

Faith DesLauriers, Legislative Director, National Association for Veterans' Program Administrators

Statement of
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On behalf of the National Association for Veterans' Program Administrators

United States Senate
Committee on Veterans' Affairs

April 21, 2010

Chairman Akaka, ranking member Burr and Members of the Committee. NAVPA appreciates the opportunity to share the experiences of our membership as it relates to the issues we have encountered as Veterans' Program Administrators on college and university campuses, as well as the shared concerns of the population we serve.

I think it important to note that the membership I represent here today are the people who have the most contact with individuals eligible to train under this new GI Bill. Veterans' Program Administrators, often referred to as Certifying Officials are the face of the GI Bills and are working untold hours to assist in the administration of this program and to maintain compliance with the rules governing all veterans' education programs. It is not business as usual. The program complexities, counseling, fiscal and reconciliation responsibilities associated with this program have increased the processing time for each claim approximately 300%.

Rules, Guidelines, and Communication:

Written policies and procedures need to be documented by VA, shared efficiently and consistently throughout their administrative structure, and disseminated quickly to institutions for implementation. As of early April, the VA's processing manual M22-4 does not include rules for the administration of the Post-9/11 GI Bill.

Some states and some RPOs issue policy advisories that are never duplicated in other regions. This creates different procedures among various parts of the country leading to veterans receiving different benefits based on where they attend and what instruction – if any – has been received by their school.

Some policy advisories and information forwarded to schools contradicts what we read in 38CFR. Non-duplication of federal benefits and overseas study are two examples that come immediately to mind. Guidance for veterans who need to dispute a debt is not clear. Instructions received from various VA sources indicate students should write to either the Debt Management Center or the RPO, or both. There does not seem to be a clearly articulated process even for this most critical situation.

VA Processing and Procedures

As of this writing we are advised that the VA remains unable to credit returned payments to veterans' accounts, pending General Counsel guidance. When tuition and fee payments (which are paid to the school on the students' behalf) are confirmed by VA to be a duplicate payment or grossly erroneous; schools are instructed to return the funds

to VA. Schools are complying and confirming when the checks are cashed. However, the returned funds are not being credited to the veteran on whose behalf they were paid and returned. Consequently, a debt or overpayment is created on the veteran and future payments withheld from their living and book stipends to recoup the debt which does not exist; one which has already been satisfied by the school.

Tuition and fee payments for multiple enrollment periods are lumped into a single payment, with no clarifying information attached. Schools must calculate the expected award, often based on estimates because we are not privileged to the eligibility tier on which the payment is based, and the student is otherwise eligible. It is very difficult for schools to reconcile lump sum payments and accurately post the funds to the appropriate enrollment periods.

The web based certification tool (VA-ONCE) should allow the school to switch a student from Chapter 33 to Chapter 33 Yellow (i.e. Yellow Ribbon) without duplicating certifications. School should be able to put zero in Yellow Ribbon block rather than moving the student record back to a regular Ch 33 program once the annual maximum contribution has been matched.

Inconsistent guidance and practices exist regarding how and when a Chapter 30 recipient should apply for their irrevocable conversion to Chapter 33 to maximize their entitlement. The procedures for determining the effective date of the conversion are not consistent. This process can put veterans in the position of losing up to 12 months of benefit if not done exactly right – Clarification of an equitable solution is critical.

The majority of educational institutions are deferring tuition and fees (in the amount due from the VA) for students who are, or appear to be eligible for the Post-9/11 GI Bill. However, these students came to college campuses with the understanding, a promise if you will that they would receive a monthly living allowance to supplement or in some cases cover living expenses. The current system of certification (one term at a time) will and has delayed monthly living stipend payments.

The living stipend/housing allowance under the Post 9/11 GI Bill should not be tied to the certification of tuition and fees. The Post-9/11 GI Bill requires that schools certify one term/semester at a time in order that actual tuition and fees be reported, rather than estimated. NAVPA maintains that the VA should create a mechanism that would allow schools to report "anticipated enrollment" data, sufficient to determine the students' rate of pursuit (training time) in order that the book and housing stipends are processed prior to the start of the term and paid throughout the certified period of enrollment, without interruption.

We further recommend that the actual tuition and fees charged to the student be reported at the end of the schools published drop/add. This change in processing could sharply reduce the number of changes in reported charges due to drop/add activity which now creates very large

numbers of overpayments to students. In addition, this would potentially reduce the number of actions required of VA claims examiners and school officials, on average, fifty percent (50%).

Payment of tuition and fees must be made to the school in a timely manner. The VA defines timely as 30 days from the occurrence. Education institutions will continue to work with the men and women who serve our country and appreciate the VBA's position; but, there should not be an expectation that schools will carry account balances indefinitely, or that they will continue to defer payments without verification of entitlement (Certificate of Eligibility). In keeping, some claims such as Yellow Ribbon cannot be processed until the school can verify that the student is eligible at the 100% tier, making the Certificate of Eligibility key to timely and accurate processing.

Educational Veterans' Office Processes and Roles

In order to reconcile CH 33 payments to schools, institutional officials have had to create internal processes that duplicate much of the VA's function. We must make a preliminary determination of eligibility, estimate tuition, fees and Yellow Ribbon awards, track payments on each student's account and reconcile the payments to insure the amounts paid on their behalf are accurate. If the student payment does not appear to be the full amount the school must coordinate that correction with the VA. Overpayments, to include duplicate payments must be returned to the VA by some means that is not consistent from one Region to another. Some schools have had to continue the practice of loaning institutional funds to students in situations described herein until VA can audit their account and correctly calculate the student debt, if any.

Assisting students with collecting the information they need to dispute a debt with VA takes an inordinate amount of time and concentration by the school administrator and combines expertise in enrollment certification/reporting, VA claims processing, and good accounting principles. Schools have created a wide range of new internal processes and mechanisms to track Chapter 33 claims in an effort to ensure payments are correct and that student financial records with the school are not negatively impacted while VA processing occurs.

Schools have created new policies to ensure students are not negatively impacted by any delays in receipt of tuition and fee payments by VA – not as great an issue now as this was in fall 2009, but still in effect. As the only face-to-face contact point in the process, schools have devoted a great deal of time and energy to working directly with students who are trying to evaluate their options when eligible for multiple GI Bill programs. While there is a great deal of general information available on the GI Bill website, this is such an individual situation that the process must take into consideration many state programs, reserve component benefits, etc, that students require one-on-one assistance on each of their unique circumstances. This has been done by schools with little training beyond possible attendance at a single conference or full comprehension of the DVA 38 CFR Part 21 Post-9/11 GI Bill; Final Rules.

The crucial role of school officials in the education benefits process could be better reflected in the wording used in VA publications and websites to ensure students recognize the need to seek out their School Certifying Official as soon as possible. Schools are also working to create processes by which student veterans are identified and communicated with as early in the

admissions/matriculation process as possible to ensure they know the steps still remaining to be accomplished in order to receive their education benefits.

Veterans' Program Administrators/School Certifying Officials are now more involved in working with parents of students with the advent of transferred entitlement. This adds another new dimension to their work. The skills now required to accomplish their tasks overlap institutional areas including registrar, financial aid, admissions, academic advising, and student accounting and disability services. These are separate and distinct administrative functions in most schools. Veterans' Program Administrators must now more than ever, receive institutional training in all these areas or have staff members assigned in each area to accomplish the required analysis for each GI Bill student.

It has also been suggested by veterans' organizations that colleges and universities are or should serve as social service agencies; trained in identifying mental health issues for student veterans as well as be able to provide other support services and programming on campuses. These skills are well beyond the scope of responsibilities of the average Veterans' Program Administrator as the position is currently viewed on most campuses.

Providing intensive social support services are beyond the scope of the purpose, funding and function of our institutions and its staff. The limited resources available on most campuses are strictly designed to promote the well being of students with the goal of increasing students' academic success. Students in need of more intensive services must look to the community for support services and it is our responsibility as academic professional to assist students to more easily access those local, state, federal and private agencies who can best meet their needs. It is the responsibility of the Department of Veterans' Affairs to make these resources known to all institutions approved for veteran training.

NAVPA recommends that the Department of Veterans Affairs develop an Education Web Portal for easy and accurate access to VA Records pertaining to Veterans' Education Benefits. Veteran students do not have an electronic means of accessing meaningful and useful information from the Department of Veterans' Affairs on their education benefits, usage and remaining entitlement from their VA records. Educational institutions are overwhelmed with the volume of calls, misinformation from the VA Call Center and limited ability to assist students in determining the status of their claims or even eligibility. Above all, eligible individuals/students should have access to their VA records. All information relative to their VA education benefits, eligibility, applications, enrollment certifications and payments should be made available to them through this portal. Information should include at minimum information sent to the veteran via the US mails at the beginning and throughout each academic year as contained in the 'Award letter and now the Certificate of Eligibility under the Post-9/11 GI Bill.

Designated school officials should have secure access to the portal for veteran students so they may provide counseling and assistance. VA-ONCE and WAVE have partially covered these issues; however, all information is still not available. Veterans should be able to view all pending issues to include receipt of documentation and current status, reasons for any delays in processing should also be addressed on this WEB portal.

We believe the implementation of a secure web portal will enhance service to veterans, bring efficiencies to the DVA with a corresponding reduction in telephone service personnel. The efficiencies in personnel utilizations realized would benefit processing time. This concept is needed now more than ever with the extreme delays in processing claims and the complexities of the Post-9/11 GI Bill.

In closing, NAVPA requests that the rules, policies and procedures governing the administration of the Post-9/11 GI Bill be made consistent, nationwide. Due to the complexities of this program schools are currently working with limited to non-existent information. Often what little they have was received through informal channels outside their state and RPO areas of responsibility. It is imperative that VA create policies consistent with the published final rules, document them thoroughly, and distribute them consistently at all levels from VA Central Office through RPOs and ELRs down to the institutions that must implement them. Only then can every veteran be assured of receiving the same benefit consideration no matter what school, state, or RPO is responsible for the processing of their claim.

Again, thank you for the opportunity to share our experiences as professional GI Bill administrators, to make recommendations for improvements in the administration of the GI Bills and for your support of meaningful legislation that would provide equity in all aspects of the delivery and simplicity of administration of the Post-9/11 GI Bill. I would be pleased to answer any questions you may have.

Respectfully submitted.