



January 3, 2019

Marya Dennis, Management and Program Analyst
U.S. Department of Education
Federal Student Aid
Union Center Plaza
830 First Street NE
Washington, DC 20002-5345

RE: Docket ID: ED-2018-FSA-0080 Re-establishment of VA-ED Matching Program

Dear Sir/Madam:

Thank you for the opportunity to comment on the re-establishment of the matching program between the Department of Education (ED) and the Department of Veterans Affairs (VA). We at Veterans Education Success, a nonprofit that advocates on behalf of veterans, servicemembers, and their families, support the re-authorization of the program, as it is necessary to ensure the timely and proper administration of Title IV benefits to veterans.

While we support the matching program, the categories of records ED provides to the VA are limited to personally identifiable information for veterans who indicate veteran status on their applications for federal financial assistance. Unfortunately, many veterans and active-duty servicemembers never have an opportunity to identify as military connected because of student aid simplification initiatives implemented about a decade ago. We strongly believe that the Department should restore the questions about veteran and service member status for all applicants on the Free Application for Federal Student Aid (FAFSA). We are convinced that such a change is both good and necessary public policy.

Because the FAFSA uses a "skip-logic" function to simplify completion, many veterans and service members never have the opportunity to self-identify. Instead they are automatically skipped past the active duty and veteran status questions based on their answers to earlier questions about their dependency status (including age, degree-level, and marital status). While we recognize and applaud the overall benefits of FAFSA simplification, the questions about military background are easy to answer in a matter of seconds.

We believe that the use of a skip-logic function on the veteran and active duty status questions works to the detriment of this cohort. First, it limits the ability of states and colleges to target their outreach to service members and veterans as early as possible in the aid application process. Although some veterans and servicemembers may not need or want to take out student loans because their military educational benefits will cover all or much of the tuition, many veterans nevertheless complete the FAFSA to determine their eligibility for Pell Grants. If their military status is missed because of the skip-logic, then they will miss out on military-connected opportunities from states and colleges.

Second, the skip-logic limits the ability of institutions to provide targeted services to veterans and active duty personnel in order to increase retention and graduation rates. Given that about 60 percent of veterans using the GI Bill are the first in their families to attend college, such services are critical to ensuring veterans' post-secondary success and protecting the taxpayer investment in veterans' transition to a successful civilian life.

Third, the skip-logic precludes any research-oriented tracking and exploration of veterans' borrowing patterns or indebtedness—and subsequently, their repayment status. Why is this important? The Higher Education Opportunity Act of 2008 prohibits schools from considering GI Bill benefits when determining veterans' eligibility for federal grants and loans. As a result, some veterans are deemed eligible for federal grants and loans covering up to the full cost of attendance as well as their Post-9/11 GI Bill benefits. A potential unintended consequence is that some veterans may incur burdensome debt. The Department of Veterans Affairs has paid about \$76.5 billion in Post-9/11 GI Bill benefits since August 2009, yet Congress lacks data to assess the extent to which veterans are incurring federal student loan debt. With military background information, the Department of Education would be able to fill in data gaps on the federal debt loads and repayment status of individuals using the Post-9/11 benefit.

Additionally, we also ask that the Department review questions about active-duty or veteran status to ensure that federal student aid applicants are correctly classified. For example, it may not be clear how individuals in the reserves, who are subject to periodic activations, should answer. Perhaps, rewording the options to read "recurring military service" and "discharged veteran" might resolve any confusion. Or, if this is not feasible, the relevant notes and "Help and Hints" sections could be clarified.

Finally, we suggest that you work with the Department of Veterans Affairs to automate the cross-walk of institutional data across the two departments, as the departments use different methods for tracking institutions (OPEID numbers vs. VA facility codes). Although the two departments manually matched school identifiers in 2013 to create a crosswalk, no system is in place to keep the crosswalk up to date as schools merge, are sold, or apply to change their identifiers. An up-to-date crosswalk is essential for both ED data analysis and federal oversight. ED needs to adopt a 2013 proposal by the Veterans of Foreign Wars (VFW) to automate the maintenance of the crosswalk, to make sure that the crosswalk is accurate, and to ensure that it does not omit some schools. The VFW proposal was submitted to the IPEDS Technical Review Panel.

Thank you in advance for taking steps to provide important data to help ensure that service members' and veterans' post-service college careers are not compromised by undue financial burdens.

Sincerely,

Walter Ochinko
Research Director
Veterans Education Success