

December 15, 2021

Vanessa Gomez
U.S. Department of Education
400 Maryland Ave. SW, Room 2C179
Washington, DC 20202
Docket ID ED-2021-OPE-0077

Dear Ms. Gomez,

The undersigned veterans and military service organizations write to make the following nominations for the upcoming negotiated rulemaking Committee on Institutional and Programmatic Eligibility that the Department of Education intends to convene in January 2022. We represent millions of servicemembers, veterans, and family members who are directly impacted by the decisions of the Department.

The proposed list of program-integrity topics to be discussed in this process, including the 90/10 Rule, ability-to-benefit, certification, change of ownership, financial responsibility, gainful employment, and administrative capability affect not only veterans and military-connected students who rely on Title IV programs, but also indirectly affect billions of federal educational dollars administered by the Departments of Defense and Veterans Affairs. The interests represented by our organizations, therefore, are significantly affected by regulations that the Department plans to develop through this process.

As important stakeholders in the outcome of these negotiations, the community of U.S. military servicemembers, veterans, and groups representing them recommends the following individuals to be appointed to represent the veterans, military, and family communities. These nominees take seriously the honor and distinction of representing the diverse interests of the large and unique veteran and military population with a non-partisan approach. We have taken special care to identify negotiators who can approach the breadth of topics with great expertise and in good faith.

- *Primary: Barmak Nassirian, Vice President for Higher Education Policy at Veterans Education Success*
barmak@vetsedsuccess.org, 202-262-4684, 1501 K Street, Ste 200, Washington, DC 20005

Barmak Nassirian brings more than three decades of experience in higher education and is a nationally-known expert on multiple facets of the higher education sector, including institutional finance, academic policy, accreditation, and federal student aid. His past policy experience includes leading roles at the American Association of State Colleges and Universities and the American Association of Collegiate Registrars and Admissions Officers, work on the last three congressional reauthorizations of the Higher Education Act, testimony before congressional committees on various higher education topics, and extensive regulatory activity with federal agencies, including multiple rounds of negotiated rulemaking with the U.S. Department of Education.

- *Alternate: Travis Horr, Senior Director of Government Affairs, Iraq and Afghanistan Veterans of America*
travis@iava.org, (202) 544-7692, 777 North Capitol St NE, Washington, DC 20002

Travis Horr presently serves as the Senior Director of Government Affairs for Iraq and Afghanistan of America, the leading veterans advocacy organization representing the Post-9/11 Generation of veterans. As a Marine Corps Combat Veteran, Travis served as an infantry rifleman stationed initially at the historic Marine Barracks "8th & I" in Washington, DC, and later at Camp Pendleton, with overseas experience in Helmand

Province, Afghanistan in 2010 and 2011. He graduated from the University of Southern Maine with a bachelor's degree in political science and government, and began his career in consulting for a boutique firm based in Portland, Maine. In his consulting role, he provided analysis and insight to Fortune 500 clients, as well as political campaigns in Maine and Delaware. Today, he is known as a leading advocate for veterans, often working closely with staff and leadership on Capitol Hill, and frequently advising senior executives at the Departments of Veterans Affairs and Defense on matters pertaining to Post-9/11 Veterans.

We urge you to recognize the importance of including legitimate representatives of this constituency who have the full faith and confidence of the organizations listed below. Others purporting to represent this community, but lacking similar support, may have alternative agendas contrary to the broader desires of the veterans we represent across the country. The nominations we put forth are supported by the following veterans and military service organizations:

Signed,

American GI Forum
Army Aviation Association of America
Black Veterans Project
Campaign to Protect Student Veterans
Commissioned Officers Association of the USPHS
Headstrong Project
Iraq and Afghanistan Veterans of America
Jewish War Veterans of the U.S.A.
Marine Corps Reserve Association
MCEC - Military Child Education Coalition
Military Officers Association of America
Modern Military Association
National Association of American Veterans, Inc.
National Association of Black Military Women
National Military Family Association
Paralyzed Veterans of America
Psych Hub
Service to School
Student Veterans of America
Swords to Plowshares
The Military Order of the World Wars
Travis Manion Foundation
University of San Diego Veterans Legal Clinic
Veterans and Military Families for Progress
Veterans Education Success
Veterans for Common Sense
Veterans of Foreign Wars of the U.S.
Vietnam Veterans of America