



TESTIMONY OF
STUDENT VETERANS OF AMERICA

BEFORE THE

COMMITTEES ON VETERANS AFFAIRS

U.S. SENATE
U.S. HOUSE OF REPRESENTATIVES

HEARING ON THE TOPIC OF:
“LEGISLATIVE PRIORITIES OF 2020”

MARCH 3, 2020



Chairmen Moran and Takano, Ranking Members Tester and Roe, and Members of the Committees:
Thank you for inviting Student Veterans of America (SVA) to submit testimony on our organizational policy priorities for 2020.

BACKGROUND

With a mission focused on empowering student veterans, SVA is committed to providing an educational experience that goes beyond the classroom. Through a dedicated network of more than 1,500 on-campus chapters in all 50 states and 4 countries representing more than 750,000 student veterans, SVA aims to inspire yesterday's warriors by connecting student veterans with a community of like-minded chapter leaders. Every day these passionate leaders work to provide the necessary resources, network support, and advocacy to ensure student veterans can effectively connect, expand their skills, and ultimately achieve their greatest potential. Student veterans are yesterday's warriors, today's scholars, and tomorrow's leaders. This ethos is embodied in the stories and successes of SVA Chapters and Alumni, such as Bonita Rodriguez, past president of the SVA Chapter at Pace University and the SVA Chapter at Colorado State University.

In the military and veteran community, a great deal of respect is given to the quiet professionals among us; those in our community who lead by example, lead those around them to greatness, and do so with overarching humility. Marine Corps veteran, recent Pace University graduate, and SVA's 2020 Student Veteran of the Year Bonita Rodriguez exemplifies what it means to be a great leader while remaining a humble, quiet professional. While leading her Chapter at Pace University, Bonita brought together SVA, the Student Government Association, Greek life, and the local community, creating a culture that fostered diversity and inclusivity while driving towards opportunities for student veterans to connect and participate with their larger community.

That same spirit of inclusivity and drive leads the work of the SVA Chapter at Colorado State University (CSU). Working closely with their Student Government Association, chapter advisors, and campus leaders, CSU has created a thriving community for student veterans that focuses on students' strengths while supporting their needs. This year, CSU is poised to build a world-class student veteran and adult learner center to better meet that mission.

CSU is also home to Rams Kids Village, an innovative solution to after-hours and short-term childcare in the on-campus library that allows CSU student veterans the opportunity to participate in group projects, study for exams, and take time for themselves. This is accomplished for CSU student veterans who are parents by creating hands-on learning opportunities for their children through early childhood educational experiences and quality care provided by the on-campus Rams Village. Under the leadership of Chapter President, Josh Johnson, CSU has consistently provided exemplary leadership in peer-to-peer support and community integration. For that, CSU was recently recognized as our 2020 Chapter of the Year and their efforts on campus help inform many of our policy priorities.

KEY RESEARCH

Over the past decade, SVA has dedicated significant resources to researching the efficacy and impact of the Post-9/11 GI Bill. With the leadership and expertise of Dr. Chris Cate, the premier researcher and academic focused on the GI Bill, our team produced both the Million Records Project (MRP) and the National Veteran Education Success Tracker Project, or 'NVEST Project' for short. The purpose was to address a straight-forward question: "What is America getting for its multi-billion-dollar investment in the education of veterans?"

In partnership with the Department of Veterans Affairs (VA) and the National Student Clearinghouse (NSC), we studied the individual education records of the first 854,000 veterans to utilize the GI Bill in the Post 9/11 era. The

bottom line is this: student veterans are among the most successful students in higher education.¹ With appropriate resources this research should be updated annually because it is important to assess student veteran success through data and to overcome outdated myths about veterans, college, and career success.

Not satisfied with just knowing student veterans' level of success in higher education, SVA started the Life-Cycle Atlas Project to begin "mapping" student veterans' educational journeys from high school to the present to better understand how student veterans succeed in higher education. With almost 4,000 responses the project has already found three key findings. First, much of the public has a nostalgic view of veterans' post-secondary educational journey: High school, Military Service, College, then Workforce, which is outdated. No doubt this view has been carried over from the World War II era to today, where service members returned from service to use the GI Bill to earn a college degree and enter the workforce. However, our research has found veterans' educational journeys are more diverse than ever before due to more options to serve and accessibility of college courses. It is within these educational journeys that a second key finding was discovered. Service members are exposed to implicit messaging that they are not college material and thereby discouraged from considering a college education after service. This implicit messaging sometimes starts with their high school guidance counselors then reinforced throughout their military service. It is often not until after they have separated and hear about other veterans succeeding in college that they realize they are college material and enroll. Finally, looking at the transition from school to the workforce, the Life Cycle Atlas Project is finding that student veterans are not utilizing the variety of career preparation opportunities that are available to them, such as internships. This puts student veterans at a disadvantage compared to more traditional student groups who have taken advantage of these career prep opportunities.

It is important to understand the demographics of student veterans. Ninety percent of student veterans using the GI Bill are prior enlisted, while the remaining ten percent are prior warrant and commissioned officers. Eighty-four percent are over the age of twenty-five. Nearly half are married, and half have children; eighteen percent are single parents. Fifty-five percent of student veterans work while enrolled with sixteen percent of those working multiple jobs.²

In terms of school and degree choice, eighty two percent of student veterans attend a not-for-profit public or private university. Student veterans are using their GI Bill to earn degrees in this order: first, bachelor's degrees, then master's degrees, followed by associate degrees, and finally terminal degrees, such as a PhD, JD, MD, etc.³

Next, the most well-known academic measure is the grade point average (GPA). The national GPA for undergrad college students is a respectable 3.15. The GPA for student veterans is 3.36. Student veterans are out-graduating nearly all other students achieving a success rate of seventy-two percent compared to the national average of sixty-six percent. Additionally, NVEST data demonstrate that student veterans have a substantially higher graduation rate when compared to other adult students who are comparable peers.⁴

In its first six years, the Post-9/11 GI Bill enabled over 340,000 veterans to complete a post-secondary degree or certificate. Twenty-three percent are women. SVA projects the Post-9/11 GI Bill will support one-hundred thousand veterans graduating every year with an overwhelming majority graduating from premier schools. That's 100,000 new doctors, accountants, scientists, financial analysts, nurses, social workers, lawyers, cybersecurity

¹ Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). *National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill*. Student Veterans of America, Washington, D.C., http://invest.studentveterans.org/wp-content/uploads/2017/03/NVEST-Report_FINAL.pdf

² Cate, C.A. *Student Veteran Census Survey 2018*. Student Veterans of America, Washington, D.C.

³ Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). *National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill*. Student Veterans of America, Washington, D.C., http://invest.studentveterans.org/wp-content/uploads/2017/03/NVEST-Report_FINAL.pdf

⁴ Id.

engineers, and teachers every single year.⁵

When looking at income, veterans with degrees out-earn their civilian peers who have never served. Veterans with a bachelor's degree earn \$84,255 annually compared to \$67,232 annually for those who have never served, and at the advanced degree level the difference is even higher, veterans with advanced degrees earn \$129,082 annually compared to \$99,734 annually.

The GI Bill is creating an ever-growing network of successful veterans who are going to run businesses, invent new technologies, teach young minds, and lead their communities, which is why we need to bolster empowering policies and programs that best support student veteran success to, through, and beyond higher education.

POLICY PRIORITIES AND RECOMMENDATIONS

GI Bill Improvements

The Forever GI Bill, formally titled *The Harry W. Colmery Educational Assistance Act*, was the largest expansion of education benefits for veterans in nearly a decade and VA has worked to implement its many provisions. While still monitoring the final stages of the Forever GI Bill implementation, SVA is bringing attention to the next wave of improvements to better serve our student veterans.

Review options to restore “break pay” and provide students with Monthly Housing Allowance (MHA) during school breaks. The *Post-9/11 Veterans Educational Assistance Improvements Act of 2010* removed interval pay, otherwise known as break pay, from the GI Bill. Reinstating break pay is one of the top policy recommendations shared by student veterans. We understand there are realistic cost considerations when it comes to break pay, but it is important to remember that student veterans are post-traditional, meaning they are pursuing education without parity in the support structure many traditional students use during school breaks. We consistently hear from student veterans throughout the year about the financial hardship that comes between terms and we look forward to working with Congress to explore ways to provide relief to our student veterans in a way that meets their needs in a fiscally responsible manner and meets the intent of the law.

Reform overseas MHA rates so they are consistent with the Department of Defense (DoD) Overseas Housing Allowance. As the remaining sections of the Forever GI Bill are implemented, we would like to highlight a problem facing students at international campuses of U.S. institutions. Under the previous guidelines, international campuses would receive the MHA of the main campus in the U.S. Going forward, however, that rate will be adjusted to the national average.

SVA has concerns about whether the U.S. national average is the appropriate MHA for international locations that may be significantly more expensive than the national average. We are also concerned that VA is using the U.S. national average instead of DoD's Overseas Housing Allowance (OHA) rates, rates designed for specific locations outside of the U.S. The DoD has already gone through the rigorous cost of living calculations, it should be the first option when determining the appropriate cost of living for our student veterans.

Review study abroad requirements. Separately, but of growing concern from student veterans and schools, the current approval requirements for study abroad programs do not align with how higher education generally organizes and operates those programs or how students elect to study abroad. SVA is concerned student veterans will have far fewer opportunities and options to study abroad compared to most other students using

⁵ Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). *National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill*. Student Veterans of America, Washington, D.C., http://invest.studentveterans.org/wp-content/uploads/2017/03/NVEST-Report_FINAL.pdf

federal education benefits. SVA encourages a review of the study abroad requirements and a conversation with study abroad professionals on how to approve a wider array of study abroad programs while still ensuring quality.

Create MHA safeguards for students at schools that temporarily close because of a natural disaster. Currently, VA is able to pay housing allowances for up to a month if a school is closed due to a natural disaster.⁶ However, based on extensive research conducted by SVA, we encourage extending that timeframe. We believe this is a common-sense, proactive policy change providing student veterans more than a few weeks' time to figure out a new plan when facing catastrophes.

Ensure members of the Guard and Reserve receive the same benefits as those on active duty when they perform the same work. As U.S. defense plans change from using the National Guard and Reserve Components as a 'strategic reserve' to an 'operational reserve,' we see an increasing level of overlap in the training and service requirements placed upon these groups. However, under current law these similar responsibilities do not always mean equal access to VA benefits. We encourage Congress to review the statutory requirements to earn these benefits and bring parity to how the Guard and Reserves earn benefits when undertaking the same duties and risks as Active Duty service members.

Give new service members more time to make a more informed decision about enrolling and paying for the Montgomery GI Bill. The Montgomery GI Bill (MGIB) has served our nation's veterans well for many years. However, with the Post 9/11 GI Bill, the MGIB is now doing little more than serving as a tax on troops. Except for a few niche scenarios, the Post-9/11 GI Bill provides more generous resources and better overall value than the MGIB. Despite this, the MGIB lingers on through the automatic enrollment of new service members who are not fully informed of the differences between the two programs. In the Navy, the decision deadline is within two days of starting service, and in the Army, it is three days.^{7,8}

Statutory requirements suggest a short period of time after entering the military to pay into the MGIB fund or not, but there is no requirement as a matter of policy.⁹ Given the importance of this decision for the service member's future, it is imperative to provide all new service members with adequate time to weigh the costs and benefits. We encourage the Committees to delay the decision to enroll in the MGIB to give our newest, and often lowest paid, service members the chance to become more accurately briefed on education benefits available to them following service and make an informed decision regarding their future.

We also encourage the Committees to consider changing the language of the MGIB to make it an "opt-in" decision instead of an "opt-out" option. Making Chapter 33 the functional default GI Bill is consistent with current data on rates of use between the programs and is the better option for the vast majority of individuals.

Eliminate the cap on years that limits how long VA education beneficiaries are eligible for in-state tuition. The *Veterans Access, Choice, and Accountability Act of 2014* established a three-year window following service for Post-9/11 GI Bill beneficiaries to receive in-state tuition at any public institution, regardless of their state of residence. After hearing confusion and frustrations about in-state tuition from many student veterans, last year SVA conducted extensive state-by-state research to better understand each state's in-state tuition regulations. While many states have passed laws to eliminate this cap, making these students eligible for resident-rate tuition regardless of when they choose to enroll, a substantial number of other states have not.

⁶ U.S. Department of Veterans Affairs. https://gibill.custhelp.va.gov/app/answers/detail/a_id/1573/~/what-if-my-school-term-is-interrupted-by-a-hurricane-or-natural-disaster%3F

⁷ Gross, Natalie. Military Times. "Wasting money? Most new recruits pay \$1,200 for lesser education benefit." December 22, 2017. <https://rebootcamp.militarytimes.com/education-transition/education/2017/12/22/wasting-money-most-new-recruits-pay-1200-for-lessereducation-benefit/>

⁸ U.S. Army Human Resources Command. Montgomery GI Bill – Active Duty. Accessed July 2019. <https://www.hrc.army.mil/content/Montgomery%20GI%20Bill%20--%20Active%20Duty>

⁹ Cornell Law School, Legal Information Institute. 38 U.S.C. § 3011. <https://www.law.cornell.edu/uscode/text/38/3011>

There are also some states with confusing or even contradictory resident-rate regulations in place. This has created a messy patchwork of inconsistent laws across the country making it difficult for students to know how much they will pay for tuition and results in inequitable treatment of a federal tuition benefit. SVA supports a legislative fix that would ensure all military-connected students have access to the same in-state tuition benefit regardless of when and where they choose to attend school, which is also in-line with the lifelong benefit of service the Forever GI Bill ensures.

VA Modernization

As VA continues to stress the importance of modernization and benefit delivery efficiency, SVA strongly encourages the consideration of student veterans, service members, and families using education benefits as a critical part of those efforts.

IT modernization efforts must be coupled with IT funding increases. As we have seen over the past year, VA's antiquated IT systems continue to be at the root of its challenges. With an enormous amount of technical debt accrued by the agency in the last 40 years, VA must communicate clearly with Congress and stakeholders on its IT infrastructure modernization needs. In turn, we urge Congress to consider the total cost of every change, adjustment, or mandate to VA. To meet the needs of our veterans, VA Education Service platforms must become a system that can adapt and change with the evolving landscape of higher education. This much-needed comprehensive IT modernization will not be easy or accomplished overnight but is a necessary conversation.

Establish the Veteran Economic Opportunity and Transition Administration with Undersecretary representation for all economic opportunity and transition programs at VA. As stated by the Independent Budget (IB) organizations in their policy recommendations for the 116th Congress, "This nation should have as much focus on the economic opportunities for veterans as it does for their health care and benefits".¹⁰ SVA agrees with the IB organizations that a greater need to focus on economic opportunity is best achieved by building on the early success of the new office at VA dedicated to transition and economic opportunity and elevating it, and Education Service, to its own administration at VA.

Presently, economic opportunity programs such as the GI Bill, home loan guaranty, and many other empowering programs for veterans are buried within the bureaucracy of VBA and functionally in competition against disability compensation policy for internal resources. Over the past century, VA has focused on compensating veterans for loss. The reality of the 21st century and beyond demands the additional goal of empowering veterans to excel post-service. Critically, this will further advance our nation's goals of enhancing economic competitiveness. A focus on veteran contributions to business and industry, to governments, to non-profit organizations, and to communities through the best education programs in our country will result in impressive returns on the taxpayer's investments.

Expand and modernize the GI Bill College Comparison Tool. The GI Bill College Comparison Tool can be invaluable to veterans considering their educational options. However, improvements would make the tool better. As it stands, the lack of coordination between the College Navigator, College Scorecard, and GI Comparison Tool reduces the overall delivery of powerful data to veterans.^{11, 12, 13} The Comparison Tool has unique data, necessitating a separate tool from ED's options but the underlying data is not being shared effectively, leaving prospective students an incomplete view of their options.

¹⁰ Disabled American Veterans, Paralyzed Veterans of America, and the Veterans of Foreign Wars. The Independent Budget – Veterans Agenda for the 116th Congress. Retrieved from: http://www.independentbudget.org/pdf/IndependentBudget_2019.pdf.

¹¹ College Navigator, National Center for Education Statistics, US Department of Education, <https://nces.ed.gov/collegenavigator/>, Accessed 01 March 2020

¹² College Scorecard, US Department of Education, <https://collegescorecard.ed.gov/>, Accessed 01 March 2020

¹³ GI Bill Comparison Tool, US Department of Veterans Affairs, <https://collegescorecard.ed.gov/>, Accessed 03 February 2020

The tool currently lacks an effective side-by-side comparison function. Students primarily use the tool for its “lookup” function for familiar institutions as that is effectively the best option the tool currently offers. Student veterans should also be able to rate their schools, giving future student veterans direct consumer feedback like Amazon’s verified user rating system. In 2013, Public Law 112-249 mandated VA launch, “centralized mechanism for tracking and publishing feedback from students,” like ‘Amazon reviews,’ yet this functionality is still missing.¹⁴

Finally, we encourage VA to maintain closed schools within the tool, versus having them merely disappear. This disappearance of schools from the tool also applies to the associated data, leaving significant gaps in the overall picture.

Establish parity between the Post-9/11 GI Bill and VR&E MHA subsistence rates. Currently, VR&E has two different housing rates. One is the rate of the Post-9/11 GI Bill MHA benefit and one that is substantially lower and based on a number of factors, such as the rate of attendance, number of dependents, and training type.¹⁵ Many student veterans have shared concerns about not being able to afford basic necessities while pursuing their VR&E individualized training and education plans. These concerns are echoed in the 2014 GAO report on VR&E which acknowledges veterans may discontinue their education plans because of financial pressures.¹⁶ Moving the subsistence rate to one rate reduces bureaucracy, eliminates confusion, and creates better parity for service members and veterans with service-connected disabilities using VR&E.

Bring VA Work-Study into parity with Federal Work-Study (FWS). Feedback we received at our last two Leadership Institutes, a leadership training program for the top student veteran leaders, highlighted a few areas of improvement for VA to consider as they modernize their work-study program. First, the program is unreliable source of income. The current paper-based model is antiquated, cumbersome, and lethargic on getting paychecks to student veterans. Transitioning to a web-based system that mirrors some of the successes of Department of Education’s (ED) work-study program is overdue, and we thank those who supported efforts to remedy this issue last year. We look forward to working with Committee leadership to ensure work-study’s basic modernization needs are met this year.

Additionally, the lack of parity between ED work-study employment options and options under VA work-study, limited to positions directly related to VA, is a source of significant frustration in Chapters. It is understandable to want to have VA funds spent on VA needs, but Congress should examine ways student veterans can take part in opportunities available to other students under ED work-study that better align with career goals.

Higher Education Act Reauthorization

Engaging on the ongoing reauthorization efforts for the *Higher Education Act* (HEA) and ensuring student veterans’ voices are heard during the process remains a top priority for SVA this year. While HEA generally falls outside the jurisdiction of these Committees, SVA continues to ask all Members as engaged veteran advocates to participate in the HEA legislative process. VA unquestionably has a significant impact on the lives of student veterans and military-connected students, but VA’s education business lines are only a fraction of the legislation and regulation that routinely touch the educational opportunities, choices, and protections that impact those same students.

¹⁴ Public Law 112-249, “Comprehensive Veterans Education Information Policy”, <https://www.govinfo.gov/content/pkg/PLAW112publ249/pdf/PLAW-112publ249.pdf>

¹⁵ U.S. Department of Veterans Affairs, VR&E Subsistence Allowance Rates, https://www.benefits.va.gov/vocrehab/subsistence_allowance_rates.asp (last visited March 01, 2020).

¹⁶ U.S. Government Accountability Office, VA Vocational Rehabilitation and Employment Program – Further Program Management Improvements Are Needed, 6, Feb.27, 2014, <https://www.gao.gov/products/gao-14-61>.

Considerable progress was made last year to negotiate a comprehensive reauthorization of the HEA. SVA is encouraged by the commitment from the House and the Senate to continue HEA efforts in a comprehensive, bipartisan manner this year, and we hope the process will be finalized before the end of the 116th Congress. While not an exhaustive list of provisions we would like to see considered, we hope these Committees will keep the following priorities in mind during the remaining HEA negotiations.

Closing the 90-10 loophole. The 90-10 rule is intended to prevent a proprietary institution from receiving all its revenue from the federal government. Essentially, if an institution is providing a high-quality education it should be able to recruit students willing to spend their own money to attend. Ironically, the rule originated in response to the Servicemen's Readjustment Act of 1944, what became known as the GI Bill, to prevent institutions existing solely to collect veterans' education benefits.¹⁷ However, a loophole exists in the rule, a loophole that does not count funds from VA or Department of Defense (DoD) educational benefits as federal funds. The predatory practices this loophole incentivizes are well-documented and unacceptable. Veterans and other American taxpayers deserve better than allowing the bottom lines of institutions to prevail.¹⁸

Closing the loophole is a long-standing policy priority among the majority of veteran service organizations. There is also well-respected research on the need to close the 90-10 loophole.¹⁹ Closing the loophole maintains full freedom to choose which school you attend, prevents fully federalizing funding of schools, and preserves a veterans right to choose their own educational journey without gambling taxpayer money on some of the worst performing schools.

The growing support for closing the loophole goes beyond veteran advocates. Last year there were considerable advancements towards closing the 90-10 loophole. Between the *College Affordability Act* in the House of Representatives and the first bipartisan bill to close the loophole in the Senate, the *Protect Veterans' Education and Taxpayer Spending Act*, many in Congress are taking leading steps to close this loophole.^{20,21} SVA looks forward to working alongside each Member to ensure that 2020 is the year the 90-10 loophole is finally closed.

Maintaining student protections and prioritizing high quality. The *Higher Education Act* includes several quality-assurance principles, most notably the borrower's defense to repayment (BD) and gainful employment (GE), meant to serve as gatekeepers to federal student aid. These provisions should create a reasonable safety net that allows students the freedom to choose the school that best meets their needs while ensuring taxpayer funds are used for worthwhile certifications and degrees.

While the principles of protection are created within HEA, the discretion of how these provisions are interpreted and instituted rests with ED and a process known as Negotiated Rulemaking (NegReg). This regulatory process is a required function established in the *Higher Education Act*, relying on diverse experts representing the stakeholders in higher education to debate and work toward consensus on regulations. SVA has been privileged to participate as a negotiator for such rulemaking negotiations, providing expert testimony to the committee and negotiators.

Given the importance of BD, GE, and the other student protections framed in HEA, maintaining and strengthening the federal gatekeeping protections is more important than ever. Congress must continue to include its intent on

¹⁷ Skinner, Rebecca. (January 2005). *Institutional Eligibility and the Higher Education Act: Legislative History of the 90/10 Rule and Its Current Status*. Congressional Research Service: Washington, D.C., Retrieved from: <http://www.policyarchive.org/handle/10207/1904>.

¹⁸ U.S. Senate Committee on Health, Education, Labor, and Pensions. (July 2012). *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success*. Washington D.C. Retrieved from: <https://www.govinfo.gov/content/pkg/CPRT-112SPRT74931/pdf/CPRT-112SPRT74931.pdf>.

¹⁹ Brookings Institution, January 2019. *Understanding the 90/10 Rule: How reliant are public, private, and for-profit institutions on federal aid?* https://www.brookings.edu/wp-content/uploads/2019/01/ES_20190116_Looney-90-10.pdf

²⁰ <https://www.insidehighered.com/news/2019/11/20/alexander-backs-bill-count-veterans-benefits-toward-profits-federal-revenue-limit>

²¹ <https://edlabor.house.gov/imo/media/doc/The%20College%20Affordability%20Act%20-%20Fact%20Sheet.pdf>

protecting both students and taxpayer funds from fraud, waste, and abuse.

Simplifying processes without sacrificing aid or protections. Many of the early conversations on HEA reauthorization have focused on the need to simplify the complex and confusing systems governing federal financial aid and student loans. There is a justifiable need to simplify things such as the Federal Application for Federal Student Aid (FAFSA) and student loan repayment options, but simplification cannot come at the expense of access to aid or increased debt for students.

Greater oversight of nonprofit conversions. Thanks to advocacy from student and consumer rights' groups, leadership in Congress, and a growing awareness by the public of predatory practices of some institutions, many of the worst providers have come under increased scrutiny. However, in response to increased awareness and scrutiny, there is an alarming trend of proprietary institutions' converting to nonprofit institutions, a status that allows those institutions to fall under different regulatory oversight requirements.

This conversion process takes advantage of a regulatory weakness between the Internal Revenue Service (IRS) and ED.²² Importantly, it also takes advantage of the authorities granted to VA to conduct oversight. To protect against fraud, waste, and abuse, Congress should expand VA's ability to act in conjunction with other agencies to prevent bad actors from taking advantage of nonprofit status.

Accountability and Affordability

Study emerging education innovations to better understand the effectiveness and efficacy of such models. In the last few years, the higher education landscape has seen a number of innovations that promise to strengthen existing pathways through education. These innovations offer compelling incentives to students and institutions as alternatives to more traditional models of success. As we reshape how we think of workforce development, and the interactions between students and institutions, we must commit to fully understanding the scope of these changes and establish appropriate protections around their use to protect students from unscrupulous actors.

Reduce VA tuition overpayments. As we have testified to before, VA overpayments and the resulting debt collection process cause tremendous disruption to the lives of student veterans.²³ A significant portion of overpayments are caused by VA's delay in processing a student's enrollment change during a school term. These delays lead to student veterans receiving more tuition money than they should, resulting in a debt that is later clawed back aggressively.²⁴ We implore the Committees to continue exploring ways to improve the current system to prevent such burdens being placed on our students.

To this end, we encourage reworking the language so that the burden of verification lies on the institution and not the student. As VA pays the school directly under the Post-9/11 GI Bill, it only makes sense that tuition overpayments and verifications of enrollment should be handled directly between the two institutions, without the student veteran in the middle. We are encouraged by these committees' interest in finding ways to improve the service and quality of benefits we offer to our veterans and hope that continued conversations around the bills today will provide avenues upon which to build consensus.

²² Shireman, Robert. The Covert For-Profit: How College Owners Escape Oversight Through a Regulatory Blind Spot. The Century Foundation. Retrieved from: <https://tcf.org/content/report/covert-for-profit/?agreed=1>.

²³ Student Veterans of America, May 22, 2019. Testimony before the Senate Veteran Affairs Committee. https://studentveterans.org/images/pdf/GA/PDF_SVAC_May22_Legislation-Testimony.pdf

²⁴ U.S. Government Accountability Office. "POST-9/11 GI BILL: Additional Actions Needed to Help Reduce Overpayments and Increase Collections." October 21, 2015. <https://www.gao.gov/products/GAO-16-42>

One example case would be in studying the feasibility of using batch payments, utilized by ED, as a way to reduce VA tuition overpayments. For decades, ED has successfully paid student aid and student loans to thousands of institutions before each term or semester begins using enrollment data from previous years. This system allows institutions access to funds in advance of their needing them, helping to ensure institutions are less likely to see bureaucracy hurting their financial stability. SVA suggests studying the feasibility of incorporating lessons learned from ED and its use of batch payments as a way to alleviate some of the front-end work VA must do to certify both housing payments and tuition payments. We acknowledge there are differences between how ED and VA function, but greater cross-agency communication and collaboration can provide valuable insight toward creating efficiencies.

Reform VA's debt collection processes. Currently, once VA has determined that a veteran owes a debt, the relevant Regional Office (RO) and Debt Management Center (DMC) send out two separate collection notices to inform the veteran of the debt and their repayment options. These two letters are sent at different times, and contain overlapping, but distinct information that only paint the full picture of the debt when considered together. Compounding this concern is the lack of clarity around the options available to veterans to dispute, appeal, or waive the debt once notified. Importantly, unless these processes are initiated within 30 days, the debt collection process will not stop, taking up to the entire monthly benefit of a veteran.

Post-Traditional Student Needs for Success

SVA strongly believes that much like the democratization of higher education the GI Bill affected in the Post-WWII era, Post-9/11 GI Bill student veterans are the tip of the spear for changing the way higher education educates and values post-traditional students in the twenty-first century, a population of students comprising the new majority of students in higher education.²⁵ Similar to the need to engage on HEA reauthorization efforts because of its impact on student veterans, there are opportunities for improvement within higher education, outside the HEA process, that will empower student veterans and improve higher education for fellow post-traditional students. While some of the recommendations SVA routinely discusses are more appropriately addressed at the institution level, it is important for these Committees to understand the landscape of topics that could be addressed here in Congress and back in local communities.

Call for better data on student food and housing insecurity. In December 2018, the GAO released a report on food and housing insecurity among college students.²⁶ After reviewing 31 separate studies, they concluded that “[n]one of these studies... constitute a representative study” of our nation’s students. In fact, until the National Postsecondary Student Aid Survey is conducted later this year, no federal agency had assessed food and housing insecurity among postsecondary students.²⁷ Our ability to understand the scope of food and housing insecurity will continue to be limited until we study the issue at a national level.

Access to Childcare on Campus. Increasing access to child care is a near universal conversation among SVA Chapters. Challenges with childcare availability and affordability are not unique to the student veteran and post-traditional student population; depending on location, childcare costs can comprise seven to twelve percent of a family’s income or even more for single parents.²⁸ The federal government has attempted to address the need for affordable child care on campus through programs such as the Child Care Access Means Parents In Schools (CCAMPIS), but historical challenges with underfunding and available child care providers limit the scope and

²⁵ Jaschik, Scott. (February 2018). Independent Students as the New Majority. Inside Higher Ed. Retrieved from: <https://iwpr.org/publications/independent-students-new-college-majority/>.

²⁶ Government Accountability Office, *Food Insecurity: Better Information Could Help Eligible College Students Access Federal Food Assistance Benefits*, GAO-19-95. December 2018. <https://www.gao.gov/assets/gao-19-95.pdf>

²⁷ The Hope Center, Real College Survey 2020. https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf

²⁸ Kumar, Aakash. (March 2018). How Unreliable And Costly Childcare Keeps People Off The Job. Forbes. Retrieved from: <https://www.forbes.com/sites/aakashkumar/2018/03/08/how-unreliable-and-costly-childcare-keeps-people-off-the-job/#292a31835e18>.

effectiveness of CCAMPIS.²⁹ SVA recommends looking at innovative solutions, such as the Colorado State University Rams Kids Village or the pilot program established for childcare at VA medical facilities, in addition to continued support for increased CCAMPIS funding.

Explore options to better integrate health and well-being services on campuses. When we speak about student veterans and their needs, we should also consider their needs beyond education benefits. The new opportunities to expand into community care partnerships and urgent care facilities hold promising opportunities to better integrate VA options with how student veterans access health care.

A compelling innovation in this area are VA telehealth pods. Telehealth at VA has been a transformative innovation that promises to improve access to healthcare to veterans nationwide, and we believe the intersection of student veteran needs, campus locations, and VA healthcare is a natural fit. To fully realize VA's commitment to treating the whole health of the veteran, we encourage Congress to explore ways to better integrate VA healthcare on campuses nationwide, including the use of telehealth technology.

Effective and Empowering Government

Congress and policy leaders should use language that empowers veterans. It is important to be cognizant of the power our words hold. Our voices do not disappear into the ether, are not lost to the vacuum of space. They are heard, internalized, and shape how we, collectively, understand our world. Thus, it is imperative for our leaders to articulate themselves as clearly as possible. Failing to do so leads to far-reaching consequences, even if unintended.

We see this in the ever-present narrative of our veterans coming back from service as 'broken' or 'damaged' in some difficult-to-describe way. We see this in the policies our leaders craft day after day, ostensibly helping our veterans heal, or solving some other tremendously grave affliction, without dedicating an equal amount of time to the positive, forward-looking policies that are just as important.

Our research, and that of others, tells a different story. It tells the story of the veteran as an asset. An asset to her community, to his school, to the nation. We see tremendous success from our veterans every single day – the stories just get drowned out in the noise of a false narrative. We need our leaders to emphasize positive language regarding veterans, and to take up the mantle of reshaping the veteran narrative to one of post-service growth.

Support increased and more efficient communication between the Department of Education and VA and formalize ombudsman or liaison role between agencies. VA has a growing need to consider the broader picture of student and institution relationships, and we encourage expanding the level of communication between VA and ED. VA does many things well, but when it comes to educational best practices, ED has many years more institutional knowledge and experience and can provide the lessons learned from those years to VA in order to improve their efficiency of delivering benefits to student veterans.

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President Franklin Delano Roosevelt transformed America into the modern nation we know today, his administration launched massive programs and agencies like Social Security, the SEC, and more. Then in 1944, he signed into law a 'little' program being called "the Servicemen's Readjustment Act," better known as the GI Bill.

But this 'GI Bill idea' almost never made it out of congress; there were some who said this new program would be the ruin of our returning GI's.

²⁹ Long, Bridget Terry. (October 2017). Helping Women to Succeed in Higher Education: Supporting Student-Parents with Child Care. The Hamilton Project. Retrieved from: http://www.hamiltonproject.org/assets/files/higher_education_student_parents_womenLong.pdf.

The President of Harvard famously penned, "We may find the least capable among the war generation, instead of the most capable, flooding the facilities for advanced education in the United States." And the President of the University of Chicago, a World War I veteran himself, argued, "Colleges and universities will find themselves converted into educational hobo jungles."

Well in 1948, just four years after their original opposition, there was widespread retraction, with Harvard's president stating, "for seriousness, perceptiveness, steadiness, and all other undergraduate virtues," the veterans of World War II were "the best in Harvard's history."

The continued success of veterans in higher education in the Post-9/11 era is no mistake or coincidence. At SVA we use the term, "the best of a generation." In our nation's history, educated veterans have always been the best of a generation and the key to solving whatever problems our nation faces, this is the legacy we know today's student veterans carry.

We thank the Chairmen, Ranking Members, and the Committee Members for your time, attention, and devotion to the cause of veterans in higher education. As always, we welcome your feedback and questions, and we look forward to continuing to work with the Committees and the entire Congress to ensure the success of all generations of veterans through education.