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Submitted through the Federal eRulemaking Portal

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Re: Evaluation of Existing Regulations; Docket ID: ED-2017-OS-0074-0001.

MALDEF respectfully submits the comments below in response to the June 22, 2017 notice entitled "Evaluation of Existing Regulations" at 82 Fed. Reg. 28431. Founded in 1968, MALDEF is the nation's leading Latino legal civil rights organization. Often referred to as the "law firm of the Latino community," MALDEF promotes social change through legislative and regulatory advocacy, community education, and high-impact litigation in the areas of immigrant rights, voting rights, employment, and education.

MALDEF strongly opposes the premise of the June 22 request. By law, the creation of every regulation or guidance is a balancing act between the financial burdens such regulations or guidance may create, and the public good those regulations or guidance foster. *See e.g.* the Paperwork Reduction Act, 44 U.S.C. § 3501 (describing the purpose of the Act, to minimize any burden, while ensuring "the greatest possible public benefit.")

The June 22 notice only requests comments on the burdens that regulations and guidance impose, and not the potential benefits and public good that can come from these regulations and guidance. It is a fundamentally flawed request, and the Department should take no action in its furtherance.

MALDEF calls upon the Department to not remove, revoke, or rescind any rules or regulations under its purview, as codified in Title 34 of the CFR. MALDEF also calls upon the Department not to remove, revoke, or rescind any non-regulatory guidance or "dear colleague" letters.

If you have any questions, please contact Adam Fernandez, MALDEF Legislative Staff Attorney, at afernandez@maldef.org. Thank you.

Sincerely,

Adam Fernandez
Legislative Staff Attorney
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