

August 26, 2022

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 testimonies 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