November 8, 2021

Maribel Aponte
VA PRA Clearance Officer
Office of Enterprise and Integration, Data Governance Analytics
Department of Veterans Affairs
1717 H Street NW
Washington, DC 20006
www.reginfo.gov/public/do/PRAMain

Dear Ms. Aponte:

In response to OMB Control No. 2900 – NEW, on behalf of the Association of Jesuit Colleges and Universities (AJCU), I would like to share comments with respect to the Department of Veterans Affairs’ (VA) proposed information collection regarding the 35% exemption request from the 85/15 reporting requirement.

Given the interdependence of requesting the 35% exemption and the required calculations of 85/15 (regardless of exemption status), we would like to note for the record that the estimates for this collection likely significantly underestimate the time it takes to be compliant. In addition, with the “policy” change outlined in the most recent Power Point (October 2020 and September 21-23, 2021) provided by VA (related to 85/15, the 35% exemption and supported/non supported students re: payment plans) there are still lingering questions that have been a challenge to resolve and understand. To minimize this confusion, we encourage the Department of Veterans Affairs to develop a more inclusive process for policy making that seeks input from impacted constituencies before publishing final or semi-final guidance.

Currently, the webpage hosting Education Service Webinars and Training has a disclaimer that, “The information in these presentations should be considered talking points for discussion and information sharing only. This information is not comprehensive and should not be used as a definitive source of information. Information on these presentations was current and correct on the date given.” This language creates uncertainty for schools as they seek specific, definitive guidance related to policy changes from the Department of Veterans Affairs.

AJCU institutions are proud so serve our nation’s Veterans and are committed to ensuring our student Veterans receive an exceptional education. We appreciate our partnership with the VA and look forward to finding ways to improve opportunities for our nation’s Veterans.

Sincerely,

Rev. Michael J. Garanzini, S.J.
President, Association of Jesuit Colleges and Universities