

June 11, 2018

Sophia McArdle  
Department of Education  
400 Maryland Avenue SW., Room 6W256  
Washington, DC 20202

RE: Public Comment on Docket No. ED-2018-OPE-0041

Dear Ms. McArdle:

On behalf of the thousands of service members, veterans, and their family members and survivors we represent, we ask that you *not postpone* the date of the implementation of regulations relating to the State authorization of distance education providers and correspondence education.

Due to service abroad, family and work obligations, service related disabilities, and other extenuating circumstance, approximately one in five military-connected students take distance education and correspondence courses. In order to ensure a strong return on investment for the student's and taxpayers' dollars it is imperative that proper measures are maintained to guarantee education offered online is high quality.

The quality metrics for Title IV programs rely heavily on the triad of federal, state, and accreditors oversight. While oversight by the federal government over Title IV programs is necessary, so is the oversight by states and accreditors, to ensure the triad works as intended. Keeping states from protecting their residents by enforcing postsecondary-specific consumer protections goes contrary to the very nature of state authorization. Given their more localized jurisdiction, states have the capacity to better monitor and follow training programs. They are also aware of what other institutions are offering in their jurisdictions, and therefore can provide better safety measures to ensure students are getting access to the same quality of education at any school they attend within their state.

Additionally, this regulation provides essential protections to consumers. Under the regulation the Department seeks to delay, states are required to ensure students have a way of filing complaints – which is essential as an early warning system of potential waste, fraud, and abuse – and schools are required to make certain information available to students, such as whether or not the program the student is pursuing will lead to licensure in their field of study for that state. A research report by Veterans Education Success found that 20% of more than 300 degrees in fields that require a license left the graduates literally ineligible to even sit for a licensing exam; their degrees left them unable to work in the field of study.<sup>1</sup> Therefore, such disclosures are

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1 Veterans Education Success, “The GI Bill Pays for Degrees That Do Not Lead to a Job” (2015) available at

<https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/57eaa61197aea4f38f19f02/1475258978479/GI+Bill+Pays+for+Degrees+That+Do+Not+Lead+to+a+Job+%283%29.pdf>

important. Making this information readily available allows students to make better informed decisions related to their pursuit of higher education, thereby helping to cut down on waste of money for both the student and the tax payer.

Military-connected student have access to a significant amount of military education benefits and deserve to know their hard-earned benefits will be used towards high quality education leading to career advancement both during their military service and in their transition into the civilian workforce. That is why we ask the Department to please move forward with timely implementation of this regulation.

Sincerely,

Jared Lyon  
President & CEO  
Student Veterans of America

Deirdre Parke Holleman, Esq.  
Washington Executive Director  
The Retired Enlisted Association

Bonnie Carroll  
Present & Founder  
Tragedy assistance Program for Survivors

Carrie Wofford  
President  
Veterans Education Success