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 2019"

March 7, 2019
Chairmen Isakson and Takano, Ranking Members Tester and Roe and Members of the Committee:

Thank you for inviting Student Veterans of America (SVA) to submit testimony on our organizational policy priorities for 2019.

Background

Established in 2008, SVA is a national nonprofit founded to empower student veterans as they transition to civilian life by providing them with the resources, network support, and advocacy needed to succeed in higher education. With over 1,500 Campus Chapters across the U.S. and in four countries overseas, serving 750,000 student veterans, SVA establishes a lifelong commitment to each student’s success, from campus life to employment, through local leadership workshops, national conferences, and top-tier employer relations. As the largest chapter-based student organization in America, we are a force and voice for the interests of veterans in higher education, and SVA places the student veteran at the top of our organizational pyramid.

Student veterans are yesterday’s warriors, today’s scholars, and tomorrow’s leaders. This ethos is embodied in the stories and successes of SVA Chapter Members and Alumni, such as Alexandria Sawin and Kyle White.

Air Force veteran, Air Force spouse, mother, SVA Chapter Leader, biology major. All titles and identities Alexandria Sawin (Alex) used to describe herself before SVA’s 11th annual national conference, (NatCon). Thanks to her dedication leading the SVA Chapter at the University of Nevada, Las Vegas (UNLV), a campus with nearly 1,500 GI Bill users, as of January, she adds “Student Veteran of the Year” to her growing list of accomplishments.

Not only is Alex a standout student, she, as the Chapter President of UNLV’s Rebel Vets, oversaw the first Operation Battle Born Ruck March. The eight day, 370-mile march through Nevada brought together student veterans and supporters carrying 7,000 dog tags in honor of the Post-9/11 service members killed in action. The event was done in conjunction with fellow Nevada SVA Chapter Truckee Meadows Veterans Club and local VFW posts. The march showed Alex’s commitment to being a leader and being a member of a team. She’s also carried her determination and drive here to Capitol Hill during the last year, where she and the UNLV Rebel Vets have offered common-sense solutions, such as the need for companies to offer paid internships, through policy recommendations. Alex is everything SVA looks for in a leader and she embodies the type of servant leadership student veterans bring to campuses.

That leadership and drive exhibited so strongly by Alex is not confined to campus, however, as often the experiences of student veterans during their service shape and inform their success both on campus and in the workplace. This leadership and drive give graduated student veterans, or SVA Alumni, a platform to make a difference for others. Kyle White, for example, exemplifies the profound impact service can have.

Kyle White was an Airborne Infantry soldier during service in the Army. After military service he majored in finance while earning his Bachelor of Science degree in Business Administration from the University of North Carolina at Charlotte, a campus with over 1,100 GI Bill users. His experience in higher education is typical of most student veterans. They major in something completely unrelated to their job in the military, then pursue high-demand degrees and seek opportunities for civilian careers that are meaningful and provide a way to support themselves and their families. Fully twenty-seven percent of student veterans who use the Post-9/11 GI Bill graduate with business degrees, just like Kyle. And, just like Kyle, most student veterans start successful careers, and they give back to their community. Kyle often speaks at SVA’s annual national conference, this year to an audience of over 2,300 people, and to smaller events such as this week’s VFW-SVA Legislative Fellows experience -- with 9 student veterans who have been on the Hill all week meeting with many of you.
Student veterans come to hear Kyle not because of his experience in higher education or his career, though that’s what he talks about, but for his service. Most of you know Kyle White as a Medal of Honor recipient. He’s taken that platform to inspire others to higher education, to transforming their lives, to being of service to others, to pursuing meaningful careers, and building communities.

But, Kyle went to college as a typical student veteran, he had not yet received the Medal, and he tells his story of higher education not as a Medal of Honor recipient, but as a student-veteran alumnus. He started his civilian career with one organization upon graduation, and quickly opted for a better opportunity—this one in finance as a fixed-income bond trader, where he’s worked since 2013. Like many veterans, Kyle has an entrepreneurial spirit and co-founded Eleven 09, a consulting firm, Kyle is married, has a daughter, a career, his own business, and supports student veterans to success in college and in career.

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, or NVEST 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 Post 9/11 GI Bill. This research included every veteran to use the benefit from 2009 until the summer of 2015. The bottom line is this: student veterans are among the most successful students in higher education. This research should be updated annually, and with the appropriate resources, SVA would do this work because we believe it is important to assess student veteran success through data and to overcome outdated myths about veterans, college, and career success. Veterans should never doubt they will succeed, but research from Edelman Intelligence demonstrates the public, educators, employers, veterans, and their spouses, all underestimate the success that comes from higher education. It is important to first understand the demographics. Ninety-percent of student veterans using the GI Bill are prior enlisted, while the remaining ten-percent are prior warrant and commissioned officers. Eighty-percent are over the age of twenty-five. Nearly half are married and forty-six-percent have children; fourteen-percent are single parents. Fifty-percent of student veterans work full-time and twenty-five percent work part-time.

In terms of school and degree choice, data proves student veterans are most likely to attend a not-for-profit public or private university—eighty-two percent. 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.

Next, the most well-known academic measure is the grade point average (GPA). The national GPA for students is a respectable 3.11. The GPA for student veterans is 3.35. Student veterans are out-grading nearly all other students—achieving a success rate of seventy-two percent compared to the national average of sixty-six percent.

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3 Id.
Even more important, NVEST data demonstrate that student veterans have a substantially higher graduation rate when compared to other adult students who are comparable peers.\(^4\)

Veterans who are diverse earn their degrees at higher levels than their peers who have never served, whether we’re measuring African Americans, except at the PhD level for African American men, Latino, or women veterans. Each of these groups earns degrees at three percent to eighteen percent higher levels than their peers who have never served. And white male veterans earn associate’s and master’s degrees at higher rates than their peers who have never served, while those who haven’t served earn bachelor’s and PhD degrees at higher levels. There is no discernable difference for Asian-American veterans and those who have not served.

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 engineers, and teachers, or enough to fill the largest college football stadium in America, every single year.\(^5\)

Veterans with degrees out-earn their civilian peers who have never served, also. Veterans with a bachelor’s degree earn $84,255 compared to $67,232 for those who have never served, and at the advanced degree level the differential is even higher, with veterans holding advanced degrees earning $129,082 compared to $99,734. Post-9/11 veterans are catching up to all veterans as they have more time in the workforce, with salaries at $71,399 and $124,534 at the bachelor’s and advanced degree levels.

That's an ever-growing network of successful veterans who are going to run businesses, invent new technologies, teach young minds, and lead their communities, which compounds the need to bolster empowering policies and programs that best support student veteran success to, through, and beyond higher education.

**Policy Priorities and Recommendations**

*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 is SVA’s top priority this year.

While HEA generally falls outside the jurisdiction of these Committees, SVA implores 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 comprise only a fraction of the legislation and regulation that routinely touch the educational opportunities, choices, and protections that impact those students.

A comprehensive reauthorization of the HEA is overdue, and SVA is encouraged by the commitment from the House and the Senate to undertake HEA efforts in a comprehensive, bipartisan manner.\(^6\) While not an exhaustive list of provisions we expect to see considered during the HEA conversations, we list priorities we hope these Committees will consider as legislation is proposed.

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\(^5\) Id.

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, in an effort to prevent institutions existing solely to collect veterans’ education benefits. 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 documented and unacceptable. Veterans and other American taxpayers deserve better than allowing the bottom lines of institutions to prevail.

In the spirit of the original intent of the 90-10 rule, SVA strongly supports all VA and DoD education benefit funds be considered federal funds under the 90-10 rule. GI Bill funds are paid for by the federal government and should be considered as such. Additionally, to ensure the rule meets the intent of providing a true market test and is applied in a fair and equitable manner, the 90-10 rule should apply to all sectors of higher education, regardless of tax status.

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 institution of higher learning 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 and is involved with the ongoing negotiations, providing expert testimony to the committee and negotiators.

In the last year, topics of negotiation included an examination of the BD and GE rules. The BD discussions centered on the topic of “Borrowers may be eligible for forgiveness of the federal student loans used to attend a school if that school misled them or engaged in other misconduct in violation of certain laws.” Many student veterans were robbed of a stable educational foundation, and the Forever GI Bill sought to correct some of the damage and allow eligible student veterans to have their GI Bill entitlement restored. While only eighteen percent of students elect to pursue educational opportunities at proprietary institutions, we maintain reservations about the claimed outcomes of some of these schools.

The recent documentary, Fail State, illuminates the practices of many of these schools. The documentary shows the recruiting practices and outcomes of these schools and identifies the critical link to the growing mass of student debt in America.

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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 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 a possibly 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. Congress should enact standards of oversight that prevent bad actors from taking advantage of nonprofit status by creating protections against hiding fraud, waste, and abuse.

**Automatically Institute Existing Benefits.** It is paramount the federal agencies responsible for the benefits and programs utilized by veterans and service members be willing to share and then act on data from other agencies to streamline benefits and programs. For example, VA recently shared data with ED on all veterans classified as Totally and Permanently Disabled, which qualifies those individuals to have any federal student loans discharged without tax penalty. But ED has not discharged the loans of those individuals. Another example could include ED’s automatically dropping eligible service members’ student loan interest rates to zero during qualified periods of service.

**Forever GI Bill Implementation Oversight**

The *Harry W. Colmery Educational Assistance Act*, more commonly known as the Forever GI Bill, was signed into law in August 2017 and created the largest expansion of education benefits for veterans in nearly a decade. Since passage, VA has implemented the majority of the Forever GI Bill’s provisions, but key provisions remain.

The frustrations felt across the country by student veterans and institutions last semester were widely shared and reviewed by these Committees during the previous Congress. We appreciate the strong leadership last Fall and are encouraged by the continued interest and commitment in this Congress to ensuring the Forever GI Bill is fully enacted and students are returned what is owed to them in missing housing benefits. Continued oversight of the implementation process and collaboration with VA will remain a priority of SVA until all provisions of Forever GI Bill are implemented.

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Working Group on Housing Reset. SVA applauds VA leadership decisions in late 2018 to reset the planned path of implementation for the housing-allowance changes required in Forever GI Bill. The proposed implementation plan included troubling assumptions about how to best meet the intent of the law. Specifically, the use of building ZIP Codes for each class attended by a student veteran was going to be too burdensome for both VA IT systems and School Certifying Officials (SCOs), and the decision to use different calculation method acknowledges that misstep.

In previous iterations of GI Bill implementation and other major VA initiatives such as the recent appeals modernization efforts, VA has often convened a working group of external stakeholders to serve in an advisory capacity. VA Education Service has held similar meetings that include updates to GI Bill processing times and the reset plan overall, which have served as useful touchpoints. But SVA encourages those meetings expand to include technical discussions because they provide an opportunity to identify challenges.

Continued Communication on Reset. One comment SVA consistently hears about on Forever GI Bill implementation: Students, institutions, and SCOs need to hear directly from VA on a regular basis about what is happening and what each entity should expect. VA should communicate through e-mail throughout the year to assure everyone the new plan is on target and on time.

STEM Scholarship Credit Hours and Communication. Based on feedback and inquiries fielded by SVA, the Edith Nourse Rogers STEM Scholarship is one of the most anticipated provisions of the Forever GI Bill. With an August 1, 2019, effective date, and the preparations for Fall 2019 semester decisions already underway by institutions and students, the need for information on the scholarships continues to grow. Communication about the application process and about how the scholarship will be dispersed should be shared as soon as possible by VA.

One concern with the scholarship, as written, includes the severe limitation of eligible degree programs the credit-hour requirement imposes.14 To help make the application process easier and more in-line with the intent to increase access to STEM degrees, SVA encourages these Committees to reevaluate the credit-hour requirement listed in the Forever GI Bill to allow VA more latitude to accept STEM programs.

VA Modernization

IT Modernization. Antiquated VA IT systems continues to be at the root of the challenges VA experiences in ensuring efficient and timely access to benefits. As we approach the end of the second decade in the twenty-first century, the time is past to address this systemic issue. VA Education Service platforms are in desperate need of a system that can adapt and change with the landscape. The much-needed comprehensive IT modernization will not be easy or accomplished overnight but is a necessary conversation.

Batch Payment Feasibility. 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 certify both housing payments and tuition payments. We

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Work-Study Modernization. In September during SVA’s Leadership Institute, a leadership training program for the top student veteran leaders, work-study was at the top of the list of Chapters’ concerns. The feedback repeatedly discussed the paper-based model as antiquated, cumbersome, and lethargic on getting paychecks to student veterans. The method is an unreliable source of income. Transitioning to a web-based system that mirrors some of the successes of ED’s work-study program is overdue.

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 frustration in Chapters. It is understandable there is a propensity 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.

Natural Disaster Response. VA is able to continue paying housing allowances to student veterans for up to a month if a school is closed due to a natural disaster. However, SVA encourages giving VA the authority to extend that timeframe when natural disasters are so severe an institution needs more than a month to reopen campus. 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.

Study Abroad Updates. The parameters VA places on study-abroad programs do not align with how higher education generally organizes and operates those programs. SVA encourages a review of the requirements under VA and a conversation with higher-education institutions on how to approve a wider array of study-abroad programs.

GI Bill Comparison Tool. The tool can be invaluable to veterans trying to understand the value of their GI Bill as they consider options. However, improvements would make the process better. As it stands, the coordination between ED and VA with the College Navigator, College Scorecard, and GI Comparison Tool reduce the delivery of data to veterans. The Comparison Tool has unique data, necessitating a separate tool from ED’s options. But, the underlying data is not being effectively shared to deliver prospective students a complete view of their options. The data running the Comparison Tool is largely limited to VA’s internal data, which is severely limited, notably excluding student veterans who run out of benefits or elect alternative funding. Furthermore, it appears VA fails to appreciate how veterans are putting the Comparison Tool to work in the field. The tool does not offer an effective “comparison” function. Prospective students primarily use the tool for its “look up” function for familiar institutions as that’s effectively the option the tool offers.

Vocational Rehabilitation and Employment Program (VR&E). VR&E is an important program at VA that supports the reintegration of veterans after service. In 2018, SVA collected student feedback on the VR&E program and provided recommendations to the 115th House Committee on Veterans Affairs to improve and modernize the program. The recommendations focused on five categories: (1) counselor concerns, (2) program administration, (3) process subjectivity, (4) career concerns, and (5) benefits

misconceptions. SVA would like to see additional review by these Committees, using recent testimony, reports, and VA and stakeholder engagement to review opportunities for modernizing the VR&E program.

**Equity of Veterans’ Economic Opportunity.** 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”. ¹⁹ 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.

*Higher Education Modernization*

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 nontraditional students in the twenty-first century, a population of students comprising the new majority of students in higher education - the new traditional student.²⁰

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 not only empower student veterans but will also improve higher education for fellow nontraditional 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.

**Support Access to Childcare on Campus.** Given 46 percent of student veterans have children, access to available and affordable childcare are consistent needs. Challenges with childcare availability and affordability are not unique to the student veteran and nontraditional student population; depending on location, childcare costs can comprise seven to twelve percent of a family’s income or even more for single parents.²¹

The federal government has attempted to address the need for affordable childcare on campus through programs such as the Child Care Access Means Parents In Schools (CCAMPIS), but historical challenges with underfunding and available childcare providers limit the scope and effectiveness of CCAMPIS.²² SVA recommends replicating the pilot program established for childcare at VA medical facilities as a similar pilot program for student veterans -- and continuing the support for increased CCAMPIS funding as done in 2018.

**Assessments for Prior Learning.** To promote efficiency and best account for the experience and training student veterans bring with them, SVA encourages conversations around how to best award credit for prior learning while maintaining a high-quality degree to continue. Prior Learning Assessments (PLA) can be a tool used to help nontraditional students, adult learners, maximize their experience and a

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need to complete a degree efficiently. A study from the Council for Adult & Experimental Learning found that use of PLAs led to greater graduation rates and persistence – and shortened completion time compared to similar students who did not use PLAs.\(^{23}\)

Many student veterans face challenges using PLAs toward a degree program, with credits often counting as elective credits and not helping to achieve degree completion. It’s likely institutions of higher learning struggle with how to adequately account for and assess military training, or that many student veterans are pursuing degrees with little to no relation to their military occupation. Regardless, a deeper study of how PLAs are affecting student veterans and potential missed opportunities to award quality credit for prior learning should be reevaluated. All assessments for prior learning should also be coupled with safeguards preventing fraud, waste, and abuse.

At our 10th annual national conference in 2018, the President and CEO of SVA, Jared Lyon, shared the story behind the quote on our anniversary challenge coin: “Some attribute the following text to Thucydides and others note that it’s a paraphrase of a book written by Sir William Francis Butler from the late 1800’s. The reality, either way, rings as true today as it ever has, and the phrase goes like this, “The nation that makes a great distinction between its scholars and its warriors will have its thinking done by cowards and its fighting done by fools.”\(^{24}\)

Supporting student veteran success is paramount, and it starts with the time, attention, and devotion to the cause of veterans in higher education supported by these Committees.

We thank the Chairmen, Ranking Members, and Committee members for the opportunity to share SVA’s perspective. We welcome your feedback and questions, and we look forward to continuing to work with these Committees and the whole of Congress to ensure the success of all generations of veterans through education.
