



THE AMERICAN LEGION  
*Veterans Strengthening America*

WASHINGTON OFFICE

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## **NEGOTIATED RULEMAKING FOR HIGHER EDUCATION**

### **JOSEPH SHARPE PUBLIC COMMENT**

On behalf of National Commander Paul Dillard and the nearly two million members of The American Legion, we thank The Department of Education for inviting us to speak on 90/10 and gainful employment at this public hearing today.

Ensuring that service members obtain quality education during and after their time in uniform is a top priority for The American Legion. Every veteran deserves the right to an education that provides them with the skills and experience needed to find gainful employment in the 21st-century labor market.

Many veterans have successfully utilized their GI Bill benefits to seek employment in their desired industries. However, others have unfortunately fallen victim to unscrupulous actors who have taken advantage of the old 90/10 interpretation of U.S. education law, whereby the G.I Bill counted as private dollars outside of the Title IV federal student aid programs. Given that taxpayers spend more than \$150 billion on federal financial aid and \$11 billion on GI Bill benefits annually, The American Legion is concerned with safeguarding federal taxpayer stewardship and ensuring public funds are supporting reputable academic institutions.

Numerous laws passed in recent years, including the Harry W. Colmery Act in 2017 and the Isakson Roe Act of 2020, seek to combat the ability of these malicious institutions to swindle the nation's veterans into overpriced and underperforming programs that fail to provide the necessary training needed to succeed in the workforce.



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The American Legion stressed the need for risk-based systems to ensure students do not graduate from institutions of higher learning facing diminished or negative job market returns. Serving on the advisory council for the Risk-Based Survey (RBS) model, The American Legion pushed for its development, advocating tirelessly to ensure that it becomes the standard practice when evaluating higher education institutions that accept GI Bill funding. The American Legion's commitment to supporting this model is codified in Resolution No. 11: GI Bill Risk-Based Survey, whereby The American Legion requests the Federal Government promptly adopt and initiate the RBS program to protect our veterans, service members, and the GI Bill.

The American Legion looks forward to the implementation and upscaling of the RBS model later this year and requests that the U.S. Department of Education upholds its current interpretation of 90/10 and enforce accordingly. We thank the U.S. Department of Education for their diligence in this manner and for their efforts to provide quality academic & vocational opportunities for our servicemembers and veterans.