



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE GENERAL COUNSEL

THE GENERAL COUNSEL

ATTORNEY WORK PRODUCT/ PRIVILEGED & CONFIDENTIAL/ PRE-DECISIONAL & DELIBERATIVE

TO: Miguel A. Cardona
Secretary of Education

FROM: Emma Leheny
Acting General Counsel

DATE: April 8, 2021

SUBJECT: The Secretary's Legal Authority for Broad-Based Debt Cancellation Under
the Higher Education Relief Opportunities for Students Act of 2003

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