

Office of the President

September 11, 2012

Re: H.R. 4057, the Improving Transparency of Education Opportunities for Veterans Act

Dear Representative:

On behalf of the higher education associations listed below, representing two- and four-year, public and private non-profit institutions, we write regarding H.R. 4057, the Improving Transparency of Education Opportunities for Veterans Act. We understand that the House will consider the measure under suspension of the rules as early as today.

H.R. 4057 directs the Secretary of Veterans Affairs to develop a comprehensive policy to improve outreach and transparency to veterans and service members by providing key information on institutions of higher learning. H.R. 4057 would provide flexibility for institutions of higher education, while ensuring effective consumer information reaches our nation's veterans. We are all acutely aware of the high number of veterans returning home from combat who struggle with understanding their higher education options post deployment. Given the persistently high national unemployment rate, institutions strongly support providing the information necessary for veteran students to succeed and make the best use of the educational benefits they have earned.

On the whole, we believe the more streamlined and less prescriptive approach taken by HR 4057 is preferable to that taken by legislation under consideration by the Senate Committee on Veterans Affairs. However, we ask that you continue to work in conference to address the concerns that we have outlined below:

- **Cost of data collection.** Higher education institutions already face significant reporting burdens and it must be remembered that these requirements are not without cost. Institutions have been overwhelmed by the pace and number of veteran consumer information requests emanating from the White House, Congress, multiple federal agencies and many state legislatures in recent years. Given current economic conditions and concerns about increasing college tuition, we ask you to carefully weigh the benefits of specific information requests against the burden and cost of collection.
- **Tracking system (page 2, lines 20 – 25).** H.R. 4057 requires the Department of Veterans Affairs to establish a centralized system to track and publish feedback from students and state approving agencies about various aspects of institutional quality and practices. Subsequent sections of the bill deal with how to share this information with accreditors and Transition Assistance Program participants. We are concerned that such a system, without any provisions for verifying the accuracy of the feedback or allowing institutional responses, would potentially disseminate inaccurate information to veteran students and be subject to abuse.
- **Median debt (page 4, lines 18-21).** We recommend that this information request be modified to mirror the median Title IV debt levels calculated by the Department of Education and included on the new model

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financial award letter (the “Shopping Sheet”). The bill requires the reporting of median debt for all students at the institution, while the Shopping Sheet calls for median debt “for completers.” Having two similar, but not identical, requirements will not only be burdensome to institutions, but also extremely confusing for veterans.

- Enrollment rates (page 5, line 1). We are unsure what is meant by an “enrollment rate”--institutions do not currently collect this information. Institutions do collect total enrollment and already report this information through the Integrated Postsecondary Education Data System.
- Licensure requirements (page 5, lines 3-10). This provision appears to require institutions to determine all federal, state or local licensure/certification requirements. Given their variety across the various jurisdictions, this would represent a massive undertaking on the part of institutions. Unfortunately, because these requirements are subject to change, these determinations would become quickly outdated.
- Award of credit (page 5, lines 17-18). Institutions are already required to disclose their transfer of credit policies under section 485(h) of the Higher Education Act. While we appreciate the desire for more information, the award of credit is a highly complex and individualized determination and institutions must remain the final arbiters as to whether credit will be accepted. We are concerned that requiring additional disclosures regarding the acceptance or non-acceptance of proprietary school credits is unlikely to provide useful information for veterans and may in fact be misleading.

Despite these concerns, we believe HR 4057 reflects a preferable approach to ensuring veterans have access to the key information they need to make thoughtful, well-informed decisions as they return home. We appreciate your consideration of our views and look forward to working with you on this and other related measures as they move forward.

Sincerely,



Molly Corbett Broad
President

MCB/ldw

On behalf of:
American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Public and Land-grant Universities
National Association of Independent Colleges and Universities