

September 20, 2017

Hilary Malawer, Assistant General Counsel
United States Department of Education
400 Maryland Avenue SW
Room 6E231
Washington, DC 20202

Docket ID: ED-2017-OS-0074

Dear Ms. Malawer:

On behalf of the University of Colorado Boulder (CU Boulder), I write to submit comments in response to the June 22, 2017 Federal Register notice, which requested public input on federal regulations to repeal, replace or modify, in accordance with Executive Order 13777 "Enforcing the Regulatory Reform Agenda."

CU Boulder recognizes the important role regulations play in the oversight of federal investments in postsecondary education, and we are committed to acting as a responsible steward of federal funds. At the same time, we have found that over time federal oversight of higher education has evolved in ways that can sometimes impede our mission to serve students and the people of Colorado and the nation. The current patchwork of federal higher education regulations is often confusing, challenging to comply with, and costly.

In 2013, Colorado Senator Michael Bennet and a group of bipartisan Senators established a task force of sixteen college and university presidents and chancellors to examine these regulations and identify areas for improvement and reform. CU President Bruce Benson served on this task force, and in February 2015, the group issued a final report with their findings entitled "Recalibrating Regulation of Colleges and Universities: Report of the Task Force on Federal Regulation of Higher Education." CU Boulder participated in in-depth discussions during a site visit with the task force, which incorporated our feedback and recommendations in the final report.

The report helpfully provides a top ten list of federal regulations that are particularly problematic, including financial responsibility standards, return of Title IV funds (R2T4), student aid verification, state authorization of distance education programs, reporting requirements for campus crimes, and institutional accreditation, among others. The report also provides a "regulations matrix" in the appendix that lists 59 regulations and proposed actions for the Department of Education to take that would improve the regulatory landscape.

I recommend this report to you as you perform this important regulatory evaluation. Please consider CU Boulder a resource as you determine which reforms will be in the best interest of students, institutions of higher education, and taxpayers.

Sincerely,



Dr. Philip P. DiStefano
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