



December 18, 2019

Paul Ray
Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th St NW
Washington, DC 20500

Dear Acting Administrator Ray,

On behalf of the Association of American Universities, comprising America's leading research universities, I write to you with urgent concern regarding the Department of Education's request for emergency review of the new proposed Information Collection Request (ICR) on Foreign Gifts and Contracts Disclosures published in the Federal Register by the Department on December 17, 2019, [Docket No. ED-2019-ICCD-0154](#).

The Department's expedited review of the information collection request under the Paperwork Reduction Act (PRA) "emergency" clearance procedures has drastically shortened the comment period from 30 days to 10 days. If approved by January 2, 2020, the date the Department has requested for OMB to approve the contents of the notice, institutions would have only 30 days to become compliant with the substantial new reporting requirements. Additionally, the truncated process undercuts our ability to provide thoughtful analysis to the Department because the 10-day comment period – of which only 7 are business days – falls over a federal holiday when the federal government and many university offices will be closed.

We believe the Department has not adequately satisfied the necessary criteria for emergency review under the Paperwork Reduction Act, which requires specific emergency conditions to exist to justify an expedited review (see <https://pra.digital.gov/clearance-types/>). Further, we agree with comments filed by the American Council on Education dated December 17, 2019 which explain in additional detail how the Department has failed to meet the criteria for emergency review. Therefore, we urge OMB not to approve the Department's request to expedite the process.

Sincerely,

A handwritten signature in black ink that reads "Mary Sue Coleman". The signature is fluid and cursive, with the first name "Mary" and last name "Coleman" clearly legible.

Mary Sue Coleman
President

Cc: Shelley L. Thompson, Office of Management and Budget
Alexander T. Hunt, Office of Management and Budget
Kelvin Droegemeier, Office of Science and Technology Policy
Lisa Nichols, Office of Science and Technology Policy
Stephanie Valentine, U.S. Department of Education