



Student Veterans of America  
1625 K STREET NW, STE 320  
WASHINGTON, DC 20006  
[www.studentveterans.org](http://www.studentveterans.org)

**TESTIMONY OF**  
**MR. WILLIAM HUBBARD**  
**VICE PRESIDENT OF GOVERNMENT AFFAIRS**  
**STUDENT VETERANS OF AMERICA**

**BEFORE THE**

**COMMITTEE ON VETERANS' AFFAIRS**  
**UNITED STATES SENATE**

**LEGISLATIVE HEARING ON THE TOPIC OF:**  
**"LEGISLATIVE AND DISCUSSION DRAFT PROPOSALS"**

**SEPTEMBER 16, 2015**



Chairman Isakson, Ranking Member Blumenthal and Members of the Committee:

Thank you for inviting Student Veterans of America (SVA) to submit our testimony on various legislative proposals and discussion drafts currently before the Committee. With over 1,200 chapters across the country, we are pleased to share with this committee the perspective of those most directly impacted by several of these important topics.

Established in 2008, SVA has grown to become a force and voice for the interests of veterans in higher education. With a myriad of programs supporting their success, which includes rigorous research, development-seeking ways to improve the landscape, and advocacy throughout the nation, we place the student veteran at the top of our organizational pyramid. As the future leaders of this country, nothing is more important than the success of student veterans in school as they prepare for productive and impactful lives.

We would like to highlight our position, the legislative intent, and potential considerations for the Committee regarding S. 1460, the *"Fry Scholarship Enhancement Act of 2015"*; S. 1938, the *"Career Ready Student Veterans Act of 2015"*; and the *"Discussion Draft, a bill to make improvements in the laws administered by the Secretary of Veteran Affairs relating to educational assistance, and for other purposes"*.

o

#### **S. 1460, the *Fry Scholarship Enhancement Act of 2015***

Last year, SVA publicly declared strong support for Section 701, the *"Expansion of Marine Gunnery Sergeant John David Fry Scholarship"* of the *"Veterans Access, Choice, and Accountability Act of 2014"* (Choice Act). Over the past decade, and even more prominently over the past several years, military families have demonstrated an integral function of support for our servicemembers. As a reflection of this support, the Post-9/11 GI Bill maintains transferability to spouses and dependents as a recognition of the role they play in the life of all veterans. The transferability option provides precedent that the Fry Scholarship is more than appropriate, given the sacrifices of those families who lost members of their family to service.

It is clear to us that the transferability option additionally provides precedent for the application of the Yellow Ribbon Program. We believe this change is consistent with the intent of congress under the Post-9/11 GI Bill and the Choice Act. Application of the Yellow Ribbon Program is both a natural extension of the benefit as well as economically advantageous to taxpayers; to be able to complete degrees or certificates without debt allows gold star families to progress in their careers unhindered by loan repayments, thereby allowing them to re-invest sooner in the economy and their communities. For SVA, this is an obvious fix and provides a simple measure of appreciation that should already exist.



## **S. 1938, the *Career Ready Student Veterans Act of 2015***

When young men and women enter the armed forces, many know they can count on the promise of furthering their lives through their lessons in leadership and the opportunity to go to school on the Post-9/11 GI Bill. Unfortunately, some come to find out that their hard work and studying does not produce what they had hoped, due to the lack of programmatic accreditation of their school. All GI Bill dollars must tie to programs with the proper certifications and licensures required for proper accreditation.

This proposal will enforce what many of us take for granted—an open and honest expectation that hard work will yield results. When some programs sell their courses as a path to a viable career, only to leave students short from their goals, the benefit of the GI Bill is wasted. It is our sincere intent to ensure that all GI Bill dollars produce the highest return on investment for our student veterans and the taxpayers. This legislation is necessary to ensure that all forms of educational assistance utilized by student veterans meets the instructional curriculum licensure or certification requirements of the state. Courses that do not follow this standard are setting up our veterans for failure.

Moreover, we support the requirement that the appropriate board or agency approve programs in a state when the career path requires such approval or licensure. With these requirements in-mind, we accept that there will be unique cases and support the Secretary's authorization to wait these requirements, but only under limited and clearly defined circumstances. We also hope to see this proposal applied evenly across all sectors of education. In some cases, there is an over-emphasis on the for-profit, non-profit or public sector, thereby allowing issues to go unnoticed elsewhere. It is necessary to apply the advantages of this proposal to all actors in higher education.

### **Discussion Draft, a bill to make improvements in the laws administered by the Secretary of Veterans Affairs relating to educational assistance and for other purposes**

Since 2008, various proposals have sought to adjust course with the Post-9/11 GI Bill as we learned lessons through practical application of the benefit. As SVA has supported previous legislative fixes, we are also supportive of this discussion draft and we will identify our position on the various sections.

- *Section 1, "Recodification and improvement of the election process for the Post-9/11 Educational Assistance Program"*

As we are seeing this fall semester, the Department of Veterans Affairs (VA) has significant challenges to processing the volume of veterans enrolling in school as they transition out of the military. Current backlogs estimated at several weeks, and any additional delays would be a further hindrance for veterans. In the case of Section 1 of this proposal, we believe the clarification of the business processes will be a benefit to the veteran, VA, and the taxpayers.



It is our intention to push for the timely distribution of funds at every opportunity, as we believe the process should not be a barrier to education for veterans. We are pleased about the thoughtful approach taken with this section, in particular the inclusion of Subsection 3326.(F)(3)(h)(2), “Notice”. This section will decrease redundancies with the typical processes, but still allow for modification. We would like similar proposals to take an equally measured approach.

- *Section 2, “Centralized reporting of veteran enrollment by certain groups, districts, and consortiums of educational institutions”*

SVA is supportive of efforts that would streamline the ability of VA to perform reporting and real-time research on the student veteran population. A consistent challenge to accessing the most recent data is the consolidation of information, and we support this effort.

- *Section 3, “Clarification of assistance provided for certain programs of education”*

Last November, SVA testified to the House Veterans Affairs Subcommittee on Economic Opportunity regarding the ability of schools to contract out certain programs for exorbitant fees. This issue results in the government covering the costs of programs well-beyond the market norm for some flight programs or electives. With the intent of creating a clear and reasonable solution, SVA accepted the National Association of State Approving Agencies (NASAA) proposal to reasonably cap such programs consistent with other courses of education.

Many of these flight programs existed before the establishment of the Post-9/11 GI Bill; alleging that cutbacks will prevent them from properly operating is a false threat. Additionally, it is important to recognize that countless numbers of flight schools effectively operate at levels well below the proposed cap. Our concern is partly based on the observation of pricing for many of these programs increasing as much as 80%, despite only 30% increases in enrollment, following the passage of the Post-9/11 GI Bill. This precedent is a hazard to the overall impact of the Post-9/11 GI Bill and we believe this section presents a reasonable option.

We believe abuses by actors willing to view the Post-9/11 GI Bill as the core feature of their business model is the true risk to the longevity of the benefit, and not the installation of reasonable standards that ensure the endurance of the benefit. SVA is also in favor of additional protective measures such as proper enforcement of the 85-15 rule—coordination of the two policies are critical to the integrity of the program.

SVA maintains serious concerns over the costs associated with this loophole. For example, one university in Utah collected a total of \$15,702,297 last fiscal year, while only preparing 68 students for flight careers, according to VA data. To say that the training or equipment is costly is not an excuse for gross abuse of the generous education benefits afforded by the Post-9/11 GI Bill, and we are pleased that this Congress seeks to address this issue.



- *Section 4, “Provision of information regarding veteran entitlement to educational assistance”*

SVA is encouraged by the prospect of a secure information technology infrastructure between institutions of higher learning (IHL) and VA. While some programs and infrastructure currently exist, a clean interface with the ability to share up-to-date information—specifically regarding the remaining benefits of each individual veteran—would be very powerful. We believe this would aid in proper counseling of student veterans and have a direct impact on their success.

- *Section 5, “Role of State Approving Agencies”*

Recent changes to the role of the State Approving Agencies (SAA) has affected the allocation of finite resources, shifting them from the areas where they need resources most. Then, in 2011, Public Law 111-377 affected how the SAAs operate. Responsibility for performing approvals split, to include the Secretary of VA, while the SAAs were to increase their role in compliance measures. This shift in resources away from the significant duty to perform approvals has diverted specialized resources away from mission-critical functions. The SAAs bring an implicit capability that should receive greater emphasis: their capacity for judicious discretion.

The SAAs across the country have the ability to call for a review of a school, even if the IHL triggers no specific standards. The goal of the SAAs, in our view, should be to have their success go unseen by the student veteran; if the SAAs perform their job well, the true beneficiaries will remain unaware. The clarification of the SAAs authority is critical to their ability to maximize effectiveness. We believe the approval process to be the preventative medicine for issues that would otherwise stem from low-quality programs underserving the interests of student veterans. This proposal would establish the SAAs as the primary body for program review, and SVA is supportive of this section.

- *Section 6, “Criteria Used to Approve Courses”*

As previously stated, SVA urges Congress to consider all sectors of higher education when crafting legislation. We have concern that that focusing on individual sectors of education allows other schools to avoid proper oversight practices. This section establishes an increasingly uniform standard with similar expectations for all schools. To establish a reasonable standard for all schools is well-within reach, and we support this section.

- *Section 7, “Compliance Surveys”*

The streamlined collection and consolidation of data efforts is a priority issue for SVA, as noted in our comments regarding Section 2. While conducting the *Million Records Project* last year, we found the expansive need to collect additional data on student veterans through more efficient means. This section facilitates the collection of critical data on an annual basis, and SVA supports this section.



## Our Final Thoughts

The intent of the Post-9/11 GI Bill, formally referred to as the “*Veterans Educational Assistance Act of 2008*” is clear: education opportunities for veterans. We have always recognized that while not every veteran will take advantage of this opportunity, it should always be there for those who served our country. Our veterans have earned this education benefit and it is up to our nation protect the integrity and longevity of the program.

Previous bills with similar components as the modern Post-9/11 GI Bill have demonstrated remarkably high returns on investment for the taxpayers. It is our goal to repeat similar and improved outcomes for this generation of veterans, and we thank those who work tirelessly on their behalf for their ceaseless efforts.

We are appreciative of the opportunity to comment on S. 1460, the “*Fry Scholarship Enhancement Act of 2015*”; S. 1938, the “*Career Ready Student Veterans Act of 2015*”; and the “*Discussion Draft, a bill to make improvements in the laws administered by the Secretary of Veteran Affairs relating to educational assistance, and for other purposes*”. The proposals reviewed under this committee represent an important step forward for veterans, their families and the impact of the Post-9/11 GI Bill.

o

We thank the Chairman, Ranking Member, 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 Senate Committee on Veterans’ Affairs and the entire Congress to ensure the success of all generations of veterans through education.