

Council for
Higher Education
Accreditation

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September 27, 2013

Ms. Jasmeet Sehra
Office of Management and Budget
DoD Desk Officer, Room 10102
New Executive Office Building
Washington, DC 20503

Dear Jasmeet:

The Council for Higher Education Accreditation (CHEA) appreciates the opportunity to respond to the Department of Defense proposed rule concerning Voluntary Education Programs. (Docket No. DOD-2013-OS-0093) (RIN 0790-AJ06).

CHEA is a national organization of 3,000 degree-granting colleges and universities and recognizes 60 institutional and programmatic accrediting organizations. CHEA has as its core purpose the national coordination of accreditation, the longstanding and historically effective means of assuring and improving academic quality in higher education.

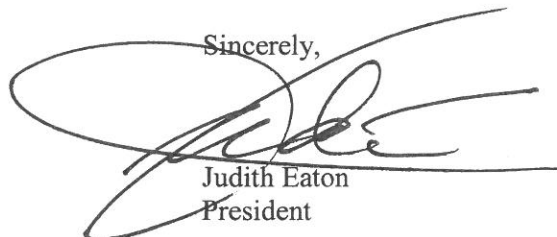
Our comments are focused on Section 68.6 Procedures; (a) (2) (ii). CHEA would recommend removal of the following language: “and participating in Federal student aid programs through the Department of Education under Title IV of the Higher Education Act of 1965.” This provision makes institutions that are accredited but do not participate in Title IV funding ineligible to continue educating those in uniform. This seems to be an unintended consequence of the provision.

Students in these accredited institutions and the government are already protected. They would continue to be protected even if the above language is removed. The schools are accredited by federally recognized accreditors. There is nothing about this part of the proposed rule that additionally protects students or the government. It does not improve institutional or instructional quality. Instead of addressing value, the proposed requirement may produce harm: It will likely limit low-cost educational providers that are currently serving members of our military and price some military members out of the higher education market.

CHEA is ready and willing to work with the Department of Defense and other interested parties to assure that the final rule protects members of the military seeking a quality education.

Thank you for the opportunity to provide our comments.

Sincerely,



Judith Eaton
President

cc: Carolyn Baker