

PUBLIC SUBMISSION

As of: 2/24/22 11:27 AM
Received: February 16, 2022
Status: Posted
Posted: February 24, 2022
Tracking No. kzp-359q-i2yp
Comments Due: February 18, 2022
Submission Type: Web

Docket: VA-2021-VACO-0001
2021 Notice with Comments

Comment On: VA-2021-VACO-0001-0584

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Principles of Excellence Complaint Feedback Tool; OMB No. 0797; FR Doc. 2021-27490

Document: VA-2021-VACO-0001-0593

Comment on ICR - Principles of Excellence Complaint Feedback Tool; OMB No. 0797; Feehan, Michael

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General Comment

The GI Bill Feedback Tool, a Waste of U.S. Taxpayer Dollars

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Few colleges and universities in the United States conspicuously share the Department of Veterans Affairs GI Bill Feedback Tool with their students. Some institutions, the State University of New York (SUNY), for example, train administrative staff to treat the Feedback Tool as a compliance risk—as opposed to a student resource. Understandably, this creates a chilling effect within the marketplace and incentivizes Institutes of Higher Education (IHE) to ignore the Feedback Tool because it poses a risk to student enrollment.

In defense of IHE purporting to be committed to the Principles of Excellence, Executive Order 13607 charged the “Secretaries of Defense and Veterans Affairs” to create a plan, not IHE. Thus, almost a decade later, servicemembers, veterans, spouses, and other family members have a better chance of being shown high definition, production quality images of a university’s veterans center than of the Feedback Tool, Postsecondary Education Complaint Intake (DoD), or their respective data.

This is a problem because a student veterans center – as well equipped as some are – does not provide information on Recruiting/Marketing Practices; Quality of Education; Accreditation; Grade Policy; Financial Issues (e.g., Tuition/Fee charges); Release of transcripts; Student Loans; Transfer of Credits; Post-Graduation Job Opportunities; Refund Issues; Change in Degree Plan/Requirement; or any other relevant information that servicemembers, veterans, spouses, and other family members should know when choosing between colleges and universities.

In response to Veterans Benefits Administration, Department of Veterans Affairs (VA)’s Notice, Federal

Register Document 2021–27490, the proposed collection of information by the VA is not necessary for the proper performance of the Veterans Benefits Administration’s functions because the information is already being collected and compared through a multitude of different means offered by the private sector. Moreover, the Feedback Tool, which accepts third-party complaints, has had an identity crisis since its inception and cannot decide if it is meant to resolve complaints or receive feedback. Accordingly, the GI Bill Comparison Tool, which pulls its complaint data from the Feedback Tool, is inundated with an excessive number of expertly drafted complaints disproportionally brought by third parties targeting specific schools.

The quality, utility, and clarity of the information to be collected can be improved by engaging in strategic partnerships with organizations familiar with artificial intelligence. This will also minimize the burden of collecting information on respondents and best comply with the Principles of Excellence.

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Attachments

Feedback Tool Public Comment