



September 13, 2018

The Honorable Betsy DeVos  
Secretary  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202

RE: Docket ID ED-2018-OPE-0042

Dear Secretary DeVos,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the civil and human rights of all persons in the United States, and the 22 undersigned organizations, we write to share our strong opposition to the department's proposal to rescind the 2014 Gainful Employment regulations and urge the department to protect all students, especially students of color, from exploitation by for-profit colleges. The department should immediately uphold the purpose of the Higher Education Act of 1965 and implement the final rule published in the Federal Register on October 31, 2014. **Our students deserve the transparency and protection this rule provides, and robust enforcement by the department to ensure federal funds are used to advance, rather than limit, educational opportunity.**

As was demonstrated in a 2014 brief, [\*Gainful Employment: A Civil Rights Perspective\*](#)<sup>i</sup>, which argued for a strong Gainful Employment rule, educational outcomes for African-American and Latino students are worse at for-profit colleges than at comparable private non-profit/public institutions and African-American and Latino students pay a higher net price and incur more debt to attend for-profit colleges. While worse outcomes at higher cost are unacceptable and cause concern in any context, the specific disproportionate nature of these harms and costs based on student race is particularly alarming to the civil and human rights community.

We call on you to fulfill your obligation to protect students and ensure responsible disbursement of precious federal funds and to immediately implement the 2014 Gainful Employment regulations and take appropriate action to ensure institutions seeking to participate in the Title IV programs of the Higher Education Act provide the quality and value that Congress intended and students deserve. If you have any questions or need additional information, please contact Liz King, director of the education program at The Leadership Conference, at [king@civilrights.org](mailto:king@civilrights.org) or (202) 466-0087.

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Sincerely,

The Leadership Conference on Civil and Human Rights  
American Association of University Women (AAUW)  
American Federation of Teachers  
American-Arab Anti-Discrimination Committee (ADC)  
Augustus F. Hawkins Foundation  
Center for Responsible Lending  
CLASP  
Clearinghouse on Women's Issues  
Hispanic Federation  
Lawyers Committee for Civil Rights Under Law  
NAACP  
NAACP Legal Defense & Educational Fund, Inc.  
National Alliance for Partnerships in Equity (NAPE)  
National Consumer Law Center (on behalf of its low-income clients)  
National Indian Education Association  
National Urban League  
PolicyLink  
Sargent Shriver National Center on Poverty Law  
Southeast Asia Resource Action Center (SEARAC)  
The Education Trust  
The Institute for College Access & Success  
UnidosUS  
Young Invincibles

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<sup>i</sup> See: <http://civilrightsdocs.info/pdf/reports/Gainful-Employment-WhitePaper.pdf>