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Veterans and Military Service Organizations Urge Education Department Not to Rollback Student Protections and Quality Controls in Program Integrity Rules

Veterans also Travel to Education Department Hearings to Share Their Experiences

WASHINGTON, DC – Today, 28 leading national veterans and military service organizations filed a public comment urging the US Education Department not to rollback student protections and quality controls in its proposed upcoming negotiated rulemaking on Title IV regulations governing education quality.

The organizations urged the Education Department to “strengthen, not discard, common-sense protections against waste, fraud, and abuse by bad actor colleges.” “Weakening or discarding these regulations would allow low-quality colleges to defraud servicemembers, veterans, their families and survivors – as well as taxpayers,” the organizations wrote.

“For too long, veterans and servicemembers have been targets of fraud and abuse by bad actor colleges,” said Veterans Education Success President Carrie Wofford. “Education Secretary Betsy DeVos should be stepping up to protect students and taxpayers, not helping bad actor colleges rip off students and taxpayers.”

The organizations noted that:

- The “credit hour” requirement for colleges was implemented to ensure bad actor colleges were not misrepresenting the amount of actual instruction given to students.¹
- The requirement that colleges have “regular and substantive interaction” between instructors and students was enacted to ensure bad actor colleges do not skirt their educational duties and charge exorbitant tuition for what amounts to an online textbook or YouTube video.
- Narrowing states’ abilities to oversee the quality of higher education (“state authorization”) would not only allow more predatory schools to enter the marketplace, but also would strip individual states of their long-held ability to protect their citizens’ right to receive quality educations.
- The requirement that higher education institutions demonstrate a reasonable relationship between the length of a program and entry-level requirements for the recognized

¹ See generally https://ifap.ed.gov/dpcletters/GEN1106.html
occupation for which the student is preparing to enter is a common-sense regulation that was put in place to combat fraud from unscrupulous schools.

- Repealing the current cap on how much Title IV eligible colleges can outsource instruction would likely result in both students and taxpayers being confused and misled over who is actually providing the education for which they are paying and whether it is worth their tuition.
- Competency-based education is important and helpful to servicemembers, veterans, and military families who gain valuable competencies during military service, and also must relocate frequently as part of their service, and should be encouraged.

Veterans and veteran representatives also testified at the Department’s public hearings on this rulemaking, including:

- **September 6, 2018, hearing in Washington DC:**
  - Testimony of Army veteran Jarrod Thoma (click [here](#)) (video and tweets [here](#))
  - Testimony of military spouse Mindy Thoma (click [here](#)) (video and tweets [here](#))
  - Testimony of VES Vice President Tanya Ang (click [here](#)) (photo [here](#)) (video [here](#))

- **September 11, 2018, hearing in New Orleans, LA:**
  - Testimony of Army Sgt Renee Seruntine (click [here](#)) (video and tweets [here](#))
  - Testimony of VES Legal Advocacy Director Mike Saunders (click [here](#)) (photo and tweet [here](#); video tweet [here](#))

- **September 13, 2018, hearing in Sturtevant, WI:**
  - Testimony of VES Veteran Engagement Director Tyson Manker (click [here](#)) (video and tweets [here](#))