

February 22, 2024

The Honorable Josh Jacobs, Under Secretary for Benefits
Veteran Benefits Administration
U.S. Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20420
via email

Re: Proposed Regulatory Change on the Definition of “Independent Study”

Dear Mr. Jacobs,

The undersigned veterans and military service organizations write to submit our strong opposition and deep concerns regarding your proposed changes to open the GI Bill to unaccredited online programs and online programs that do not lead to a degree (also referred to as online non-college degrees (NCDs)). The proposed rule change is being done *without public comment*, and would revise the definition of “independent study” and “distance education.” The effect of this would be to remove online programs from the requirements of 38 USC § 3680A, which requires accreditation and that programs lead to a standard college degree or certain certificates.

We have serious concerns about the substantive effects of this change, as well as the Administration’s unwillingness to open the proposed changes to the appropriate process of public comments. We ask that the Administration abandon its efforts to extend GI Bill approval to unaccredited online programs and online programs that do not lead to a degree/certificate.

Sincerely,

Air Force Sergeants Association
American GI Forum
Blue Star Families
Coast Guard Chief Petty Officers Association
Commissioned Officers Association of the USPHS
Elizabeth Dole Foundation
Fleet Reserve Association
Iraq and Afghanistan Veterans of America
Military Chaplains Association
Military Child Education Coalition
Modern Military Association of America
National Association of State Approving Agencies
National Military Family Association

No Greater Sacrifice Foundation
Paralyzed Veterans of America
Service Women's Action Network
Swords to Plowshares
The American Legion
Tragedy Assistance Program for Survivors
Travis Manion Foundation
Veteran Staffing Network
Veterans Education Success
Veterans for Common Sense
VETSxHBCU
Vietnam Veterans of America

CC:

The Hon. Terri Tanielian, White House Domestic Policy Council
Ms. Faye Fernandes, Senate Committee on Veterans' Affairs
Ms. Kesley Baron, Senate Committee on Veterans' Affairs
Ms. Katy Flynn, House Committee on Veterans' Affairs
Mr. Justin Vogt, House Committee on Veterans' Affairs