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APPROVING AGENCIES

STATEMENT FOR
THE RECORD BY
WILLIAM D. STEPHENS
PRESIDENT
NATIONAL ASSOCIATION OF STATE APPROVING AGENCIES
BEFORE THE
COMMITTEE ON VETERANS AFFAIRS
UNITED STATES SENATE
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Introduction

Chairman Akaka and members of the Committee, I am pleased to appear before you today on behalf of the National Association of State Approving Agencies (NASAA) to provide input on the implementation of the Post-9/11 GI Bill and to discuss various ideas/suggestions for moving forward to improve the delivery of earned benefits for those brave men and women who have served or are currently serving our country.

State Approving Agencies have been an integral part of the administration of the various GI Bills since shortly after the inception of the original GI Bill in June of 1944. It has been our distinct pleasure and honor to have the opportunity to contribute to the success of these programs. In short, State Approving Agencies are “the face of the GI Bill at the state level.”

Background

There is no question that the events of September 11, 2001, changed the United States forever. For almost nine years, the role of the military has expanded as a direct result of our war on terrorism. As you are aware, there are many different GI Bills that provide benefits for veterans/reservists/dependents. Beginning August 1, 2009, the newest GI Bill (the Post-9/11 GI Bill also known as Chapter 33) started paying increased benefits. This “war time” GI Bill has greatly increased both the access to higher education and the number of individuals using their earned benefits. The 2009 fall semester brought many challenges for all those involved in providing the necessary assistance of the administration of the various GI Bills. When we look at the administration of the various GI Bills, there are three components/partners. The “front line” for administration of the GI Bills are the Certifying Officials located at the institutions/establishments. They are the ones that the veterans/eligible individuals look to for answers to their questions. Because of the complexity and other new requirements necessary for the effectiveness of the implementation, special training and support was needed and continues to be necessary. The second partner is the State Approving Agencies. As stated above, we are “the face of the GI Bill at the state level.” In addition to approving the various institutions/establishments as well as the programs at those facilities, we also have extensive interaction with the Certifying Officials. That includes both annual visits to active institutions/establishments, various outreach activities designed to increase GI Bill utilization, various training workshops for Certifying Officials, as well as liaison with many organizations to improve the delivery of

benefits. The third partner is the Department of Veterans Affairs. Their role includes not only establishing eligibility and paying the benefits for eligible veterans/individuals but also working with both the State Approving Agencies and the Certifying Officials. All three partners are necessary for the effective delivery of benefits.

Looking Back

The 2009 Fall Semester was very challenging for all three partners. Due to both the complexity of the Post-9/11 GI Bill and the increased volume of claims, Certifying Officials, State Approving Agency staff, and Department of Veterans Affairs staff were overwhelmed with questions, inquiries, and situations they had never experienced before. At the institution level, staff other than Certifying Officials became actively involved in the process. This is especially true for Bursars and other fiscal staff because the tuition and fees are paid directly to the institution under Chapter 33. State Approving Agencies were tasked with determining the highest tuition and fees at a public institution for an undergraduate in-state student. While this may have seemed straightforward, there were many complications with establishing those figures. In addition, there is a timeliness issue. Many state's fiscal year begins on July 1st of each year. Because the highest tuition (and sometimes fees) are not set until after the state budget is finalized, it was not possible for the Certifying Officials for many public (and some private institutions who participate in the Yellow Ribbon Program) to submit their enrollment certifications. This caused a delay in their processing and payment of benefits. Department of Veterans Affairs had the challenging and complex task of processing the enrollment certifications. This processing included reviewing the enrollment certifications submitted by institution officials, verifying that the programs had been approved by the State Approving Agency, establishing eligibility, and then paying the veteran/individual. Department of Veterans Affairs hired a substantial number of additional staff to accomplish this task. In addition, we are pleased that Department of Veterans Affairs is working on updating their electronic process. This will improve their efficiency. Updating the Department of Veterans Affairs electronic systems is long overdue. We highly encourage the use of technology wherever possible.

Institution officials responded to this new challenge with increased effort and determination. They reviewed their internal procedures to determine what needed to be changed, worked with veterans/individuals to assist them wherever possible, ensured that the fiscal staff at their institution was aware that the payment of tuition and fees was delayed, and assisted both the State Approving Agency and the Department of Veterans Affairs with identifying problems/issues to be addressed. State Approving Agencies provided both training and individual assistance for the institution officials, conducted various outreach activities to inform eligible veterans/individuals of this new GI Bill, and worked with Department of Veterans Affairs staff to identify problems/issues and recommend solutions. Department of Veterans Affairs staff at the state level (Education Liaison Representatives and Compliance Survey Specialists) worked closely with State Approving Agency staff and, where possible, Certifying Officials to provide the best possible service. At the Regional Processing Offices, staff worked diligently to process the increased volume of complex claims. At the national level, Central Office staff worked to ensure proper guidance was provided to ensure everyone understood exactly what was needed. Due to the "interaction" of the new GI Bill with already existing regulations and policies, this was a challenge to accomplish. In addition to the above, we want to acknowledge the

Department of Veterans Affairs decision and implementation of the one-time emergency advance payment of benefits that enabled veterans to remain in school until they received their housing allowance and book stipend. In short, a need was seen and Department of Veterans Affairs reacted to serve veterans/eligible individuals.

Looking back, even with all of the challenges, we feel the implementation went fairly well. Obviously many lessons were learned; and by all three partners working together, service can be improved.

Moving Forward

Looking ahead to changes that can be made to improve the delivery of service, we feel the following should be considered:

Additional training and support for Certifying Officials. As the “front line,” Certifying Officials need to have all of the tools necessary to serve their veterans/eligible individuals. Training should be in various formats including: training workshops sponsored by Department of Veterans Affairs, training provided by the various Certifying Official organizations, training provided by State Approving Agencies staff (this can be especially effective because many Certifying Officials cannot travel out of state for training), as well as on-line training.

Concerning State Approving Agencies, there are two areas that would improve the overall effectiveness of the GI Bill. First, increased emphasis on outreach and training of Certifying Officials. State Approving Agencies are in the unique position to be able to provide direct training tailored to the needs of their Certifying Officials. Second, since State Approving Agency staff visit the institutions on a regular basis, they could provide additional assistance with ensuring compliance. Currently State Approving Agency staff does a limited review of veteran records to ensure institutions are following their approved policies and procedures. This could be expanded to a more detailed review and increased number of records to review. In addition, State Approving Agency staff could also review the fiscal records to determine if the correct tuition and fees are being charged and are properly credited for the appropriate veterans/individual. Both of the above would require increased funding for State Approving Agencies. State Approving Agency funding has remained the same for five (5) years while the workload has increased drastically. Just as the amount of time Certifying Officials and Department of Veterans Affairs staff must spend on the new GI Bill, State Approving Agency time has increased. As a general statement, if it takes 10 minutes to “respond” to questions/issues for the other chapters of the GI Bill (Chapter 30, 1606, 1607, etc.), it takes at least four times as long to respond to Chapter 33 questions/issues.

There are three changes that would definitely improve the administration of veteran’s educational benefits.

Expand the role of the State Approving Agencies (with increased funding) to include entering approved programs directly into the Web Enhanced Approval Management System (WEAMS). Currently all approval actions are forwarded in paper form to an Education Liaison Representative who must then enter the approved program list. This is very time consuming. A system could be established that permits the State Approving Agency to directly enter the

approved programs, and they can then be reviewed by the Education Liaison Representative. This will avoid duplication of effort.

Separate the payment of tuition and fees from the payment of the housing allowance by allowing Certifying Officials to certify prior to the establishment of the highest tuition and fees for that state. Currently Certifying Officials must wait until the maximum state tuition and fees are established for Post-9/11 GI Bill recipients. For those states with a fiscal year that begins July 1, there is a major complication. For some states, it was not possible for enrollments to be sent to DVA until well into August. Prior to this year, Certifying Officials could submit enrollment information up to 120 days prior to the start of the semester/term. Many of the larger institutions did this and thus the workload for Department of Veterans Affairs was more evenly distributed throughout the year. NASAA recommends that DVA seriously consider permitting Certifying Officials to certify veteran's enrollment prior to the state establishing their highest tuition and fees. This would allow processing of the housing allowance and book allowance in a timely manner. Following the establishing of the highest tuition and fees for the state, the institution would submit the necessary information to DVA for the payment of the tuition and fees.

Permit State Approving Agencies "read only" access to Department of Veterans Affairs computer systems so we could more effectively respond to veterans/individuals inquiries. All State Approving Agency staff have completed the necessary security training as required in our annual contract with the Department of Veterans Affairs. This will also provide staff detailed information on which records to review which will assist in reducing fraud, waste, and abuse.

The above three items are provided simply as suggestions to improve service to veterans/eligible individuals. We realize that there would be technology and other challenges to implementing these; however, once implemented the system would be more effective in serving veterans/reservists/dependents.

Concerning the Department of Veterans Affairs, we suggest they continue to work towards establishing effective policies/guidance for the implementation of Chapter 33. They have provided various guidance that has improved the effectiveness. There are still some areas that need guidance. These include but are not limited to: establishment of a list identifying the fees that are considered acceptable to be covered under Chapter 33, clarifying guidance concerning establishing what is greater than ½ time for accelerated and summer programs, clarification of the payment of benefits for non-college degree clock hour programs at degree granting institutions, and other areas as identified by State Approving Agencies and Certifying Officials. We also feel strongly that the continuation of using focus groups that include representatives from the various organizations that are comprised of Certifying Officials and State Approving Agency representatives provides a great base to ensure the perspective from the "field" is represented. We would also suggest including Department of Veterans Affairs staff from both the Regional Processing Offices and staff assigned in the various states. Their unique perspective is very valuable.

Closing

Mr. Chairman and Members of the Subcommittee, we thank you for the opportunity to address you today. Two other items we would suggest serious consideration be given. First, combining and simplifying the various GI Bills would not only increase veterans/eligible individuals understanding of their benefits but also would assist Department of Veterans Affairs processing of claims. Second, the Post-9/11 GI Bill needs to be expanded to include increased benefits for eligible veterans/individuals who enroll in programs at nondegree institutions and apprenticeship/on-the-job training establishments. They have served and earned benefits the same as those veterans who attend degree granting institutions.

We are always willing to provide our unique perspective and would be pleased to respond to any questions that you have.