

National Association for College Admission Counseling

...guiding the way to higher education

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October 15, 2013

Ms. Nancy Kessinger
Veterans Benefits Administration (20M33)
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

OMB Control No. 2900 – Principles of Excellence Complaint System Intake

Dear Ms. Kessinger:

On behalf of the National Association for College Admission Counseling (NACAC), thank you for the opportunity to comment on the proposed Department of Veterans' Affairs' (VA) Principles of Excellence Complaint System (PoECS). We appreciate your efforts to help veterans and servicemembers obtain a quality education and file a complaint if they feel an individual or institution is acting improperly.

Founded in 1937, NACAC is an organization of more than 13,000 professionals from around the world dedicated to serving students as they make choices about pursuing postsecondary education ("college"). NACAC is committed to maintaining high standards that foster ethical and social responsibility among those involved in the transition process, as outlined in the NACAC Statement of Principles of Good Practice, which can be found on our website (www.nacacnet.org). Our members include school counselors, college admissions officers, independent educational consultants, community-based organizations, and counselor educators, among others.

Over the past several years, NACAC has become increasingly concerned about the conduct of some colleges, especially as it relates to the recruitment of prospective students who may be veterans or members of our nation's armed services. These students have sacrificed a great deal to earn their education benefits and should not be viewed as "dollar signs in uniform," as some have described predatory recruitment practices towards servicemembers and veterans.

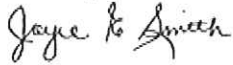
Overall, we are pleased with the PoECS; however, we do have a few suggestions that may make it more effective.

1. In addition to linking to the form through the GI bill website and the eBenefits portal, the PoECS should be made available on the Department of Veterans Affairs homepage. This will help ensure that students can find the complaint form quickly and easily.

2. We strongly urge you to strengthen the process of engaging the college after the complaint is filed. While Federal Register notice states that colleges must respond to the complaint within 90 days, it is not clear to what degree they must respond. Based on our read of the Notice, a college could simply dismiss the complaint without actually addressing the perceived problem after which the complaint would be deemed settled. We believe that a college must provide a detailed explanation in its response and we encourage the VA to include an appeals process so that the student can respond to the college's comments.

Again, thank you for the opportunity to weigh in on the PoECS. Please contact NACAC's Director of Public Policy and Research David Hawkins at dhawkins@nacacnet.org or (703) 299-6809 for additional information or if you have any questions about these recommendations and/or NACAC.

Sincerely,

A handwritten signature in cursive script that reads "Joyce K. Smith".

Joyce Smith, CEO