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Agency Information Collection Activities; Proposals, Submissions, and Approvals: 35 Percent Exemption Request from 85/15 Reporting Requirement

Document: VA-2024-VACO-0001-0625
Comment on ICR-35% Exemption Request from 85_15 Reporting Requirement- Walsh University

Submitter Information

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Organization: Walsh University

General Comment

Dorothy Glasgow
VA PRA Clearance Officer, (Alt.)
Office of Enterprise and Integration/Data Governance Analytics
United States Department of Veterans Affairs
Washington, DC 20420

Dear Ms. Glasgow:

I am writing in response to Federal Register Notice FR Doc. 2024-20785, which includes an Information Collection Request (ICR) regarding additional data from institutions with the 35% waiver from 85/15 reporting.

With the passage of the Ensuring the Best Schools for Veterans Act of 2022, accredited institutions of higher education with a total veteran student enrollment of less than 35% are statutorily exempt from monitoring, collecting, and reporting data related to the 85/15 regulations. Institutions must confirm the enrollment waiver every two years.

Institutions with less than 35% of their student population using VA benefits should be exempt from the 85/15 rule reporting requirements. This exemption is justified for several reasons. Firstly, the low percentage of VA benefit recipients inherently indicates a minimal risk of program abuse, which is the primary concern the rule aims to address. Secondly, the 85/15 data from these schools would provide little value in monitoring potential quality issues, as the rule was designed to do. Lastly, eliminating this reporting requirement for exempt schools would significantly reduce their administrative burden, allowing them to focus resources on more impactful areas of education and student support.

The ICR should be changed to reflect the law and not cause confusion for institutions like mine that strive to serve veteran students and ensure their GI Bill benefits help provide a valuable education.

Sincerely,

