

The Veterans Education Project (VEP)

Matthew Feehan, J.D.
Senior Policy Advisor

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We believe in identifying solutions. VEP is committed to nonpartisan research to identify the best path forward for Student Veterans and engages lawmakers and policy-experts to implement fair and equitable changes to the governance of higher education.

The Veterans Education Project applauds the Department’s effort to implement the accountability framework enacted in the One Big Beautiful Bill Act in a manner that is coherent, administrable, and applied consistently across for-profit, nonprofit, and public institutions.

The proposed regulatory revisions appropriately recognize that Congress has directed the Department to move toward a single, program-level earnings accountability system tied to Direct Loan participation, rather than maintaining competing regulatory regimes. Aligning existing Financial Value Transparency and Gainful Employment regulations with amended HEA statute reflects a reasonable implementation of that mandate. VEP views the Department’s decision to apply the earnings premium metric uniformly across programs as an important step toward protecting military-affiliated students regardless of the program or institution they enroll in.

Eliminating the debt-to-earnings metric, narrowing consequences to loss of Direct Loan eligibility, and standardizing cohort construction and comparison groups reduces unnecessary complexity while preserving a meaningful accountability signal. Collectively, these changes move the framework away from sector-based presumptions and toward outcome-based evaluation. This shift better reflects statutory intent, promotes regulatory durability, and reduces the unique risk that military-affiliated students are disproportionately affected by sector-specific policy swings unrelated to program quality and outcomes.

Furthermore, VEP notes that military-affiliated students—including veterans, servicemembers, and their families—are often underrepresented in Title IV-based datasets due to shared reliance on the GI Bill and Department of Defense (War) tuition assistance. As a result, certain programs with substantial or little military-affiliated enrollment may have outcomes that are not captured. VEP views this not as a flaw in the overall framework, but as an area where further data analysis and potential collaboration with the U.S. Departments of Veterans Affairs (VA) and War (DoW) may be warranted to ensure that accountability determinations accurately reflect program value.

Accordingly, the Veterans Education Project looks forward to representing the military-affiliated community during negotiations and engaging collaboratively with fellow negotiators and subject-matter experts to help reach consensus on this important regulatory package.