

PUBLIC COMMENT: Sara Appel

SUPPORTING STATEMENT FOR PRINCIPLES OF EXCELLENCE COMPLAINT SYSTEM INTAKE (OMB Control Number 2900-XXXX)

A. Justification.

1. Executive Order 13607, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members, requires the establishment of a centralized complaint system for students receiving Federal military and veteran educational benefits. The purpose of the complaint system is to provide a standardized method to submit a complaint against an educational institution alleging fraudulent and unduly aggressive recruiting techniques, misrepresentation, payment of incentive compensation, failure to meet state authorization requirements, or failure to adhere to the Principles of Excellence as outlined in the Executive Order.

The VA's Principles of Excellence Complaint System (PoECS) will leverage DoD's complaint system to intake and manage complaints utilizing their existing contract and systems architecture with each agency only having access to their data. The VA's complaint system will utilize the same software platform as the DoD system. The complainants will access the complaint system through the GI Bill website and eBenefits portal. Veterans, family members, or other members of the public will be able to open links at either VA website location and enter the requested information. Complainants will be offered the opportunity to review the information in their complaint prior to clicking on the submit button. Once a complaint is submitted, the complainant will receive an email verifying that the complaint was received. At this point, the complaint will be stored in the complaint system and be available to select VA employees for review. VA will review the complaint and on behalf of the complainant will share the complaint with the institution which is subject of the complaint. VA will request the institution to formally respond to the complaint within 90 days. If an institution fails to respond within 90 days, VA will contact the institution and request a status update. Once VA receives a response from the institution, VA will forward the response to the complainant. At this point, VA will close the case. Valid complaints received will be transmitted to the central repository at FTC Consumer Sentinel. The information in the central repository is the same information provided by the complainant. Authorized law enforcement officials who have been granted access to the FTC Consumer Sentinel database will have access to view all complaints.

Comment [AS1]: What is the statute of limitations for complaints? Within two years of the incident? Five years?

Comment [AS2]: Is there not correspondence to the complainant what the investigation findings are and what if any additional steps or follow-up may be taken? Right now it reads that once the institution responds, that's it.

2. The respondent will submit a complaint about an educational institution online through either the GI Bill website or the eBenefit portal. The information gathered can only be obtained from the individual respondents. Valid complaints will be accepted from third parties.