Ms. Ashley Clark  
U.S. Department of Education  
Washington, DC 20202

RE: Docket ID ED-2022-OPE-0062

Dear Ms. Clark,

The undersigned organizations serving service members, veterans, and their families and survivors are pleased to offer our strong support of the proposed regulations to implement the closure of the 90/10 loophole.

For more than a decade, our organizations have fought to close the 90/10 loophole which inadvertently incentivized schools to target members of our community for their GI Bill benefits. Last year, with broad bipartisan support, Congress finally closed the loophole. The direct impacts on students from our community of closing this loophole are especially apparent when you see their testimony from the rulemaking negotiations (see appendix).

The proposed regulations represent the unanimous consensus of the negotiated rulemaking committee, which was comprised of representatives of schools, veterans advocates, and other consumer and student advocates. The committee’s unexpected consensus was the result of good-faith negotiations and compromise on the part of all participants in the process.

The closure of the 90/10 loophole has been a long time priority for military-connected students, and we look forward to its faithful implementation.

Sincerely,

American GI Forum of the United States  
AMSUS, Society of Federal Health Professionals  
Blue Star Families  
City of Boston Office of Veterans’ Services  
Cohen Veterans Network  
Combined Arms  
Commissioned Officers Association of the USPHS  
Disabled American Veterans  
Exceptional Families of the Military  
Iraq and Afghanistan Veterans of America  
Jewish War Veterans of the U.S.A.  
Military Chaplains Association  
Military Child Education Coalition  
Military Officers Association of America  
Modern Military Association  
National Association of American Veterans, Inc.  
National Military Family Association  
Paralyzed Veterans of America  
Psych Hub  
Psycharmor  
Service to School  
Service Women’s Action Network  
Student Veterans of America  
Swords to Plowshares  
The American Legion  
The Headstrong Project  
Tragedy Assistance Program for Survivors  
U. S. Coast Guard Chief Petty Officers Association  
University of San Diego Veterans Legal Clinic  
Veterans Education Project  
Veterans Education Success  
Veterans for Common Sense  
Veterans of Foreign Wars  
VetsFirst/United Spinal Association  
Vietnam Veterans of America
APPENDIX

Excerpts from testimonials of military-connected students on the topic of the 90/10 Rule as provided during the negotiated rulemaking committee’s public comment period:

“After I left the service, I was immediately bombarded with advertisements, mail, and phone calls from colleges. I wanted to use my GI Bill benefits to pursue a career in the medical field. One of the schools was Hesser College, which was owned by Kaplan…The school never provided job placement services, resume critiquing, and despite promising a guaranteed job after graduation, I again was lost, but at that point, I had $50,000 in student loan debt, despite being told that the GI Bill would cover everything.”

- Sean Braunstein, U.S. Army Veteran

“During recruitment, Argosy said they’re highly ranked and selective. After I enrolled, I realized this was just a misleading sales tactic — the school let in people who hadn’t passed the GED and couldn’t handle college-level work.”

- Kenneth Shaw, U.S. Navy Veteran

"I felt pressure to enroll from Phoenix recruiters who told me I needed to enroll quickly or I’d miss out, so I signed up right away. But when I arrived, I found out that new cohorts started every week. They also claimed their alumni went on to be executives and that the school had partnerships with government agencies and companies like Microsoft and AT&T, but I never saw these or any other job placement services."

- Alphi Coleman, U.S. Army Veteran

"Recruiters from the University of Phoenix sold me on their degree path and assured me I’d incur no out-of-pocket tuition costs because of my GI Bill benefits and the school’s active duty discount… I also found myself $11,000 in loan debt, and when I wanted to transfer to Sacramento State to pursue a different master’s program, I was told only 3/4 of my credits would transfer."

- Daniel Dresen, Army National Guard Veteran

"I used my GI Bill to attend Ashford University. One reason I went there is that they stressed that they were “military friendly” and that my GI Bill would cover all my tuition… I would never have gone to Ashford if I had known that my GI Bill was not going to cover all my tuition, and that Ashford is unfriendly and unhelpful to military veterans, especially those experiencing injuries."

- Jenica King, U.S. Army Veteran