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