

May 16, 2017

The Honorable Johnny Isakson  
Chairman  
U.S. Senate Committee on Veterans' Affairs  
SR-412 Russell Senate Office Building  
Washington, DC 20510-6375

The Honorable Jon Tester  
Ranking Member  
U.S. Senate Committee on Veterans' Affairs  
SR-412 Russell Senate Office Building  
Washington, DC 20510-6375

Dear Chairman Isakson and Ranking Member Tester:

Thank you for the invitation to submit comments on legislation being considered during your May 17 hearing, specifically the Veterans Education Priority Enrollment Act of 2017 (S.764). On behalf of the higher education associations listed below, representing two- and four-year, public and private, nonprofit colleges and universities, I am pleased to provide the following comments.

S. 764 requires that if an institution has a priority course enrollment system, the institution must allow veterans to enroll in classes at "the earliest possible time" permitted under that system. Failure to provide priority enrollment for veterans and others using VA education benefits would result in the institution losing its eligibility to participate in the Post-9/11 GI Bill.

We support the intent of the legislation, which is to help veterans complete their degrees in a timely manner while using their Post-9/11 benefits. However, although some institutions and states have adopted veteran-priority registration policies, we are unaware of any evidence documenting a widespread problem that would warrant this type of federal mandate.

Colleges and universities serve a range of diverse student populations, many of whom are priorities for the nation and the federal government, including veterans. Others include students with disabilities, first-generation students, underserved populations, students who are near completion or who need a particular course sequencing to complete or stay on track to on-time completion. Many campuses provide priority registration to juniors or seniors, or students needing a particular course for their major. However, under the bill, an institution would be required to provide the same priority status to a freshman student veteran as a senior who needs one class to graduate. Colleges need to maintain flexibility in enrollment and registration policies to balance these priority student populations.

In addition, it is unclear how the bill's requirements would interact with existing campus registration policies, which vary significantly. The bill assumes that all colleges and universities have tiered systems, where students register at different times according to different criteria. But this is not always the case. For example, if an institution allows all students to register at the same time but gives a preference to those needing courses for their major, would the bill's requirements be fulfilled since veterans were able to register "at the earliest possible time" even though they received no special priority?

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Colleges and universities are committed to helping veterans succeed in meeting their higher education goals. Institutions have implemented a number of strategies to support veterans tailored to meet the needs of their specific campuses and student populations. While some campuses have implemented veteran-priority registration policies, this may not be the best strategy for every campus.

We strongly support efforts to help veterans succeed. We recommend reframing the bill to encourage institutions to consider implementing priority policies rather than mandating them and allow institutions the flexibility to find solutions that work best for their campuses. We believe this change would go a long way toward addressing our concerns. It also has the added benefit of ensuring that the bill would not conflict with existing state laws on the subject.

Thank you for your work to support student veterans. We welcome the opportunity to work with you as the legislation moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Molly C. Broad". The signature is fluid and cursive, with the first name "Molly" and last name "Broad" clearly distinguishable.

Molly Corbett Broad  
President

On behalf of:

American Association of Collegiate Registrars and Admissions Officers  
American Association of Community Colleges  
American Association of State Colleges and Universities  
American Council on Education  
Association of American Universities  
Association of Public and Land-grant Universities  
Hispanic Association of Colleges and Universities  
National Association of College and University Business Officers  
National Association of Independent Colleges and Universities

MCB/ldw