerning the Department's preliminary inquiry into Georgia State University's compliance with Section 117 of the Higher Education Act. We appreciated the opportunity to meet with Neal and Joi on February 2 to discuss the status of the GSU Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of GSU's compliance with Section 117 and finalizing and closing the investigation. We apologize for the delay in reaching out to you following our February call.

As discussed during the February 2 call, we have prioritized some requests for submission of additional information that we believe is necessary to assess GSU's compliance. As promised, a written summary of those requests is below:

- A copy of the most recent version of GSU's Section 117 compliance policy or procedures, or if such a document has not been developed, a description of the process that GSU follows in addressing Section 117 requirements. This should include matters such as how GSU gathers information across the institutions about gifts and contracts with foreign sources, how it determines which transactions might be reportable, how it calculates the value of contracts, and how it ensures that it is aggregating multiple transactions involving one foreign source in a reporting period and calendar year.
- A list of all gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources for the periods from January 1, 2020 through the present (i.e., through the December 2022 reporting deadline). During our call, GSU indicated that GSU compiles spreadsheets for each reporting period, through which each office reports gifts from or contracts with foreign sources to the Office of Legal Affairs, and that GSU would provide the Department with such spreadsheets.

The Department has adopted a plan for a faster pace in reviewing and bringing its Section 117 investigations to closure. To ensure that the investigation moves forward at an expeditious pace, we are requesting the information above by July 27. However, we appreciate that before our call, some time had passed since the Department was last in contact with you and that additional time has passed since our February 2 call, and so it may take some time for you to review the status of the investigation on GSU's end. If you believe you will be unable to submit information to us by July 27, please let us know and provide a date that you believe is feasible.

If you have any questions, please feel free to contact Lisa or me (or Hilary). Thank you for your cooperation, and we look forward to connecting with you again soon.

Best Regards,
Joanna

Joanna L. Torres
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
joanna.torres@ed.gov | (202) 453-7313
Pronouns: she/her/hers

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From: Delbridge, Kristin
Subject: RE: Section 117 Investigation - Fordham University
To: Harris, Lisa (OGC); 'Margaret Ball'
Cc: 'Daniel Correll'; Malawer, Hilary; Sweeney, Alexandra
Sent: July 7, 2023 10:47 AM (UTC-04:00)

Good morning, Margie and Daniel,

I hope you both enjoyed your Fourth. I am following up on Lisa's email below regarding your availability for a mini training on Section 117 by July 21. As the next reporting deadline is July 31, we believe it would be most helpful to host the session beforehand. Please respond with 60-minute timeframes that work best for you both.

Additionally, the Department is requesting that the list of all gifts and contracts as outlined by Lisa below be produced by July 21. Receiving the list before the next reporting deadline could help tremendously in moving the Department's investigation along.

Please let us know if you have any additional questions.

Thank you for your cooperation,

Kristin Delbridge
General Attorney
U.S. Department of Education
Office of the General Counsel
Business and Administrative Law Division
E-mail: Kristin.Delbridge@ed.gov

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From: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Sent: Monday, June 26, 2023 3:46 PM
To: 'Margaret Ball' <mball@fordham.edu>
Cc: 'Daniel Correll' <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: RE: Section 117 Investigation - Fordham University

Good afternoon, Margie – I hope that you had a good weekend. Kristin and I met today to revisit and summarize the request that we discussed during our last meeting with you and Dan. We request the following:

- o A list of **all** gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period). We had previously requested a list of statutorily defined (i.e., reportable) gifts and/or contracts with foreign sources. This expanded request for a list that includes **all** gifts and contracts with foreign sources during the period in question would allow us to review and assess whether Fordham is properly aggregating transactions for purposes of Section 117 reporting.

In addition, we request confirmation as to whether Fordham has filed disclosure reports that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, specifically the reportable transactions for which Fordham provided the Department with information in its October 2020 response to the original Section 117 investigation letter.

Please let us know if you have any questions about these requests. Thank you for your continued cooperation.

Lisa

From: Harris, Lisa (OGC)
Sent: Friday, June 23, 2023 2:26 PM
To: Margaret Ball <mball@fordham.edu>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: RE: Section 117 Investigation - Fordham University

Good afternoon, Margie – Thank you so much for your email. I know that Hilary responded to you separately today concerning the (b)(6) investigation, and as she noted, I am responding about the follow-up email that we owe you. First, please do not apologize. Rather, please accept my apologies for the delay in getting our requests to you. Kristin and I are meeting on Monday and will be sending you an email shortly thereafter. In the meantime, one of the other matters that we had discussed during our call was offering a Section 117 “mini-training” for you and Dan (and anyone else on Fordham’s staff you believe should join). If you are interested, we would like to provide this as soon as is convenient and by July 21, if possible. If you could let us know of your availability, we would be happy to schedule this. I would suggest a 90-minute block of time to be safe.

Thank you again for reaching out, and you will hear from us again next week with our requests for information. Have a good weekend.

Lisa

From: Margaret Ball <mball@fordham.edu>
Sent: Thursday, June 22, 2023 1:03 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Good Afternoon, Lisa,

I just wanted to follow up on our last conversation. You had nicely offered to send us an email with the items you were requesting at the meeting referenced below. Because of that, Dan and I were free to listen and not try to scribble things down while you spoke so we're struggling trying to recall exactly what you had requested. Apologies if you sent them and somehow they got misdirected but neither of us seem to have received anything. Would you be able to send the notes to us?

Also, at the last meeting we learned the wonderful news that the (b)(6) investigation has been closed. You were going to look into whether we might get something in writing (a really brief one sentence statement is just fine) that we could share with our accreditors who have been following this investigation.

Thanks so much. Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel

Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Thu, Apr 13, 2023 at 4:10 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Dan –

Thank you for your response. We will review, and we look forward to speaking again with you and Margie next week.

Best,
Lisa

From: Daniel Correll <dcorrell@fordham.edu>
Sent: Thursday, April 13, 2023 12:00 PM
To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>
Cc: Margaret Ball <mball@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>
Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

The following is Fordham University's ("Fordham") response to the queries posed in your email below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).

Response: Fordham reports that there were no such statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present.

- With respect to Request Nos. 2 and 3 in the Department’s August 10, 2020 investigation letter, and consistent with Fordham’s response of October 9, 2020:

- Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.

Response: Fordham reports that no additional information or documentation was located since its October 9, 2020 response.

- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

Response: Fordham will make all appropriate filings for the previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, but seeks guidance from the Department as to how to do so appropriately.

- Written documentation of Fordham’s Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

Response: Fordham’s internal policy for Section 117 reporting is attached.

We look forward to providing any additional information during our call next week.

Best,
Dan

On Wed, Apr 12, 2023 at 4:36 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Hi Margie – Thank you for your email. We look forward to receiving the written responses from Dan later this week. Meanwhile, I can schedule all of us for a meeting next Thursday, April 20 at 9:30 am. I will follow up with a meeting invitation.

We have looked into the status of the investigation involving Fordham's former student and will provide information very soon.

We look forward to speaking with you and Dan next week. Thank you.

Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Wednesday, April 12, 2023 1:01 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Dear Lisa,

Dan and I wanted to schedule a follow up meeting with all of you. Later this week, Dan will send you some written responses that we would be happy to discuss.

We are available at the following times next week:

Monday, April 17 after 1:30

Thursday, April 20 all day

Friday, April 21 9am to 11 am

I thought I would start with some big time blocks. If none of those work, we can look at other times next week and move some meetings around.

Also, have you been able to find out who we should be in touch with about the investigation regarding our former student (b)(6) Thanks so much for any guidance you might be able to provide us on that situation.

We'll look forward to hearing from you.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road
Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Tue, Mar 7, 2023 at 4:58 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Thank you so much for your reply, Margie. My apologies – I should have mentioned the other investigation in my email. It's on our to-do list to look into it and to share information with you as soon as we have it. Having the summary below is helpful; thank you for sending it.

We look forward to being in touch soon.

Best,
Lisa

From: Margaret Ball <mball@fordham.edu>

Sent: Tuesday, March 7, 2023 4:46 PM

To: Harris, Lisa (OGC) <Lisa.Harris@ed.gov>

Cc: Daniel Correll <dcorrell@fordham.edu>; Malawer, Hilary <Hilary.Malawer@ed.gov>; Delbridge, Kristin <Kristin.Delbridge@ed.gov>

Subject: Re: Section 117 Investigation - Fordham University

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Thanks so much, Lisa, for providing us the information from our call. We hope to get back to you with the responses in short order and will provide some possible times for a followup call.

Also, I just wanted to remind you of the other investigation we mentioned in the call that you had promised to check on. On August 20, 2020 we received notice of a 20 U.S.C. Section 1094 investigation regarding Fordham student (b)(6) [redacted]. We believe information regarding both this investigation and the Section 117 investigation was provided to you by (b)(6) [redacted] attorney. (b)(6) [redacted] also filed an action against Fordham in New York Supreme Court on July 23, 2020. Fordham's motion to dismiss was granted on October 7, 2020, and the deadline for (b)(6) [redacted] to perfect his appeal has long passed. Despite requests, we have not heard from the Department regarding this investigation since October 2020.

Again, thanks very much for your time, and we will get back to you shortly regarding the Section 117 investigation.

Margie Ball

Margaret T. Ball, Esq.
Vice President and General Counsel
Fordham University
Cunniffe House, Room 111
441 East Fordham Road

Bronx, NY 10458
Phone: (718) 817-3110
Fax: (718) 817-3115
mball@fordham.edu

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On Mon, Mar 6, 2023 at 4:29 PM Harris, Lisa (OGC) <Lisa.Harris@ed.gov> wrote:

Good afternoon, Margie and Dan –

Thank you for speaking with us on Friday, March 3. We appreciated the opportunity to meet with you to discuss the status of the Fordham Section 117 investigation, including how the Department is approaching this work to move toward the mutual goals of Fordham's compliance with Section 117 and finalizing and closing the investigation. We look forward to working collaboratively with you to help achieve these two goals. To that end, as we also discussed, we have prioritized some requests for submission of additional information, based on our August 10, 2020 notice of investigation, and Fordham's October 9, 2020 response, that we believe are necessary to assess Fordham's compliance. As promised, we provide a written summary of those requests below:

- With respect to Request No. 1 in the Department's August 10, 2020 investigation letter:
 - A list of statutorily defined foreign gifts, contracts, and/or restricted or conditional gifts or contracts from or with statutorily defined foreign sources from 2020 through the present (i.e., through the December 2022 reporting period).
- With respect to Request Nos. 2 and 3 in the Department's August 10, 2020 investigation letter, and consistent with Fordham's response of October 9, 2020:
 - Any additional information or missing documentation that Fordham did not previously produce but was subsequently able to locate as a result of the review Fordham was continuing, per its October 9, 2020 response; and
 - Specifically concerning Request No. 3, this request is limited to any information or documentation regarding **statutorily defined** gifts or contracts, and/or restricted or conditional gifts or contracts with the entities mentioned in that request.
- Filing of new, updated, or amended disclosure reports, as appropriate, that disclose all previously unreported gift and contract transactions meeting the Section 117 threshold, including the reportable transactions for which Fordham provided the Department with information or documentation in its October 2020 response, as well as other reportable transactions that Fordham may have since identified (through the December 2022 reporting period).

- Written documentation of Fordham's Section 117 internal policies or procedures, including how Fordham obtains information about potentially reportable transactions across the entire institution and how it addresses aggregation of gifts or contracts by foreign source.

We appreciate that before our call, some time had passed since the Department was last in contact with you and that it will take some time for you to review the status of the investigation on Fordham's end, including the previous submissions in response to the initial investigation letter. After you have had time to undertake that review, we would like to have a follow-up call to discuss the above requests. Please let us know of your availability within the next two weeks, and we will be happy to send a meeting invitation. In the meantime, if you have any questions, please feel free to contact Kristin or me. Thank you for your cooperation, and we look forward to speaking with you again soon.

Regards,
Lisa

Lisa Wells Harris
Attorney
Office of the General Counsel
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-2110
Phone: 202-401-6042
Email: lisa.harris@ed.gov
Pronouns: she/her/hers

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Daniel Correll, Esq.
Associate General Counsel
Fordham University
Office of Legal Counsel
Cunniffe House, Room 111
Bronx, New York 10458
Telephone: 718.817.5810
Fax: 718.817.3115
dcorrell@fordham.edu

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