



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 2022”

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Chairmen Tester and Takano, Ranking Members Moran and Bost, and Members of the Committees,

Thank you for inviting Student Veterans of America (SVA) to submit testimony on our organization's policy priorities for 2022. 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 campus-based chapters across the country, SVA aims to inspire yesterday's warriors by connecting student veterans with a community of dedicated 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.

Introduction

At Student Veterans of America, our goal is to inspire tomorrow's leaders. This ethos is embodied by the SVA chapter at Georgetown University. The Georgetown University Student Veterans Association (GUSVA) is one of our many Chapters that have greeted the challenges associated with social distancing as an opportunity to transform their operations and increase accessibility to student veterans and the community. Georgetown University is home to our 2021 Chapter of the Year, and they continue to inspire others with their adaptability and commitment to their community.

One of the clearest examples of GUSVA's commitment to community has been its incredible work at the forefront of helping to resettle our Afghan allies. Since August 2021, despite challenges presented by the pandemic, GUSVA has coordinated with other community partners such as Husayn for Humanity, Afghan Youth Relief Foundation, VFW Posts 9274 and 3150, and National Capital Battalion Naval ROTC to expand their outreach and serve as an example for other chapters interested in making a difference for our new Afghan neighbors. Overall, GUSVA coordinated 9 service projects with 70 volunteers, which contributed to a total of 210 hours of service in the greater District of Columbia-Maryland-Virginia (DMV) area. The chapter has also amplified visibility for queer veterans on campus and launched *Women Vets @ GU*, an interest group which celebrates women veterans in higher education. A queer person of color who served in the U.S. Navy during Don't Ask, Don't Tell, Chapter President Nick Mararac helps to guide the chapter in its support of those who have been historically discriminated against and excluded due to their genders and sexualities. On September 11, Secretary Denis McDonough of the Department of Veterans Affairs recognized GUSVA for leadership and service during the National Day of Service, during which they recruited 37 volunteers. GUSVA has been a leader in their community through service.

While examples like Georgetown are special, they are not unique. Over this past year, student veterans nationwide have risen to the occasion as they always have. Katherine Martinez served from 2015-2019 as a Sonar Technician with duty stations aboard the USS Winston S Churchill and the Mid-Atlantic Regional Maintenance Center. When she left the Navy in 2019, she attended Tidewater Community College and was introduced to SVA, later becoming Chapter President. She has devoted much of her time to raising awareness about mental health issues through her service as a Character Does Matter mentor and Operation Legacy project coordinator with the Travis Manion Foundation, and she served for three years as the chairperson for the Virginia Beach American Foundation for Suicide Prevention. In 2020, Katherine transferred to Old Dominion University and joined the SVA chapter where she served as the Community Outreach Officer and in 2021 became the first female President in the 13-year history of the chapter at ODU. Katherine graduated this year, has joined SVA's Board of Directors along with Nick, and plans to pursue graduate school this fall.

Stories like those above inspire us every day in our work at SVA, and we hope they do the same for the members of these committees as you strive to improve the lives of student veterans in higher education.

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The GI Bill as the Front Door to VA

SVA has long championed the benefits of the GI Bill for student veterans. It offers unparalleled opportunities to beneficiaries, assisting them in accomplishing their educational and professional dreams, but it remains a deep source of untapped potential for VA. The GI Bill is one of VA's greatest assets and, if properly harnessed, can aid the Department in growing the number of veterans it serves.

For many veterans, the GI Bill is the first touchpoint they will have with VA, making their experience with it the barometer by which they will judge any potential future interactions with VA.¹ A positive GI Bill experience builds veterans' trust and confidence in VA, and, in turn, increases veterans' likelihood of taking advantage of the full range of VA services. The GI Bill is truly the front door to VA, but to fully realize its great potential, Congress must conduct strong oversight and ensure VA reprioritizes education services internally, updates their aging IT infrastructure, and makes use of technological advances to better serve veterans' needs.

We applaud the steps VA has taken to embrace this vision. With an overhaul of VBA's IT systems underway, the agency is making huge improvements in GI Bill customer service by reducing call center wait times, enhancing communication options, and ensuring quicker benefit transactions. These improvements will help lay the groundwork for the trust and confidence that will build VA's brand among current GI Bill beneficiaries and all those to come. At the same time, it will help VA better communicate with veterans about all the services the Department offers.

While VA's recent efforts to prioritize the GI Bill through modernized IT infrastructure are laudable, there is more work to be done. SVA calls on VA and Congress to explore how the GI Bill can better integrate within the higher education system to reduce friction points that negatively impact veterans. Student veterans using their earned education benefits sit at a confusing crossroads between the higher education policies at the Department of Education (ED) and those at VA. To address this issue, we encourage, among other things, greater interagency collaboration, data sharing, and automation where possible.

The effects of embracing the GI Bill as the front door to the VA will be substantial. The Department will welcome more veterans through its doors and outperform their expectations by delivering a top-of-the-line experience with the GI Bill, laying the groundwork for future engagement and utilization of the entire scope of VA's programs and services.² We look forward to focusing on this concept as we work with our partners at VA and our veteran advocate counterparts in 2022 and beyond.

SVA Research Findings and Initiatives

Over the past decade, SVA has dedicated significant resources to researching the efficacy and impact of the Post-9/11 GI Bill. The bottom line is this: student veterans are among the most successful students in higher education.³ We hope the information below is helpful in providing a more robust understanding of who student veterans are and how we can better serve them.

Our team produced both the Million Records Project (MRP) and the National Veteran Education Success Tracker

¹ See *generally Journeys of Veterans Map*, U.S. DEPARTMENT OF VETERANS AFFAIRS, *Journeys of Veterans Map*, <https://www.blogs.va.gov/VAntage/wp-content/uploads/2020/02/Veteran-Journey-Map.pdf>; (last visited Feb. 25, 2021); *VA Welcome Kit*, DEPARTMENT OF VETERANS AFFAIRS, *VA Welcome Kit* (Nov. 12, 2020) <https://www.va.gov/welcome-kit>.

² THE U.S. DEPARTMENT OF VETERANS AFFAIRS, *FY 2018 – 2024 STRATEGIC PLAN 5* (May 31, 2019).

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., https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf.

Project (NVEST).⁴ The purpose of these studies was to address a straightforward question: “What is America getting for its multi-billion-dollar investment in the education of veterans?” In partnership with 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.

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.⁵ With almost 4,000 responses the project has already produced three key findings.

First, much of the public has an outdated view of veterans’ post-secondary educational journey: high school, military service, college, then workforce. This view has persisted since the World War II era, when 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 greater accessibility of college courses.

A second key finding was discovered within these journeys. 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 high school guidance counselors and is reinforced throughout military service. It is often not until after they have separated and hear about other veterans succeeding in college that veterans realize their potential and enroll.

Finally, examining 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 and externships. This puts student veterans at a disadvantage compared to more traditional student groups who have taken advantage of these career preparation opportunities.

SVA's research on student veteran demographics further illuminates their status as post-traditional students. Ninety percent of student veterans using the GI Bill are prior enlisted, while the remaining ten percent are prior warrant and commissioned officers. Ninety percent are over the age of twenty-five. Nearly half are married and half have children, while seventeen percent are single parents. Forty-eight percent of student veterans work while enrolled with eighteen percent of those working multiple jobs.⁶

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.⁷

While the national Grade Point Average (GPA) for undergraduate college students is a respectable 3.15, the GPA for student veterans is 3.44. 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.⁸

⁴ See *generally Research*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/> (last visited Feb. 24, 2021).

⁵ See *generally Life Cycle Atlas*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/life-cycle-atlas/> (last visited February 15, 2021).

⁶ Cate, C.A. Student Veteran Census Survey 2022. Student Veterans of America, Washington, D.C.

⁷ 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., https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf.

⁸ *Id.*

In its first six years, the Post-9/11 GI Bill enabled more than 340,000 veterans to complete a post-secondary degree or certificate. SVA projects the Post-9/11 GI Bill will support approximately one-hundred thousand veterans graduating every year, with an overwhelming majority graduating from premier schools. That is 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,⁹ and as we recognize International Women's Day today, we note that twenty-three percent are women.

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.¹⁰

Over the last few years, SVA has deployed the Veteran Opinion Survey, a national survey of veterans that periodically collects opinions on the challenges they face, and the effectiveness of the groups and government leaders tasked with addressing them. These surveys elevate the voice of student veterans on policy matters of national importance and were designed to provide an important accountability check for the agencies, elected officials, and the organizations that serve them.¹¹ The pandemic confirmed the value of these new surveys as SVA used them to better understand how COVID-19 impacted student veterans and their families. The unique data that was collected informed SVA's action on behalf of student veterans during this challenging period.

In 2022, SVA will focus our research on better understanding student veterans' core needs. We are releasing three surveys this year, our Veteran Household Financial Health and Planning Survey, Veterans in the Workforce, and our first ever Student Veterans' Basic Needs Survey. These new research tools will fill critical gaps in currently available information, allow us to better serve our chapter members, and advocate for meaningful policy solutions.

SVA's annual Veteran Household Financial Health & Planning Survey is designed to help stakeholders better understand financial wellness of veteran households and provide early indicators on the return on investment of the GI Bill. The new survey will offer key insights into veterans' ability to meet their financial needs and those of their families by collecting information on subjects like debt, home ownership, and retirement planning. The survey results will help stakeholders, including policymakers, better understand veteran financial challenges, the financial impact of service member transition, and veteran socioeconomic mobility.¹² Last year's survey provided interesting insights. Sixty-three percent reported their current student loan debt was less than forty thousand dollars. Fifty-five percent of respondents reported current home ownership with seventy-three percent of this group reporting they used a VA home loan to help finance their home purchase. Fifty-four percent reported they are currently contributing too little to their retirement savings and forty-nine percent saying that their current level of debt is making it difficult to contribute to their retirement.¹³

The SVA Student Veterans' Basic Needs Survey just concluded and our Research team is analyzing the results. The survey is intended to address a concerning lack of data on the basic needs of student veterans and the broader veteran community. To fill these gaps, this new survey collected critical information on topics like food

⁹ See 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., https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf.

¹⁰ *Student Veterans: A Valuable Asset to Higher Education*, INSTITUTE FOR VETERANS AND MILITARY FAMILIES AND STUDENT VETERANS OF AMERICA (2017), https://studentveterans.org/wp-content/uploads/2020/08/Student-Veterans_Valuable_9.8.17_NEW.pdf.

¹¹ *Veterans Opinion Survey*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/veterans-opinion-survey/> (last visited Feb. 24, 2021).

¹² *Veteran Household Financial Health & Planning Survey*, Student Veterans of America, <https://studentveterans.org/research/veteran-household-financial-health-planning-survey/> (last visited Feb. 15, 2022).

¹³ *Veteran Household Financial Health & Planning Survey Results*, Student Veterans of America (on file with author).

security, housing security, childcare, and healthcare access, among others. This additional information will equip our community, supporters, and elected officials with the knowledge they need to support veterans' basic needs.¹⁴

The Veterans in the Workforce survey is focused on collecting and reporting information related to veterans' participation in the workforce, such as job satisfaction, potential job/career changes, and veteran trends in the labor market. While many studies focus on veterans' transition to the workforce, few focus on veterans who are already in the workforce. This lack of information prevents policy makers and stakeholders from making data-driven policies to support veterans in the workforce and robs businesses of essential information that would help them attract and retain veterans in their companies. This annual research project focuses on currently employed veterans' attitudes (job satisfaction, workplace stress and conflicts, etc.), what job seekers are looking for in potential jobs, managers, and companies from graduating student veterans and other veteran job seekers and provide insights from veteran entrepreneurs.

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 in 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. Quality data is key to these efforts. We encourage these Committees to take advantage of the full breadth of SVA's research as they endeavor to craft the policies that will serve current and future generations of student veterans.

Diversity, Equity, and Inclusion

SVA has long advocated for the creation of inclusive spaces, not only among its chapter membership, but also on campuses across the nation. Last September, we partnered with the Rutgers Center for Minority Serving Institutions on a first-of-its-kind collaboration that will help SVA collect more data and hear more voices that will inform our policy work on Capitol Hill. We encourage committee members to tune in to our social media platforms and podcast for "SVA Mondays" to learn more about how this partnership is advancing diversity, equity, and inclusion for student veterans and military-connected students at minority serving institutions.

SVA is also creating a senior fellow position to oversee the diversity, equity, and inclusion initiatives at our national headquarters, including leading the creation of our new Racial Justice Task Force. The goal of the task force will be to expand representation and inclusion of communities of color across SVA's operations including chapter membership, organizational programming, and advocacy.

Last, but not least, SVA will lead a national conversation through a Student Veteran Inclusion and Representation Summit ensuring that Black, Indigenous, and People of Color student veterans and service members, as well as their families, are at the forefront of conversations about diversity, equity, and inclusion. Representation is imperative where diversity, equity, and inclusion are a goal, and SVA sees this summit as an opportunity to create space that is more representative of the nation, rather than the groups that have historically predominated higher education. It is our hope that this summit is the first in a long series of discussions that help reframe the national conversation around inclusion and representation in higher education. We invite everyone here today to attend, take part in these meaningful dialogues, and allow this experience to inform and reshape how we think about our legislative priorities going forward.

Priorities Overview

In this testimony, we will highlight our top policy priorities for 2022 and beyond, most of which originate from direct interactions with student veterans at our annual Regional Summits, Leadership Institute, Washington Week, and National Conference. Our priorities fall into the following five categories.

¹⁴ *Basic Needs and Wellness Survey*, Student Veterans of America, <https://studentveterans.org/research/student-veterans-basic-needs-and-wellness-survey/> (last visited Feb. 15, 2022).

- GI Bill Improvements
- Post-Traditional Student Success
- Strengthening Higher Education
- VA Modernization
- Transparency and Accountability

SVA is committed to the next phase of thinking about the GI Bill, elevating the voices of student veterans, and better addressing their everyday needs. With the collective input of student veterans provided during SVA programming throughout the last year, we have finalized our legislative priorities, which are shared in detail in the sections that follow and in a one-page summary available to all Committee Members, student veterans, and interested advocates.

Top Priorities

1. *Codify GI Bill protections created during the COVID-19 pandemic for use in future emergencies.*

For years, student veterans have encountered challenges with education benefits during times of unexpected hardship—often due to natural disasters.¹⁵ The pandemic exposed the true scale of these challenges and the numerous gaps in VA’s legal authority that prevent the agency from protecting students and their benefits in emergency situations. In response to these challenges, and to protect student veterans and their families from a sudden, unnecessary loss of benefits, Members of these Committees and their staff worked tirelessly to patch holes in the underlying veterans’ education benefits support structure as quickly as they were identified, creating a temporary safety net that we rely on to this day.

As June approaches, along with yet another expiration of these provisions, the question will once again arise as to whether these protections must be extended once again. As we have all seen over the past two years, these repeated extensions are an inefficient and time-consuming way to govern. Over the course of the pandemic, these protections have proven themselves invaluable. We should learn from our shared history and preserve these protections to ensure VA can protect our nation’s veterans during future emergencies.

SVA strongly urges the Committees to make the temporary COVID-19 protections permanent so that, when an emergency or major disaster is declared, the Secretary of VA may proactively enable these critical, stabilizing authorities and protect student veterans and their families.

We appreciate how quickly and effectively Congress has responded to the unique and significant needs of student veterans throughout the pandemic. These actions were necessary to preserve the basic integrity of the educational benefits system. Allowing these protections to expire without a permanent solution would place our nation’s veterans back into the precarious position they were in before the pandemic, armed only with the hope that whichever Congress is in session at that time will do the right thing as quickly as it must be done. This is needlessly reactionary. The common-sense solution is clear: make the current protections permanent.

2. *Identify and establish better support for post-traditional students' basic needs, including food, shelter, and childcare.*

In December 2018, the GAO released a report on food and housing insecurity among college students.¹⁶ After reviewing 31 separate studies, they concluded that “[n]one of these studies... constitute a representative study” of our nation’s students.¹⁷ In fact, no federal agency has assessed food and housing insecurity among

¹⁵ Student Veterans of America. Natural Disaster Map. <https://studentveterans.org/government-affairs/natural-disaster-map/>.

¹⁶ GOVERNMENT ACCOUNTABILITY OFFICE, FOOD INSECURITY: BETTER INFORMATION COULD HELP ELIGIBLE COLLEGE STUDENTS ACCESS FEDERAL FOOD ASSISTANCE BENEFITS, GAO-19-95. December (Dec. 2018.), available at <https://www.gao.gov/assets/gao-19-95.pdf>.

¹⁷ *Id.*

postsecondary students and that will remain true until the most recent National Postsecondary Student Aid Survey (NPSAS) is completed.¹⁸

Other research designed to fill current gaps paints a potentially concerning picture. A 2020 survey conducted by The Hope Center found that in 2019, nearly 40 percent of student respondents reported being food insecure during the previous 30 days, more than 46 percent reported experiencing housing insecurity in the past year, and 17 percent reported being homeless during the past year.¹⁹

While SVA works to collect its own data through our 2022 Student Veteran Basic Needs Survey, we call on Congress to also support efforts to collect additional data on student basic needs.

Childcare needs are another pressure point for post-traditional students, including many student veterans. Increasing access to childcare is a near-universal conversation among SVA Chapters. This is no surprise given that more than fifty percent of student veterans are parents.²⁰ Childcare challenges create added pressures for student veterans and other post-traditional students which can complicate academic journeys.

With childcare costs comprising about 10 percent of an average family's income, and presumably more for single parents, financial pressures can compound more quickly for student parents.²¹ These pressures have predictable outcomes: twenty-four percent of students pursuing bachelor's degrees reported that they have considered stopping taking courses in the latter half of 2020 due to childcare or caregiver responsibilities.²² This number rises to thirty-two percent for those students pursuing associate degrees.²³

According to the Center for Community College Student Engagement (CCCSE), twenty-two percent of parent students reported a lack of childcare made it difficult for them to complete their coursework.²⁴ And, of those that manage to graduate, the Institute for Women's Policy Research (IWRP) reports that "[m]edian student parent debt is nearly 2.5 times higher than debt among students without children."²⁵

The only federal program dedicated solely to providing childcare assistance for lower-income students in higher education is Child Care Access Means Parents in Schools, or CCAMPIS, but historical challenges with underfunding and available childcare providers, particularly in evening and weekend hours, limit its effectiveness.²⁶ Other federal programs that provide childcare assistance, such as the Child Care Development

¹⁸ *Real College Survey 2020: Five Years of Evidence on Campus Basic Needs Insecurity*, THE HOPE CENTER, https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf (last visited Feb. 24, 2021).

¹⁹ *Id.*

²⁰ *The 2020 SVA Census Survey: Student Veteran General Breakdowns*, STUDENT VETERANS OF AMERICA 6 (Jan. 2021), <https://studentveterans.org/wp-content/uploads/2021/04/SVA-Census-2020-Report.pdf>

²¹ Rasheed Malik, *Working Families Are Spending Big Money on Child Care*, CENTER FOR AMERICAN PROGRESS (June 20, 2019), <https://cdn.americanprogress.org/content/uploads/2019/06/19074131/Working-Families-SpendingBRIEF.pdf> (citing U.S. CENSUS BUREAU 2014 SURVEY OF INCOME AND PROGRAM PARTICIPATION, WAVE 3 (2019)), <<https://www.census.gov/programssurveys/sipp/data/datasets/2014-panel/wave-3.html> (last visited Feb. 24, 2021).

²² Gallup, *Gallup State of the Student Experience: Fall 2020 Report*, <https://www.gallup.com/education/327485/state-of-the-student-experience-fall-2020.aspx>.

²³ *Id.*

²⁴ CCCSE, *The Impact of COVID-19 on Entering Students in Community Colleges*, Spring 2021, https://cccse.org/sites/default/files/SENSE_COVID.pdf.

²⁵ Institute for Women's Policy Research, *The Student Parent Equity Imperative: Guidance for the Biden-Harris Administration*, https://iwpr.org/wp-content/uploads/2021/04/Student-Parent-Equity-Imperative_final.pdf.

²⁶ See generally TERRY BRIDGET LONG, THE HAMILTON PROJECT, *HELPING WOMEN TO SUCCEED IN HIGHER EDUCATION: SUPPORTING STUDENTPARENTS WITH CHILD CARE* (Oct. 2017), available at

Block Grant (CCDBG), have more difficult eligibility rules, thus limiting their effectiveness as a support pillar for post-traditional students.

SVA recommends that Congress increase funding for CCAMPIS and build in enhanced flexibility for CCDBG applicants. We also recommend Congress investigate how they might expand or create new programs modeled off the pilot programs established for childcare at VA medical facilities.

Finally, we recommend that the members of these committees continue considering draft legislation first proposed by former VFW-SVA Fellow El'ona Kearney of The Evergreen State College as part of the VFW-SVA Legislative Fellowship. El'ona's work highlighted the lack of assistance for non-traditional childcare options, such as care from relatives and neighbors who are more likely to be available and willing to assist with childcare during off-peak times like evenings and weekends. This stipend proposal would provide at least some flexibility and assistance to student veterans, many of whom need alternative childcare options.²⁷

3. *Ensure members of the National Guard and Reserve receive the same benefits as those on active duty when performing the same work.*

As U.S. defense plans change from utilizing 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 for the deployment of these service members and those of active-duty service members. However, under current law, these similar responsibilities do not equate to similar benefits. These inequities were laid bare recently as members of the National Guard were tasked with responding to numerous, unprecedented challenges including multiple natural disasters, COVID-19, and the violent insurrection in our nation's capital.²⁸

SVA would like to recognize the ongoing efforts to address these issues in the House-passed H.R. 1836 – Guard and Reserve Parity Act of 2021. We thank Chairman Levin of the HVAC EO Subcommittee for his tireless work to make every day in uniform count the same for everyone who wears it. We encourage the Senate to pass this critical legislation and finally bring parity to benefits for members of the Guard and Reserve who undertake the same duties and risks as their active-duty counterparts.

4. *Comprehensively review and update Monthly Housing Allowance (MHA) calculations to address gaps and disparities such as those related to Veteran Readiness & Employment (VR&E), break pay, overseas institutions, and online instruction.*

Even before the pandemic, SVA regularly heard from students that current MHA rates do not reflect the reality of their living situation. Whether it be the lower subsistence rates for VR&E compared to Post-9/11 MHA, the lack of payment for periods between academic terms, the flat rate for overseas learners, or inequities in distance learners' MHA, students have raised concerns about the efficacy of MHA and its disconnect from the needs of today's students.

Student veterans are quite often post-traditional students that do not fit the mold of traditional students. They tend to carry greater responsibilities for dependents and lack the flexibility and support structures available to traditional students. With these realities mind, SVA believes it is time to review certain fundamental assumptions underlying MHA. We encourage Congress to consider the following recommendations to ensure MHA meets the needs of today's student veterans.

http://www.hamiltonproject.org/assets/files/higher_education_student_parents_womenLong.pdf

²⁷ Discussion Draft, To amend title 38, United States Code, to direct the Secretary of Veterans Affairs to pay to certain veterans, who receive certain educational assistance furnished by the Secretary, a weekly stipend for child care services (2021), available at <https://docs.house.gov/meetings/VR/VR10/20210921/114046/BILLS-1172ih-U1.pdf>.

²⁸ Meghann Myers, *State National Guard chiefs call for more troops, more benefits for federal missions*, MILITARY TIMES (Jan. 29, 2021), <https://www.militarytimes.com/news/your-military/2021/01/29/state-national-guard-chiefs-call-for-more-troops-more-benefits-for-federal-missions>.

VR&E subsistence rates. For years, student veterans have shared concerns about affording basic necessities while pursuing their VR&E individualized training and education plans, concerns echoed in a 2014 Government Accountability Office (GAO) report which found that veterans may discontinue their plans before completion due to financial pressures.²⁹ This issue exists primarily due to VR&E having two different subsistence rates: the internal VR&E subsistence rate and the much higher Post-9/11 MHA rate.

The standard VR&E rate is substantially lower than the Post-9/11 MHA rate and based on several factors, such as rate of attendance, number of dependents, and training type.³⁰ The maximum rate possible under this model requires a student to have two dependents and scarcely reaches the national average MHA under Ch. 33. Raising the VR&E subsistence rate to the Post-9/11 MHA rate reduces bureaucracy, eliminates confusion, encourages program utilization, and ensures greater fairness in benefits for veterans with service-connected disabilities.

Break pay. Another issue that continues to cause hardship for many students is the lack of payment for periods between academic terms. 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 significant 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 continue to hear from student veterans throughout the year about the financial difficulties that occur between terms. SVA asks that Congress explore options to provide relief to our student veterans in a way that is both consistent with the intent of the law and fiscally responsible.

Overseas rates. We have also heard from students about the overseas MHA rate, recently changed to the U.S. national average, not being adequate for their training locale. SVA does not believe the national average is the appropriate MHA rate for international locales, particularly when many of those areas have significantly higher costs of living. We recommend these Committees review ways to either more appropriately match the MHA rate with overseas locations, or simply use the relevant DOD Overseas Housing Allowance (OHA) rate or national average, whichever is greater. VA already uses DOD's BAH rates to determine MHA rates for domestic students and OHA rates for those in U.S. territories. We believe using the OHA rate for overseas GI Bill students is a common-sense solution that provides a more equitable housing rate and establishes consistency in the methods VA uses to establish those rates.

Distance learner rates. A recurring complaint throughout the pandemic has been the inequitable treatment of distance learner MHA rates compared to in-person MHA rates. While Congress responded quickly to preserve MHA rates for students who were attending classes in-person but forced online, students who were enrolled solely in distance learning courses continued to receive an MHA rate that is half the national average. With more students learning online, many student veterans see this difference as unfair or a punishment for their school or education choices.

SVA recognizes that the pandemic has shown this difference to be unreasonable. We believe now is the time to begin the discussion on how best to bring parity to these MHA rates while ensuring the solution is workable. We have yet to identify the ideal solution, but we ask that the members of these committees work with us to find creative solutions that will shrink the gap between the current rates.

²⁹ U.S. GOVERNMENT ACCOUNTABILITY OFFICE, VA VOCATIONAL REHABILITATION AND EMPLOYMENT PROGRAM – FURTHER PROGRAM MANAGEMENT IMPROVEMENTS ARE NEEDED 6 (Feb. 27, 2014), available at <https://www.gao.gov/products/gao-14-61>.

³⁰ *Veteran Readiness and Employment (VR&E) Subsistence Allowance Rates*, U.S. DEPARTMENT OF VETERANS AFFAIRS (Sept. 29, 2021), https://www.benefits.va.gov/vocrehab/subsistence_allowance_rates.asp.

We thank the Committees for considering the various buckets of MHA reform that are needed to ensure the benefit appropriately and adequately addresses the needs of today's student veterans.

5. *Explore options to better integrate and support VA healthcare on campuses, particularly through the VA VITAL program.*

When we speak about student veterans and their needs, we must also consider their needs beyond education benefits. One recently prioritized advancement, the expanded telehealth utilization 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.

An oft-overlooked program that quietly excels is VA's Veterans Integration to Academic Leadership, or VITAL, program. VITAL is a joint effort between the Veterans Benefits Administration (VBA) and the Veterans Health Administration (VHA) that provides on-campus mental healthcare and support services to student veterans and, when needed, coordinates with VHA, VBA, and community care providers. In addition, VITAL provides education and training on student veteran-specific needs for campus faculty and staff to further aid schools in creating a more welcoming community for transitioning student veterans.

When viewed in the light of VA's "Whole Health" treatment objective, VITAL's broad portfolio of services stands out as well-designed, flexible, and responsive to the day-to-day needs of student veterans. We know how important programs like this are to student veterans because, based on our public opinion surveys, healthcare and mental healthcare services have been identified as the top two issue areas on which veteran service organizations should focus their advocacy efforts.³²

In addition, SVA would like to see VITAL program capabilities expanded on campuses across the country through increases in annual funding and by making on-campus access to VA Healthcare, including the use of telehealth technology, and coordination with community care providers a top agency priority. This could not only increase student veteran access to VA healthcare, but access for veterans in the broader community as well, empowering veterans of all stripes to seek and receive the health care services they need.

SVA thanks Representative Ellzey for his leadership on H.R. 5516, *the VITAL Assessment Act*. The bill would produce a report on the VITAL program, providing Congress with key information to better understand and support the program. The bill passed the House, and we encourage the Senate to pass the measure as well. The report mandated by this legislation is the first step to improving and expanding this program on campuses across the country.

To fully realize VA's commitment to treating the whole health of veterans, we encourage Congress to explore ways to better integrate VA healthcare on campuses nationwide, especially with additional support for the VA Vital Program.

Additional Priorities

GI Bill Improvements

1. *Expand protections for members of the National Guard and Reserve who face short-term deployments and training obligations during their academic term.*

SVA has heard from student service members who face challenges in completing coursework or exams due to conflicts with short-term military training or deployments. Administrative issues such as withdrawal and reimbursement can also contribute to uncertainty for service members as they manage concurrent military service and school obligations. SVA believes most institutions sincerely want to help these students balance their military duties with their studies, but students nevertheless lack a basic safety net in many instances.

Federal law requires institutions to offer student service members readmission in certain circumstances associated with long-term and short-term duty obligations.³¹ These are important protections, but they only address the initial barrier of readmission, while service members often encounter many other challenges when balancing military duty and their studies. A recent change to law also requires that institutions provide a policy that “otherwise accommodates” service members during short service-related absences.³² This is a significant first step toward protecting student service members, especially for those in the many states that have no laws requiring institutions to provide such accommodations.³³ Nevertheless, this language is unlikely to cure confusion and the fundamental inequities created by the current patchwork of different state laws in this area.³⁴

SVA thanks Representative Underwood for championing H.R. 5604, the *Protections for Student Veterans Act*. This bill, which has passed the House, would establish specific universal protections for service members using VA education benefits and who are impacted by military service obligations. Student service members using VA benefits and managing concurrent military duty deserve the certainty of standard protections at the federal level. This legislation fills gaps by establishing a baseline set of safeguards for these students while still allowing schools and states the freedom to offer more generous protections, should they so choose.

While SVA supports this bill, we believe it must be expanded on by ensuring students are allowed the option to continue their classes for credit while also excusing absences during service obligations. Without this option, service members may not be entitled to continue their studies during a short-term activation. The current language may force service members to take an incomplete and resume their courses only after their service obligation concludes. SVA is aware of instances where National Guard units have provided leeway for student service members to continue studies during recent state-side deployments, but students may still be prevented from doing so unless their institutions provide similar flexibility. SVA also encourages future efforts to expand the scope of these protections to encompass all student service members, not just those using VA education benefits.

Finally, SVA encourages Congress to work in tandem with ED, VA, and DOD to explore other ways to provide student service members with additional protections and flexibility so military duty does not negatively impact academic progress.

2. *Address concerns with VR&E processes and personnel.*

Last April, VA announced a self-identified change in how it assesses eligibility for VR&E as it relates to other veterans’ education benefits. In short, a veteran may use their VR&E eligibility up to a 36-month cap and then, separately, use another education benefit, such as the Post-9/11 GI Bill, up to its own 36-month cap, with a total cap of 48 months. SVA would like to commend VA for identifying and changing its interpretation. This change provides a greater benefit to eligible veterans and complies with the underlying statute.

To continue this positive trend, SVA encourages more discussion around the VR&E program with VA and a focus on specific areas of concern, such as the lack of counselors, difficulty in contacting VA to determine eligibility, long timelines in the assessment process, uneven counselor guidance and accessibility, among others.

VR&E is one of the most flexible and important programs in VA’s portfolio. Indeed, in certain scenarios, it provides a vastly greater benefit than even the generous Post-9/11 GI Bill. Particularly considering the recent change to entitlement charges by VA, it is more important now than ever to thoroughly review this program for obstacles, barriers, and shortfalls that prevent it from fulfilling its true potential as a benefit. We look forward to working with the Committees on the best path forward for the program.

³¹ See 20 U.S.C. 1091c; 38 U.S.C. § 3679(f)(1)(G).

³² 38 U.S.C. § 3679(f)(1)(G).

³³ See *generally* Internal SVA Working-compilation of State Student Service Member Protection Laws. (available on file with organization).

³⁴ See *generally id.*

Post-Traditional Student Success

1. *Call for additional funding for VetSuccess on Campus (VSOC) locations and veteran centers and explore ways to increase the SCO-to-veteran ratio on campuses.*

The VSOC program is one of the few SVA hears about that is uniformly positive. Despite this, over its lifetime, the program has only expanded to approximately twenty schools beyond its original ninety-or-so. This program is popular, providing tremendous help and guidance to student veterans and schools. We encourage Congress to provide adequate funding to ensure it can expand to meet the growing needs of student veterans everywhere.

On-campus student veteran centers are crucial to student veteran success. According to the results of a survey conducted by Operation College Promise, “the most beneficial campus service was a veteran center on campus especially one with a specific office/lounge where veteran students can meet, work together and learn about veteran/military student benefits and programs.”³⁵ This closely parallels what SVA hears directly from student veterans, many of whom often request additional support for their veteran centers. These requests for additional support are coming at a time when veteran-support services are facing reduced funding on many campuses.³⁶ We thank Representative Frankel and Senator Rosen for their efforts to address this issue through *The Veteran Education and Empowerment Act*, which would, among other things, reauthorize grant funding to support student veteran centers on campuses across the country.³⁷

Another common piece of feedback we receive from student veterans is that there are not enough School Certifying Officials (SCO) to adequately address the needs of all the student veterans at many campuses. SVA hears similar feedback from SCOs themselves. This overlap in feedback from SCOs and the students they serve is concerning because it suggests there is a very real problem with VA’s currently recommended ratio of one SCO to every 200 GI Bill students. We encourage committee members to consider how they might address shortfalls in VA’s current guidance on this issue.

2. *Expand access to reliable broadband internet.*

As SVA has testified before, higher education’s rapid transition to online instruction in the wake of COVID-19 has made students’ access to affordable and reliable broadband internet more important than ever.³⁸ This transition has accelerated investment in online program infrastructure at institutions around the country. As a result, we expect online learning to play an increasingly mainstream role in higher education, even well after the pandemic. It is concerning, then, that millions of Americans cannot either access or afford reliable broadband internet. Put another way, the digital divide in this country is real, and the pandemic laid bare these inequities.

SVA would like to recognize the passage of the *Infrastructure Investment and Jobs Act* which provides \$65 billion to improve broadband access in rural areas and affordability in lower-income communities.³⁹ As part of this, the Emergency Broadband Benefit Program, which we applauded for its direct benefit to communities of need, has been turned into a permanent program called the Affordable Connectivity Program. Programs like this, with

³⁵ WENDY A. LANG ET AL., COMPLETING THE MISSION II: A STUDY OF VETERAN STUDENTS’ PROGRESS TOWARD DEGREE ATTAINMENT IN THE POST 9/11 ERA 10 (Nov. 2013), available at https://campussuite-storage.s3.amazonaws.com/prod/1280306/3a32f069-629b-11e7-99ef-124f7febbf4a/1691064/278b511c-024e-11e8-8b36-0a8d44716112/file/completing_mission_ii-Nov2013.pdf (emphasis added).

³⁶ Military Times Staff, *About 1 in 3 colleges have cut funding for veteran-support programs, survey says*, MILITARYTIMES (Feb. 22, 2021), <https://www.militarytimes.com/education-transition/2021/02/23/about-1-in-3-colleges-have-cut-funding-for-veteran-support-programs-survey-says/>.

³⁷ Veteran Education and Empowerment Act, H.R. 3686 (2021); Veteran Education and Empowerment Act, S. 1881 (2021).

³⁸ Student Veterans of America, Testimony of Justin Monk before the U.S. Senate Committee on Veterans’ Affairs hearing on the topic of “SUCCESS AFTER SERVICE: IMPROVING VETERANS’ EMPLOYMENT, EDUCATION, AND HOME LOAN OPPORTUNITIES.” <<https://www.veterans.senate.gov/imo/media/doc/10.27.21%20Monk%20SVA%20Testimony1.pdf>>.

³⁹ Infrastructure Investment and Jobs Act. https://www.epw.senate.gov/public/_cache/files/e/a/ea1eb2e4-56bd-45f1-a260-9d6ee951bc96/F8A7C77D69BE09151F210EB4DFE872CD.edw21a09.pdf.

funding to support and flexibility in how they are applied, serve as remarkable examples of how Congress can help those in need quickly.

However, despite the much-needed influx of funding to support these programs, the work to bridge the digital divide is not yet complete. According to the FCC, there are at least 2.2 million veteran households in this country without either fixed or mobile broadband connections, with price and location described as the top barriers to adoption.⁴⁰ For student veterans, over half of whom are parents, the consequences of being unable to access reliable broadband extend beyond themselves to their dependents.

A recent Pew Research Center survey found that roughly a quarter of the population does not have a broadband internet connection at home.²² Pre-pandemic, students in these disconnected homes fell into what is called the “Homework Gap”, where the lack of an adequate internet connection prevented them from being able to complete their homework and contributed to lower rates of academic success. Courses shifting online during the pandemic only worsened these inequities. Without other options than dropping out entirely, students have increasingly begun to sit outside their schools, local libraries, or coffee shops to connect to free wireless internet and complete their schoolwork, a practice FCC Chairwoman Jessica Rosenworcel has called “Parking Lot Wi-Fi.”⁴¹

SVA recognizes that much has been done recently to address these concerns, and we applaud the work that has been done. But with so many more veterans still in need of help, we urge these Committees and Congress to continue exploring innovative ways to make sure students can access this essential service, which will continue to play an ever-larger role in their higher education journeys.

Strengthening Higher Education

1. Pass a comprehensive reauthorization of the Higher Education Act (HEA).

Reauthorizing the *Higher Education Act* (HEA) and ensuring student veterans’ voices are heard during the process remains a top priority for SVA. While HEA generally falls outside the jurisdiction of these Committees, SVA implores all Members, as engaged veteran advocates, to prioritize and participate in efforts to reauthorize HEA. VA significantly impacts the lives of student veterans and military-connected students, but the agency’s education business lines handle only a fraction of the higher education legislation and regulation that ultimately affect student veterans, service members, and their families.

The unfortunate reality is that HEA is woefully out-of-date, and as a result, unable to adequately serve students in a 21st Century higher education system. Reauthorization is well overdue given the frequency with which Congress has addressed the statute in the past. SVA encourages Congress to take the steps necessary to reauthorize the HEA.

2. Ensure accurate and timely implementation of the improved 90/10 Rule that now counts VA and DOD educational benefits as federal education funds.

Congress has finally closed the harmful 90-10 loophole in a move that will protect student veterans and service members from bad-actor institutions more interested in prioritizing profit than student outcomes.

The 90/10 rule was intended to serve as a market viability test to ensure proprietary schools were fit enough to

⁴⁰ The Federal Communications Commission, *Report on Promoting Broadband Internet Access Service for Veterans, May 2019*. Accessed July 20, 2020. <https://docs.fcc.gov/public/attachments/DOC-357270A1.pdf>.

⁴¹ STATEMENT OF JESSICA ROSENWORCEL COMMISSIONER FEDERAL COMMUNICATIONS COMMISSION BEFORE THE SUBCOMMITTEE ON COMMUNICATIONS & TECHNOLOGY COMMITTEE ON ENERGY AND COMMERCE UNITED STATES HOUSE OF REPRESENTATIVES SEPTEMBER 17, 2020. <<https://docs.fcc.gov/public/attachments/DOC-366984A1.pdf>>

attract healthy, diverse sources of revenue.⁴² In other words, it was intended to prevent bad-actor schools from subsisting entirely off federal taxpayer money. To that end, Congress crafted a rule requiring that proprietary schools obtain a minimal amount of their revenue, now just 10 percent, from sources other than federal financial aid.⁴³

Unfortunately, the law suffered from a critical oversight—it excluded VA and Department of Defense (DOD) education benefits like the GI Bill and Tuition Assistance.⁴⁴ This loophole created a perverse incentive for bad-actor schools to target student veterans and service members for their earned education benefits.⁴⁵ These students became the linchpin of a scheme by low-quality, bad-actor schools to evade the 90/10 rule.⁴⁶ For every one VA or DOD education benefit dollar that bad-actor schools took in from service members and veterans, they gained access to another nine dollars in federal financial aid.⁴⁷ The result was that bad schools had a pathway to subsist entirely off federal taxpayer dollars.

The loophole's impact on student veterans and service members has been disastrous. Bad-actor institutions employed well-documented, deceptive, aggressive, and downright fraudulent recruitment tactics to enroll student veterans.⁴⁸ Some student veterans attending these schools fully expended their earned VA education benefits, and many took out federal student loans in addition.⁴⁹ Low-quality schools have left student veterans with worthless degrees, non-transferrable credits, depleted benefits, and mountains of debt.⁵⁰ Simply put, the loophole emboldened bad-actor schools and negatively impacted the academic and financial futures of thousands of

⁴² See generally *Cleland v. National Coll. of Business*, 435 U.S. 213, 216 (1978) (discussing the purpose of the Department of Veterans Affairs' 85-15 rule—the model for the 90/10 rule—as “allowing the free market mechanism to operate” by ensuring “[t]he price of the course...respond[ed] to the general demands of the open market as well as to those with available Federal moneys to spend.”).

⁴³ The original rule required proprietary institutions to obtain at least 15 percent of their revenue from sources other than title-IV federal financial aid. Pub. L. No. 102-325 (1992). Congress amended the rule in 1998 to require that these schools earn just 10 percent of their revenue from sources other than federal financial aid. Pub. L. No. 105-244 (1998).

⁴⁴ It is clear the loophole was an unintentional oversight because that is how congressional staff who drafted the rule's statutory language described it afterward, and because excluding such massive sources of federal education assistance flies in the face of the law. See WALTER OCHINKO, VETERANS EDUCATION SUCCESS, DEPARTMENT OF EDUCATION DATA SHOWS INCREASED TARGETING OF VETERANS AND SERVICE MEMBERS, HIGHLIGHTING URGENCY OF CLOSING 90/10 LOOPHOLE 3-4 (Nov. 2017), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5a043bdfc83025336298845f/1510226911840/VES+90%3A10+Report+-+FINAL.pdf> (citing Daniel Golden, *For Profit Colleges Target the Military*, BLOOMBERG NEWS (Dec. 30, 2009), available at <https://www.bloomberg.com/news/articles/2009-12-30/for-profit-colleges-target-the-military>).

⁴⁵ See Tanya Ang and Lauren Augustine, *The '90-10 rule' in higher education is a target on veterans' backs*, THE HILL (June 24, 2019, 7:00 AM), <https://thehill.com/opinion/education/449445-the-90-10-rule-in-higher-education-is-a-target-on-veterans-backs>.

⁴⁶ See ALEXANDRA HEGJI, CONGRESSIONAL RESEARCH SERVICE, R46773, THE 90/10 RULE UNDER HEA TITLE IV: BACKGROUND AND ISSUES 40 at n.50 (April 26, 2021) (referencing “several reports of false or predatory marketing or advertising practices on the part of some proprietary IHEs attempting to enroll GI Bill and TA participants, in part to pass the 90/10 requirement.”), available at <https://files.eric.ed.gov/fulltext/ED614219.pdf>.

⁴⁷ OCHINKO, *supra* note 6 at 4.

⁴⁸ See generally *Why For-Profit Institutions are Targeting Veterans Educational Benefits*, VETERANS EDUCATION SUCCESS (Jan. 1, 2014), <https://vetsedsuccess.org/why-for-profit-institutions-are-targeting-veterans-education-benefits> (summarizing numerous accounts of predatory recruitment of student veterans at bad-actor proprietary institutions); U.S. SENATE HEALTH, EDUCATION, LABOR, AND PENSIONS COMM., 113TH CONG., IS THE NEW G.I. BILL WORKING? FOR-PROFIT COLLEGES INCREASING VETERAN ENROLLMENT AND FEDERAL FUNDS 9-11 (July 30, 2014), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/56100b87e4b0147725a71e86/1443892103628/GI-Bill-data-July-2014-HELP-report.pdf>.

⁴⁹ IS THE NEW G.I. BILL WORKING?, *supra* note 10 at 10-11; OCHINKO, *supra* note 6 at 13 (discussing reports of proprietary schools aggressively steering student veterans toward federal student loans or fraudulently authorizing loans on behalf of these students).

⁵⁰ See generally IS THE NEW G.I. BILL WORKING?, *supra* note 10 at 9-11 (discussing the aggressive and deceptive recruitment of student veterans at proprietary institutions and the consequences for these students such as debt, inability to find a job after graduation, and wasted GI Bill benefits); *Why For-Profit Institutions are Targeting Veterans Educational Benefits*, *supra* note 10 (discussing student veterans attending bad-actor proprietary institutions and being left with worthless degrees, non-transferable credits, and debt).

student veterans and service members.⁵¹

Fortunately, Congress saw fit to close the loophole, an effort which garnered bipartisan support.⁵² The new law requires that all “federal education assistance” be appropriately counted on the 90 percent side of the 90/10 equation.⁵³ Congress delayed the law’s implementation until January 1, 2023 and subjected the change to negotiated rulemaking to begin no later than October 1, 2021.⁵⁴

SVA is committed to ensuring the new rule is implemented in a timely and accurate manner by the Department of Education. We have taken an active role in rulemaking on this issue so far. We’ll continue to do so until the process concludes and a strong version of the new rule goes into effect. We hope the new 90/10 law serves to highlight good proprietary institutions and hold them up as models for how the sector can truly serve students.

3. *Restore the Gainful Employment and Borrower Defense rules to defend students and taxpayers against fraud, waste, and abuse.*

Borrower Defense to Repayment (BD) and Gainful Employment (GE) are important policies that can protect students against bad actors and low-quality institutions in higher education. The BD rule is supposed to provide federal student loan relief to students who were defrauded by bad-actor schools.⁵⁵ The GE rule was designed to ensure certain programs provide a worthwhile education—one that is affordable relative to earnings after graduation.⁵⁶ Together, these measures can help protect both students and taxpayers against fraud, waste, and abuse.

The BD and GE policies were meant to provide critical assurances that guard students against bad actors in higher education. The 2015 and 2016 closures of ITT Technical Institute and Corinthian Colleges respectively highlight why these policies are so important for student veterans. These schools closed abruptly after being mired in controversy for having allegedly engaged in false or deceptive representations to students. After the schools closed, thousands of students were left with debt, depleted education benefits, and few, if any, viable ways to transfer credits to other institutions to continue their educations.⁵⁷ The events surrounding ITT and Corinthian Colleges were not isolated occurrences, with thousands of student veterans impacted by other proprietary school closures in the years that followed.⁵⁸ The documentary *Fail State* illuminates the practices of

⁵¹ See generally Kimberly Hefling, *Vets snared in for-profit college collapse want GI Bill Money back*, POLITICO (July 2, 2015), <https://www.politico.com/story/2015/07/veterans-gi-bill-for-profit-colleges-119697>; Chris Kirkham and Alan Zarembo, *For-profit colleges are using the GI Bill to make money off veterans*, LOS ANGELES TIMES (Aug. 18, 2015), <https://www.latimes.com/business/la-fi-for-profit-colleges-gi-bill-20150809-story.html>; Danielle Douglas-Gabriel, *Veterans are getting short shrift as for-profit colleges close down, report says*, THE WASHINGTON POST (Oct. 21 2016), <https://www.washingtonpost.com/news/grade-point/wp/2016/10/21/veterans-are-getting-the-short-shrift-as-for-profit-college-close-down-report-says/>.

⁵² Pub. L. No. 117-2, § 2013 (2021); *U.S. Senate Closes 90/10 Loophole in Bipartisan Amendment to COVID Relief Reconciliation Package*, VETERANS EDUCATION SUCCESS (March 6, 2021), <https://vetsedsuccess.org/u-s-senate-closes-90-10-loophole-in-bipartisan-amendment-to-covid-relief-reconciliation>; see also Protect Veterans’ Education and Taxpayer Spending Act of 2019, S. 2857, 116th Cong. (2019) (demonstrating landmark bipartisan support for an earlier legislative effort in the Senate to close the 90/10 loophole).

⁵³ Pub. L. No. 117-2, § 2013 (2021).

⁵⁴ *Id.*

⁵⁵ *Why Students Need a Strong Borrower Defense Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS, 1 (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Borrower-Defense-Rule.pdf>.

⁵⁶ *Why Students Need a Strong Gainful Employment Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS, 1 (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Gainful-Employment-Rule.pdf>.

⁵⁷ See generally *Why Students Need a Strong Borrower Defense Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Borrower-Defense-Rule.pdf>.

⁵⁸ Natalie Gross, *Thousands of veterans had education derailed when for-profit college chains abruptly closed*, MILITARY TIMES (June 20, 2019), <https://rebootcamp.militarytimes.com/news/education/2019/06/20/thousands-of-veterans-had-education-derailed-when-for-profit-college-chains-abruptly-closed/>.

bad actor schools in higher education by revealing their aggressive recruiting practices, poor student outcomes, and how they contribute to growing student debt in America.⁵⁹

The Forever GI Bill sought to correct some of the damage done by low-quality institutions that shut down by allowing beneficiaries to restore GI Bill entitlement. However, for student veterans and service members who hold federal student loans, BD may be their only option for relief after being defrauded. The Gainful Employment rule could work to protect students at the outset of their academic journey by ensuring that only quality career education programs have access to title IV funds.

Unfortunately, BD was substantially weakened in recent years, and GE was rescinded altogether in 2019. SVA opposed these rollbacks and continues to work to restore these important student safeguards. In 2020, SVA was proud to partner with a diverse coalition of student groups and VSOs that led the charge to overturn ED's weakening of the BD rule. That effort resulted in a bipartisan rebuke of the new regulation in both houses of Congress.⁶⁰

ED has initiated rulemaking to revise both the BD and GE regulations through the Negotiated Rulemaking process as required under the HEA. This process incorporates input from diverse experts representing constituencies throughout higher education who debate and work toward consensus on HEA regulations. At this time last year, we informed you SVA was looking forward to participating in negotiations to rebuild the BD and GE rules. We're proud to report that we were privileged to have one of our staff represent service members and veterans in the recent negotiated rulemaking session that addressed BD. The negotiations produced strong draft regulatory language that enjoyed near universal consensus among negotiators. We look forward to continued participation in the rulemaking process and eagerly await the Department's proposed rules on BD and GE, the latter of which is currently being negotiated.

SVA encourages members of Congress to support, defend, and strengthen these critical policies that protect student veterans, service members, and their families.

4. *Improve oversight and accountability of trends in higher education such as institutional conversions, online program management, and lending practices.*

Today's students, including student veterans, have more learning options than ever, with many, quite literally, right at their fingertips. These new, often innovative ways of learning are compelling options for post-traditional students, like student veterans, especially as the cost of higher education and student loan debt continue to rise. As higher education changes, it is important that policy makers weigh the risks and benefits posed to students by new learning options and investigate ways to address affordability more broadly.

Bad-actor proprietary schools in higher education have come under increased scrutiny in recent years, due in large part to numerous high-profile closures and repeated allegations of fraud. As these schools face growing attention from legislators, regulators, and law enforcement, there has been a corresponding trend in schools converting to non-profit status or being acquired by or rebranding under the umbrella of public institutions.

The overarching concern with conversions is that a converting proprietary school may not sufficiently untangle itself from its former profit-driven motives and structure.⁶¹ This means students, including veterans and service members who enroll at these institutions at disproportionate rates,⁶² run the risk of believing converted schools

⁵⁹ DIRECTOR ALEX SHEBANOW, FAIL STATE, FAILSTATE.COM (A SDCF LLC Film 2018), <https://failstatemovie.com>.

⁶⁰ Michael Stratford, *Congress sends rebuke of DeVos 'borrower defense' rule to Trump's desk*, POLITICO (May 19, 2020, 9:29 PM), <https://www.politico.com/news/2020/05/19/congress-devos-rebuke-270077>.

⁶¹ See generally Robert Shireman, *How For-Profits Masquerade as Non-profit Colleges*, THE CENTURY FOUNDATION (Oct. 7, 2020), <https://tcf.org/content/report/how-for-profits-masquerade-as-nonprofit-colleges/>.

⁶² CAREN A. ARBEIT AND LAURA HORN, U.S. DEPARTMENT OF EDUCATION, A PROFILE OF THE ENROLLMENT PATTERS AND DEMOGRAPHIC

are dedicated to a public or non-profit mission when, in reality, the schools may still prioritize profits over student outcomes.⁶³

These concerns are exacerbated by the growing adoption of online content in higher education, which has been compounded itself by the forced shift to online learning during the pandemic. The growth in online programs has given rise to a concerning method of conversion where public or non-profit institutions acquire for-profit schools to manage online courses.⁶⁴ This is an appealing maneuver for some public and non-profit schools looking to expand online options because certain proprietary institutions have well-established, robust capacity for online program management. These arrangements have also come under scrutiny because schools—even prominent ones—will cede core responsibilities, like student recruitment, to proprietary OPMs in lucrative revenue-sharing deals.⁶⁵ Such contracts run the risk of recruitment and profits being prioritized over quality student outcomes.⁶⁶

Institutional conversion was addressed to some extent in VA laws through additional oversight measures passed in the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*. Specifically, the law increased oversight of converted proprietary institutions by subjecting them to annual risk-based reviews for three years following conversion.⁶⁷ We thank Congress for passing this important oversight measure. Still, as a recent GAO report illuminates, these conversions continue to pose major risks to students.⁶⁸

In recent years, higher education has seen a boom in innovations with the potential to expand pathways to higher education to untold numbers of new students. These innovations, like distance education programs and competency-based education models, offer compelling incentives to students and institutions as alternatives to traditional brick-and-mortar classes. The affordability and flexibility of these programs are key selling points among post-traditional students, like veterans, but these new trends are not without risk.

As we reshape how we think of workforce development, and the interactions between students and institutions, we must commit to fully understanding these trends and establish appropriate guardrails to protect students from unscrupulous actors and low-quality programs. We encourage Congress to continue monitoring institutional conversions as well as online program management and to legislate additional safeguards where appropriate to protect students.

Institutional lending practices are also worthy of Congress's attention. The CFPB recently signaled they would

CHARACTERISTICS OF UNDERGRADUATES AT FOR-PROFIT INSTITUTIONS 16 (Feb. 2017), *available at* <https://nces.ed.gov/pubs2017/2017416.pdf> (explaining that “Compared with other undergraduates, larger percentages of students at for-profit institutions were military students (9 percent vs. 4 percent in public and nonprofit). Military students constituted a larger percentage of students enrolled at for-profit 4-year institutions than at any other level of for-profit institution (12 percent vs. 2–7 percent), public (3–5 percent), or nonprofit institution (4 percent).”).

⁶³ See generally Robert Shireman, *These Colleges Say They're Nonprofit—But Are They?*, THE CENTURY FOUNDATION (Aug. 6, 2018), <https://tcf.org/content/commentary/colleges-say-theyre-nonprofit/>; Robert Shireman and Yan Cao, *Dubious Conversions of For-Profit Colleges: Decoding the GAO Report*, THE CENTURY FOUNDATION (Jan 27, 2021), <https://tcf.org/content/commentary/dubious-conversions-profit-colleges-decoding-gao-report/>.

⁶⁴ See generally Lindsay McKenzie, *University of Arizona's Big Online Push*, INSIDE HIGHER ED (Aug. 4, 2020), <https://www.insidehighered.com/news/2020/08/04/university-arizona-acquires-ashford-university>.

⁶⁵ See *TCF Analysis of 70+ University-OPM Contracts Reveals Increasing Risks to Students, Public Education*, THE CENTURY FOUNDATION (Sept. 12, 2019), <https://tcf.org/content/about-tcf/tcf-analysis-70-university-opm-contracts-reveals-increasing-risks-students-public-education>; See also Lindsay McKenzie, *Key Senators Turn Up Heat on OPMs*, INSIDE HIGHER ED (Feb. 5, 2020), <https://www.insidehighered.com/news/2020/02/05/online-program-management-companies-face-washington-microscope>.

⁶⁶ See *TCF Analysis of 70+ University-OPM Contracts Reveals Increasing Risks to Students, Public Education*, THE CENTURY FOUNDATION (Sept. 12, 2019), <https://tcf.org/content/about-tcf/tcf-analysis-70-university-opm-contracts-reveals-increasing-risks-students-public-education>.

⁶⁷ Johnny Isakson and David P. Roe, M.D., *Veterans Health Care and Benefits Improvement Act of 2020*, Pub. L. No. 116-315, Title I, Subtitle A, § 1022.

⁶⁸ See Robert Shireman and Yan Cao, *Dubious Conversions of For-Profit Colleges: Decoding the GAO*, THE CENTURY FOUNDATION (Jan. 27, 2021), <https://tcf.org/content/commentary/dubious-conversions-profit-colleges-decoding-gao-report/>.

begin reviewing such activity. The Bureau identified the following areas of concern: enrollment restrictions, transcript withholding, improper payment acceleration, failure to issue refunds, and improper lending relationships.⁶⁹

Some institutions have also begun offering an alternative financing product to traditional private student loans. This product, known as an Income Share Agreement (ISA), is an arrangement between the institution or other lender and a student which provides the student with up-front cash to pay for their studies and ties their monthly repayment amount to their post-graduation earnings. These agreements are attractive to students because there is no interest and because repayment is often capped both as to term and amount. As with any financial product, however, there are risks involved, and students may be unable to identify them.⁷⁰ This is particularly problematic given that many proponents of ISAs argue that these agreements are exempt from federal consumer credit laws.⁷¹

We ask that Congress be mindful of these and other institutional lending issues as it crafts legislation that may provide the opportunity for any needed oversight in this area.

VA Modernization

1. Monitor VA's ongoing efforts to modernize IT and communications systems, including implementation of the Digital GI Bill.

Typically, using the GI Bill is one of the first interactions a newly transitioned veteran will have with VA in the universe of post-service benefits and programs.⁷² This means a seamless GI Bill process is key to establishing trust and confidence in the agency with every veteran they serve.

In turn, SVA has been a vocal supporter of a full-scale IT modernization effort at VA for a long time.⁷³ 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 modernization effort is already underway thanks to the steps Congress took to provide VA with the funds needed to start this process.⁷⁴ We appreciate VA's prompt efforts to begin implementing these changes. Still, the project is ongoing, and we will continue to call on Congress to provide the necessary funds to complete the task. In addition, strong oversight of this years-long process must be maintained as student veterans cannot afford for it to falter.

⁶⁹ Consumer Financial Protection Bureau to Examine Colleges' In-House Lending Practices, CFPB (Jan. 20, 2022), <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-to-examine-colleges-in-house-lending-practices/>.

⁷⁰ STUDENT BORROWER PROTECTION CENTER, SOLVING THE STUDENT DEBT CRISIS OR COMPOUNDING THE CRISIS? (2020), available at https://protectborrowers.org/wp-content/uploads/2020/07/SBPC_Hayes_Milton_Relman_ISA.pdf.

⁷¹ STUDENT BORROWER PROTECTION CENTER, CREDIT BY ANY OTHER NAME 5 (2020), available at https://protectborrowers.org/wp-content/uploads/2020/07/Pearl.Shearer_Credit-By-Any-Other-Name.pdf.

⁷² See generally *Journeys of Veterans Map*, U.S. DEPARTMENT OF VETERANS AFFAIRS, *Journeys of Veterans Map*, <https://www.blogs.va.gov/VAAntage/wp-content/uploads/2020/02/Veteran-Journey-Map.pdf>; (last visited Feb. 25, 2021); VA Welcome Kit, DEPARTMENT OF VETERANS AFFAIRS, VA Welcome Kit (Nov. 12, 2020) <https://www.va.gov/welcome-kit>.

⁷³ See generally STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE SUBCOMMITTEE ON ECONOMIC OPPORTUNITY AND TECHNOLOGY MODERNIZATION OF THE H. COMM. ON VETERANS' AFFAIRS ON MOVING BEYOND PATCHWORK SYSTEMS: THE FUTURE OF EDUCATION SERVICES IT, 116th Cong. (Sept. 16, 2020), available at https://studentveterans.org/wp-content/uploads/2020/09/HVAC-EO_-IT_Testimony_Sept16_2020.pdf; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H. AND S. COMMS. ON VETERANS' AFFAIRS ON LEGISLATION PRIORITIES OF 2020, 116th Cong. 6 (March 3, 2020), available at <https://www.veterans.senate.gov/imo/media/doc/03.03.2020%20-%20SVA%20Testimony.pdf>; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H. AND S. COMMS. ON VETERANS' AFFAIRS ON LEGISLATIVE PRIORITIES OF 2019, 116th Cong. 7 (March 7, 2019), available at <https://www.veterans.senate.gov/imo/media/doc/5%20-%20SVA%20Testimony%2003.07.19.pdf>.

⁷⁴ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. J, Title V, § 515.

Specifically, SVA still supports draft legislation from the past HVAC EO Subcommittee hearing on April 14th aimed at establishing critical benchmarks and requirements for transparency that will ensure VA addresses specific IT infrastructure issues and provides appropriate updates on its progress. VA, to its credit, has been communicative and transparent about the process and improvements thus far, and we are greatly appreciative of the efforts they have undertaken to this point. Our support of this, or substantially similar, draft legislation is driven by our hope that it will help VA avoid the pitfalls that plagued previous implementation efforts, like that of the Forever GI Bill.

Lastly, as a recommendation, SVA recommends taking full advantage of the ongoing modernization effort at VA and establishing pre-emptive, automatic qualification to transferring service members and electronic Certificate of Eligibility (COE) disbursal. This is one of the most obvious and impactful ways to turn the modernization effort into a reality for our veterans.

SVA looks forward to working with committee members and officials at VA to ensure this modernization effort is successful. The educational experiences of current and future generations of student veterans depend on it.

2. *Establish the Veteran Economic Opportunity and Transition Administration with Undersecretary representation for all economic opportunity and transition programs at VA.*

Greater focus must be placed on economic opportunity for veterans, including through higher education.⁷⁵ This would be 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, but 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 taxpayers' investments.

3. *Restore study abroad opportunities for GI Bill and VR&E students.*

In August 2020, VA enacted a revised interpretation of 38 U.S.C. § 3680A(f), the statute underlying the approvals of study abroad programs for student veterans. These new requirements restricted students' ability to attend some of the most common and popular study abroad programs available.⁷⁶ In response to these changes, SVA and NAFSA wrote a letter to Secretary McDonough asking him to reconsider these administrative changes that create obstacles to student veterans pursuing study abroad.⁷⁷ VA's response to our letter made clear that the agency believes their revised interpretation is strictly compliant with the underlying statute and they have no room to provide relief to the affected students.⁷⁸

⁷⁵ See DISABLED AMERICAN VETERANS, PARALYZED VETERANS OF AMERICA, AND THE VETERANS OF FOREIGN WARS., THE INDEPENDENT BUDGET – VETERANS AGENDA FOR THE 116TH CONGRESS. Retrieved from: 120 (2019), *available at* http://www.independentbudget.org/pdf/IndependentBudget_2019.pdf (explaining that “[t]his nation should have as much focus on the economic opportunities for veterans as it does for their health care and benefits”).

⁷⁶ Institute of International Education (IIE), “Duration of Study Abroad,” Open Doors Report 2020 (New York: IIE, 2020), <https://opendoorsdata.org/data/us-study-abroad/duration-of-study-abroad>.

⁷⁷ Letter to the Honorable Denis R. McDonough, Secretary of the Department of Veterans Affairs. <<https://www.nafsa.org/sites/default/files/media/document/nafsa-sva-042021.pdf>>.

⁷⁸ Letter to NAFSA, SVA from Thomas J. Murphy, Acting Under Secretary for Benefits. <<https://www.nafsa.org/sites/default/files/media/document/va-nafsa-061521.pdf>>.

While we understand VA's position as appropriate to the letter of the law, we believe this change creates unnecessary obstacles to an increasingly necessary component of many higher education programs and inequity between the treatment of student veterans and Title IV students as it relates to studying abroad. SVA believes that student veterans should be given the same opportunity to study abroad and develop the skillset they need to enter a global workforce as ED provides their Title IV classmates.

In short, and as seen in our joint letter to VA:

"It is vital to ensure all students have access to a quality education that will prepare them for the global workforce into which they will graduate. Therefore, we urge the Department to work with relevant stakeholders in higher education and study abroad to review the current VBA guidance on the use of Post-9/11 GI Bill benefits for study abroad and to consider following a similar approach to that of the U.S. Department of Education's Title IV Federal Student Aid program, which allows the use of these funds for study abroad programs that award academic credit."⁷⁹

We look forward to working with these Committees on this issue going forward.

4. *Improve VA Work Study to address pay disparities and expand job opportunities so they better align with student goals.*

SVA has received valuable feedback from student veterans in recent years about how VA can continue to modernize the work-study program. One issue raised regularly is the substantial disparity in job opportunities available to students participating in the VA Work-Study program compared to those available through Federal Work Study. VA Work-Study students are largely required to work in roles directly related to VA. This limitation greatly diminishes VAWS students' ability to learn and develop the skillsets they need to enter the broader workforce.

To begin addressing this disparity, the recent Isakson-Roe bill re-established the ability of students to qualify for VA Work-Study when performing veteran liaison duties for members of Congress.⁸⁰ This is a step in the right direction, and we greatly appreciate the work these Committees did to expand the program to include these opportunities, but more can be done to expand opportunities available to student veterans through the program.

As part of our ongoing VFW-SVA Fellowship program, we are working with Fellow and PhD candidate John Randolph of Penn State University to recommend important changes to the VAWS system. Specifically, he proposes broadening the pool of qualifying work-study jobs and improving the payment rate and structure.

Veterans' demonstrated propensity for service should be rewarded by expanding the jobs available through VA Work-Study to at least include public interest, non-profit, and government agency positions. Specifically, these Committees might consider including veteran liaison jobs at public agencies and non-profit organizations that fulfill duties like those performed by participants who can now work for members of Congress.⁸¹ We hope to work with the Committees' leadership to examine ways to further expand opportunities available to VA Work-Study students so they can benefit from the greater variety of experiences available to their Federal Work Study peers.

⁷⁹ Letter to the Honorable Denis R. McDonough, Secretary of the Department of Veterans Affairs. <<https://www.nafsa.org/sites/default/files/media/document/nafsa-sva-042021.pdf>>.

⁸⁰ Johnny Isakson and David P. Roe, M.D., Veterans Health Care and Benefits Improvement Act of 2020, Pub. L. No. 116-315, Title I, Subtitle A, § 1006.

⁸¹ *Id.* (authorizing duties including "[t]he distribution of information to members of the Armed Forces, veterans, and their dependents about benefits and services under laws administered..." by VA.).

5. Refine the GI Bill Comparison and Feedback Tools.

The Comparison Tool can be invaluable to veterans trying to understand the value of their GI Bill as they consider their educational options.

As it stands, the lack of coordination between ED and VA on College Navigator, College Scorecard, and GI Comparison Tool reduces the overall delivery of powerful data to veterans.⁸² The Comparison Tool has unique data, justifying itself as a separate tool from ED's options, but the underlying data is not being shared effectively between these tools, leaving prospective students an incomplete view of their options. We encourage members to explore ways to better share and integrate the data across ED and VA resources.

SVA also believes student outcome measures should be displayed in the GI Bill Comparison Tool. Establishing the appropriate data feeds and displaying the information in the tool would require IT upgrades that fit neatly alongside those currently happening at VA. In one of the most common-sense recommendations we have, each institution should be required to disclose how effective it is at delivering on its promise to students. By informing military-connected students about the effectiveness of GI Bill-eligible programs, we allow them to make informed decisions about how to spend their education benefits.

The GI Bill Comparison Tool also suffers from a lack of detailed information about student complaints. For any given school, the tool simply shows a tally of complaints across broad categories. The tool also only publishes complaints from the prior 24 months. We have previously provided specific recommendations to address these issues in a public comment on VA's continued collection of information through the GI Bill Feedback Tool:

VA should publish and maintain a comprehensive database of all school-specific complaints submitted through the Feedback Tool. Students should be given the option to disclose their narrative comments publicly, and those comments should be included in the database. The feedback database should be presented in a familiar interface, preferably one that mirrors other popular review websites. This means it should include helpful user features like search, filters, and sorting. We further recommend the Department include a link on each school's profile page in the GI Bill Comparison Tool that directs students to a full, detailed list of complaints submitted about that institution. This will help students identify and better understand the true nature of complaints submitted about each school. It will also improve the ability of advocates and researchers to monitor and analyze past and present institutional compliance with the Principles of Excellence and other laws.⁸³

To address concerns about fake or inaccurate reports, we believe VA should verify that reports come from current or former students of the institution for which feedback is being provided and that schools be given the opportunity to issue public responses to complaints.

VA should also place caution flags on schools in the GI Bill Comparison Tool that receive an inordinate number of student complaints. VA currently only places caution flags on schools with a program of education subject to "increased regulatory or legal scrutiny" by VA or other federal agencies.⁸⁴ We support this use of caution flags, but student veterans also deserve to be alerted when a school has received a troubling number of student complaints.

⁸² See generally *College Navigator*, NATIONAL CENTER FOR EDUCATION STATISTICS, US DEPARTMENT OF EDUCATION, <https://nces.ed.gov/collegenavigator> (last visited March 1, 2020); *College Scorecard*, US DEPARTMENT OF EDUCATION, <https://collegescorecard.ed.gov> (last visited March 1, 2020); *GI Bill Comparison Tool*, US DEPARTMENT OF VETERANS AFFAIRS, <https://www.va.gov/gi-bill-comparison-tool/> (last visited Feb. 24, 2021).

⁸³ *SVA Comment on OMB Control No. 2900-0797 Agency Information Collection Activity: Principles of Excellence Complaint System Intake*, STUDENT VETERANS OF AMERICA 3 (2020), available at <https://www.regulations.gov/comment/VA-2020-VACO-0001-0084>.

⁸⁴ *GI Bill® Comparison Tool: About This Tool*, U.S. DEPARTMENT OF VETERANS AFFAIRS (June 11, 2020), https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp#sourcedata.

We also ask that VA develop a mechanism to maintain closed schools within the tool, versus having them simply disappear. This removal of schools from the tool means associated data also disappears, leaving significant gaps in the overall picture for how those schools served students. We look forward to working with Congress and VA to update this valuable resource so it can better serve student veterans, service members, and their families.

Transparency and Accountability

1. *Improve data collection and sharing practices across government agencies and call for more publicly available data.*

There are several areas where government data on student veterans could be improved to help us better understand their needs and successes. For instance, data on student veterans generally in the Integrated Postsecondary Education Data System (IPEDS) is lacking. There is also insufficient data on student veteran incomes. Finally, there is a shortage of government data on student basic needs issues.

We recommend the committees support a whole-of-government approach to addressing these gaps. For instance, Congress should explore ways in which it can work with ED to make data on self-reported veteran status available in IPEDS in addition to the data that exists for those students using VA or DOD education benefits. Further, we ask that the committees encourage data-sharing between ED, VA, and the Internal Revenue Service (IRS) to improve longitudinal data on student veteran incomes. Lastly, we ask that the committees support collection of data on student basic needs by including studies and program reporting requirements in relevant legislation.

SVA itself will take a leading role in collecting more data on student veteran basic needs. We recently concluded our first ever Student Veteran Basic Needs Survey that collected responses from student veterans on several different topics including food security, housing security, and childcare. This effort will inform our policy work and SVA looks forward to sharing the results with committee members.

Relatedly, we also ask that members of these committees support the College Transparency Act (CTA) which has broad bipartisan support in both chambers.⁸⁵ This legislation, backed by nearly 150 organizations, would improve higher education data and ensure students have access to critical information to make more informed choices about their higher education journeys all while protecting students' individual data.⁸⁶ Short of comprehensively reauthorizing the HEA, passing the CTA to transform how post-secondary data is collected might be one of the most important steps Congress can take to improve higher education in America.

2. *Call for improved data and studies on how student debt impacts student veterans, service members, and their families.*

The rising level of student debt is a well-documented issue facing today's college students, with this debt growing by more than 100 percent between 2010 and 2020 and the cumulative national total surpassing \$1.7 trillion.⁸⁷ What is less understood is how student debt specifically impacts student veterans. SVA's annual census data confirms that some veterans graduate with student debt, but exactly why this is and how it affects their academic and financial futures remains unknown.

SVA has been privileged to welcome the Pew Charitable Trusts to our National Conferences in recent years to

⁸⁵ College Transparency Act, S. 839, 117th Cong. (2021).

⁸⁶ Letter from organizations supporting the College Transparency Act to bill sponsors (2021), *available at* <https://www.ihep.org/wp-content/uploads/2021/06/PostsecData-National-Skills-Coalition-College-Transparency-Act-Letter-2.pdf>.

⁸⁷ See Abigail Johnson Hess, *U.S. student debt has increased by more than 100% over the past 10 years*, CNBC (Dec. 22, 2020), <https://www.cnbc.com/2020/12/22/us-student-debt-has-increased-by-more-than-100percent-over-past-10-years.html> (citing Federal Reserve figures).

present research about veteran student debt. Early findings indicate more than a quarter of student veterans borrowed student loans in the 2015-16 academic year.⁸⁸ Pew's analysis also shows most student veterans who borrow student loans do so to cover living expenses.⁸⁹ The research so far has been illuminating, and SVA looks forward to the release of additional insights in coming months that will more closely examine the exact reasons why veterans borrow student loans at the rate they do.

We believe more can be done at the federal level to improve data collected on veteran student loan debt and to make it available to the public. Better understanding this debt is critical before determining what must be done to address it. To do so, SVA recommends these committees consider creating new federally funded research grants to support student veteran research initiatives.

We look forward to amplifying future data in this area and working with Congress, VA, and ED to identify ways the federal government can improve data gathered on student loan debt held by veterans.

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In closing, SVA is grateful for the opportunity to submit testimony on our policy priorities for the 2022 legislative calendar. Our top priorities are codifying the temporary COVID-19 protections, improving support for student veterans' basic needs, Guard and Reserve benefit parity, MHA reform, and integrating VHA onto college campuses. They are the best ways we have identified to improve the physical, emotional, and financial well-being of our nation's student veterans. By addressing these issue areas, our country delivers on the promise we made every veteran the day they chose to serve – that service to our country would not just be rewarding on its own but would leave veterans better off than when they joined.

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.

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."

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 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.

⁸⁸ Phillip Oliff, Ama Takyi-Laryea, Scott Brees & Richa Bhattarai, *Veteran Student Loan Debt Draws New Attention*, PEW (Sept. 13, 2021), <https://www.pewtrusts.org/en/research-and-analysis/articles/2021/09/13/veteran-student-loan-debt-draws-new-attention>.

⁸⁹ Phillip Oliff, Ama Takyi-Laryea, Scott Brees & Richa Bhattarai, *Why Veterans With GI Bill Benefits Still Take Out Student Loans*, PEW (Jan. 7, 2022), <https://www.pewtrusts.org/en/research-and-analysis/articles/2022/01/07/why-veterans-with-gi-bill-benefits-still-take-out-student-loans>.