



**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 2021”**

**MARCH 3, 2021**

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 the 117th United States Congress. With a mission focused on empowering student veterans, SVA is committed to providing an educational experience that goes beyond the classroom. We elevate the academic, professional, and personal development of veterans in higher education through chapter programs and services, outcomes and impacts research, and advocacy at every level.

Through a dedicated network of more than 1,500 on-campus chapters in all 50 states and three countries overseas representing more than 750,000 student veterans, SVA aims to inspire yesterday's warriors by connecting student veterans with a community of like-minded chapter leaders. Every day these passionate leaders work to provide the necessary resources, network support, and advocacy to ensure student veterans can effectively connect, expand their skills, and ultimately achieve their greatest potential. As a data-driven organization, SVA's research team collects, analyzes, and interprets data from national partners as well as institutions and chapters to tell the stories of our nation's most talented group of college students.

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## Executive Summary

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At Student Veterans of America, our goal is to inspire tomorrow's leaders. This ethos is perfectly captured when considering our Chapter at Clemson University, led by the Chapter President, Matthew Morris, a U.S. Navy veteran. Over the course of the COVID-19 pandemic, the Chapter experienced a significant leadership transition, and Matthew's team worked closely with the campus career services office to promote and organize virtual career fairs and professional development courses. They found innovative ways to partner with organizations in the community to safely conduct meaningful events with veterans from previous generations, such as a viewing of the film "Outpost."

Clemson is one of our many Chapters that have greeted the challenges associated with social distancing as an opportunity to transform operations and increase accessibility to student veterans and the community. Clemson University received our 2021 Chapter of the Year Award for continuing to inspire others through adaptability and commitment to community.

While examples like Clemson are noteworthy, they are not unique. Throughout the past year, student veterans nation-wide have risen to the occasion as they always do. At the University of Nevada Las Vegas (UNLV), Andrew Ho is a first-generation college student and the SVA Chapter President on his campus. In 2010, he joined the United States Air Force, and after his military service he chose to pursue a degree in occupational therapy. After he noticed his peers grappling with the common challenge of "imposter syndrome," he stepped up as a leader.

Andrew worked with other student veterans on his campus to establish an environment where student veterans could develop a sense of belonging and felt comfortable contributing to their campus community in ways that no other students could. He is a leader in the Peer Advisors for Veteran Education (PAVE) program, a mentor with the Big Brothers Big Sisters of America, and a true servant-leader building a culture of trust on his campus. Andrew was selected from among thousands of his peers as our 2021 Student Veteran of the Year, and there are so many others with similarly impressive stories of success, service, and leadership.

In this testimony, we will highlight our top policy priorities for 2021 and beyond. These priorities arose from direct interactions with student veterans at our annual Regional Summits, Leadership Institute, Washington Week, and National Conference. Several weeks ago, we hosted a highly inclusive virtual National Conference with record-breaking student veteran attendance at our 13th annual "NatCon." The priorities you will see below are organized

into the following topics:

- GI Bill Improvements
- VA Modernization
- Higher Education Reauthorization Act
- Accountability and Affordability
- Post-Traditional Student Success
- Effective and Empowering Governance

As you read through the rest of our testimony, we feel it is imperative to have a comprehensive understanding of the higher education landscape for veterans through national-level data and research, and for this reason we incorporated a review of some of our findings in the next section. Data and research inform every aspect of our programs and advocacy, as anecdote and assumptions often lead to myths that so frequently rule crucial decisions.

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## A Summary of Our Research Findings

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Throughout the past decade, SVA has dedicated significant resources to researching the efficacy and impact of the Post-9/11 GI Bill. We have incorporated overviews of this research in recent years' testimony and felt it was important to include it this year as well, due to the many new members joining these Committees. 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.

With the leadership and expertise of Dr. Chris Cate, our team produced both the Million Records Project (MRP) and the National Veteran Education Success Tracker Project, or 'NVEST Project' for short.<sup>1</sup> The purpose was to address a straight-forward question: "What is America getting for its multi-billion-dollar investment in the education of veterans?" In partnership with the Department of Veterans Affairs (VA) and the National Student Clearinghouse (NSC), we studied the individual education records of the first 854,000 veterans to utilize the Post 9/11 GI Bill.

The bottom line is this: student veterans are among the most successful students in higher education.<sup>2</sup> With appropriate resources, this research could be updated annually to better assess student veteran success through data and to overcome outdated myths about veterans, college, and career success. Not satisfied with just illuminating 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.<sup>3</sup> With almost 4,000 responses the project has already produced three key findings.

First, much of the public has a nostalgic view of veterans' post-secondary educational journey: High school, Military Service, College, then Workforce – this is outdated. There is no doubt this view has been carried over from the World War II era to today, where service members returned from service to use the GI Bill to earn a college degree and enter the workforce. However, our research has found veterans' educational journeys are more diverse than ever before due to more options to serve and accessibility of college courses.

It is within these educational journeys that a second key finding was discovered. Service members are exposed to

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<sup>1</sup> See *generally Research*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/> (last visited Feb. 24, 2021).

<sup>2</sup> 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](https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf).

<sup>3</sup> See *generally Life Cycle Atlas*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/life-cycle-atlas/> (last visited February 15, 2021).

implicit messaging that they are not college material and thereby discouraged from considering a college education after service. This implicit messaging sometimes starts with their high school guidance counselors then reinforced throughout their military service. It is often not until after they have separated and hear about other veterans succeeding in college that they realize their potential and enroll.

Finally, looking at the transition from school to the workforce, the Life Cycle Atlas Project is finding that student veterans are not utilizing the variety of career preparation opportunities that are available to them, such as internships, externships, and co-operative education. This puts student veterans at a disadvantage compared to more traditional student groups who have taken advantage of these hands-on learning and career preparation opportunities.

It is also important to understand the demographics of student veterans. Ninety percent of student veterans using the GI Bill are prior enlisted, while the remaining ten percent are prior warrant and commissioned officers. Eighty-four percent are over the age of twenty-five. Nearly half are married, and half have children; eighteen percent are single parents. Fifty-five percent of student veterans work while enrolled in courses with sixteen percent of those working multiple jobs.<sup>4</sup>

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.<sup>5</sup>

Next, the most well-known academic performance measure is the grade point average (GPA). The national GPA for undergraduate college students is a respectable 3.15. The GPA for student veterans is 3.36. Student veterans are out-graduating nearly all other students achieving a success rate of seventy-two percent compared to the national average of sixty-six percent. Additionally, NVEST data demonstrate that student veterans have a substantially higher graduation rate when compared to other adult students who are comparable peers.<sup>6</sup>

In its first six years, the Post-9/11 GI Bill enabled more than 347,000 veterans to complete a post-secondary degree or certificate. Twenty-three percent are women. SVA projects the Post-9/11 GI Bill will support 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.<sup>7</sup>

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.<sup>8</sup>

As we move forward, SVA is committed to pioneering the next bold steps in student veteran research. Last year,

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<sup>4</sup> Cate, C.A. Student Veteran Census Survey 2018. Student Veterans of America, Washington, D.C.

<sup>5</sup> 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](https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf).

<sup>6</sup> *Id.*

<sup>7</sup> 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](https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf).

<sup>8</sup> *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](https://studentveterans.org/wp-content/uploads/2020/08/Student-Veterans_Valuable_9.8.17_NEW.pdf).

our team deployed the Veteran Opinion Survey, a new national survey of veterans that periodically collects opinions on the challenges veterans face, and the effectiveness of the groups and government leaders tasked with addressing them. These surveys will elevate the voice of student veterans on policy matters of national importance and provide an important accountability check for the agencies, elected officials, and organizations that serve them.<sup>9</sup>

This past year 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. These responses are addressed in greater detail below in the section summarizing the pandemic's impact on student veterans.

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

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## Overview of COVID-Related Findings and Priorities

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Student veterans have experienced unique frustrations and concerns throughout the pandemic, even with the generous flexibilities created by this Congress and the quick support provided by the Veterans Benefits Administration (VBA). Unlike their civilian counterparts, student veterans were nearly wholly dependent on schools accurately understanding rapidly changing VA guidance and considering GI Bill regulations when making decisions for entire student populations.

Even seemingly common-sense decisions had drastic and almost catastrophic implications for students using VA benefits. To be fair, school administrators were facing unprecedented decision requirements and were making decisions for thousands of people at once. Similarly, it is important to recognize that VBA is only one part of the overall system and can only operate under its current requirements and authorities.

In the week after SVA last testified during these joint hearings in March 2020, as the pandemic began to unfold, we became aware of several issues that would significantly and negatively impact student veterans and their families across the country. When we, and others in the veteran advocacy community, raised these issues, Congress responded quickly to stitch together a patchwork of solutions to rectify many of these unintended oversights.

We would like to again state our gratitude for the efforts of all involved to protect the hundreds of thousands of student veterans and families across the country that were at risk of losing the roof over their heads, tuition payments, benefit entitlement, and much more. Indeed, some of our first recommendations for this new Congress, a year later, are to review and study the emergency needs specific to the GI Bill uncovered during the COVID-19 response and take a two-prong approach to preventing the mass confusion and concern experienced this past year for future national emergencies.

First, as an immediate assurance, Congress should codify the flexibilities and protections created for the GI Bill so they can be activated immediately when a national emergency is declared. While we greatly appreciate how quickly and effectively Congress responded to the unique and significant needs of student veterans last year,

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<sup>9</sup> *Veterans Opinion Survey*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/veterans-opinion-survey/> (last visited Feb. 24, 2021).

these course corrections were necessary to preserve the basic integrity of the educational benefits system. It makes little sense to reopen these types of wounds again in future emergencies.

Learning from our shared history in 2020 will prevent the need for such heroic efforts and allow for more effective GI Bill governing during emergencies in the future. Second, we know the patchwork of flexibilities and protections created last year is just that, a patchwork, and inherently not perfect. A more sustainable and dependable GI Bill administration system should also be studied to identify ways we can make the GI Bill work more seamlessly within the higher education system.

Beyond identifying immediate legislative needs stemming from COVID-19, as mentioned previously, SVA surveyed veterans across the country throughout last year to better understand the ripple effects of the pandemic. These surveys were conducted over the course of several months on a variety of topics, including their thoughts on the pandemic, the realities of how it continues to impact them, and what problems remain. We will gladly share the entirety of the data with any interested office, but we want to highlight some of the key findings here:

- Roughly half of respondents shared that their monthly income was either not enough to pay bills or that little remains after paying bills.
- Seven in ten veterans who are parents reported an issue with loss of childcare or school closures negatively impacting their ability to work.
- More than eighty percent had some concern about COVID-19 impacting their academic goals or delaying progress towards a degree or certificate.
- Roughly one third reported being concerned about not having a job in the next three months.
- More than eighty percent had a pessimistic view of the economy.
- Nearly seventy percent believed, even as recently as January of this year, that COVID-19 will not be over and completely behind us for at least another year.
- As of January 2021, only 4% of student veterans' schools whose operations were impacted by the pandemic had returned to normal.<sup>10</sup>

The overall takeaway is that student veterans, like all Americans, continue to need assurances and support to navigate such uncertain times. From immediate worries of being unable to stay in their homes, to anxiety over what the future holds, student veterans and their families have concerns that reach far beyond any single program within VA.

To recover from the challenges of this last year and empower our veterans to excel post-military service and post-pandemic, it is critically important that veterans receive assistance from, and build confidence in, the entire gamut of programs VBA offers. In other words, as the Independent Budget (IB) organizations stated in their policy recommendations for the 116th Congress, "This nation should have as much focus on the economic opportunities for veterans as it does for their health care and benefits".<sup>11</sup>

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## The GI Bill as the Front Door to VA

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Based on what we have heard from student veterans in recent years and months, we are committed to our priorities having a central theme: the GI Bill is the 'front door' to VA. 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

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<sup>10</sup> COVID-19 and 2020-2021 Veterans Opinion Surveys, STUDENT VETERANS OF AMERICA (on file with author).

<sup>11</sup> 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](http://www.independentbudget.org/pdf/IndependentBudget_2019.pdf).

programs.<sup>12</sup> This means a seamless GI Bill process is key to establishing trust and confidence in the agency. Much like the Veterans Health Administration's (VHA) 'Whole Health' concept for treating the entirety of a veteran, SVA advocates for a 'Whole Benefits' approach for modernizing VA Education Services.

The idea is a big one, but it begins with perfecting all the small steps in the process along the way. With an overhaul of VBA's IT systems now underway, the agency can focus on continuing to improve customer service to veterans calling into the GI Bill call center with faster response times, expand communication avenues via text, chat, and email, quickly respond to beneficiaries' questions, calculate benefits accurately and in a timelier manner, digitize eligibility certificates to reduce wait times, reduce the lag time between applying for benefits and receiving the first tuition and housing payments, and much more. By truly embracing the GI Bill as the front door, the first interaction, newly transitioned veterans have with VA, we open up untold potential for VA to focus on making consistent, early outreach with accurate contact information to establish a lifelong connection with VA.

Additionally, we strongly support additional study of how the GI Bill can better integrate within the higher education system to prevent the mass concern student veterans faced during the pandemic and continue to face today. Student veterans using their earned education benefits sit at messy and confusing crossroads of higher education policies at the Department of Education (ED) and those at the Department of Veterans Affairs.

While historically, this intersection has been manageable, the pandemic has exposed concerning blind spots worth further review. The entirety of the experience we as a collective community—from advocates, congressional staff, school administrators, VA, and most importantly to student veterans—have faced throughout the last year beg the need for thorough review of how we can reduce the complexities of how the GI Bill interacts with higher education administration.

We know this is a large, complex problem to solve, but ensuring we are working toward a more effortless relationship between the two systems while still respecting the unique needs of GI Bill administration, will help prevent the type of emergencies many student veterans faced this past year. In honoring the GI Bill as the front door to VA, SVA will continue to advocate for our annual policy priorities that improve the daily lives of student veterans and their families, increase efficacy of government programs used by student veterans through efforts such as closing the 90-10 loophole, push for greater data transparency, and elevate the success and value of an educated veteran population.

The effects of truly embracing the GI Bill as the front door to VA will be felt immediately, as veterans across the country will see improvements in their first interactions with VA, and long after as well. At SVA, we often say student veterans are the ambassadors for military service. Similarly, the quality of VA's service to student veterans is the ambassador for all VA services. We look forward to focusing on this concept as we work with our partners at VA and our veteran advocate counterparts during 117th Congress and beyond.

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## Policy Priority Recommendations

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### GI Bill Improvements

#### 1. *Monitor and ensure quality implementation of recent GI Bill legislation*

As a result of these Committees' and others' tireless work last year, a remarkable number of policy changes were implemented that will improve the lives of veterans across the country. SVA will be carefully monitoring the

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<sup>12</sup> 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>.



ongoing implementation of these improvements, including many provisions enacted in the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*.

There are more than 30 provisions in that bill that impact student veterans, their families, and survivors in some way.<sup>13</sup> Among other items in the bill, we will be tracking the new dual certification process, how overpayments are handled by schools, and the new oversight and accountability standards for institutions. We will also closely follow VA's efforts to modernize their education IT infrastructure.

Last year, roughly \$243 million in unused *Coronavirus Aid, Relief, and Economic Security Act (CARES Act)* funds were repurposed to allow VA to begin modernizing its dated education IT infrastructure by digitizing the GI Bill.<sup>14</sup> SVA commends these Committees for shifting those funds and we commend the VA for the initial steps taken to begin this long overdue process.

We also know current funds are insufficient on their own to finance the entire modernization effort, and we will continue to call on Congress to provide the necessary funds to complete the task. Finally, SVA will be paying close attention to any pandemic relief measures that may not yet be fully implemented, primarily those that were supposed to be effective as of January 2021.

## 2. *Comprehensively review and update Monthly Housing Allowance (MHA) to address rate disparities such as those related to break pay, rural areas, overseas institutions, and medical rotations*

SVA regularly hears from students that current MHA rates do not reflect the reality of their living situation for many students. Whether it be the flat rate for overseas learners, rates that do not serve students well during medical rotations, unavailability of payment for periods between academic terms, or issues with rural rates, among other issues, MHA needs additional attention from Congress.

A looming problem faces students at international campuses of U.S. institutions. Under previous MHA guidelines, students attending international campuses received the MHA attributed to that school's main U.S. campus. Going forward, however, that rate will be adjusted to the national average. SVA does not believe the U.S. national average is the appropriate MHA rate for international locales, particularly when many of those areas have significantly higher costs of living.

VA uses the Department of Defense (DoD) Basic Allowance for Housing (BAH) – a state-side rate – to determine domestic MHA rates.<sup>15</sup> VA should similarly use DoD's Overseas Housing Allowance (OHA) – a non-domestic rate – to set overseas MHA. DoD has already gone through the process of rigorously calculating the cost of living in numerous locales abroad and incorporating them into the OHA rate.<sup>16</sup> This is a common-sense solution that will provide overseas students with a more equitable MHA rate and establish consistency in the methods VA uses to establish those rates.

Medical rotations are another pain point for students receiving MHA. As students rotate through hospitals across the country, they can be subjected to far higher costs of living than those on which their MHA is based. Students even go into debt to support themselves in these situations. There are already rates established for the locations these students rotate through. Congress should explore ways to provide these students with MHA rates that match the location of their medical rotation to prevent them from taking on unnecessary financial burdens.

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<sup>13</sup> See generally Johnny Isakson and David P. Roe, M.D., *Veterans Health Care and Benefits Improvement Act of 2020*, Pub. L. No. 116-315.

<sup>14</sup> Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. J, Title V, § 515.

<sup>15</sup> *Post-9/11 GI Bill (Chapter 33) Payment Rates for 2019 Academic Year (August 1, 2019 - July 31, 2020)*, U.S. DEPARTMENT OF VETERANS AFFAIRS (June 18, 2019), [https://www.benefits.va.gov/GIBILL/resources/benefits\\_resources/rates/ch33/ch33rates080119.asp](https://www.benefits.va.gov/GIBILL/resources/benefits_resources/rates/ch33/ch33rates080119.asp).

<sup>16</sup> See *Overseas Housing Allowance*, U.S. DEPARTMENT OF DEFENSE, DIRECTORATE OF MILITARY COMPENSATION POLICY, [https://www.defensetravel.dod.mil/Docs/Fact\\_Sheet\\_OHA.pdf](https://www.defensetravel.dod.mil/Docs/Fact_Sheet_OHA.pdf) (last visited Feb. 24, 2021).



Another MHA issue that continues to cause hardships 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 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 come between terms. SVA believes there is a way to provide relief to our student veterans in a way that is both consistent with the intent of the law and fiscally responsible.

In recent years, SVA has highlighted another MHA issue affecting students across the country – the need for greater flexibility in policies allowing MHA payment when natural disasters force institutions to temporarily close. VA may continue paying housing allowances to student veterans for up to a month if a school is closed due to a natural disaster.<sup>17</sup> However, extensive research conducted by SVA shows that many school closures last longer than one month.<sup>18</sup>

We encourage Congress to grant VA the authority to extend the timeframe for continued MHA payments when natural disasters are so severe an institution needs more than one month to reopen campus. This is another common-sense, proactive policy change that would provide student veterans more than a few weeks' time to figure out a new plan when facing catastrophes.

Finally, there are reports that MHA rates are not serving student veterans well in some rural areas with rates often below the current national average not adequately meeting actual cost-of-living needs, resulting in many of these students struggling to make ends meet. These examples are by no means exhaustive of the concerns we field related to MHA. These examples also do not answer the important question asking if rates being based on supplemental income for DoD service members is adequate for GI Bill users, or whether the inability for many student veterans to access additional programs such as SNAP and Unemployment Insurance are causing more damage as students look to meet basic needs.

The conversation cannot be as simple as raise MHA rates for some, we urge congress to conduct a comprehensive review of current MHA policies to identify improvements that will ensure allowances better serve all student veterans, especially those experiencing the issues highlighted above.

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

As U.S. defense plans change from 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 this past year 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.<sup>19</sup>

<sup>17</sup> *What if my School Term is Interrupted by a Hurricane or Natural Disaster*, U.S. Department of VETERANS AFFAIRS (July 8, 2018), [https://gibill.custhelp.va.gov/app/answers/detail/a\\_id/1573/~/what-if-my-school-term-is-interrupted-by-a-hurricane-or-natural-disaster%3F](https://gibill.custhelp.va.gov/app/answers/detail/a_id/1573/~/what-if-my-school-term-is-interrupted-by-a-hurricane-or-natural-disaster%3F).

<sup>18</sup> See *generally Natural Disaster Map*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/government-affairs/natural-disaster-map/> (last visited Feb. 11, 2021).

<sup>19</sup> 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>.

We encourage Congress to thoroughly review the statutory requirements that qualify service members for benefits and to 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. *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 facing challenges in completing coursework or exams due to conflicts with short-term military training or deployment obligations. SVA believes most institutions sincerely want to help these students balance their military obligations with their studies. However, current law does little to help these students manage these competing priorities.

There are institutional readmission protections for service members, but those only cover students who completely withdraw from their school for a duty period of at least 30 consecutive days.<sup>20</sup> We encourage Congress to work in tandem with ED, VA, and DoD to explore ways to provide student service members with additional protections and flexibility so military training does not have an unnecessarily negative impact on their studies.

#### 5. *Formalize the Department of Veterans Affairs 'rounding out' practice*

VA has announced it will phase out a practice known as Rounding Out on or after August 1, 2021.<sup>21</sup> Students must typically only take courses required for the completion of their program in order to meet full-time status and receive maximum MHA. The Rounding Out practice allows GI Bill students who are in their final term to "round out" their course schedule with non-required courses to achieve full-time status. This permits these students to finish their final term while receiving full-time MHA.<sup>22</sup>

The Rounding Out policy is not found in statute or regulation. Rather, it is VA guidance to School Certifying Officials that the agency previously found appropriate to cure a basic unfairness in how benefit requirements can impact some students in their final term. Despite years of administering the benefit this way, and without any notable objections, VA appears to believe they no longer have the authority to afford students the compassion of this limited reprieve.

SVA and others, including the National Association of Veterans' Program Administrators (NAVPA), believe elimination of this rule will increase out-of-pocket costs for certain student veterans in their final term, force them to take out unnecessary loans, and potentially cause some to drop out of school altogether.<sup>23</sup> To ensure student veterans have access to a fair housing allowance throughout their final term, SVA asks Congress to remove all confusion and pass legislation that would cement the Rounding Out practice in law.

### VA Modernization

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<sup>20</sup> *Frequently Asked Questions: Institutional Readmission Requirements for Servicemembers*, U.S. DEPARTMENT OF EDUCATION (Sept. 25, 2017), <https://www2.ed.gov/policy/highered/guid/readmission.html>.

<sup>21</sup> U.S. DEPARTMENT OF VETERANS AFFAIRS, SCHOOL CERTIFYING OFFICIAL HANDBOOK (ON-LINE) – ROUNDING OUT, U.S. DEPARTMENT OF VETERANS AFFAIRS (Dec. 3, 2020), *available at*

[https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va\\_ssnew/help/customer/locale/en-US/portal/55440000001018/content/554400000149088/School-Certifying-Official-Handbook-On-line#Rounding%20Out](https://www.knowva.ebenefits.va.gov/system/templates/selfservice/va_ssnew/help/customer/locale/en-US/portal/55440000001018/content/554400000149088/School-Certifying-Official-Handbook-On-line#Rounding%20Out).

<sup>22</sup> *Id.*

<sup>23</sup> NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS, VETERANS' EDUCATION PROGRAMS ISSUES AND LEGISLATION TALKING POINTS 2020, NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS (2020), 3 (2020), *available at* <https://www.navpa.org/wp-content/uploads/2020/03/NAVPA-Leg-Agenda-Feb-2020-Talking-points.pdf>.

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

1. *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.<sup>24</sup> 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.

2. *Continue to expand and modernize the GI Bill Comparison Tool*

The Comparison Tool can be invaluable to veterans trying to understand the value of their GI Bill as they consider educational options but there are improvements that would improve the overall utility of the tool. 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.<sup>25</sup> The Comparison Tool has unique data, justifying itself as 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.

The data running the Comparison Tool are largely restricted to VA's internally available data, which are also limited, notably excluding many student veterans who run out of benefits prior to graduation or elect alternative funding. Those limitations notwithstanding, SVA appreciates the continued public availability of the raw data powering the GI Bill Comparison Tool. This data allows external entities to run complementary research and analysis to support additional feedback to VA and policymakers.

A 2013 law required VA to launch a "centralized mechanism for tracking and publishing feedback from students..."<sup>26</sup> While the current tool technically satisfies these broad requirements, it is far from adequate to meet the needs of students in a 21<sup>st</sup> century higher education system. Several issues and recommendations to address them are covered below.<sup>27</sup>

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<sup>24</sup> 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](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").

<sup>25</sup> 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).

<sup>26</sup> Pub. L. No. 112-249 §1(a).

<sup>27</sup> Many of the recommendations below are sourced from SVA's public comment on VA's 2020 Notice of Agency Information Collection Activity

The GI Bill Comparison Tool suffers from a substantial lack of detailed information about student complaints. For any given school, the tool simply shows a tally of complaints across broad categories. If a user wants to find more information about a complaint, they might think to click the “source” link. Unfortunately, that simply links the user to a page detailing the tool’s functions.<sup>28</sup> The tool also only publishes complaints from the prior 24 months. We recently 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.<sup>29</sup>

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.<sup>30</sup> 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.

We also we 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. Lastly, we encourage VA to incorporate a side-by-side comparison feature so students can more easily compare schools. We look forward to working with Congress and VA to update this valuable resource so it can better serve student veterans, servicemembers, and their families.

### 3. *Establish parity between the Post-9/11 GI Bill and VR&E MHA subsistence rates*

Many student veterans have shared concerns about not being able to afford basic necessities while pursuing their individualized training and education plans. Indeed, these concerns are echoed in the 2014 Government Accountability Office (GAO) report on VR&E which establishes that veterans may discontinue their plans before completion due to financial pressures.<sup>31</sup> Currently, VR&E has two different subsistence rates. One is the rate of

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for the Principles of Excellence Complaint System, where they can be found in substantially similar form. *See generally SVA Comment on OMB Control No. 2900-0797 Agency Information Collection Activity: Principles of Excellence Complaint System Intake*, STUDENT VETERANS OF AMERICA (2020) (on file with author.), available at <https://www.regulations.gov/comment/VA-2020-VACO-0001-0084>.

<sup>28</sup> *See 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](https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp#sourcedata).

<sup>29</sup> *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>.

<sup>30</sup> *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](https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp#sourcedata).

<sup>31</sup> 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>.

the Post-9/11 GI Bill MHA benefit, and the other is substantially lower and based on several factors, such as rate of attendance, number of dependents, and training type.<sup>32</sup> Moving the subsistence rate to one rate reduces bureaucracy, eliminates confusion, and ensures greater fairness in benefits for service members and veterans with service-connected disabilities.

#### *4. Expand VA Work Study options to include opportunities that better align with student goals and career fields*

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 was remedied, to a degree last year, by changes that allow students to qualify for VA Work-Study when performing veteran liaison duties for members of Congress.<sup>33</sup> We 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.

Veterans' demonstrated propensity for service should be rewarded by expanding the jobs available through VA Work-Study to 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.<sup>34</sup> We hope to work with Committee 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.

#### *5. Improve VA communications on new or updated policies and ensure all handbooks accurately reflect all required regulations*

The numerous legislative changes made last year highlight the larger, ongoing need for VA to improve the way it communicates new and updated policies to school officials. In terms of recent policy changes, SVA has received reports regarding a lack of guidance being disseminated to institutions that must comply with new laws. That said, we are heartened by VA's recent efforts signaling they will have a dedicated website for guidance pertaining to the many changes in the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020* and hope such efforts continue for future changes.

While we know it is the agency's intent, we hope VA moves as swiftly as possible to issue guidance, so implementation of these changes is timely and effective. We look forward to working with these Committees to identify ways VA can expand on recent efforts to better communicate this and future guidance to stakeholders.

#### *Higher Education Act Reauthorization*

Reauthorizing the *Higher Education Act* (HEA) and ensuring student veterans' voices are heard during the process remains a top priority for SVA this year. While HEA generally falls outside the jurisdiction of these Committees, SVA continues to implore all Members, as engaged veteran advocates, to prioritize and participate in the HEA reauthorization process. VA unquestionably has a significant impact on the lives of student veterans and military-connected students, but VA's education business lines comprise only a fraction of the legislation and

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<sup>32</sup> *VR&E Subsistence Allowance Rates*, U.S. DEPARTMENT OF VETERANS AFFAIRS, [https://www.benefits.va.gov/vocrehab/subsistence\\_allowance\\_rates.asp](https://www.benefits.va.gov/vocrehab/subsistence_allowance_rates.asp) (last visited March 01, 2020).

<sup>33</sup> 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.

<sup>34</sup> *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.).

regulation that routinely touch the educational opportunities, choices, and protections that impact those same students.

Bipartisan negotiations have yielded some progress in recent years, but full authorization has repeatedly fallen short of the finish line. SVA hopes this new Congress will move to reauthorize the HEA, which is woefully out-of-date to adequately serve students in a 21<sup>st</sup> Century higher education system, particularly as we reckon with significant changes in higher education caused by COVID-19. While not an exhaustive list of provisions we hope to see considered during HEA negotiations, we list priorities we hope these Committees will keep in mind.

## 1. *Close the 90-10 loophole once and for all*

The 90-10 rule is intended to prevent a proprietary institution from receiving all its revenue from the federal government. Essentially, if an institution is providing a high-quality education, it should be able to recruit students willing to spend their own money to attend. The rule requires that at least 10 percent of a proprietary institution's revenue come from a source other than federal financial aid.<sup>35</sup> Ironically, the rule is modeled after one used by VA to prevent institutions existing solely to collect veterans' education benefits.<sup>36</sup>

However, a loophole exists in the rule, which results in VA and Department of Defense (DoD) educational benefits not being counted as federal funds. The predatory practices this loophole incentivizes are well-documented and unacceptable.<sup>37</sup> Veterans and other American taxpayers deserve better than allowing the bottom lines of institutions to prevail.

Closing the loophole is a long-standing policy priority for most veteran service organizations.<sup>38</sup> There is well-respected research on the need to close the 90-10 loophole and the efficacy of doing so.<sup>39</sup> Closing the loophole maintains students' full freedom to choose which school they attend, prevents fully federalizing funding for schools, and protects veterans' ability to craft their unique educational journey without gambling their earned benefits and taxpayer money on the worst performing schools.

The growing support for closing the loophole goes beyond veteran advocates. In recent years, there have been considerable advancements towards closing the 90-10 loophole. Thanks to the leadership of Senators Carper, Tester, Cassidy, and Lankford, the first bipartisan bill to close the loophole in the Senate, the *Protect Veterans' Education and Taxpayer Spending Act* was introduced last Congress. Along with many other bills aimed at closing the loophole, and recent efforts to possibly use the budget reconciliation process, many in Congress are taking steps to close this loophole, and we are hopeful this is the Congress to finally achieve this long-standing priority.<sup>40</sup>

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<sup>35</sup> 20 U.S.C. § 1094(a)(24).

<sup>36</sup> See LEE AND ADAM LOONEY, UNDERSTANDING THE 90/10 RULE: HOW RELIANT ARE PUBLIC, PRIVATE, AND FOR-PROFIT INSTITUTIONS ON FEDERAL AID?, THE BROOKINGS INSTITUTION 3 (Jan. 2019), available at [https://www.brookings.edu/wp-content/uploads/2019/01/ES\\_20190116\\_Looney-90-10.pdf](https://www.brookings.edu/wp-content/uploads/2019/01/ES_20190116_Looney-90-10.pdf).

<sup>37</sup> See generally U.S. SENATE COMMITTEE ON HEALTH, EDUCATION, LABOR, AND PENSION, FOR PROFIT HIGHER EDUCATION: THE FAILURE TO SAFEGUARD THE FEDERAL INVESTMENT AND ENSURE STUDENT SUCCESS (July 30, 2012), available at <https://www.govinfo.gov/content/pkg/CPRT-112SPRT74931/pdf/CPRT-112SPRT74931.pdf>.

<sup>38</sup> See 37 *Veterans and Military Service Organizations write Congress to share our priorities for Higher Education Act reauthorization*, VETERANS EDUCATION SUCCESS 1-2 (May 2, 2019), <https://vetsedsuccess.org/37-veterans-and-military-service-organizations-write-congress-to-share-our-priorities-for-higher-education-act-reauthorization>.

<sup>39</sup> See generally Michelle Dimino, *Three Loopholes that Congress Needs to Close to Protect Students*, THIRD WAY, <https://www.thirdway.org/memo/three-loopholes-that-congress-needs-to-close-to-protect-students> (discussing why closing the loophole is necessary); LEE AND ADAM LOONEY, UNDERSTANDING THE 90/10 RULE: HOW RELIANT ARE PUBLIC, PRIVATE, AND FOR-PROFIT INSTITUTIONS ON FEDERAL AID?, THE BROOKINGS INSTITUTION (Jan. 2019), available at [https://www.brookings.edu/wp-content/uploads/2019/01/ES\\_20190116\\_Looney-90-10.pdf](https://www.brookings.edu/wp-content/uploads/2019/01/ES_20190116_Looney-90-10.pdf) (discussing the effects of closing the loophole).

<sup>40</sup> See Paul Fain, *Bipartisan Movement in Washington*, INSIDE HIGHER ED (Nov. 20, 2019), <https://www.insidehighered.com/news/2019/11/20/alexander-backs-bill-count-veterans-benefits-toward-profits-federal-revenue-limit>; *College*



2. *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 quality assurance and student safeguard policies. The BD rule is supposed to provide federal student loan relief to students who were defrauded by bad-actor schools.<sup>41</sup> The GE rule was designed to ensure certain programs provide a worthwhile education – one that is affordable relative to earnings after graduation.<sup>42</sup> 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 reassurances to many students, including student veterans who, in the past, have been robbed of a stable educational foundation by bad-actor proprietary institutions. The respective 2015 and 2016 closures of ITT Technical Institute and Corinthian Colleges 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.<sup>43</sup> 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.<sup>44</sup>

In response to such abuses, the Forever GI Bill sought to correct some of the damage by allowing eligible student veterans to have their GI Bill entitlement restored. Still, no student should face the risk of their school defrauding them, but for those who do and have federal student loans – like many student veterans – borrower defense may be their only option for relief.

According to data from 2015-2016 academic year, 17 percent of undergraduate military students, including student veterans, using veteran education benefits were attending proprietary institutions.<sup>45</sup> The recent documentary, *Fail State*, illuminates the practices of many of these schools. The documentary shows the recruiting practices and outcomes of these schools and identifies the critical link to the growing mass of student debt in America.<sup>46</sup>

Unfortunately, BD was substantially weakened in recent years, and GE was rescinded altogether. SVA opposed these rollbacks and continues to work to restore these important student protections. Last year, Student Veterans of America 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. This effort resulted in a bipartisan rebuke of the new regulation in both

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*Affordability Fact Sheet*, House Ed. & Labor Committee 2 (2019),

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

<sup>41</sup> *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>.

<sup>42</sup> *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>.

<sup>43</sup> *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>.

<sup>44</sup> 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/>.

<sup>45</sup> LAURA HOLIAN AND TARA ADAM, U.S. DEPARTMENT OF EDUCATION, *STATS IN BRIEF: VETERANS' EDUCATION BENEFITS 21* (NCES 2020-488rev March 2020), available at <https://nces.ed.gov/pubs2020/2020488rev.pdf>.

<sup>46</sup> DIRECTOR ALEX SHEBANOW, *FAIL STATE*, FAILSTATE.COM (A SDCF LLC Film 2018), <https://failstatemovie.com>.



houses of Congress.<sup>47</sup>

We fully expect ED to initiate Negotiated Rulemaking to restore the BD and GE rules in the coming years. Negotiated Rulemaking is a required regulatory process within the HEA. It incorporates input from diverse experts representing the stakeholders in higher education to debate and work toward consensus on HEA regulations. SVA has been privileged to participate as a negotiator for such rulemaking negotiations in the past, providing expert testimony to the committee and negotiators, and we hope to be a part of the future negotiations to rebuild the BD and GE rules.

Given the repeated abuses by bad-actor institutions taking advantage of students, and the recent rollbacks of BD, GE, and the other student protections framed in HEA, strengthening federal student safeguards is more important than ever. Congress must act to restore and protect these important policies to defend both students and taxpayer funds from fraud, waste, and abuse.

### 3. *Improve oversight of for-profit conversions*

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

This issue was addressed in some ways for VA through additional oversight measures passed last year in the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020* which increases oversight of converted for-profit institutions by subjecting them to annual risk-based reviews for three years following conversion.<sup>48</sup> Still, as a recent GAO report illuminates, these conversions continue to pose major risks to students.<sup>49</sup> These risks are, in many ways, the product of insufficient oversight at the Department of Education and the Department of the Treasury.<sup>50</sup>

To protect against fraud, waste, and abuse, we encourage Congress and the members of these Committees to support oversight and accountability reforms at ED and the Department of the Treasury, that would provide for greater scrutiny of for-profit conversions.

#### Accountability and Affordability

Today's students, including student veterans have more learning options than ever and many are 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.

### 1. *Call for studies that analyze the efficacy of new trends and innovations, especially digital material, in higher*

<sup>47</sup> 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>.

<sup>48</sup> 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.

<sup>49</sup> 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/>.

<sup>50</sup> U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *IRS AND EDUCATION COULD BETTER ADDRESS RISKS ASSOCIATED WITH SOME FOR-PROFIT COLLEGE CONVERSIONS 48-49* (Dec. 2020), U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *available at* <https://www.gao.gov/assets/720/711601.pdf>.

*education, including the risks and benefits they pose to students*

Over the last few years, the higher education landscape has experienced 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 more traditional models of learning, like brick-and-mortar classes. Affordability and flexibility – particularly attractive traits among post-traditional students, including student veterans – are key selling points for these learning models.

These new learning options, however, are not without risk. There are serious concerns about program quality and oversight issues that must be addressed. Further, many new online learning modalities are increasingly being administered by Online Program Managers (OPM). These arrangements have come under increasing scrutiny for their use of contracts in which schools – even prominent ones – cede core responsibilities, such as student recruitment, to the OPM in lucrative revenue-sharing deals.<sup>51</sup> Such contracts run the risk of recruitment and profits being prioritized over quality student outcomes.<sup>52</sup>

As we reshape how we think of workforce development, and the interactions between students and institutions, we must commit to fully understanding the scope of these changes and establish appropriate guardrails around their use to protect students from unscrupulous actors and low-quality programs.

*2. Call for better data 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.<sup>53</sup> What is less understood is how student debt specifically impacts student veterans. SVA's annual census data confirm that at least some veterans graduate with student debt, but the scope of that data is limited.

SVA eagerly awaits the results of the Pew Charitable Trusts' nationwide survey on student loan debt held by veterans. The survey will offer valuable insights into how much student loan debt veterans hold, why they have it, and how it impacts their lives. Beyond this survey, however, we feel more can be done at the federal level to improve the data collected on veteran student loan debt and to make it available to the public. Better understanding where this debt is held is critical before conversations on how to address it.

We look forward to sharing future data on this issue and working with Congress, VA, and ED to identify ways the federal government can improve the amount and quality of data gathered on student loan debt held by student veterans.

*Post-Traditional Student Success*

SVA strongly believes that Post-9/11 GI Bill student veterans are the tip of the spear for changing the way higher education educates and values post-traditional students in the twenty-first century, a population of students

<sup>51</sup> 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>.

<sup>52</sup> 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>

<sup>53</sup> 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)

comprising the new majority of students in higher education.<sup>54</sup> Similar to the need to engage on HEA reauthorization efforts because of its impact on student veterans, there are opportunities for improvement within higher education, outside the HEA process, that will empower student veterans and improve higher education for fellow post-traditional students.

While some of the recommendations SVA routinely discusses are more appropriately addressed at the institution level, it is important for these Committees to understand the landscape of topics that could be addressed here in Congress and back in local communities.

### 1. *Call for better data on student food and housing insecurity*

In December 2018, the GAO released a report on food and housing insecurity among college students.<sup>55</sup> After reviewing 31 separate studies, they concluded that “[n]one of these studies... constitute a representative study” of our nation’s students.<sup>56</sup> In fact, until the most recent National Postsecondary Student Aid Survey (NPSAS) is concluded, no federal agency had assessed food and housing insecurity among postsecondary students.<sup>57</sup>

The NPSAS is ongoing but other research designed to fill current gaps, does paint 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.<sup>58</sup>

Our ability to understand the scope of food and housing insecurity and to respond, if necessary, will continue to be limited until we have better data the issue at a national level. We encourage Congress to support efforts to collect additional data on these issues.

### 2. *Increase access to childcare, including through expanded on-campus services*

Increasing access to childcare is a near universal conversation among SVA Chapters. That is not surprising considering more than fifty percent of student veterans reported having children as recently as 2018.<sup>59</sup> Childcare issues, including availability and affordability, pose a comparatively unique challenge to student veterans and other post-traditional students.

With childcare costs capable of comprising about 10 percent of an average family’s income and presumably more for single parents, it is understandable how financial pressures can compound more quickly for these students.<sup>60</sup> The federal government has attempted to address the need for affordable childcare on campus through programs such as the Child Care Access Means Parents In Schools (CCAMPIS), but historical challenges with

<sup>54</sup> See generally LINDSEY REICHLIN CRUSE, ELEANOR ECKERSON, AND BARBARA GAULT, INSTITUTE FOR WOMEN’S POLICY RESEARCH, INDEPENDENT STUDENTS AS THE NEW COLLEGE MAJORITY (Feb. 2018), available at [https://iwpr.org/wp-content/uploads/2020/10/C462\\_Understanding-the-New-College-Majority\\_final.pdf](https://iwpr.org/wp-content/uploads/2020/10/C462_Understanding-the-New-College-Majority_final.pdf).

<sup>55</sup> 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>.

<sup>56</sup> *Id.*

<sup>57</sup> *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](https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf) (last visited Feb. 24, 2021).

<sup>58</sup> *Id.*

<sup>59</sup> *The 2018 SVA Census Survey: Student Veteran General Breakdowns*, STUDENT VETERANS OF AMERICA 6 (June 2020), <https://studentveterans.org/wp-content/uploads/2020/09/SVA-2018-Census-Report-Demo.pdf>.

<sup>60</sup> 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), available at <https://www.census.gov/programs-surveys/sipp/data/datasets/2014-panel/wave-3.html> (last visited Feb. 24, 2021)).

underfunding and available childcare providers, particularly in evening and weekend hours, limit the scope and effectiveness of CCAMPIS.<sup>61</sup>

SVA recommends these Committees explore how they can support innovative solutions, such as the Colorado State University Ram Kidz Village.<sup>62</sup> We also encourage the Committees to investigate how they might expand or create new programs modeled off the pilot program established for childcare at VA medical facilities, in addition to supporting increased funding for CCAMPIS.

### 3. *Explore options to better integrate and support VA healthcare on campuses*

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

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

### 4. *Expand access to reliable broadband internet*

Student access to reliable broadband internet is more important than ever. This is particularly true as higher education has transitioned online in the wake of COVID-19. This transition has accelerated investment in online program infrastructure at institutions around the country. As a result, we can expect online learning to play an increasingly mainstream role in higher education, even well after the pandemic. The digital divide in this country is real, and the pandemic laid bare these inequities.

Over the last year, we heard stories about student veterans struggling with internet access.<sup>63</sup> Other students were forced to drive to school parking lots to access university wi-fi in order to complete coursework.<sup>64</sup> These challenges can be even more daunting for students in rural areas, who already face a host of other unique issues throughout their higher education journeys. We urge these Committees and Congress to explore 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.

### *Effective and Empowering Governance*

Effective and empowering government is key to student veterans' success. We encourage Congress and other leaders to adopt a healthy, positive narrative when addressing issues on behalf of our veterans. SVA also asks that Congress continue to focus on improving governance structures by updating systems, refining processes, and prioritizing inter-agency coordination to better serve our student veterans.

<sup>61</sup> See generally TERRY BRIDGET LONG, THE HAMILTON PROJECT, HELPING WOMEN TO SUCCEED IN HIGHER EDUCATION: SUPPORTING STUDENT-PARENTS WITH CHILD CARE (Oct. 2017), available at [http://www.hamiltonproject.org/assets/files/higher\\_education\\_student\\_parents\\_womenLong.pdf](http://www.hamiltonproject.org/assets/files/higher_education_student_parents_womenLong.pdf).

<sup>62</sup> See generally *Ram Kidz Village*, COLORADO STATE UNIVERSITY, <https://alvs.colostate.edu/student-parent/rkv/> (last visited Feb. 24, 2021).

<sup>63</sup> Stephanie Colombini, *'It's Been A Nightmare': Student Veterans Face Unique Challenges With Online College Classes*, THE AMERICAN HOMEFRONT PROJECT (April 23, 2020), <https://americanhomefront.wunc.org/post/its-been-nightmare-student-veterans-face-unique-challenges-online-college-classes>.

<sup>64</sup> Colleen Flaherty, *Reserved: Internet Parking*, INSIDE HIGHER ED (May 8, 2020), <https://www.insidehighered.com/news/2020/05/08/parking-lot-wi-fi-way-life-many-students>.

1. *Encourage Congress and policy leaders to use language focused on empowerment of veterans.*

It is important to be cognizant of the power our words hold. As we are all more aware than ever before, our voices do not disappear into the ether or lost to the vacuum of space. They are heard, internalized, and shape how we, collectively, understand our world. Thus, it is imperative for our leaders to articulate themselves as clearly as possible. Failing to do so leads to far-reaching consequences, even if unintended.

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

Our research, and that of others, tells a different story. It tells the story of the veteran as an asset. An asset to their community, to their school, to the nation. We need our leaders to emphasize positive language regarding veterans, and to take up the mantle of reshaping the veteran narrative to one of post-service growth.

2. *Reform VA debt collection procedures to help students better understand when and what they owe.*

It has been the practice that once VA has determined a veteran owes a debt, the relevant Regional Office (RO) and Debt Management Center (DMC) sends out two separate collection notices to inform the veteran of the debt and their repayment options. These two letters are sent at different times, and contain overlapping, but distinct information that only paint the full picture of the debt when considered together. Compounding this concern is the seeming lack of clarity around the options available to veterans to dispute, appeal, or waive the debt once notified.

Importantly, unless these processes are initiated within 30 days, the debt collection process will not stop, taking up to the entire monthly benefit of a veteran. We applaud VA’s recent efforts to simplify the process for veterans so they can more easily check their debts and find information on the options available to them through the agency’s new “Manage your VA Debt” webpage.<sup>65</sup> We also commend DMC for their efforts during the pandemic to provide veterans with flexibility in managing their debts during this challenging time, and more recently, for their focus on better communicating the nature of this relief to affected veterans.

DMC has made notable improvements, but SVA remains concerned about the issues mentioned above, and we will continue to monitor and provide input on DMC’s ongoing efforts to improve their processes. We encourage the members of these Committees to work with VA to build on the agency’s recent improvements by exploring how the debt collection process can be further streamlined.

3. *Support more efficient communication and coordination between the Department of Defense, Department of Education, and VA through the establishment of interagency task forces, opportunities for stakeholder representation, and an inter-departmental liaison role.*

Student veterans, service members, their families, and survivors benefit from a broad spectrum of benefits and policies across multiple government agencies. However, a lack of communication and coordination between these agencies creates friction in policy that can ultimately have a negative impact on these students. One reason for this is that there is no robust, collaborative effort between the three agencies dedicated specifically to the educational experience of student veterans, service members, and their family members.

Last year, the pandemic illuminated how this friction is created and the potential disruption it can cause in the

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<sup>65</sup> *Manage your VA Debt*, U.S. DEPARTMENT OF VETERANS AFFAIRS (Feb. 24, 2021), <https://www.va.gov/manage-va-debt/>.

lives of student veterans. As ED implemented the student relief provisions in the CARES Act, the agency disseminated guidance dictating how students could qualify for emergency aid grants. ED stipulated that students must demonstrate their eligibility for Title IV funds to receive the grants and suggested that schools use students' Free Application for Federal Student Aid (FAFSA) to verify eligibility.

This concerned student organizations and VSOs, including SVA, because many student veterans do not complete FAFSA since they use other federal education benefits like the GI Bill to pay for their educations.<sup>66</sup> This meant these students were required to take additional steps to verify their eligibility, which included searching out institutional-specific application processes, completing aid application forms, and waiting for confirmation of eligibility, all before they received this aid.

We encourage these Committees to explore ways to eliminate these kinds of friction points by increasing collaboration between the agencies. Student veteran concerns must be part of the ongoing conversation – instead of merely afterthoughts as new policies are considered, drafted, and implemented. To this end, we urge these Committees to consider options including creation of new interagency task forces, opportunities for stakeholder representation, and an inter-departmental liaison position.

As part of this process, it is also important for Congress and these agencies to continue improving the coordinated collection, sharing, and public dissemination of relevant data on student veterans, service members, their family members, and survivors. The benefits of prioritizing this kind of interagency collaboration are limitless and will have an immediate impact on these students. Among other things, such collaboration would allow these agencies to swiftly identify and respond, preemptively and reactively, to a wide range of issues impacting these students, such as:

- Complicating factors in seemingly unrelated laws or guidance;
- Best practices for administering similar systems, such as those for benefit payments;
- New trends in higher education and their potential impact on these students and their benefits;
- Concerning trends in data that highlight unmet needs;
- How ever-evolving DoD mobilization codes continue to impact access to education benefits;
- Needs created by the pressures of mid-term activations of student service members; and
- Ways to polish recent improvements to the Transition Assistance Program.

We welcome the opportunity to work with these Committees, VA, ED, and DoD, to improve interagency communication and coordination with the shared goal of ensuring the voice of military-affiliated students is an integral part of these agencies' collaborative efforts.

○

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. 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." The President of the University of Chicago, a World War I veteran himself, argued, "Colleges and universities will find themselves

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<sup>66</sup> See Letter from Student Veterans of America and Veterans Education Success to Secretary DeVos (May 19, 2020), VETERANS EDUCATION SUCCESS, <https://vetsedsuccess.org/wp-content/uploads/2020/05/Letter-to-ED-re-CARES-Guidance.pdf>.

converted into educational hobo jungles.” Well in 1948, just four years after their original opposition, there was widespread retraction, with Harvard’s president stating, “for seriousness, perceptiveness, steadiness, and all other undergraduate virtues,” the veterans of World War II were “the best in Harvard’s history.”

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

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