

Your Comment Tracking Number: 1jx-88qq-8go6

Docket # ED-2013-ICCD-0128-0004

We write to commend the Education Department for its proposals to improve its Integrated Postsecondary Education Data System (IPEDS) data collection.

First, we support the Department's proposal to expand its database beyond "first-time, full-time" students by collecting information on returning (i.e., "non-first-time") and part-time students similar to the information collected on first-time, full-time students. This is an important and long overdue change. Many students, including veterans, attend college part-time, and many return to college after military service or another break.

Second, we support the Department's proposal to collect and make available data on veterans and military education assistance, especially:

- The Post-9/11 GI Bill
- Yellow Ribbon Program
- Credit for military training
- Dedicated point of contact for support services for veterans, military service members, and their families
- Recognized student veteran organization on campus
- Member of the Servicemembers Opportunity Colleges
- URL for tuition policies specifically related to veterans and military service members
- Number of students receiving Post-9/11 GI Bill benefits and the total dollar amount of tuition and fee benefits awarded to them through the institution
- Number of students receiving DoD Tuition Assistance and the total dollar amount of DoD Tuition Assistance awarded to them through the institution

We concur with the Department's IPEDS Technical Review Panel recommendation that these datapoints are "necessary for policy-making and analysis and to improve information available to veterans and military service members considering postsecondary education."

In addition to capturing the data on students' completion, retention, and graduation, the Department should also collaborate with the Departments of Defense and Veterans Affairs to make available more comprehensive data on the total dollar amounts and number of students utilizing G.I. Bill and military education aid. Please also ensure collection and cross-reference of VA facility codes (school code numbers) for GI Bill to ensure VA is able to regularly update its institutional crosswalk with the Department of Education, which is necessary to comply with the requirement in P.L. 112-249 and Executive Order 13607 that VA develop a school comparison tool for college-bound veterans.

Third, we support the Department's decision to require for-profit colleges to submit the same data as non-profit colleges. We also support the Department's proposal to disaggregate the data on expenses. A key data point is instructional expenses versus other costs. We agree with the Department's rationale that this proposed change will increase data comparability across institutional sectors. More transparency is needed than exists today, not less.

Finally, please consider collecting data on students' debt upon graduation. Students' debt load is a key factor and is needed for full transparency to help students choose a college. As you may know, even students using the G.I. Bill may take on debt.

Thank you.

Signed,

Association of the U.S. Navy
Iraq & Afghanistan Veterans of America
Initiative to Protect Student Veterans, University of San Diego
Law School
National Guard Association of the U.S.
Paralyzed Veterans of America
Student Veterans of America
Veterans Education Success
Veterans for Common Sense
Veterans Student Loan Relief Fund
VetJobs
VetsFirst, a Program of United Spinal Association
Vietnam Veterans of America