

November 13, 2017

Ms. Jennifer Bell-Ellwanger  
U.S. Department of Education  
400 Maryland Ave., SW Room 6C111  
Washington, DC 20202  
By e-mail: [Jennifer.bell-ellwanger@ed.gov](mailto:Jennifer.bell-ellwanger@ed.gov)

Dear Ms. Bell-Ellwanger:

Please include the following public comment in Docket # ED-2017-OS-0078:

### **PUBLIC COMMENT FROM VETERANS & MILITARY SERVICE ORGANIZATIONS**

As organizations working for veterans, servicemembers, their families and survivors, we thank you for the opportunity to comment on the Department's [proposed supplemental priorities](#) for discretionary grant programs.

We appreciate the Department of Education's inclusion of military and veteran students as one of its top eleven priorities for funding. Of particular note, we support the Department's desire to increase the number of students using their military benefits through clearer communication on the benefits available to them. In addition to improving communications to veterans about the availability of their benefits, we encourage the Department to fund efforts to arm military-connected students with necessary information to ensure informed college choice.

Approximately 67% of military-connected students are first-generation, low-income, minority, and other underserved students who struggle with navigating the post-secondary process. Often, they make uninformed decisions based on peer recommendations or because of deceptive marketing and recruiting by low quality colleges. Uninformed choices can leave service members or veterans with worthless credits and degrees.

Additionally, we commend the Department's understanding of the unique challenges military-connected students face and the resiliency they have shown to overcome these barriers. Previous grant programs funded by Department have made a significant impact on encouraging institutions of higher learning to build and enhance programs and services to support military-connected students. We believe holistic support services are integral to the academic success of these students and encourage the Department's continued funding of these programs. We also encourage the Department to fund programs that help veterans make the transition from military life to college.

Additionally, we support the Department's inclusion of funding for programs that serve the needs of military-connected children. We echo the suggestions from the Military Child

Education Coalition to ensure that "meaningful choice" and "high quality education" are well-designed and executed to benefit military-connected children and not spent on inadequate and ineffective private ventures.

We encourage the Department of Education to coordinate all of these efforts with the Departments of Veterans Affairs and Defense. We also encourage the Department to collaborate in inter-agency data-sharing with these two departments and the US Census Bureau. This information would help provide better outcome data regarding use of Tuition Assistance and GI Bill benefits, including the Department's interest in the number of veterans not using their GI Bill benefits.

Regarding the Department's third priority for funding – increasing alternative pathways to credentials needed for in-demand jobs – we note these pathways, such as competency-based education and credit for prior learning, decrease time to attainment of post-secondary goals while helping meet workforce needs. We urge the Department to ensure high quality in grantees, through measurable student outcomes, such as job placement rates, salaries, and graduation rates, and through evidence-based data to determine the skills and credentials needed. This will protect students from subpar programs purporting to speed students' pathways to jobs, while actually leaving the students with worthless training and student debt.

The Department's fourth priority includes arming K-12 students with financial literacy and employability skills. We encourage the Department to specifically include military children and to expand its focus to post-secondary military-connected students, as they are often targeted with financial consumer fraud. We urge the Department to coordinate this work with the Office of Servicemember Affairs at the U.S. Consumer Financial Protection Bureau.

Thank you for your consideration.

Sincerely,

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Army Aviation Association of America

Kristofer Goldsmith  
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