



**TESTIMONY OF
STUDENT VETERANS OF AMERICA**

BEFORE THE

COMMITTEE ON VETERANS' AFFAIRS

U.S. SENATE

HEARING ON THE TOPIC OF:

**“SUCCESS AFTER SERVICE: IMPROVING VETERANS’ EMPLOYMENT, EDUCATION,
AND HOME LOAN OPPORTUNITIES”**

October 27, 2021



Chairman Tester, Ranking Member Moran, and Members of the Committee: Thank you for inviting Student Veterans of America (SVA) to submit testimony on improving veterans' employment and education benefits. With a mission focused on empowering student veterans, SVA is committed to providing an educational experience that goes beyond the classroom.

Through a dedicated network of 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.

Extension of temporary COVID protections and technical corrections to recent legislation

Last year, SVA led the push to establish emergency protections for student veterans, service members, their families, and survivors who were at risk of being harmed by abrupt education changes caused by the pandemic. Thanks to Congress, especially those on this Committee, a host of protections were rapidly passed into law to protect millions of students from nightmare scenarios that would have negatively impacted their education benefits.¹ However, those protections are set to expire in December. The persistence of COVID-19 cases and hospitalizations, as well as the understated threat of yet another surge in the coming colder months, reminds us of the need to remain vigilant and preserve the protections and flexibilities this Committee worked so hard to create.² This reality is reinforced by our own first-hand accounts from schools and students about the need to remain online for the foreseeable future and the value to schools of being able to flexibly adapt to changing circumstances.

SVA thanks this Committee and its staff for their hard work over the past year in ensuring student veterans and schools have what they need to succeed. The sheer amount of work involved cannot be overstated and we're grateful for your tireless efforts. As you consider extending the temporary protections, we urge the Committee to include a few necessary adjustments to preserve the intent behind recent legislation, such as the Isakson-Roe and THRIVE Acts, and protect the broader higher education community, to include student veterans, from some of its unintended consequences. Our list of immediate needs:

An extension of the temporary protections until the end of next term. Recent downturns in COVID-19 cases and hospitalizations have been positive signs, but we have already seen how the ebb of COVID-19 cases and the urge to return to our normal lives leads to an increased flow of cases and hospitalizations. While we all hope that this is truly the tail end of an awful two years, hope is not certainty. Students are registering for the coming term as we speak and only the temporary protections provide the stability necessary to prevent yet another school year from being called into question.

A legislative solution to recent Rounding Out rule changes at VA. As we shared in letter to this Committee in September, we are glad that VA decided to preserve their Rounding Out policy for students in their final academic term. However, as the rule was narrowed dramatically to comply with the underlying statute, we believe many student veterans are still at risk of losing a large portion of their Monthly Housing Allowance (MHA) in the coming term. To avoid causing undue financial stress to student veterans about to graduate, we urge this Committee to include the Rounding Out legislative fix found in either H.R. 2878 - Native VetSuccess at Tribal Colleges and Universities Pilot Program Act or H.R. 5509, the Student Veteran

¹ Leo Shane III, *Lawmakers pass second emergency package to protect student veterans from coronavirus losses*, MILITARY TIMES (April 21, 2020), <https://www.militarytimes.com/education-transition/2020/04/21/lawmakers-pass-second-emergency-package-to-protect-student-veterans-from-coronavirus-losses/>.

² Emily Anthes, New York Times. 'Lurching Between Crisis and Complacency': Was This Our Last Covid Surge? <<https://www.nytimes.com/2021/10/14/health/coronavirus-delta-surge.html>>

COVID-19 Protection Act of 2021.^{3,4}

Revise the incentive compensation ban to match the Department of Education's (ED) long-standing guidance on the practice. An unintended consequence of the recent bills, VA now requires a strict ban on all incentive compensation practices by schools in order to stay eligible for title 38 funds. However, specific instances are allowed by ED, including the use of incentive compensation in the recruitment of international students. Since these students are valuable members of the on-campus community, and often pay full tuition and fees, they are an important addition to any school's student body and financial health. This uneven prohibition potentially presents schools with a question: If necessary, would you rather admit international students or student veterans? SVA does not believe this situation is necessary and we urge this Committee to ensure ED and VA guidance on this issue match.

Allow schools that substantially comply with ED's College Financial Planning (CFP) template to meet the Sec. 1018 requirements from Isakson-Roe. Section 1018 in Isakson-Roe compels schools to provide an extensive list of information requirements to prospective students. In general, SVA is supportive of these changes and are glad to see such information made widely available. However, due to the depth and breadth of the requirements many schools, both foreign and domestic, have expressed concerns about being able to access and provide some of them. SVA would like to see schools provided with a reasonable flexibility in providing such information, particularly in light of VA's lack of guidance on what exactly constitutes compliance with the new standards. We have heard that VA and ED are working together to develop a more comprehensive CFP for schools, one we hope will allow institutions to more easily satisfy all relevant statutory disclosures.

Address privacy law concerns for foreign schools. SVA has heard from numerous international schools and student veterans that recent legislation, and its subsequent review by VA, have led to intractable compliance issues, leaving students unable to attend the school of their choice and schools no recourse but to withdraw from title 38. In particular, international schools have objected to the requirement that they provide non-VA student information to VA, at VA's behest, as the agency seeks to confirm that VA students are not being charged a different rate for tuition, fees, or licensure tests. These requirements conflict with many countries' privacy and information disclosure laws, and so the schools' hands are tied to the detriment of the students who would otherwise attend. We urge this Committee to address this issue immediately and prevent a large-scale withdrawal of students and disapproval of international institutions.

While work on more permanent solutions continues, we ask this Committee to take up and pass these necessary refinements and give all involved enough time to thoughtfully consider and prepare for what comes next.

Permanently codify current emergency protection authority to ensure VA can protect student veterans during emergencies

For years, student veterans have encountered challenges with education benefits during times of unexpected hardship—often due to natural disasters like the recent Hurricane Ida.⁵ The pandemic exposed the true scale of these challenges and the numerous gaps in VA's legal authority that prevent the agency from protecting students and their benefits in emergency situations. SVA believes that Congress should provide VA the authority to be proactive in their efforts to protect student veterans.

³ Congress.gov, H.R. 2878 – Native VetSuccess at Tribal Colleges and Universities Pilot Program Act. <<https://www.congress.gov/bill/117th-congress/house-bill/2878/text>.

⁴ Congress.gov, H.R. 5509 – The Student Veteran COVID-19 Protection Act of 2021. <<https://www.congress.gov/bill/117th-congress/house-bill/5509/text>>

⁵ See *generally Natural Disaster Map*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/government-affairs/natural-disaster-map/>.

Earlier this year, the House passed the *GI Bill NEED Act*, which would pause delimiting dates to ensure veterans' benefits do not expire if a school closes due to an emergency.⁶ We appreciate the House's work on that bill and the bill sponsors' leadership on the issue, and we urge this Committee to take up and pass this bill as soon as possible. However, it is important to note that this bill represents only a fraction of the protections passed last year and covers only a portion of the overall student veteran population.

We hope to see Congress continue to codify the remaining emergency protections and flexibilities created over the last 18 months. The stabilizing authorities created should be available without major acts of Congress in the future. This Committee has an opportunity to build on its incredible work last year in stewarding these landmark protections into law by ensuring VA has the authority to call on them when future emergencies and disasters impact student veterans.

The future-state of VA education benefits

Looking forward, we are committed to the next phase of thinking about the GI Bill and elevating the voices of student veterans and their everyday needs. The majority of our policy priorities come from direct interactions with student veterans each year during our Regional Summits, Leadership Institute, Washington Week, and National Conference. Based on what we have already 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 programs.^{5,6} This means a seamless GI Bill process is key to establishing trust and confidence in the agency with every veteran they serve. Much like the Veterans Health Administration's (VHA's) 'Whole Health' concept for treating the entirety of a veteran, SVA advocates for a 'Whole Benefits' approach to modernizing VA Education Services. In other words, instead of looking at just how to improve the benefit itself, the entire ecosystem surrounding it, from IT infrastructure, to call center quality and customer service, to measuring the outcomes of these programs, must be reviewed, improved, and executed with the excellence our nation's veterans deserve.

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.⁷ SVA commends this Committee 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. In addition, strong oversight of this years-long process must be maintained as neither we nor student veterans can afford for it to falter.

In order to determine where to look for improvements to the future state of veterans' education and employment benefits, a full review of how the pandemic impacted many of the programs related to the safety, economic prosperity, and well-being of our nation's veterans is necessary.

Review student veterans' access to child-care and better integrate it into post-traditional student supports. As recently as last year, more than 50 percent of student veterans reported having children.⁸ By comparison, traditional students report having dependent children at a roughly twenty percent rate.⁹ It is no surprise, then, that the availability and affordability of childcare are top areas of concern for student veterans.

⁶ Rep. Sherrill sponsored GI Bill need act passes house. (2021, May 18). Representative Mikie Sherrill. <https://sherrill.house.gov/media/press-releases/rep-sherrill-sponsored-gi-bill-need-act-passes-house>.

⁷ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. J, Title V, § 515

⁸ The 2020 SVA Census Survey: Student Veteran General Breakdowns, STUDENT VETERANS OF AMERICA 5-6 (January 2021), <https://studentveterans.org/wp-content/uploads/2021/04/SVA-Census-2020-Report.pdf>.

⁹ Gallup. *Gallup State of the Student Experience: Fall 2020 Report*. <<https://www.gallup.com/education/327485/state-of-the-student-experience-fall-2020.aspx>>

With childcare costs comprising about 10 percent of an average family's income, and presumably more for single parents, financial pressures can compound more quickly for these students.¹⁰ These pressures have predictable outcomes: twenty-four percent of students pursuing bachelor's degrees reported that they have considered stopping taking courses in the latter half of 2020 due to childcare or caregiver responsibilities.¹¹ This number rises to thirty-two percent for those students pursuing associate degrees.¹²

According to the Center for Community College Student Engagement (CCCSE), twenty-two percent of parent students reported a lack of childcare made it difficult for them to complete their coursework.¹³ And, of those that manage to graduate, the Institute for Women's Policy Research (IWRP) reports that "[m]edian student parent debt is nearly 2.5 times higher than debt among students without children."¹⁴

The only federal program dedicated solely to providing childcare assistance for lower-income students in higher education is Child Care Access Means Parents in Schools, or CCAMPIS, but historical challenges with underfunding and available childcare providers, particularly in evening and weekend hours, limit its effectiveness.¹⁵ Other federal programs that provide childcare assistance, such as the Child Care Development Block Grant (CCDBG), have more difficult eligibility rules, thus limiting their effectiveness as a post-traditional student support pillar. Increased funding for CCAMPIS, and enhanced flexibility for CCDBG applicants, are two common-sense improvements SVA strongly supports.

Beyond increasing funding levels for existing programs, we also recommend Congress investigate how they might expand or create new programs modeled off the pilot programs established for childcare at VA medical facilities.¹⁶

Review whether the existing Monthly Housing Allowance (MHA) calculation is adequate and appropriate to meet the needs of today's students. Even before the pandemic, SVA would regularly hear from students that current MHA rates do not reflect the reality of their living situation. Whether it be the flat rate for overseas learners, rural rates falling below the local housing market, rates that do not serve students well during medical rotations, or the lack of payment for periods between academic terms, students have raised concerns about the efficacy of MHA and its disconnect from the needs of today's students.

It is important to remember that student veterans are post-traditional students that do not fit the mold of traditional students. They tend to carry greater responsibilities for dependents and lack the flexibility and support structures available to traditional students. We believe it is time to review MHA's fundamental assumptions with these realities in mind and determine whether adjusting the underlying model for the benefit is necessary to meet the needs of today's student veterans.

Distance learner rates. A recurring complaint throughout the pandemic has been the inequitable treatment of distance learner MHA rates compared to in-person MHA rates. While Congress responded

¹⁰ Rasheed Malik, Working Families Are Spending Big Money on Child Care, CENTER FOR AMERICAN PROGRESS (June 20, 2019), <https://cdn.americanprogress.org/content/uploads/2019/06/19074131/Working-Families-SpendingBRIEF.pdf> (citing U.S. CENSUS BUREAU 2014 SURVEY OF INCOME AND PROGRAM PARTICIPATION, WAVE 3 (2019),

<<https://www.census.gov/programssurveys/sipp/data/datasets/2014-panel/wave-3.html> (last visited Feb. 24, 2021)>

¹¹ Gallup. *Gallup State of the Student Experience: Fall 2020 Report*. <<https://www.gallup.com/education/327485/state-of-the-student-experience-fall-2020.aspx>>

¹² Id.

¹³ CCCSE. *The Impact of COVID-19 on Entering Students in Community Colleges*. Spring 2021.

<https://cccse.org/sites/default/files/SENSE_COVID.pdf>

¹⁴ Institute for Women's Policy Research. *The Student Parent Equity Imperative: Guidance for the Biden-Harris Administration*.

<https://iwpr.org/wp-content/uploads/2021/04/Student-Parent-Equity-Imperative_final.pdf>

¹⁵ See generally TERRY BRIDGET LONG, THE HAMILTON PROJECT, HELPING WOMEN TO SUCCEED IN HIGHER EDUCATION: SUPPORTING STUDENTPARENTS WITH CHILD CARE (Oct. 2017), available at

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

¹⁶ Department of Veterans Affairs, VA Launches Childcare Pilot, July 16, 2011. <<https://www.va.gov/opa/pressrel/pressrelease.cfm?id=2134>>

quickly to preserve MHA rates for students who were attending classes in-person but forced online, students who were enrolled solely in distance learning courses continued to receive an MHA rate that is half the national average. With more students learning online, regardless of course type, many student veterans see this difference as unfair or a punishment for their school or education choices.

SVA recognizes that the pandemic has shown this difference to be unreasonable. We believe now is that time to begin the discussion on how best to bring parity to these MHA rates while keeping online educational quality in mind.

Rural rates. We have heard reports over the years that MHA rates are not serving student veterans well in some rural areas with rates 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 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. And, while the Department of Defense (DoD) has disputed these claims, the issue has been a consistent drumbeat over the years from student veterans, so we want to reiterate it as an ongoing concern.

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

Veteran Readiness & Education (VR&E) and Chapter 33 subsistence rates. For years, student veterans have shared concerns about affording basic necessities while pursuing their VR&E individualized training and education plans, concerns echoed in a 2014 Government Accountability Office (GAO) report on VR&E which found that veterans may discontinue their plans before completion due to financial pressures.¹⁷ The fact that this issue exists is simply because VR&E has two different subsistence rates. One is the rate of 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.¹⁸ The maximum rate possible under this model requires a student to have two dependents and scarcely reaches the national average MHA under Ch. 33. Moving the subsistence rate to one rate reduces bureaucracy, eliminates confusion, encourages program utilization, and ensures greater fairness in benefits for veterans with service-connected disabilities.

To supplement this needed conversation, we need better data on these MHA concerns. SVA encourages this Committee to authorize a comprehensive study of these issues.

Broadband access for rural and low-income households. With higher education's rapid transition to online instruction in the wake of COVID-19, student access to affordable and reliable broadband internet is more important than ever. Schools across the country have increased their investment in online program infrastructure, so we can expect online learning to play an increasingly mainstream role in higher education, even well after the pandemic. It

¹⁷ 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>.

¹⁸ VR&E Subsistence Allowance Rates, U.S. DEPARTMENT OF VETERANS AFFAIRS, <https://www.benefits.va.gov/vocrehab/subsistence_allowance_rates.asp>

is concerning, then, that millions of Americans cannot either access or afford reliable broadband internet.

Because of issues with how broadband access data is collected, the number of Americans that lack access to broadband internet is unclear. Federal Communications Commission (FCC) data show between 14.5 million and 18 million Americans without broadband access, while other studies have found that this number is closer to 42 million.^{19,20} For veteran households, FCC states that 15 percent, or 2.2 million, lack either fixed or mobile broadband connections, with price and location described as top barriers to adoption.²¹ For student veterans, over half of whom are parents themselves, the consequences of living without broadband internet exist for themselves and their dependents.

A recent Pew Research Center survey found that roughly a quarter of the population does not have a broadband internet connection at home.²² Pre-pandemic, students in these disconnected homes fell into what is called the “Homework Gap”, where the lack of an adequate internet connection prevented them from being able to complete their homework and contributed to lower rates of academic success. Now, with school instruction increasingly delivered online, these students also cannot attend virtual classes or complete coursework, further heightening their risk of falling behind academically. Without other options, students have increasingly begun to sit outside their schools, local libraries, or coffee shops to connect to free wireless internet and complete their schoolwork, a practice FCC Acting Chairwoman Jessica Rosenworcel has called “Parking Lot Wi-Fi.”²³

Beyond the harm done to students, the consequences of not improving broadband access are obvious, broad, and far-reaching. Save the many ‘essential workers’ who do not have the luxury, our economy depends on employees being able to reliably work from home. Our healthcare system increasingly relies on telehealth medicine to safely provide physical and mental healthcare, functions important to all, but particularly so for rural veterans.²⁴ Millions of students, of all ages and backgrounds, are potentially being set further and further behind. The consequences are endless. In contrast, the potential positive outcomes are endless.

According to the Federal Reserve Bank of Richmond, bringing broadband infrastructure to rural areas is “linked to increased job and population growth, higher rates of new business formation and home values, and lower unemployment rates.”²⁵ They also note that “...the long run benefits of broadband access could grow exponentially, given the potential for innovation and productivity gains it provides.”^{26,27,28} In other words, broadband access is a fiber optic lifeline for rural and underserved communities, leveling the economic playing field and providing opportunity to all.

We applaud efforts like FCC’s Emergency Broadband Benefit Program, which provides a \$50 a month stipend to eligible families to subsidize internet connectivity, as well efforts to engage older programs, like E-rate and

¹⁹ Federal Communications Commission, 2020 Broadband Deployment Report. <<https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf>>

²⁰ BroadbandNow, BroadbandNow estimates availability for all 50 states; Confirms that more than 42 million Americans do not have access to broadband. <<https://broadbandnow.com/research/fcc-broadband-overreporting-by-state>>

²¹ The Federal Communications Commission, *Report on Promoting Broadband Internet Access Service for Veterans, May 2019*. Accessed July 20, 2020. <https://docs.fcc.gov/public/attachments/DOC-357270A1.pdf>

²² Pew Research Center. Mobile Technology and Home Broadband 2021. June 3, 2021. <<https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/>>

²³ Federal Communications Commission. 2020 Broadband Deployment Report. April 24, 2020. <<https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf>>

²⁴ Department of Veterans’ Affairs. “With TeleOncology, VA stands shoulder-to-shoulder with Veterans in rural areas to reduce disparities in cancer care.” July 16, 2021. <<https://blogs.va.gov/VAntage/91061/va-stands-shoulder-shoulder-veterans-rural-areas-reduce-disparities-cancer-care/>>

²⁵ Federal Reserve Bank of Richmond. Bringing Broadband to Rural America. December 2020.

<https://www.richmondfed.org/publications/community_development/community_scope/2020/comm_scope_vol8_no1#footnote2>

²⁶ Id.

²⁷ e Sa, Paul. 2017. “*Improving the Nation’s Digital Infrastructure*.” Office of Strategic Planning and Policy Analysis, Federal Communications Commission.

²⁸ Gallardo, Roberto, Brian Whitacre, Indraneel Kumar, and Sreedhar Upendram. 2020. “*Broadband Metrics and Job Productivity: A Look at County-Level Data*.” *Annals of Regional Science*. <https://doi.org/10.1007/s00168-020-01015-0>.

Lifeline, to better support remote learning.²⁹ However, these efforts also highlight a fundamental truth: how our country thinks about internet connectivity is outdated. Instead of retrofitting new initiatives onto decades-old ones, we need big, bold ideas. Ideas that recognize the truth that the internet is a *requirement* in order to participate in our economy, to achieve our higher education goals, to reach for the American Dream. Once a luxury, broadband internet access is now a necessity, and our country must react accordingly.

Student veterans' on-campus healthcare options should be expanded, with a particular focus on VA's Veterans Integration to Academic Leadership (VITAL) program. As shared in our recent testimony outlining our annual policy priorities before the Senate and House Veterans Affairs Committees, SVA is committed to viewing and advocating for the GI Bill as the front door to the Department of Veterans Affairs (VA).³⁰ This commitment is driven by VA's Journey of Veterans Map which highlights the GI Bill as one of the first interactions recently transitioned veterans will have with VA.³¹

Welcoming transitioning veterans into additional VA services is key to establishing trust and confidence in the agency that could last a lifetime. A critical part of establishing that trust and confidence during the transition period should also include ready and easy access to mental health care options, such as VA's VITAL program.

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

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

In addition, SVA would like to see VITAL program capabilities expanded on campuses across the country by incorporating telehealth pods like those located at Veterans of Foreign Wars and American Legion posts through VA's Accessing Telehealth at Local Area Stations (ATLAS) program.³³ Opening telehealth pods on campuses would increase not only student veteran access to telehealth care, but the surrounding communities' access, empowering veterans of all stripes to seek and receive the health care services they need.

Collect better data on student veterans. A common organizational management saying comes to mind: "If you can measure it, you can manage it." Central to our work as an organization is our commitment to seeking out data and willingly being led wherever it leads. Unfortunately, a recurring theme throughout the pandemic was how robust data on issues relevant to student veterans was often difficult, if not impossible, to find. Before we can manage many of the most urgent issues we hear from student veterans, we need better measurement of the problems. Some areas where we strongly encourage increased federal and institutional research:

Student loan debt. 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

²⁹ Federal Communications Commission. Emergency Broadband Benefit. <<https://www.fcc.gov/broadbandbenefit>>

³⁰ Student Veterans of America, Testimony before the Joint Committee on Veterans' Affairs, March 3, 2021. <<https://www.veterans.senate.gov/imo/media/doc/SVA%20Testimony%2003.03.21.pdf>>

³¹ Department of Veterans Affairs, Journey of Veterans Map. <<https://www.blogs.va.gov/VAntage/wp-content/uploads/2020/02/Veteran-Journey-Map.pdf>>

³² SVA public opinion survey data collected August 2020.

³³ Department of Veterans Affairs, VA and ATLAS. Accessed October 8th, 2021. <<https://connectedcare.va.gov/partners/atlas>>

national total surpassing \$1.7 trillion.³⁴ What is less understood is how student debt impacts student veterans specifically. SVA's annual census data confirm that at least some veterans graduate with student debt, but the scope of that data is limited.

Soon, the Pew Charitable Trusts will release the results of its nationwide survey on student loan debt held by veterans.³⁵ This 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 believe 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 beginning conversations on how to address it.

Food and housing insecurity. In December 2018, the GAO released a report on food and housing insecurity among college students.³⁶ After reviewing 31 separate studies, they concluded that “[n]one of these studies...constitute a representative study” of our nation’s students.³⁷ 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.³⁸ It is also important to note here that, while more data is always welcome, NPSAS data is limited in its coverage of student veterans because it requires the filing of a Federal Application for Federal Student Aid (FAFSA). Because many student veterans receive education assistance through their GI Bill, they often do not fill out FAFSA forms. This leaves datasets like NPSAS as incomplete due to under-sampling student veterans.

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.³⁹

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Recently, VA's National Center on Homelessness Among Veterans (NCHAV) published a study that “...revealed that four types of financial strain – debt, unemployment, lower income and financial crises – increase the risk of future homelessness.”⁴¹ In addition, the Department of Housing and Urban Development's (HUD) 2020 Annual Homeless Assessment Report to Congress (AHAR) found that approximately eight percent, or 37,252, of homeless adults were veterans, an increase over 2019.⁴²

While the data above applies to veterans broadly, student veterans, especially those with dependents, are facing ever-increasing financial burdens due to the pandemic. Without more support, the risk of more student veterans and their families facing homelessness or other basic necessity insecurity grows higher.

³⁴ 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)

³⁵ Pew Charitable Trusts, Veteran Student Loan Debt Draws New Attention <<https://www.pewtrusts.org/en/research-and-analysis/articles/2021/09/13/veteran-student-loan-debt-draws-new-attention>>

³⁶ 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>.

³⁷ Id.

³⁸ Real College Survey 2020: Five Years of Evidence on Campus Basic Needs Insecurity, THE HOPE CENTER, https://hope4college.com/wpcontent/uploads/2020/02/2019_RealCollege_Survey_Report.pdf (last visited Feb. 24, 2021).

³⁹ Id.

⁴¹ Department of Veterans Affairs, National Center on Homelessness Among Veterans. <<https://www.va.gov/opa/pressrel/includes/viewPDF.cfm?id=5654>>

⁴² Id.

Unfortunately, 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.

Monitor recent VA debt collection procedures reforms to ensure minimal impact to student veterans as collections resume. SVA has previously testified on VA's onerous debt collection procedures, urging reform to prevent many of the negative impacts it causes student veterans.⁴³ During the pandemic, VA's Debt Management Center (DMC) has taken several steps to address some of these issues, such as creating a new web service to manage personal debts and offering extended debt relief options to veterans. DMC has also held monthly calls with stakeholder organizations with updates on their reform progress and solicited feedback on best practices to improve their procedures.

In addition, DMC recently published a proposed rule to adjust their threshold for reporting VA debts to consumer reporting agencies.⁴⁴ SVA would like to recognize the hard work of DMC to develop this proposed rule, and the positive impact it will have on veterans across both the Veterans Health Administration (VHA) and the Veterans Benefits Administration (VBA). More specifically, according to DMC's review of their historical credit reporting, it will adjust their annual total of veterans reported to consumer reporting agencies from 60,000 to approximately ten.^{45,46}

As debt collection procedures restart, SVA hopes to continue working with DMC to ensure that veterans are well-informed of their deadlines, resolution options, and that the proposed rule does, indeed, dramatically reduce negative credit reports. We appreciate DMC's clear commitment to improving their processes in favor of all veterans, and we encourage Congress to work with VA to build on the agency's recent improvements by exploring how the debt collection process can be further streamlined.

Review the Veterans Readiness & Employment (VR&E) program for ways to improve. This past April, VA announced a self-identified a change in how they assess eligibility for VR&E as it relates to other veterans' education benefits. In short, a veteran may use their VR&E eligibility up to a 36-month cap and then, separately, use another education benefit, such as the Post-9/11 GI Bill, up to its own 4-36-month cap, with a total cap of 48 months. SVA would like to commend VA for identifying and changing their interpretation. This change provides a greater benefit to eligible veterans and complies with the underlying statute.

To continue this positive trend, SVA encourages this Committee to discuss the VR&E program at greater length with VA and focus on specific areas of concern that we have heard expressed by numerous student veterans of the years. Concerns include a lack of information provided in the Transition Assistance Program curriculum, difficulty in contacting VA to determine eligibility, long timelines in the assessment process, uneven counselor guidance and accessibility, among others.

As these discussions move forward, SVA recommends taking full advantage of the ongoing Digital GI Bill and IT modernization effort at VA and establishing pre-emptive, automatic qualification to transferring service members and electronic Certificate of Eligibility (COE) disbursal.

Expand the VetSuccess on Campus (VSOC) program to more schools across the country. The VSOC program is one of the few SVA hears about that is uniformly positive. Despite this, over its lifetime, the program has only expanded to approximately twenty schools beyond its original ninety-or-so. This program is wildly

⁴³ Student Veterans of America, testimony before Senate Veteran Affairs Committee, March 3, 2021.

<<https://www.veterans.senate.gov/imo/media/doc/SVA%20Testimony%2003.03.21.pdf>>

⁴⁴ Federal Register, Department of Veterans Affairs, Threshold for Reporting VA Debts to Consumer Reporting Agencies. July 23, 2021.

<https://public-inspection.federalregister.gov/2021-15490.pdf?utm_source=federalregister.gov&utm_medium=email&utm_campaign=pi+subscription+mailing+list>

⁴⁵ Id.

⁴⁶ Id.

⁴⁶ Debt Management Center, Meetings between Debt Management Center and Student Veterans of America, June 23 2021 and June 26, 2021.

popular with student veterans and schools, and we encourage Congress to provide adequate funding to ensure it can expand to meet the growing needs of student veterans everywhere.

National Guard and Reservist protections and parity. As U.S. defense plans change from utilizing the National Guard and Reserve Components as a ‘strategic reserve’ to an ‘operational reserve’, we have seen an increased operational tempo for members of reserve component, especially the National Guard.⁴⁷ This concern has been especially evident recently as we saw members of the National Guard tasked with responding to a steady stream of unprecedented challenges including multiple natural disasters, COVID-19, and the violent insurrection in our nation’s capital.⁴⁸

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

SVA is aware of recent efforts to bring parity to National Guard and Reservist benefit accrual as well as establishing protections for student servicemembers that face short-term activations. We are supportive of legislation in both of these areas and look forward to working with the Committee on these issues.

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

In addition, 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.⁵⁶

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.⁴⁹ 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

⁴⁷ Myers, M. (2021, January 29). *State National Guard chiefs call for more troops, more benefits for federal missions*. Military Times. <https://www.militarytimes.com/news/your-military/2021/01/29/state-national-guard-chiefs-call-for-more-troops-more-benefits-for-federal-missions/>

⁴⁸ Steve Beynon, *National Guard will be Used ‘More, Not Less’ as Military Preps for Future War, General Says*, MILITARY.COM, June 18, 2021, <https://www.military.com/daily-news/2021/06/18/national-guard-will-be-used-more-not-less-military-preps-future-war-general-says.html>.

⁴⁹ See DISABLED AMERICAN VETERANS, PARALYZED VETERANS OF AMERICA, AND THE VETERANS OF FOREIGN WARS., THE INDEPENDENT BUDGET – VETERANS AGENDA FOR THE 116TH CONGRESS. Retrieved from: 120 (2019), available at http://www.independentbudget.org/pdf/IndependentBudget_2019.pdf (explaining that “[t]his nation should have as much focus on the economic opportunities for veterans as it does for their health care and benefits”).

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.

Workforce Innovation and Opportunity Act (WIOA) concerns. Lastly, we would be remiss if we did not mention an issue of which we only recently became aware, but raises concerns about the scope and effectiveness of WIOA Adult training programs and American Job Centers (AJCs). While difficult to parse in some cases, the data on these programs show disappointing returns in many states across a range of metrics.

According to the Department of Labor's (DOL) State Data Book for FY2019, WIOA training programs in eleven states did not find a single disabled veteran to train in the entire program year, and an additional nine states could not locate twenty to train despite the ratio of potential clients registered in different parts of the job centers being more than twenty-to-one.⁵⁰

Perhaps more distressingly, for those veterans trained in WIOA Adult programs, post-exit wages floundered. In only four states did trainees experience wage gains over twenty-five percent, and in seventeen states post-training wages were actually lower than before entering the program.⁵¹ When the trainees were disabled veterans, the situation is even more dire. In only five states did post-WIOA wages after six months exceed the poverty threshold for a family of four, and in no state did it exceed twenty percent.⁵²

In short, our recommendation to Congress is to review the systems in place and ensure that disabled veterans are getting the appropriate training for placement in high demand occupations, and that all veterans are receiving training that actually provides a reasonable chance to improve wages upon completion.

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The continued success of veterans in higher education in the Post-9/11 era is no mistake or coincidence. In our Nation's history, educated veterans have always been the best of a generation and the key to solving our most complex challenges. This is the legacy we know today's student veterans carry.

We thank the Chairman, Ranking Member, and the Committee Members for your time, attention, and devotion to the cause of veterans' health care and higher education. As always, we welcome your feedback and questions.

⁵⁰ Department of Labor, PY 2019 Data Book.

<<https://www.dol.gov/sites/dolgov/files/ETA/Performance/pdfs/PY%202019%20WIOA%20and%20Wagner-Peyser%20Data%20Book.pdf>>

⁵¹ Id.

⁵² Id.