

August 21, 2018

The Honorable Robert M. Worley
Director, Educational Services
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

SUBJECT: Comments regarding June 12, 2018 letter requiring academic progress reporting for GI Bill students

Dear Director Worley,

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), I write to you to provide comments regarding the June 12 letter that you provided to institutions of higher education regarding required reporting requirements related to Forever GI Bill recipients on college campuses.

Founded in 1910, AACRAO is a nonprofit association of more than 11,000 higher education admissions and registration professionals who represent approximately 2,600 institutions and agencies in the United States and more than 40 other countries. The vast majority of our individual members are campus officials with direct responsibility for admissions, recruiting, academic records, and registration functions, including veteran reporting.

AACRAO supports and endorses the opportunity to report the academic progress for GI Bill students. However, we have concerns and questions regarding the requirements, methodology and definitions contained in your letter of 12 June 2018. Specifically, in order to fully support the academic progress reporting requirement, additional definitions of terms and descriptions regarding how each outcome will be calculated should be shared with all institutions. This detail was not included in your letter and is not articulated in the regulation you referenced (34 CFR 668.34). Alignment of definitions would allow for the ability to compare veterans to other student populations.

Moreover, the reporting requirements as stated in your letter requires reporting graduation and program completion dates in VA-ONCE or through the appropriate paper form. We believe there are significant problems with this process, which we think will affect the data quality and the accuracy of reporting academic progress by this method. To expand on this concern, GI Bill students who have either stopped using or exhausted their GI Bill benefits cannot be reported unless their last enrolled term and last term of benefits usage are concurrent. This is a flawed methodology, especially as the Department of Veterans Affairs (VA) definition of graduation rates only counts a veteran as graduating if they received VA benefits during the term when they graduated. As a result, significant numbers of successful GI Bill beneficiaries will not be recorded, and their academic progress will be under-counted or unreported.

We would encourage the VA to maximize this opportunity and review the VA-ONCE system in its entirety as the current method of reporting to the VA requires manual data entry into VA-ONCE. This is a labor intensive process, which takes away from time that institutions can use to assist students. In addition, manual data entry also increases the possibility of human error.

With members who have the day-to-day responsibility of managing GI Bill benefits to veterans on campuses and complete much of the reporting through VA-ONCE, we would like to serve as a resource to the VA. In fact, AACRAO recently established a short-term work group charged with assessing the feasibility of aligning the veterans reporting process with existing enrollment and compliance reporting business processes. The work group also hopes to identify issues, requirements and potential changes to Student Information Systems to facilitate improvements in veterans reporting.

We hope that this letter is well received and I would like to request a meeting with you and your staff to introduce you to some of the members of the workgroup, who I have cc'ed below. We stand ready to support the VA's mission of supporting veterans, especially in their ability to maximize their GI bill benefits and achieve academic success. Please feel free to reach out to William Gil, AACRAO's Director of Government Relations, at 202-355-1080 or gilw@aacrao.org to coordinate a meeting.

Sincerely,



Michael V. Reilly
Executive Director

Cc: John Fletcher (Chair), Associate Provost, Enrollment Services, East Carolina University
Joe Rasmussen (Vice-Chair), Veterans Service Coordinator, University of Wisconsin-Madison
Bhavesh Bambhroia, University Registrar, Temple University
Kimberly Bloodgood, Director, Office for Veterans and Military Personnel, Indiana University-Purdue University Indiana
Amy Gleason, Assistant Registrar for Compliance, Duke University
Bridgette Ingram, Director, Scholarships and Financial Aid, Texas A&M University
George Levanthes, Vice President, National Student Clearing House
Christina Wojtysiak, Senior Reporting Specialist, University of Notre Dame
Emily Barrier, Certifying Official for Programs, University of Maryland University College
Audra McQuarie, Vice President, Registrar, University of Phoenix
Cory Cashen, Associate Registrar, Veterans Services, University of Arizona
David Johnson, Senior Associate Registrar, University of Iowa
Dustin Noll, Office of the Registrar-Veteran Certification Team, University of Texas-Austin
Tina Hummons, Associate Registrar-Daily Operations, Sinclair Community College
Jackie Swensen, St. Olaf College