

Attn: Board of NC-SARA

re: Proposed Clarification Modification E - Discontinued Programs

To Whom It May Concern:

My name is Ramond Curtis, I am the State Policy Manager for Veterans Education Success. We work on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill® and other federal education programs. On behalf of the student servicemembers, veterans, their family members and survivors that we represent, we thank you for the opportunity to comment on the Proposed Clarification of Modification E-Discontinued Programs.

The proposed changes to the SARA manual, which state that "The institution agrees that in cases where the institution cannot fully deliver the instruction for which a student has contracted, it will provide a reasonable alternative for delivering the instruction or reasonable financial compensation for the education the student did not receive," is inadequate for the purposes of student veterans.

As you may be aware, the Post 9/11 G.I. Bill pays benefits from the Department of Veterans' Affairs (VA) directly to the school. The Department of Defense (DoD) does the same thing with the Tuition Assistance Program (TAP) for active duty servicemembers. This proposal does not seem to contemplate these specific situations, and thus would seem to be inadequate.

An acceptable alternative would be to require the school to provide a refund of all amounts paid by the student, or on their behalf, to the institution. Restitution for failure to perform a contractual agreement needs to contemplate student veterans, who have sacrificed so much for America. The higher educational institution of their choice should be required to ensure that they are able to obtain an adequate return on investment for the sacrifice that they have made for us all.

Very respectfully,

Ramond Curtis

State Policy Manager

Veterans Education Success