



APRIL/MAY 2025 NEWSLETTER

IMPORTANT DATES:

May 27-29 **CECU North American** Career Education Convention

June 11

DJA Webinar: General Participation Requirements 11am CST

June 15-16 **NACCAS** Workshop Arlington, VA

June 30 Deadline for 24/25 FAFSA

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As April showers brought more than just May flowers, higher education found itself in the eye of a political storm. With a flurry of Executive Orders and a legal injunction putting the brakes on bold plans to dismantle the Department of Education, the past two months reminded us that even in academia, spring is not always a time of quiet growth — sometimes, it's the season for legal briefs and policy upheaval.

In this edition, we'll break down the latest updates, examine their potential impact, and explore what's next for higher education. In a surprise turn of events, many Trump supporters within the industry were shocked to learn of the administration's recent announced support of the Biden administration's Financial Value Transparency and Gainful Employment rule. Though Trump stripped the GE rule under his prior presidency, those actions do not seem to be repeated themselves under his current leadership. While it is unclear of the future of the rule, we provide a summary of the legal briefs.

Amidst this period of political change, institution's should be relieved with the return of the FSA System functionality for NSLDS post-screening that has been missing since the implementation of the 24/25 award year changes. The season for change continues as FSA announces the retirement of the SAIG FSA web enroll site as the goal to establish FSA Partner Connect as a one-stop shop provides for the transition of that availability to its site. Institution's needing to take advantage of enrollment features on SAIG should anticipate a period of downtime as the site migrates to it's new home.

Lastly, school users are reminded that ensure compliance with their General Participation Requirements in the FSA programs they must have established access to the appropriate FSA systems. This month announces a change to the inactivity periods on certain sites as they become more stringent to ensure site security. Visit our Compliance Corner to ensure your institution does not experience disruption to system access.

Until next month, stay informed and engaged,

Renee Ford, Vice President

IN THE NEWS: A WAVE OF EXECUTIVE ORDERS RELEASED AFFECTING THE EDUCATION **SECTOR**

Late last month, President Trump released several new Executive Orders relating to the Higher Education, as well as Elementary and Secondary Education. The list of Executive orders included:

- Reforming Accreditation to Strengthen Higher Education
- Transparency Regarding Foreign Influence at American Universities
- White House Initiative to Promote Excellence and Innovation at HBCU's
- Preparing Americans for High-Paying Skilled Trade Jobs of the Future
- Advancing AI Education for American Youth Restoring Equality of Opportunity and Meritocracy
- Reinstating Common Sense Discipline Policies

As the latter two EO's are geared more towards the elementary and secondary education sectors, we have simply linked the order for your review. Alongside the EO, the Trump administration also released a Fact Sheet summarizing the directives within the order, as well as the goals it intends to accomplish. Federal Student Aid has reacted swiftly to two of the orders as they have released an Electronic Announcement regarding Foreign Influence, as well as a Dear Colleague providing guidance on the changes to the approval process for accrediting agencies.

This first executive order comes as no surprise as on April 4th the Department published a federal register, Accrediting Agencies Currently Undergoing Review for the Purpose of Recognition by the U.S. Secretary of Education. The federal register provided information for the public to submit written comments concerning the performance of accrediting agencies under review. Prior to the register release, there had been speculation on the topic being included in the upcoming Negotiated rulemaking process.

In response to this EO and the other five education related orders, Secretary of Education, Linda McMahon provided comment in a press release. Specific to the EO to Reform and Strengthen Accreditation, the Secretary cited America's accreditation marketplace as broken and monopolized by a small number of institutional accreditors. She stated, "The existing accreditation monopoly raises costs, contributes to the ever-increasing tuition and fees faced by American families, favors legacy four-year institutions, blocks new accreditors from the market, interferes with states' governing board decisions, and pushes universities in ideological directions when they should be focused on core subjects" While this statement recognizes the need for reform as seen by the present administration, the fact sheet for this EO outlines the goal of this reform is to strengthen the educational offering provided by IHE's, ensuring they produce high-quality and high value education free from unlawful discrimination and ideological overreach.

The fact sheet on accreditation further outlines the efforts to be made to reform the higher education accreditation system. These steps will begin first by increasing accountability for accreditors, particularly regarding poor performance and unlawful discrimination through violations of federal civil rights law. The Order mandates a realignment towards student-centered outcomes, including the removal of race, ethnicity or sex-based criteria, while prioritizing intellectual diversity to allow for the advancement of academic freedom, intellectual inquiry and student learning. The EO will also provide for streamlining the process for accreditor recognition, allowing new entries into the marketplace to encourage innovation and competition.

The EO seems to credit the accreditation system as the causation of student soaring debt, low graduation rates and producing degrees of little value by approving "low quality institutions". From my perspective, the process towards accreditation that we have seen through working with clients for nearly 40 years is far from lacking proper oversight. Often accreditation requires an abundance of burdensome reporting and extensive applications to gain and maintain approval. It will be interesting to see how this reform plays out and the effect we see on the accreditation process for Title IV funding. Cynthia Jackson Hammond, president of the Council for Higher Education Accreditation, said in a statement that accreditors already work with institutions and programs when there is a "shortfall in outcomes." In a statement shared from COE, the organization "firmly reject President Trump's mischaracterization of accreditors' role in the nation's postsecondary education system,", and followed with the following, "we stand ready to work with the secretary of education on policies that will advance our shared mission of enhancing quality, innovation, integrity, and accountability."

In response to this recent EO, a Dear Colleague was published in late April indicating changes to the approval process for institution's wishing to change accrediting agencies. While the DCL reminds institutions of the requirement for the Department's approval of applications to switch accrediting agencies, it also indicates, "neither the law nor the regulation disincentivizes or prohibits an institution from changing an accrediting agency or choosing to have multiple accrediting agencies." This reminder provides institution's affirmation of their relative freedom of choice when it comes to choosing an accrediting partnership that aligns with their school's mission.

While the next EO regarding foreign influence may not impact all institutions in our target readership, we wanted to provide a brief overview. The executive order calling for transparency regarding foreign influence at American universities stems from what the Trump Administration cites as a lack of oversight from the prior administration in ensuring the following of Section 117 of the HEA, which mandates IHE's report significant sources of foreign funding being received. While the EO fact sheet specifically calls out the prior Biden administration, the EO cites a lack of transparency dated back to 2010-2016 as a study included indicates universities failed to disclose more than half of reportable foreign gifts.

The goal of this EO is to bolster transparency regarding the foreign funds flowing to American higher education and research institutions to protect American educational, cultural and national security interests. The fact sheet outlines the steps that will be taken to achieve those goals are to enforce the transparency requirements already mandated by law by rescinding actions carried out by the prior administration that allow obscuring foreign funds and also to require universities to disclose the true source and purpose of the foreign funds. It will do so by restoring accountability and holding non-compliant institutions accountable through audits, investigations and enforcement actions, while also working to end the secrecy surrounding foreign funding. Through the above steps the Administration aims to safeguard American interests to ensure that the lack oversight and undisclosed foreign funding does not provide an open window for foreign influence into our own educational research and national security.

In her press release on the President's EO's, Secretary McMahon, highlighted the goal of the EO, "Promote Excellence and Innovation at HBCU's" is to "expand partnerships and share best practices for institutions to become hubs of opportunity and economic engines for local industries and employers." The order itself outlines the need is a continuation of commitments made in Trump's prior administration to support and elevate Americans historically black colleges and universities as they remain integral to American student's pursuit of prosperity and wellbeing. The EO also highlights the policy intends to allow for "equal opportunities for participation in Federal programs".

The published fact sheet highlights that to advance HBCU excellence, the White house initiative will prioritize private-sector partnerships, institutional development, and workforce preparation in high-growth industries like technology, healthcare, manufacturing, and finance. To enhance the capabilities of HBCUs, the initiative will support implementation of the HBCU PARTNERS Act, fostering research and program excellence, improving affordability and retention, and building pipelines for students to attend HBCUs. Additionally, the initiative will address barriers HBCUs face in receiving federal and state funding and improve their competitive for research and development funding.

The final EO and perhaps the one most pertinent to our cohort of readers, is Preparing Americans For High-Paying Skilled Trade jobs of the future. The need for this EO is the Administration's perspective the current postsecondary system is unproductive in preparing young Americans for high paying skilled trade jobs. The goal is to modernize American workforce programs and remove the one size fits all approach where the focus was college was the pathway for all students beyond secondary education. The fact sheet outlines the efforts that will be taken to achieve this goal. The order directs a joint review of all federal workforce programs by the Secretaries of Labor, Education, and Commerce to modernize, integrate, and re-align programs to address critical workforce needs in emerging industries, capitalizing on the AI Revolution. Efforts will also be made to put the American worker first, incentivizing domestic manufacturing to produce American made products and American developed technologies. Lastly, there will be a focus on expanding apprenticeship opportunities.

IN THE NEWS: A FEDERAL JUDGE BLOCKS TRUMP ADMINISTRATION FROM ED DISMANTLING

In last month's newsletter, we covered the March Executive Order calling for the dismantling of the Department of Education, while also hinting at the move of the federal student loan portfolio from FSA to the Small Business Administration. As has become an alarming trend with prior orders issued by the Trump administration, a federal judge issued a preliminary injunction barring the execution of this order. Appointed by the former President Biden, U.S. District, Judge Myong Joun, released his determination on Thursday, May 22nd, calling the Trump administration's changes to the Department of Education and firing of over a thousand ED employees unlawful. In agreeance with our statement's last month, the judge confirmed in his order "the Department cannot be shut down without Congress's approval."

The injunction was brought forth by a pair of school districts in Massachusetts, the American Federation of Teachers and 21 Democratic state attorneys general who filed a suite against President Trump in March to block the executive order and reverse the reduction in force actions. ED spokesperson, Madi Biedermann, stated officials, "will immediately challenge this on an emergency basis." As such, the administration filed a notice of appeal the same afternoon the injunction was issued. In the interim, the judge directs ED to reinstate federal employees whose

employment was terminated on or after January 20th. Additionally, the injunction also applies to transfer of federal student loans and special education.

COLLECTIONS RESUME FOR DEFAULTED FEDERAL STUDENT LOANS

The Department of Education announced, April 21st, that it would resume collection on defaulted student loans starting May 5th. Student loan borrowers who defaulted on their loans had not made payments towards their balances since March 2020, when the COVID-19 pandemic paused such collection efforts. This means that for any students who defaulted on their student loans, there has been no collection efforts made since that time. Within that period, there was also a COVID 19 flexibility that provided a repayment pause on federal student loans through September 2023. Borrowers who have their loans in default received email correspondence to contact the Debt Resolution Group, which helps resolve disputes related to defaulted loans. Later this summer, the Office of Federal Student Aid (FSA) will send notices to start the wage garnishment process, the Department of Education said.

The Biden administration spent much of their efforts focusing on loan forgiveness, though each attempt met legal challenges. The most recent being February 18, 2025, federal injunction preventing the Department from implementing the Saving on a Valuable Education (SAVE Plan and parts of other Income driven repayment plans. The initial result of this injection was a temporary inability to apply online for IDR and online loan consolidation. However, student aid confirmed the application process for eligible borrowers resumed on March 26, 2025. Borrowers enrolled under the SAVE plan have been in legal limbo these past few months. FSA urges these borrowers to find a new home for their loans and begin the process of seeking other repayment plan alternatives.

TRUMP ADMINISTRATION BACKS BIDEN'S FVT/GE REGULATIONS

Late this month, the Trump administration surprised many by revealing their intent to continue the defense of the Biden Administration Financial Value and Gainful Employment Rule. Based on the actions of the prior Trump administration, which removed the 2019 GE Rule, it had been an assumed conclusion the current administration would follow similar suit. However, as the extended summary-judgment briefing deadline of May 16, 2025, for the consolidated litigation challenging the GE Rule passed, the Department urged the federal district court to uphold the 2024 GE Rule.

The 2024 GE Rule was initially set to implement on July 1, 2024; however, two separate lawsuits-since consolidated- brought by the American Association of Cosmetology Schools and Ogle School Management, challenged the rule as being unlawful. The argument posed that the legal definition of "gainful employment" as outlined in the Higher Education Act did not require the Department to use debt and earnings metric as a regulatory standard. In its briefing response, the Department indicates the term "gainful" means "profitable....and that is the term's best meaning the investment of federal taxpayer dollars is at stake." As such the Department argues the metrics are appropriately designed as, "Congress could not have possibly intended to waste taxpayer money on programs that leave students in unaffordable debt or no better off when they started."

It is unclear what will happen next in response to this unexpected turn of events. While the legal challenge is being worked out in the courts, the existing implementation of the statue remains set to deploy on September 30, 2025. For a greater breakdown of the Department's reply brief, we encourage you to read the blog post by Thompson Coburn here.

25/26 NEGOTIATED RULEMAKING

The Department of Education hosted public hearings, both in person and virtually, in advance of the 25/26 Negotiated Rulemaking sessions in late April/early May. The request for public comments were focused on three areas:

- Refining definitions of a qualifying employer for the purpose of determining eligibility for the Public Service Loan Forgiveness program
- Pay As You Earn (PAYE) and Income Contingent Repayment (ICR) repayment plans
- Efforts to streamline current federal student financial assistance program regulations while maintaining or improving program integrity and institutional quality

The public hearings yielded 750 plus comments and on May 12th, the Department published a Federal Register announcing their intent to host a single, three-day session of Federal Negotiated Rulemaking. Titled, "Negotiated Rulemaking Committee: Negotiate Nominations and Schedule of Committee Meetings," announces the schedule for negotiations to be Monday, June 30th through Wednesday, July 2nd. Nominations for negotiators to serve on the committee are due on or before June 2nd.

The notice indicates the committee's topics will address the following topics:

- Refining definitions of a qualifying employer for the purposes of determining eligibility for the Public Service Loan Forgiveness program (an echoed topic from the open comment period).
- Revisiting family size, restructuring repayment plan provisions, including the alternative repayment plan, and certain other provisions of the July 10, 2023, rule.

NSLDS POST SCREENING FUNCTIONALITY RETURNS

In July 2024, the Department announced a delay in the functionality of the NSLDS post screening for the 24/25 and 25/26 FAFSA cycles. The initial announcement indicated the availability to return in late 2024; however, that timeline was further extended to Spring of 2025. In January, the Department announced a temporary solution through the NSLDS Post-screening Eligibility Changes File sent through the COD website and later directly to the school's SAIG mailbox. This process required school's to review student's included in the changes file and pull a Financial Aid History Report through NSLDS to address changes in the student's aid eligibility.

While the temporary availability allowed for provisional steps to be taken to ensure proper aid packaging, institutions longed for the more streamlined approach offered through the standard post-screening process available prior to the 24/25 implementation. That functionality announced its return in a May 1st EA, with expected processing to resume the week of May 5th. As with most system offerings affected by the 24/25 FAFSA implementation, the processing release was not without hiccups. Shortly after processing resumed, a subsequent update to the EA indicated that while many records were processed correctly, there existed some cases where a student had multiple transactions, an error causing the NSLDS post-screening data to appear based on an earlier transaction instead of the most recent transaction. As a result, for some students, the records with post-screening data delivered during the first week did not reflect corrections or other updates made after the initial transaction. The identified error was corrected shortly after and a new transaction was delivered with the FPS Correction Reason indicating, "NSLDS Postscreening".

FSA PARTNER CONNECT EXPANDS TO INCLUDE SAIG ENROLLMENT FUNCTIONALITY

FSA Partner Connect was created to consolidate FSA functions into one digital storefront for all Federal Student Aid and partner engagement. In July 2025, FSA Partner Connect will become the primary enrollment and user management service for FSA, allowing partners to enroll for access to FSA services and systems and to exchange information via the SAIG. We will add Student Aid Internet Gateway (SAIG) enrollment functionality to FSA Partner Connect and the SAIG Enrollment website will be retired. To prepare for this important transition, the SAIG Enrollment website will no longer be available to users after June 12, 2025.

Users do not need to take any action to maintain their **current** access or enrollment. During the transition period and then following the July 2025 implementation in FSA Partner Connect, authorized users will continue to access FSA systems and services and exchange data over the SAIG as they normally would. For **new or** updated enrollments, refer to the "SAIG Enrollment Processing Impacts During Transition Period" section within the electronic announcement for important information about actions that are needed by June 12, 2025, to ensure changes are processed in a timely fashion.

The new FSA Partner Connect features we will implement are as follows:

- SAIG Enrollment for Accessing FSA Systems and Services and for Exchanging Data We will transition functionality from the SAIG Enrollment website to FSA Partner Connect for partners to complete all enrollment actions for accessing and exchanging data with FSA services and systems.
- Electronic Signatures With the move to the new platform, partners will no longer need to mail paper signature forms or email scanned copies of signature forms. Instead, all actions requiring a signature will be completed through an electronic signature process.
- Online Submission for Foreign Schools Currently, foreign schools are required to complete enrollments or make updates using the paper version of the SAIG Enrollment Form. Following the transition, foreign schools will be able to enroll or make updates through FSA Partner Connect.

As there will be a period of downtime during the transition with the existing SAIG enrollment site retiring on June 12th and the FSA Partner Connect functionality not opening until July, enrollment changes during the transition period will be impacted as follows:

- Signature pages submitted to the FPS Help Desk for enrollment actions completed on or before June 12 will be processed if they are received by the FPS Help Desk by June 12 and they are completed correctly by the user. Signature pages received after June 12 or incomplete forms may not be processed.
- Signatures submitted to the FPS Help Desk for actions not finalized in the SAIG Enrollment system on or before June 12 will be rejected. These actions will need to be completed via FSA Partner Connect after the July implementation and signatures will be completed through the electronic signature process. Paper forms (mailed or scanned and sent via email) will not be accepted by FSA Partner Connect.

FSA states that future trainings will be announced in June to assist with the transition. We encourage users who anticipate being impacted by this change monitor the Knowledge Center for such announcements.

FY 26 DIRECT LOAN FEES REMAIN UNCHANGED

Under the Budget Control Act of 2011 (the sequester law), the terms require a statutory increase to the loan fees charged to Direct Loan borrowers for Direct Subsidized/Direct Unsubsidized and Direct PLUS Loans from their statutory rates of 1 percent and 4 percent, respectively. The FY 26 sequester fees are the same as the FY 25 sequester fees. This means for all loans where the first disbursement is made on or after Oct. 1, 2020, and before Oct. 1, 2026, the loan fees are as follows:

- 1.057% for Direct Subsidized Loans and for Direct Unsubsidized Loans. As an example, the loan fee on a \$5,500 loan would be \$58.13.
- 4.228% for Direct PLUS Loans (for both parent borrowers and graduate and professional student borrowers). As an example, the loan fee on a \$10,000 loan would be \$422.80.

Loan fee calculations resulting in more than two decimal places must be **truncated** (not rounded) to two digits after the decimal point (cents). **Note:** Institutions may now begin submitting Direct Loan origination records to the COD System where the first disbursement will be on or after Oct. 1, 2025, using the loan fees provided in this announcement.

Additionally, the sequester law requires a reduction in the statutory amounts for TEACH Grants. The FY 26 sequester percentage reduction is the same as the FY 25 sequester reduction. Therefore, the statutory award amount for all TEACH Grant awards where the first disbursement is on or after Oct. 1, 2020, and before Oct. 1, 2026, must be reduced by 5.70%, as shown below:

5.70% reduction from the TEACH Grant statutory maximum award amount of \$4,000. This is a dollar reduction of \$228, resulting in an adjusted maximum award amount of \$3,772.

COMPLIANCE CORNER

MAINTAINING ACCESS TO FSA SYSTEMS

To participate in the FSA programs, a school user is required to establish access to FSA systems. Such access is set up through the Access and Identity Management System (AIMS). AIMS provides the authentication (log-in) process for many systems accessed by institutional partners as part of their required processing functions and compliance reporting. These systems include:

- Common Origination and Disbursement (COD) website
- Electronic Cohort Default Rate Appeals (eCDR Appeals),
- 2024–25 FAFSA Partner Portal and 2025–26 FAFSA Partner Portal
- National Student Loan Data System (NSLDS®) Professional Access
- Student Aid Internet Gateway (SAIG) Enrollment
- EDconnect software.

To ensure these systems, which contain sensitive information, remain as secure as possible, FSA has announced a change to the time period of inactivity allowed for users. Prior to the update, sf a user did not access a specific system behind AIMS for 90 calendar days, user's access was disabled to that system. The number of days of inactivity is unique to each system the user is authorized to access. However, on May 18, 2025, the period of inactivity was reduced to 30 calendar days for many of FSA's systems for partners, including the COD website, the FAFSA Partner Portal, NSLDS Professional Access, and SAIG Enrollment.

If a user has not logged in to one of these systems for 30 calendar days, the user's access to that system will be disabled. Upon their next log-in attempt, the user will receive an error message directing them to contact customer support. The user should first try to use a new self-service option to restore access. Should those steps not work, the user should call customer support.

Losing access to FSA systems, even temporarily, can negatively impact your intuition's ability to process federal aid for your student's and poses a risk to your school's compliance requirements. Please note that while the 30 days of inactivity results in only a temporary block to access, after 365 calendar days of inactivity in a specific system, a user's access is permanently deactivated. Deactivated system access cannot be restored by calling customer service. If the user still requires access to that particular system, the user must be re-enrolled by the institution's Primary Destination Point Administrator (DPA) via the SAIG Enrollment website.

Be sure you and your team are aware of these access updates to minimize any disruptions in FSA system access.



CALENDAR and RESOURCES

Training Resources

DJA MONTHLY WEBINARS

General Participation Requirements- Wednesday, June 4th, 11 a.m. CST

Rescheduled from May: Return of Title IV Funds- Wednesday, June 18th, 11 a.m. CST

NOTE: There may be a difference between DJA local time and your time zone. To determine your time zone equivalent, click on this link to view a time zone map: http://www.worldtimezone.com/time-usa12.php

Webinars are free to clients, as well as our newsletter recipients on a trial basis. Invitations are automatically sent to all clients, however if you do not receive an invitation, email Lynessa Roberts at lroberts@gotodja.com. After registering, you will receive the log-in information. If you would like to attend a webinar and are not a DJA client, please email Lynessa and she will ensure you receive an invitation to register. Questions can be directed to Lynessa by email or by calling toll free at 1-800-242-0977.

2025 DJA WEBINAR SCHEDULE

JUN 4	General Participation Requirements
JUN 18	Rescheduled from May: Return of Title IV Funds (Including LOA)
JUL 16	Campus Crime Report
AUG 6	Entrance and Exit Counseling
SEPT 3	Cash Management
OCT 8	Enrollment Reporting Using NSLDS
NOV 5	Program Integrity (Audits, Program Review)
DEC 3	1098-T Reporting

2025 TITLE IV DATES TO REMEMBER

We know how complex the compliance requirements can be for schools participating in the Title IV programs, as can keeping up with all the reporting deadlines year to year. To asset our clients and other institutional partners, we have developed a quick reference calendar reviewing the important deadlines for the year 2025. For a printed color copy, visit us at any of our upcoming exhibitor events or to print your own copy, click here.

Upcoming Conference Schedule

CECU North American Career Education Convention

The North American Career Education Convention is the largest gathering of private career education professionals in North America. This event features well-known keynote speakers, experts leading concurrent sessions, and an



environment to connect and network with others in the sector. Year after year, the Convention attracts a diverse audience of sector leaders from across the country. The 2025 Convention will be held at the MGM Grand in Las Vegas, NV May 27th through May 29th. This year, Renee Ford, our Vice President, had the opportunity to serve on the Exhibitor Task Force, working with other exhibitors to enhance the customer experience at the Exhibit Hall. Renee will join our President, Deborah John at our booth to showcase the advantages a partnership with our company can offer to ensure your institution maintains regulatory compliance through our streamlined, cost-savings approach. Visit us to discuss how our services can best meet your financial aid administration needs.

This year's conference is sure a must attend event!

NACCAS Quarterly Workshop June 14-16

NACCAS is hosting their second quarter Workshop in Arlington, Virgina at the DoubleTree by Hilton Washington DC-Crystal City, with pre-candidate training on Saturday June 14th and workshop sessions the following Sunday and Monday. DJA will be available as an exhibiting partner. We invite you to stop by our booth for a yearly calendar of Title IV deadlines, a copy of our most recent newsletter and a notebook and pen to utilize throughout your training. We would love to visit with you on how partnering with DJA can be a great addition to ensuring compliance with Title IV fund administration.

For a complete listing of where to find DJA at upcoming industry conventions and conferences, visit our exhibiting calendar at our website here.

Disclaimer: The information presented in this Newsletter is provided as a service and represents our best efforts to assist institutions with federal student aid regulations. We have collected information we believe to be important in finding and obtaining the resources for administering federal student aid; however, we assume no liability for the use of this information. The information in this newsletter does not constitute, and should not be construed as, legal advice.