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August 21, 2017

The Honorable Betsy DeVos
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Docket ID: ED-2017-OS-0074

Dear Secretary DeVos:

Thank you for the opportunity to provide input to the U.S. Department of Education's Regulatory Task Force to review, modify or repeal unnecessary regulations and policy guidance. We appreciate your interest in addressing the extensive and, at times, overly complex regulatory scheme that institutions of higher education must navigate, while also ensuring that students and taxpayers are well-served and protected.

As you know, the United Negro College Fund (UNCF) is America's largest and most successful minority higher education assistance organization, representing 37 private historically black colleges and universities (HBCUs) and investing in better futures for African American students through higher education. HBCUs disproportionately enroll students from low-income families who have substantial financial need but limited access to resources. Despite these higher levels of financial need, a 2016 UNCF study, [*Fewer Resources, More Debt*](#), found that students attending four-year HBCUs carry a heavier student debt burden – one that is twice as great, on average, as students attending other four-year colleges and universities.

UNCF appreciates and supports the Trump Administration's interest, as well as longstanding interest in the U.S. Congress, in addressing the increasing volume and complexity of federal postsecondary education regulations. In 2015, the Task Force on Federal Regulation of Higher Education, commissioned by a bipartisan group of Senators, released a report, [*Recalibrating Regulation of Colleges and Universities*](#), which provided a comprehensive analysis of the scope and breadth of higher education regulations and the compliance challenges that colleges and universities face. UNCF supports the Task Force's recommendations and commends them to the Department as an actionable roadmap toward higher education regulatory reform.

Among those rules identified in the Task Force's report, I would like to draw your attention to a specific regulation that poses disproportionate challenges to both HBCUs and the low-income students they serve – the Department's requirements for the verification of student eligibility for financial aid process, referred to commonly as the 'income verification process.' While the intent of the income verification process is to ensure the accuracy of information on the Free Application for Federal Student Aid (FAFSA), in practice, it often results in an extremely burdensome and unnecessary additional barrier to college entry for low-income students, who essentially must repeatedly prove that they lack resources to attend college and require federal financial assistance.

A 2016 report entitled [*On the Sidelines of Simplification, Stories of Navigating the FAFSA Verification Process*](#), synthesized feedback from various focus groups and a survey of over 600 college financial aid professionals, underscoring the many challenges that financial aid administrators experience with the verification process and its impact on the low-income students they serve. Of the aid administrators surveyed in the report, 80 percent agreed that the verification process was difficult for students and families to navigate, and over 70 percent confirmed that the process places unnecessary burdens on low-income students. Even more troubling, more than half of all aid administrators surveyed reported that the verification process can prevent students from receiving the timely aid that they need and can result in students being unable to enroll on time for classes.

Due to the significantly higher proportion of Pell students enrolled in HBCUs, and the fact that these students tend to be flagged for additional verification at higher rates, the income verification process poses a disproportionately heavier burden on our institutions. HBCU financial aid offices, which already typically operate with limited staff and resources, are required to spend time and energy securing and verifying additional documentation from low-income students and families, time and energy that could be better spent directly assisting and counseling students. Yet, there is evidence that few Pell-eligible students see a change in their aid eligibility due to the income verification process.

While recent efforts have significantly simplified the FAFSA process for many families, we fear that the income verification process will continue to hinder much of this progress, particularly for students and families with the greatest financial need. For example, the introduction and expanded use of the IRS Data Retrieval Tool (DRT) allowed millions of federal aid applicants to easily import income data into the online FAFSA. However, in the 2014-2015 school year, the Department still required colleges to collect further data or verify information for more than 5.3 million students (more than 25 percent of all FAFSA applicants), many of whom were low-income and Pell-eligible. As the Department works to continue to improve and streamline the FAFSA process and strengthen the IRS DRT, we encourage the Department also to consider how the income verification process can be included in these efforts.

Considering the impact that the income verification process has on low-income students and their ability to access and pay for a college education, as well as on the ability of institutions, particularly HBCUs, to serve this population well, we strongly encourage the Department to streamline and improve the income verification process as part of its regulatory review.

I thank you for your consideration of UNCF's views and would be pleased to provide any additional information that might be helpful to you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael L. Lomax". The signature is fluid and cursive, with the first name "Michael" and last name "Lomax" clearly legible.

Michael L. Lomax, Ph.D.
President & CEO
UNCF