

Office of the President

September 12, 2012

The Honorable Patty Murray  
Chairman, Committee on Veterans' Affairs  
U.S. Senate  
SR-412 Russell Senate Office Building  
Washington, DC 20510

The Honorable Richard M. Burr  
Ranking Member, Committee on Veterans' Affairs  
U.S. Senate  
SR-412 Russell Senate Office Building  
Washington, DC 20510

Dear Chairman Murray and Ranking Member Burr:

On behalf of the higher education associations listed below, representing approximately 4,300 two-year and four-year, public and private, non-profit colleges, universities and research institutions, I write to express our views regarding S. 2241, the G.I. Bill Consumer Awareness Act. Although we have not seen the latest version of the legislation, we understand that the Committee will mark up a modified version of the bill incorporating provisions from both S. 2179, the Military and Veterans Educational Reform Act and S. 2206, the G.I. Educational Freedom Act.

S. 2241 contains many provisions designed to provide additional consumer information and protections for veterans using G.I. Bill education benefits. We strongly support efforts to help veterans make informed decisions while selecting the institution that best meets their needs. We also strongly support efforts to protect veterans from fraudulent and unduly aggressive recruiting practices occurring at a subset of institutions. However, we are concerned that parts of the bill run counter to its larger goals.

S. 2241 calls on institutions to provide highly detailed data not currently collected by institutions. The legislation contains nearly 30 new information requests, many containing subparts and requiring further disaggregation by subgroups. Several provisions seek information at the "program of education" level, which would require disaggregation of data by major or field of study—a level of granularity not collected by institutions. In fact, because most of the information sought is different than what is currently reported through the Integrated Postsecondary Education Data System, the legislation would result in the creation of a new data collection mechanism, requiring resources that could be utilized more wisely during these difficult fiscal times. Reporting requirements are not without costs—costs that are ultimately reflected in higher tuition for students. Given the sheer volume and disaggregation of data envisioned, the information is more likely to overwhelm than inform.

Among other provisions, S. 2241 would require all programs of education to comply with Title IV requirements as a condition of G.I. Bill eligibility. We support this requirement in principle, but urge the committee to carefully review the language to ensure that Title IV participating programs will not lose G.I. Bill eligibility due to minor, technical compliance issues.

S. 2241 also requires institutions to provide an explanation of transfer of credit policies including whether credits awarded are transferable to other public institutions in the state and whether the institution awards credit for prior military experience. 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,

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the award of credit is a highly complex and individualized determination. Additional generalized statements on this issue are, at best, unlikely to provide useful information for consumers and, at worst, misleading. If transfer of credit disclosures need modification, the issue should be considered in the context of the upcoming Higher Education Act reauthorization.

Finally, S. 2241 contains several provisions that are similar, but not identical, to other veteran consumer initiatives already underway. For example, the Executive Order on the Principles of Excellence for Veterans and Service Members directs the Department of Veterans Affairs and other agencies to develop comparable student outcome measures using existing agency data systems, and requires signing institutions to designate a point of contact for academic and financial counseling, and to use the model financial aid form or "Shopping Sheet" to provide personalized financial aid award information to prospective student veterans. 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. We are concerned that without further coordination, S. 2241 is likely to duplicate existing efforts, and cause further confusion for both agencies and institutions tasked with implementation.

We appreciate your consideration of our views and look forward to working with you as the legislation proceeds. We thank you for your continued efforts on behalf of our nation's veterans.

Sincerely,

A handwritten signature in black ink, reading "Molly C. Broad". The signature is fluid and cursive, with the first name "Molly" and last name "Broad" clearly legible.

Molly Corbett Broad  
President

MCB/lw

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