COMMITTEE ON
EDUCATION AND THE WORKFORCE

U.S. HOUSE OF REPRESENTATIVES
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June 20, 2023

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Docket ID ED-2023-OPE-0089

Dear Secretary Cardona,

I write to share my views on the Department of Education's (Department's) Notice of Proposed Rulemaking (NPRM) on gainful employment, financial transparency, financial responsibility, and certification procedures.[1] The Department's proposed rule makes great strides to protect students and taxpayers from low-quality programs and will improve the Department's ability to oversee accountability of institutions of higher education.

Gainful Employment

I am encouraged by the Department's proposal to reinstate and strengthen the Gainful Employment (GE) rule. The *Higher Education Act of 1965 (HEA)* requires career education programs (non-degree) at all institutions as well as all programs at for-profit institutions (degree and non-degree), to "prepare students for a gainful employment in a recognized occupation."[2] Despite the GE requirement being in statute since 1965, the lack of an enforceable compliance standard rendered this longstanding consumer protection unenforceable. Due to concerns with the rapid enrollment growth in the for-profit sector amidst reduced federal oversight following amendments made in the HEA via the 2008 reauthorization, the Obama Administration set out to devise a compliance standard for GE that would hold programs subject to the requirement accountable for providing a credential of value in the labor market.

[1] Financial Value Transparency and Gainful Employment (GE), Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit (ATB), 88 Fed. Reg. 32300 (May 19, 2023) (*hereinafter* "2023 NPRM").

[2] Higher Education Act of 1965, 20 U.S.C. 1001 et seq., §§ 101(b), 102(b)(1)(A)(i), (c)(1)(A).

In 2011, the first GE rule was finalized and established metrics for loan repayment and debt-to-earnings schools had to pass to receive HEA title IV (Title IV) funds. In 2012, a judge ruled that the loan repayment rate threshold chosen by ED was not backed by a strong evidentiary standard.[3] Since the repayment rate and debt-to-earnings ratios were seen by the judge as intertwined, the full rule was struck down.[4] The GE rule was renegotiated and finalized in 2014.[5] Instead of the loan repayment metric, the 2014 rule only included student debt-to-earnings ratio benchmarks.[6] The 2014 GE rule withstood multiple court challenges by for-profit associations.[7] The rule went into effect in July 2015 and prompted many colleges to close their worst-performing programs.[8] Unfortunately, the Trump Administration halted the implementation of this rule and officially rescinded it in 2019.[9] This was a significant step backwards in holding institutions accountable and protecting students and taxpayers from low-quality programs. Thus, I am pleased the Biden Administration has taken great efforts to restore and strengthen the GE rule.

Given the importance of a strong gainful employment rule, I would like to emphasize the need to maintain or improve certain aspects of the proposed rule to ensure students are best protected and institutions are appropriately supported.

The Department should keep the current dual accountability metrics of a debt-to-earnings ratio and an earnings premium test.

The Department's proposal incorporates two separate accountability metrics to determine whether a postsecondary program prepares students for gainful employment: a debt-to-earnings ratio and an earnings premium test.[10] The debt-to-earnings ratio compares the median earnings of program completers who received federal aid to the median annual payments on student loan debt borrowed for that program, to ensure students who complete a program are not saddled with debt they can't afford to repay.[11] The earnings premium test measures whether program completers who received federal aid are earning at least as much as the typical high school graduate in a State's labor force, to ensure that the credential earned conferred real value in the

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[3] Program Integrity: Gainful Employment-Debt Measures, 76 Fed. Reg. 34385 (June 13, 2011) (*hereinafter* "2011 Final Rule").
[4] Assoc. of Priv. Colleges and Universities v. Duncan, 870 F. Supp. 2nd 133 (D.D.C. 2012).
[5] Program Integrity: Gainful Employment, 79 Fed. Reg. 64889 (October 31, 2014) (*hereinafter* "2014 Final Rule").
[6] *Id.* at 64891.
[7] *Ass'n of Priv. Sector Colleges & Universities* v. *Duncan,* 110 F. Supp. 3d 176 (D.D.C. 2015), *aff'd,* 640 F. App'x 5 (D.C. Cir. 2016); *Am. Ass'n of Cosmetology Sch.* v. *DeVos,* 258 F. Supp. 3d 50 (D.D.C. 2017) ; https://www.reuters.com/article/us-usa-education-lawsuit/judge-upholds-u-s-gainful-employment-rules-for-for-profit-colleges-idUSKBN0OC2J520150527;
[8] Kevin Carey, *DeVos Is Discarding College Policies That New Evidence Shows Are Effective*, N.Y. Times A17, July 1, 2017, https://www.nytimes.com/2017/06/30/upshot/new-evidence-shows-devos-is-discarding-college-policies-that-are-effective.html.
[9] Madison Weiss, The Tortured Path of the Gainful Employment Rule, Center for American Progress (May 17, 2023), https://www.americanprogress.org/article/the-tortured-path-of-the-gainful-employment-rule/
[10] U.S. Dept. of Educ., Fact Sheet: Holding Colleges Accountable for Delivering Financial Value for Students, 2 (May 17, 2023), https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/gainful-employment-and-transparency-fact-sheet.pdf.
[11] *Id.*

workforce.[12] Together, these metrics help ensure students are enrolling in high-quality programs that set them up for economic success.

In the 2011 and 2014 GE rules, programs were evaluated solely on the median debt levels of graduates.[13] While this protects students from programs that have high debt burdens, it is not a measure of a credential's value in the marketplace.[14] Further, the Department's regulatory impact analysis of the proposed rule found that default rates are very high for students in programs that pass debt-to-earnings thresholds but fail the earnings premium.[15] Armed with data from the earnings premium, a prospective student can make an informed choice of a postsecondary program. The earnings premium provides an objective measure of the growth in earning potential a student could expect to receive by earning a credential.[16] This is important, as we know many institutions spend heavily on advertising their career education programs, often targeting low-income prospective students.[17] The earnings premium helps protect students, particularly students from marginalized communities, from entering low-value programs.[18]

There is significant rigorous research on the positive implications for higher education accountability of using a high school earnings metric in conjunction with a debt metric.[19] Most importantly, using two metrics helps control for differences in student demographics, including race and ethnicity; they are not the driving factors that would cause programs to fail gainful employment.[20] Rather, program and institutional factors explain the majority of the variance in

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[12] *Id.*
[13] 2011 Final Rule at 34388; 2014 Final Rule at 64891.
[14] Madison Weiss, Marshall Anthony Jr., Gainful Employment: Using Data to Examine Potential Effects of a High School Earnings Threshold, The Institute for College Access and Success, 6 (June 2022), https://ticas.org/wp-content/uploads/2022/06/Gainful-Employment-Using-Data-to-Examine-Potential-Effects-of-a-HS-Earnings-Threshold.pdf.
[15] 2023 NPRM at 32308.
[16] Stephanie Cellini, Kathryn Blanchard, Using a High School Earnings Benchmark to Measure College Student Success: Implications for Accountability and Equity, Postsecondary Equity & Economics Research Project, 10 (January 2022), https://www.peerresearchproject.org/peer/research/body/2022.1.18-PEER-HSEarnings.pdf
[17] Student Borrower Protection Center, Selling Out Students: A Case Study in Brand-Name Schools Partnering with For-Profit Scammers to Make a Buck, 8 (March 2023), https://protectborrowers.org/wp-content/uploads/2023/03/Selling-Out-Students.pdf; Stephanie Hall, How Much Education Are Students Getting for Their Tuition Dollar, The Century Foundation (February 28, 2019), https://tcf.org/content/report/much-education-students-getting-tuition-dollar/.
[18] Madison Weiss, Marshall Anthony Jr., Gainful Employment: Using Data to Examine Potential Effects of a High School Earnings Threshold, The Institute for College Access and Success, 7 (June 2022), https://ticas.org/wp-content/uploads/2022/06/Gainful-Employment-Using-Data-to-Examine-Potential-Effects-of-a-HS-Earnings-Threshold.pdf.
[19] Michelle Dimino, Adding an Earnings Threshold to Gainful Employment, Third Way, 2 (January 13, 2023), http://thirdway.imgix.net/pdfs/adding-an-earnings-threshold-to-gainful-employment.pdf; Stephanie Cellini and Kathryn Blanchard, Using a High School Earnings Benchmark to Measure College Student Success: Implications for Accountability and Equity, Postsecondary Equity & Economics Research Project, 1 (January 2022), https://www.peerresearchproject.org/peer/research/body/2022.1.18-PEER-HSEarnings.pdf; Jordan Matsudaira and Lesly Turner, Towards a framework for accountability for federal financial assistance programs in postsecondary education, Brookings Institute, (November 2020), https://www.brookings.edu/wp-content/uploads/2020/11/20210603-Mats-Turner.pdf.
[20] 2023 NPRM at 32429-32433; Stephanie Cellini and Kathryn Blanchard, Using a High School Earnings Benchmark to Measure College Student Success: Implications for Accountability and Equity, Postsecondary Equity

both the debt-to-earnings and earnings premium metrics, even when controlled for student characteristics.[21] Under the proposed rule, 93% of public institutions and 97% of private non-profit institutions have no programs that fail either the debt-to-earnings or earnings premium metrics.[22] Comparatively, for-profit institutions account for only 11% of GE programs, but 58% have at least one program that does not pass one of the two accountability metrics.[23] Due to the disproportionate level of failing programs at for-profit institutions, the Department estimates that as a consequence of this GE rule, there will likely be significant enrollment shifts from these low-quality programs to programs at community colleges and HBCUs.[24] This will help ensure that students are attending programs at institutions designed to support their postsecondary needs and adequately prepare them for the workforce.

Ultimately, the two-tiered framework proposed by the Department will significantly improve the accountability of programs designed to prepare students for gainful employment by addressing both the debt burden a student will incur and the potential earnings growth they can expect to see if they choose a program.

The Department should uphold its proposed inclusions for warnings and acknowledgements for GE programs.

In the 2023 NPRM, the Department proposes that when a program subject to GE fails either of the two accountability metrics, the institution is required to notify students promptly that the program could lose Title IV eligibility in a subsequent award year.[25] In these warnings to students about potential loss of eligibility, the Department has proposed requiring the following additional information:

- Academic and financial options to continue education at the same institution;
- Whether the institution would refund tuition and fees; and
- Whether students can transfer credits earned to another institution through articulation agreements or a teach-out.[26]

I urge the Department to uphold these requirements for warnings provided to students. Research has shown that at the institutional level, school closures seriously negatively impact a student's chance of earning a postsecondary credential: students impacted by closures are 71% less likely to reenroll in college within one month and 50% less likely to receive a credential compared to

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& Economics Research Project, 1 (January 2022), https://www.peerresearchproject.org/peer/research/body/2022.1.18-PEER-HSEarnings.pdf; Cody Christensen and Lesley Turner, Student Outcomes at Community Colleges: What Factors Explain Variations in Loan Repayment and Earnings? The Brookings Institute, 2 (September 2021), https://www.brookings.edu/wp-content/uploads/2021/09/Christensen_Turner_CC-outcomes.pdf

[21] 2023 NPRM at 32429.

[22] U.S. Dept. of Educ., Fact Sheet: Holding Colleges Accountable for Delivering Financial Value for Students, 3-4 (May 2023), https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/gainful-employment-and-transparency-fact-sheet.pdf

[23] *Id. at* 3.

[24] 2023 NPRM at 32435.

[25] *Id.* at 32347.

[26] *Id.*

students who did not experience a school closure.[27] By providing information in advance of a program's loss of Title IV funding, students will be able to make an informed decision regarding whether to enroll in a particular program.

The Department should provide a template for institutions to utilize for acknowledgment information.

The 2023 NPRM does not specify text institutions must use to convey acknowledgement requirements to students.[28] The Department argues that institutions are "well positioned" to draft information about the acknowledgement requirements based on the needs of their students. Unfortunately, there are many instances where institutions, regardless of how well-intentioned they may be, do not provide adequate information to help students understand how they will finance their education. In a 2022 report, the nonpartisan Government Accountability Office (GAO) found that most colleges do not follow best practices for "providing clear and standard information in their financial aid offers."[29] GAO found that with a lack of clear and standard information, students could be led to choose a college they cannot afford.[30]

Therefore, to aid in the standardization of information, the Department should provide a template for institutions to utilize when sharing information on acknowledgements. The template would be one that, in the Department's view, is in compliance with requirements for the GE rule. By providing an optional template for institutions to utilize, the Department can encourage clarity and standardization while not mandating it. Additionally, a template could help ease the administrative burden of creating a statement that is assured to be in compliance with GE requirements.

The Department should provide additional resources to support under-resourced institutions and institutions with unique missions.

In the 2023 NPRM, the Department welcomed comments on how to address the fact that some communities face unequal access to education and that some institutions established to support these communities are often faced with lower government investments.[31] I believe it is important to acknowledge that under-resourced institutions and institutions with missions to serve students historically excluded from higher education may have unique factors that impact how students finance their education. Additionally, while the Department's analysis concludes that the GE rule will facilitate improvements in program quality, many schools may not have the tools to make those improvements.[32] It is imperative for under-resourced institutions and

[27] Rachel Burns et al., A Dream Derailed? Investigating the Causal Effects of College Closures on Student Outcomes, State Higher Education Executive Officers Association, 6-9 (April 2023), https://sheeo.org/wp-content/uploads/2023/04/SHEEO_CollegeClosures_Report2.pdf.
[28] 2023 NPRM at 32338.
[29] Government Accountability Office, Financial Aid Offers: Action Needed to Improve Information on College Costs and Student Aid, 2 (November 2022), https://www.gao.gov/assets/gao-23-104708.pdf.
[30] *Id.,* 21.
[31] 2023 NPRM at32300.
[32] *Id.* at 32393.

institutions with historical missions to receive additional support from the federal government, given the decades of inequitable funding and resources they have received.[33]

Because of these concerns, I suggest the Department provide a set of support structures and resources tailored towards GE programs at these institutions. Specifically, the Department could work with institutions to develop robust improvement plans and provide technical assistance on how to implement given improvements. Additionally, the Department should make resources available to institutions as soon as possible following the failure of either accountability metrics. This will give institutions the best chance of improving performance under the metrics prior to a final rescission of Title IV aid eligibility.

Financial Value Transparency Framework for Non-GE Programs

I applaud the Department's efforts to provide increased transparency and information to students on outcomes of postsecondary educational programs generally. When deciding on their postsecondary plans, students often cite cost of attendance (including financial aid and debt), employment rates, and post-graduate earnings as key factors in choosing specific programs.[34] Research also shows that students face a knowledge gap in understanding potential college costs, and this gap impacts their ability to choose a college wisely.[35] Disclosures help reduce uncertainty about outcomes and can provide context for varying outcomes based on program type, institutional sector, and career field, among other variables.[36] Therefore, it is important for the Department to help fill in information gaps and provide transparency on the financial implications of students' educational decisions.

While the Department's proposal represents an important step forward for transparency in higher education, I believe there are several issues the Department should take into consideration.

The Department should find mechanisms to highlight the unique missions of certain institutions.

Many institutions were founded and operate today with missions to educate specific student populations and/or address historical inequities within education. These institutions embrace students' cultural background and varied experiences and provide programs intended to connect

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[33] Krystal Williams and BreAnna Davis, Public and Private Investments and Divestments in Historically Black Colleges and Universities, American Council on Education, 2 (January 2019), https://www.acenet.edu/Documents/Public-and-Private-Investments-and-Divestments-in-HBCUs.pdf; William Boland and Marybeth Gasman, America's Public HBCUs: A Four State Comparison of Institutional Capacity and State Funding Priorities, University of Pennsylvania Center for Minority Serving Institutions, 6-8 (April 2014), https://www.luminafoundation.org/wp-content/uploads/2017/08/four-state-comparison.pdf.

[34] Rachel Fishman, 2015 College Decisions Survey: Part 1, Deciding to Go to College, New America, 6 (2015), https://static.newamerica.org/attachments/3248-deciding-to-go-to-college/CollegeDecisions_PartI.148dcab30a0e414ea2a52f0d8fb04e7b.pdf.

[35] Ann Coles, et al., Beyond the College Bill: The Hidden Hurdles of Indirect Expenses, UAspire, 14 (2020) http://www.uaspire.org/BlankSite/media/uaspire/Beyond-the-College-Bill.pdf.

[36] Douglas Webber, *Are college costs worth it? How ability, major, and debt affect the returns to schooling*, 53 Econ. of Educ. Rev. 296–310 (August 2016), https://doi.org/10.1016/j.econedurev.2016.04.007.

students to campus and coursework.[37] For example, Tribal Colleges and Universities (TCUs) were founded in part to preserve and advance Native culture through locally- and culturally-based programs, and many TCUs have programs centered on the preservation of Native languages and culture.[38] Programs like these may not have clear financial benefits, but the social and cultural impact for students, and in turn our country, are indisputable. The Department must find mechanisms to highlight the incalculable ways that such experiences at certain institutions provide non-financial value for students.

The Department should consider consolidating all consumer information on college costs, debt burdens, and earnings in the future.

As the Department continues to enhance cost transparency across higher education, I strongly suggest finding ways to consolidate information into a single source from the Department, such as the College Scorecard. The College Scorecard is the Department's primary, but not sole resource for students and families to access information on institutions and programs.[39] While a disclosure website would provide useful information to students, it creates an additional website for them to review during their college search process. Recognizing that research has suggested the College Scorecard has limited impact on student choice,[40] the Department should focus efforts on improving it, and not creating a new disclosure website where students have to turn for specific program information. As the disclosure website evolves, I urge the Department to consider ways to work towards a consolidation of consumer information either in the College Scorecard or through another accessible platform.

Certification Procedures

I am encouraged by the Department's proposal to amend several provisions in the certification procedures for institutions to participate in federal student aid programs. Certification procedures include reviewing institutional eligibility, administrative capability, and financial responsibility.[41] The new proposed rule would enhance the rigor of the Department's process for certifying institutions both for initial and ongoing aid participation.[42] I was particularly pleased with the proposed requirement for institutions to establish teach-out plans or articulation agreements when at risk of closure. New research shows that school closures have an "overwhelmingly negative" impact on students' college completion, and the effect is worse for

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[37] H. Comm. on Educ. & Lab., Investing in Economic Mobility: The Important Role of HBCUs, TCUS, and MSIs in Closing Racial and Wealth Gaps in Higher Education, 116th Cong. (2019), https://democrats-edworkforce.house.gov/imo/media/doc/Ed_and_Labor_HBCU_TCU_and_MSI_Report_FINAL.pdf

[38] The Am. Indian Higher Educ. Consortium, About AIHEC (2019), http://aihec.org/who-we-are/index.htm; The Am. Indian Higher Educ. Consortium, TCU Majors (2019), http://aihec.org/who-we-serve/TCUmajors.htm.

[39] The Department has also included warnings in the College Scorecard when institutions are placed on Heightened Cash Monitoring 2, which indicates financial risk for students and taxpayers.

[40] Michael Hurwitz and Jonathan Smith, *Student responsiveness to earnings data in the College Scorecard*." 56 Econ. Inquiry 1220-43 (2018).

[41] 2023 NPRM at 32302.

[42] *Id.* at 32302.[43] Rachel Burns et al., A Dream Derailed? Investigating the Causal Effects of College Closures on Student Outcomes, State Higher Education Executive Officers Association, 6 (April 2023), https://sheeo.org/wp-content/uploads/2023/04/SHEEO_CollegeClosures_Report2.pdf.

students of color.[43] This change will help mitigate the harsh consequences of school closures on students.

I was also encouraged to see proposed changes to § 668.14(b)(26) that limit the ability for institutions to offer GE certificate programs that take longer to complete than required by a given state for licensure or certification purposes.[44] Currently, programs cannot exceed 150 percent of the credit hours required by a state, which does help limit the ability of schools to overcharge students. But by going further than this, the Department would ensure that students only pay for the necessary hours to reach licensure and do not unnecessarily use up their lifetime eligibility for Pell Grants. As we move toward the expansion of federal aid to short-term programs, this is a good guardrail to protect students' Pell eligibility.

While I am pleased the Department is taking steps to enhance certification procedures, I believe there can be additional ways to strengthen this portion of the rule.

The Department should keep the provisional certification timeline of 2 years.
In the 2023 NPRM, the Department asked whether to maintain the proposed two-year limit on recertification or extend recertification to no more than three years for provisionally certified institutions.[45] When institutions have exhibited significant consumer protection concerns, oversight from the Department is of the utmost importance. I suggest the Department should keep the recertification limit at two years. If an institution has major consumer protection issues, oversight from the Department must be strong and frequent. I am concerned that by extending the provisional certification timeline to 3 years, institutions that do not benefit students will be allowed to continue operating without the best interest of students and taxpayers in mind. Instead, the Department must maintain the rigorous vetting of any institution participating in federal student aid programs.

The Department should clarify that institutions must comply with all consumer protection laws of general applicability.
The language proposed in the 2023 NPRM for 34 CFR 668.14(b)(32) requires institutions to comply with state consumer protection laws on closures, recruitment, and misrepresentation. Based on the language, it could be interpreted that institutions must only comply with these specific consumer protection laws and may not have to comply with all laws in a given state. If this was not the Department's intention, I suggest that preamble language of the final rule emphasize the expectation that institutions must comply with all consumer protection laws of general applicability, including but not limited to laws on closures, recruitment, and misrepresentation.

Financial Responsibility

[43] Rachel Burns et al., A Dream Derailed? Investigating the Causal Effects of College Closures on Student Outcomes, State Higher Education Executive Officers Association, 6 (April 2023), https://sheeo.org/wp-content/uploads/2023/04/SHEEO_CollegeClosures_Report2.pdf.
[44] 2023 NPRM at32381-32382.
[45] *Id.* at 32300-32301.

The financial stability of institutions is of utmost importance in protecting students and taxpayers from financially risky institutions.[46] I applaud the Department's efforts in this NPRM to streamline and strengthen financial risk assessments. This proposal would update the mandatory triggering events and establish discretionary triggering events that result in the Department's investigation of whether additional financial protection is necessary.[47] According to the NPRM, current regulations limit the Department's ability to address financial problems in a timely manner in addition to offering protection against institutional closures and behaviors which may harm students. The new proposed rule would mitigate risks by creating new mandatory triggering conditions which would alert the Department of institutions that are financially at risk.

While I am pleased at the great strides to protect students and taxpayers in the proposed rule, I believe the financial responsibility portion of the rule could be even stronger.

The Department should require disclosures on instructional spending.
I am encouraged to see the required disclosures of spending on recruiting, advertising, and any other pre-enrollment activities in § 668.23(d) of the proposed Financial Responsibility regulation. The Department, however, did not include the requirement of disclosing instructional spending. How an institution spends its money says a lot about what it prioritizes. A recent analysis found that a significant number of online and for-profit institutions spend less than one-quarter of their tuition revenue on instruction, while spending significantly larger portions on marketing and advertising.[48] Research has also shown that investments in instruction and student supports can directly impact student completion rates.[49] Given the importance of transparency around how institutions spend their revenue, I suggest the Department also require institutions to disclose program-level data on instructional spending.

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[46] U.S. Dept. of Educ., Negotiated Rulemaking 2021-2022 Issue Paper 4: Financial Responsibility, 1, (January 2022), https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/4finanresponsibility.pdf
[47] 2023 NPRM at 32301-32302; U.S. Dept. of Educ., Fact Sheet: Proposed Rules to Protect Students by Strengthening Department of Education Oversight and Monitoring of Colleges and Universities, 1 (May 17, 2023), https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/fact-sheet-for-other-may2023-nprm-issues.pdf.
[48] Stephanie Hall, How Much Education Are Students Getting for Their Tuition Dollar? The Century Foundation (February 28, 2019), https://tcf.org/content/report/much-education-students-getting-tuition-dollar/
[49] *Id.*; Shelbe Klebs and Tamara Hiler, Follow the Taxpayer Dollars: How can Instructional Spending Screen Could Work in Higher Ed, Third Way, 1-2 (November 20, 2019), http://thirdway.imgix.net/pdfs/follow-the-taxpayer-dollars-how-an-instructional-spending-screen-could-work-in-higher-ed.pdf.

Conclusion
Two fundamental principles drive these proposed rules: protecting students and taxpayers and holding institutions accountable. I commend and support the proposals the Department has put forward. As the Department works to finalize these regulations, I appreciate your consideration of these comments. I also encourage the Department to strongly enforce all of the proposed rules to ensure that all students benefit from these accountability measures and that we continue vigorous oversight over institutions.

Sincerely,

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ROBERT C. "BOBBY" SCOTT
Ranking Member