

**Cory Titus, Military Officers Association of America**  
**October 27, 10:18 AM**

Good morning to the Department of Education officials and staff. My name is Cory Titus, and I am the Military Officers Association of America's Director of Veterans' Benefits. I'm speaking on behalf of our 350,000 members to urge your department to strongly implement the new laws passed by Congress to close the 90/10 loophole.

Education and the opportunity to better one's life have been a cornerstone of service since the GI Bill was first implemented during World War II. While this benefit has changed the lives of millions of servicemembers and veterans, myself included, it also has made our community a target of deceptive schools seeking profits first and foremost. Our servicemembers, veterans, families, and survivors using the GI Bill deserve better – Congress certainly understood this when it closed the 90/10 loophole on a bipartisan basis.

The legislated delay in implementation allows schools more than enough time to account for the upcoming changes, and it would be a disservice to the intent of the law and our GI Bill students if the Department of Education were to weaken Congress's intent with the final rules.

GI Bill students deserve a quality education and a choice of schools, not a focused effort by institutions to pocket their education benefits. It is perfectly reasonable to expect a college to receive 10% of its funding from non-government sources.

MOAA has worked on this issue for years and supports closing the 90/10 loophole after seeing the harm done by schools that target our community. Thank you for the opportunity to comment, and please contact us with any questions you may have.