

May 4, 2018

Mick Mulvaney
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Mulvaney:

We write on behalf of the undersigned associations to bring to your attention an issue of immediate concern to students and colleges. Recent statements from Administration officials and Members of Congress have indicated that proposals to make rescissions to non-defense funding may be submitted to the Congress as early as next week.

Our members understand your obligation to carefully steward federal funds, but there is the possibility of meaningful harm to students and their families if funding for federal student aid programs are included in any rescission package. This is true regardless of whether Congress ultimately approves or rejects the rescissions proposed by the Administration.

As you well know, under the Impoundment Control Act of 1974, once a special message from the Administration is delivered to Congress, federal agencies are required to impound the funds identified until the process is resolved. Congress has up to forty-five legislative session days as defined in the statute to act on this request. Due to the nature of the congressional calendar in an election year, if the full forty-five days is taken, a decision on the rescissions may not occur until late in the summer or early in the fall.

While that uncertainty over programmatic funding will pose challenges for any impacted parties, in the case of federal student aid, it poses unique and damaging possibilities. The federal student aid year begins on July 1, at which time federal student aid is released for the approaching academic year. It is at this point that the financial aid packages students have been promised by their institutions (according to their eligibility under law) are disbursed.

Any changes at this point will be deeply harmful to students and their families. Students applied for federal aid as early as last October; they received aid packages from institutions beginning last fall and into the spring and most have already made their final decisions by the traditional May 1 deadline regarding where to go based on that information. Students and schools depend on the guarantees the federal government gave when they made their decisions about where they will attend before giving up their other options. As you know, these are not decisions any family, but especially low-income families, take lightly.

Fiscal Year 2018 Rescission

May 4, 2018

Because the student aid year starts so early, were any of the student aid programs to be included in the Administration's request, there is a near certainty that funds for those programs would be impounded at the moment students need them. Worse still, this information would arrive close to the start of the school year, forcing families to make difficult choices regarding their plans for the fall, with little time to prepare.

Similarly problematic would be any rescission to funding previously provided by Congress to the Pell Grant program. Pell Grants are the foundational program of federal student aid and over seven million students are depending on them to afford college this academic year. Any rescissions of existing funding would undercut the long term ability of the program to serve low income students.

For these reasons, student aid funds should not be included in a rescission package, and we thank you for your attention to this issue.

Sincerely,



Ted Mitchell
President

On behalf of:

ACPA-College Student Educators International

ACT

American Association of Colleges for Teacher Education

American Association of Colleges of Nursing

American Association of Collegiate Registrars and Admissions Officers

American Association of Community Colleges

American Association of State Colleges and Universities

American Association of University Professors

American College Health Association

American Council on Education

American Dental Education Association

American Indian Higher Education Consortium (AIHEC)

Association of American Medical Colleges

Association of American Universities

Association of Governing Boards of Universities and Colleges

Association of Jesuit Colleges and Universities

Association of Public and Land-grant Universities

Association of Research Libraries

Consortium of Universities of the Washington Metropolitan Area

Council for Christian Colleges & Universities

Council for Opportunity in Education

Fiscal Year 2018 Rescission

May 4, 2018

Council of Graduate Schools

Council of Independent Colleges

Educational Testing Service (ETS)

EDUCAUSE

Hispanic Association of Colleges and Universities

NAFSA: Association of International Educators

National Association for College Admission Counseling

National Association of College and University Business Officers

National Association of Colleges and Employers

National Association of Independent Colleges and Universities

National Association of Student Financial Aid Administrators

Phi Beta Kappa Society

The College Board

UPCEA