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U.S. Department of Education 400 Maryland Avenue SW, LBJ, Room 216-34 Washington, DC 20202-4537

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Thank you for the opportunity to comment on the March 26, 2018 Federal Register notice seeking input on the Higher Education Hurricane and Wildfire Relief Program application and related matters. This comment is submitted on behalf of the Center for American Progress' Puerto Rico Relief and Economic Policy Initiative, a program that will focus on immediate-term hurricane response efforts for Puerto Rico, with an eye towards long-term planning, economic recovery, and solvency.

The Center for American Progress (CAP) is an independent, nonpartisan think tank dedicated to improving the lives of all Americans through progressive ideas and action.

We write to strongly oppose the application burdens placed on higher education institutions seeking access to emergency relief funds, particularly as they affect public and non-profit institutions of higher learning in Puerto Rico.

The entire application process is unnecessarily cumbersome and detrimental to aiding colleges and universities on the island. The requirement of both a pre-application and an application, for example, to access these funds are arbitrary and not required by the law establishing disaster relief funds. The Department of Education itself estimates that completing the application would take dozens of hours.

This needlessly complex process is particularly concerning given that Puerto Rico is still in the midst of a long, arduous recovery. Significant parts of the island remain without electricity and those that have regained power experience regular blackouts. This leaves large areas without any or reliable access to high-speed internet and the basic services to not only access the applications but apply for the funds.

Importantly, the aforementioned applications and the instructions to complete them are not in Spanish despite the fact that other hurricane guidance is available in Spanish. The failure to provide this docu-

mentation in Spanish provides additional barriers to access for the colleges and universities who would most benefit from the funding.

We recommend that the Department of Education waive these burdensome application requirements and significantly streamline the process while making all documentation available in Spanish. In addition, the department should assign Spanish-speaking staff to assist in reaching out to affected institutions with information regarding the availability of these emergency funds and to assist them in procuring them. This would make the funding, which is drastically needed, more readily available to those institutions and students most in need.

If you have further questions please contact Enrique Fernandez-Toledo, Director, Puerto Rico Relief and Economic Policy at EFernandez_Toledo@americanprogress.org

Thank you for your consideration.