

To Whom It May Concern,

The Veterans Education Project is committed to protecting all Student Veterans at every institution of higher education. To that end, we write to share our concerns with the new proposed "Gainful Employment" guidelines. We are calling for the Gainful Employment measurements to be applied equally to all schools, and by including appropriate calculations for critical mental health-related degree programs, we will ensure no Student Veteran is unprotected during their pursuit of higher education.

Some ill-intentioned universities have escaped accountability for far too long. These schools have made millions of dollars off of our Student Veterans, but have failed to provide the employment opportunities they promised and advertised. Meanwhile the Department of Education and Congress have turned a blind eye to these practices. For this reason, VEP applauds Secretary Cardona's assertion that Gainful Employment measurements should be applied equally to all higher education institutions; public, private, for-profit, and non-profit alike. In addition, to see that bachelor degree programs, the type of programs that attract the most Student Veteran dollars of all is being exempted is incredibly concerning.

Furthermore, as we find ourselves in the worst mental health crisis in history, we must ensure that institutions are not disincentivized to offer life-saving programs in the field of mental health. It is understood that these fields of study require residencies and practical hours post-graduation. As such, the immediate Gainful Employment calculations are extremely poor, which could dissuade institutions from offering these degrees. Therefore, we ask that programs that train Psychologists, Psychiatrists, and other mental health providers are given similar calculations to those afforded to healthcare providers. During the current mental health epidemic, it would be detrimental to the entire population, and especially to the Veteran population, who suffer disproportionately with mental health conditions, to inadvertently decrease the availability of programs that prepare students to work in these critical professions.

We must protect our Veterans, as they have projected us. All institutions must be held to the same high standards of care and support for Student Veterans. The use of Gainful Employment measurements across all types of institutions will promote ethical practices and protect Student Veterans against predatory recruitment tactics. We thank the Department for its continued commitment to protecting Student Veterans, and we stand ready to offer any assistance the Department may need.

Sincerely,

Stephen Patterson Executive Director

Veterans Education Project

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