



June 16, 2017

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STATEMENT FOR THE  
UNITED STATES SENATE  
COMMITTEE ON VETERANS' AFFAIRS**

**ON BEHALF OF:**

**The National Association of College and University Business Officers**

The National Association of College and University Business Officers (NACUBO) respectfully submits this statement to the Senate Committee on Veterans' Affairs for the hearing on "Pending Legislation" held on June 15, 2017.

NACUBO represents the chief business and financial officers at more than 2,100 public and private nonprofit colleges and universities and higher education providers with the goal of advancing the economic viability and business practices of higher education institutions to support the fulfillment of their academic missions.

As Congress moves to pass legislation aimed at improving the lives of the veterans who have served our country, NACUBO appreciates this opportunity to express thanks for several of the higher education-related provisions in the Committee's GI Bill Discussion Draft as well as to share questions and concerns on several sections of the draft.

**Sec. 11 "Treatment For Purposes of Educational Assistance Administered by the Secretary of Veterans Affairs, of Educational Courses that Begin Seven or Fewer Days Before or After the First Day of an Academic Term."**

NACUBO applauds the Committee for taking up this important issue. This change will allow student financial aid administrators the flexibility needed to match aid to the accurate amount of courses a student is registered for in a given term and will allow student veterans to receive aid in a timely manner that most accurately reflects their course loads.

As more is learned about what it takes to help the student veteran population succeed in higher education with the goal of degree completion, NACUBO urges the Committee to also consider the definition of a term as a whole under Department of Veterans Affairs (VA) Rule 38 CFR 21.4131. This rule, which is not in line with the Department of Education rules defining academic terms, does not allow student veterans engaged in modular coursework—courses designed to take place at rapid pace over three to four weeks—to receive aid for full-time course loads for an academic term, despite the fact that modular courses allow the same amount of credit completion during an academic term as a traditional academic schedule. A student veteran might take four back-to-back modular classes of three weeks each, earning three credits each class, for a total of twelve total credits over a twelve-week academic term, the same amount of credits most traditional students would earn in the same time period. However, because three of the four classes would begin more than seven days after the traditional start of the academic term, the VA would not consider the student full-time for aid purposes.

Modular classes offer a more concentrated approach to learning that many student veterans prefer and offer flexibility to students managing familial and other obligations outside of their academic careers. In order to better support student veterans in their goal of degree completion, NACUBO urges the Committee to take this issue into account when addressing the issue of terms in this legislation.

**Sec. 12 “Improvement of Information Technology of the Veterans Benefits Administration.”**

College and university administrators and student veterans alike often express frustration with the information technology (IT) infrastructure that exists for the VA, in that the technology is often outdated, not user friendly, and does little to allow higher education officials and students to manage, disburse, and receive VA educational assistance in an efficient and well-organized way. NACUBO commends the Committee for recognizing this flaw within the Agency and is appreciative of the Committee’s attempts to fix it.

NACUBO encourages Congress to add language to the legislation that would require the VA to devote some of the \$30,000,000 allocation for IT updates for the period of fiscal years 2018 through 2019 to develop a system within the VA that would allow colleges and universities to upload flat data files to the VA on multiple veterans at a time for certification purposes. The system as currently exists allows only for the upload of data concerning a single student veteran at a time, which imposes significant time and resource burdens on School Certifying Officials (SCOs) and increases the likelihood for error in claims processing. A system designed to allow for batch uploads of data files would enable financial aid offices to serve student veterans more efficiently and reduce gap time for student veterans waiting to receive their educational assistance.

NACUBO also urges Congress to add language to this legislation that would encourage the VA to earmark a portion of these IT update funds for building a better electronic system for communicating with student veterans, colleges, and universities more efficiently. The quality of communication between the VA and institutions serving student veterans is often hampered by slow and incomplete access to information that should be readily available online. For instance, the VA has a system of mailing hard copies of reports on payments made for student veterans to institutions. This system is slow, has much room for error in mail delivery, and often causes difficulty for students and financial aid offices alike. A shift to online delivery would greatly improve this issue.

Additionally, Congress should ask the VA to take this opportunity of IT revamp to improve its means of transmitting policy directives, reminders, instructions, and other important information for colleges and universities by updating its website pages more frequently, making them more user friendly, and potentially creating a specialized RSS feed for financial aid personnel so student aid administrators across the country would receive uniform guidance in a timely manner.

**Sec. 13 “Provision of Information Regarding Entitlement of Veterans to Educational Assistance.”**

In order to best counsel a student veteran on the most efficient and cost-effective way to structure their higher education, it is imperative that colleges and universities know exactly how much educational assistance the VA has determined that student is entitled to at any given time. This provision, particularly with the requirement of delivery of information through an IT system, will greatly increase the ability of colleges and universities to assist student veterans in making the best choices for their academic careers. NACUBO commends the Committee for including it in the discussion draft and urges it to be retained in final legislation.

**Sec. 15 “Limitation on Use of Reporting Fees Payable to Educational Institutions and Joint Apprenticeship Training Committees.”**

The current two-tiered structure for reporting fees payable to institutions serving student veterans is unnecessarily complex and does not accurately reflect the level of administrative time and burden required by student financial aid offices in reporting on their veteran students. The shift in this provision to a single reporting fee is clear and at a level that acknowledges the effort expended by colleges and universities as they go through the required steps to serve these students. NACUBO applauds the Committee for the changes proposed in this provision of the discussion draft and would like to see it remain in the final legislation.

NACUBO appreciates the opportunity to weigh in on this discussion draft and welcomes further conversation with the Committee and its staff on these issues.

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