

October 13, 2017

Ethics Office
U.S. Department of Veterans Affairs
810 Vermont Ave, NW
Washington, DC 20420

RE: Docket VA-2017-VACO-0001-0227 (82 FR 43288)

Dear Sir/Madam:

We understand the Department of Veterans Affairs (VA) plans to rescind its recent [proposal](#) to waive a federal ethics statute ([38 USC 3683](#)) in order to specifically allow “all VA employees” to “receive any wages, salary, dividends, profits, gratuities, or services from, or own any interest in, a for-profit educational institution.”

We thank you. Common sense suggests veterans would not be served by allowing financial entanglements between VA employees and colleges that want the GI Bill.

Should the Department undertake any revision of its proposal, please consult our organizations, as well as ethics experts, to ensure VA employees are not unwittingly manipulated to steer veterans towards a particular college. For example, VA employees taking classes should not accept tuition discounts or other favors that might leave the employees vulnerable to requests from the college to help recruit veterans or influence the college’s access to GI Bill funds. Similarly, waivers for outside employment should ensure the VA employee’s specific job duties do not involve the opportunity to steer veterans towards a college or influence its access to GI Bill funds.

Finally, we urge the Department to follow the Inspector General’s recommendation of alerting VA employees to their obligations under the ethics law.

Thank you for your consideration.

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Director of Government Relations
Got Your 6

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