

April 14, 2016

Submitted via Federal eRulemaking Portal at www.regulations.gov

Office of the Deputy Chief Management Officer
Directorate of Oversight and Compliance
Regulatory and Audit Matters Office
U.S. Department of Defense
9010 Defense Pentagon
Washington, DC 20301-9010

Re: Comments on the Department of Defense proposed rulemaking on the "*Interstate Compact on Educational Opportunity for Military Children*", 81 Fed. Reg. 11698 (March 7, 2016); Docket: DOD-2014-OS-0020; RIN: 0790-AJ33

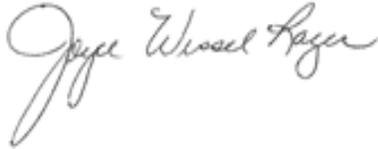
As a longtime supporter of the *Interstate Compact on Educational Opportunity for Military Children*, and an ex officio member of the Compact Commission, the National Military Family Association is pleased by the proposed rule establishing the Department of Defense's (DoD) roles and responsibilities in the Compact. The Interstate Compact is a vital tool in smoothing the transition for military children as they move between school districts and states. As the school system responsible for educating nearly 80,000 military-connected children, many of whom transition to and from local public schools every year, the participation of the Department of Defense Education Activity (DoDEA) is critical to the Compact's success. While not a member of the Compact, DoDEA has followed the Compact's policies regarding enrollment, eligibility, placement, attendance and graduation for years. We are pleased the proposed rule confirms DoDEA's continued adherence to these policies.

Now that the Compact has been adopted by all 50 states and the District of Columbia, the next step must be to ensure each state has a functioning state council. These councils play an important role in raising awareness of the Compact among school districts, as well as answering questions and resolving conflicts. Although DoD cannot compel states to create and maintain state councils, it can and should ensure each council has one or more military representatives. While we commend DoD for its thoughtful approach to identifying military representatives, we have concerns about some of the procedures outlined in the proposed rule. Under the proposed rule, each Service will be assigned several states and will be responsible for selecting the military representative to serve on those states' councils. The military representative must be a military member or DoD civilian who can serve on the state council for two years. Given the transient nature of military life, we believe this places an undue burden on the Services, who will be required to identify a new representative each time an individual serving on a state council is reassigned to a new location. Rather than choosing an individual, we believe it makes more sense to formally attach the military representative role to a given position or billet. An assignment by billet would provide the state councils with the assurance the military representative role will be continuously occupied and reduce the burden on the Services.

Should you have any questions regarding our response, please contact Eileen Huck in our Government Relations Department at 703-931-6632 or by e-mail at EHuck@militaryfamily.org.

The National Military Family Association is the leading nonprofit dedicated to serving the families who stand behind the uniform. Since 1969, NMFA has worked to strengthen and protect millions of families through its advocacy and programs. We provide spouse scholarships, camps for military kids, and retreats for families reconnecting after deployment and for the families of the wounded, ill, or injured. NMFA serves the families of the currently serving, retired, wounded or fallen members of the Army, Navy, Marine Corps, Air Force, Coast Guard, and Commissioned Corps of the USPHS and NOAA.

Sincerely,

A handwritten signature in cursive script that reads "Joyce Wessel Raezer". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Joyce Wessel Raezer
Executive Director