



November 12, 2024

Dorothy Glasgow
VA PRA Clearance Officer, (Alt.)
Office of Enterprise and Integration/Data Governance Analytics
U.S. Department of Veterans Affairs
810 Vermont Ave., NW
Washington, DC 20420

Dear Ms. Glasgow,

On behalf of the undersigned associations, representing the full spectrum of American higher education, I write to express our members' strong concerns with the approach proposed in the U.S. Department of Veterans Affairs' (VA) Agency Information Collection Activity: 35% Exemption Request From 85/15 Reporting Requirement (FR Doc. 2024-20785).

The Ensuring Best Schools for Veterans Act (PL 117-174), which was enacted in 2022, was explicit that exempt institutions are required to verify that they remain compliant with the exemption every two years but have no other requirements as it relates to the 85/15 data. Congress clearly intended to address the confusion and burden imposed on institutions resulting from the VA's interpretation of then existing law.

In September, the VA invited comments on a revision of a currently approved data collection pertaining to the 35% exemption for 85/15 reporting. The proposed revision would create a new requirement that institutions compile, retain and submit 85/15 data to the VA, regardless of whether the institution qualifies for the 35% exemption.

Put simply, the data collection proposed in the notice is not allowable under law. The VA should amend its approach and make clear that institutions qualifying for the 35% exemption are under no obligation to compile, retain or submit 85/15 data to the VA.

We appreciate the opportunity to offer comments and look forward to working with VA and Congress to ensure this data collection best serves the needs of veterans and institutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell".

Ted Mitchell
President

On behalf of:

American Association of Collegiate Registrars and Admissions Officers

American Association of Community Colleges

American Association of State Colleges and Universities

American Council on Education

Association of American Universities

Association of Catholic Colleges and Universities

Association of Jesuit Colleges and Universities

Association of Public and Land-Grant Universities

Council for Christian Colleges and Universities

National Association of College and University Business Officers

National Association of Independent Colleges and Universities

National Association of Student Financial Aid Administrators