The Honorable

U. S. House of Representatives

Washington, DC 20515

Dear :

On behalf of the I urge you to alter language in the “Digital Accountability and Transparency Act” (H.R. 2146) that would greatly impede the U.S. Department of Education (ED) from offering vital and mandated training to staff in colleges and universities in.

We support efforts to create greater transparency and accountability in government spending; however, we believe the construction of the current language could have serious unintended harmful effects on ED’s ability to train and update those in the student aid profession who administer more than $160 billion in federal student aid to more than 16 million students each year. For example, each yearholds a conference that and **.** ED representation at our conference is invaluable to our members.

Specifically, we support the following modifications to the proposed amendments, as put forth by the American Society of Association Executives (ASAE):

* **Definition of a Conference:** Section 1(D) defines “conference” as a meeting “sponsored by 1 or more agencies, 1 or more organizations that are not agencies, or a combination of such agencies or organizations.” This definition would encompass every conference held by one of our professional associations at the national, regional, and state level. Our recommendation is to revise this definition to a meeting “sponsored by 1 or more federal agencies” so that it is strictly tied to federal conferences. Professional associations provide low-cost ways for federal agencies to provide regulatory updates and implementation guidance to those charged with ensuring compliance with the regulations.
* **Conference Limitations:** The final section of the amendment, Section 4, limits any agency from expending funds on “more than a single conference sponsored or organized by an organization during any fiscal year, unless the agency is the primary sponsor and organizer of the conference.” This provision is highly problematic for associations that invite government employees to conferences for training purposes. A reasonable reading of this provision would mean that if ED employees attend a regional conference, they would then be prohibited from attending any other training sponsored by that association. ED employs an entire department of federal trainers for the express purpose of ensuring that different people working within a university (such as financial aid, business, or admissions officers) receive necessary training and timely regulatory updates. We recommend deleting this limitation because it is too broad and does not take into account the diverse structure of associations and the primary purpose of association conferences.

We are also concerned about the amendment to H.R. 2146 that caps annual travel expenses to no greater than 80 percent of FY2010 expenditures. We believe a significant decrease in ED’s travel budget, which has already been reduced, would negatively impact training opportunities for our members. Schools that participate in the Title IV programs are required to have an adequate number of qualified persons to administer the federal student aid programs and to designate a capable individual to coordinate student financial assistance. An individual may be considered capable in part based upon completion of ED training. This amendment would contradict these existing regulatory requirements and negatively affect our members’ ability to administer Title IV funds. We recommend that it be deleted and that each agency retain responsibility for the efficient administration of its administrative funding.

We respectfully ask you to consider the above modifications to ensure that this important piece of legislation does not create negative consequences.

Sincerely,