



Student Veterans of America
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**TESTIMONY OF
MR. WILLIAM HUBBARD
VICE PRESIDENT OF GOVERNMENT AFFAIRS
STUDENT VETERANS OF AMERICA**

BEFORE THE

**OFFICE OF POSTSECONDARY EDUCATION
U.S. DEPARTMENT OF EDUCATION**

**PUBLIC HEARING ON THE TOPIC OF:
"RULEMAKING AGENDA OF 2017"**

JULY 10, 2017



On behalf of Student Veterans of America, a higher education non-profit representing over 1.1 million veterans in post-secondary education, I stand before you strongly urging this body to stand with students, and fully implement the borrower's defense negotiated Rule.

My name is Will Hubbard. I am a former chapter leader of the Student Veterans of America chapter at American University, and now serve on the national headquarters staff as the Vice President of Government Affairs. I also served as a non-federal negotiator in the original borrower's defense rulemaking in 2015, representing the perspective of our military-connected students.

With rumors of these hard-won victories to protect students being at risk, we delivered a letter this spring on behalf of dozens of military, veteran, and family organizations to the Chairmen of the Senate Health, Education, Labor and Pensions Committee, and the House Education and Workforce Committee. In this letter, we identified four protections that our community is committed to fighting for, and more so than ever

- First, **the Gainful Employment Rule**, which enforces the Higher Education Act's requirement that career education programs receiving federal student aid must "prepare students for gainful employment in a recognized occupation." This common-sense requirement applies to career education programs at all types of colleges (public, nonprofit, and proprietary) and protects both students and taxpayers from waste, fraud, and abuse. Veterans express anger when they discover that the government knew that a career education program had a lousy record but allowed them to waste their time and GI Bill benefits enrolled in it.
- Second, **new regulations on federal student loan relief** for defrauded borrowers and college accountability, which make it harder for schools to hide fraud and clarify avenues for students to receive the loan relief they are entitled to under the Higher Education Act. America's heroes are targeted for such fraud because of the 90/10 loophole, and deserve the relief they are entitled to under the law.
- Third, **the ban on incentive compensation** in the Higher Education Act, which was enacted more than 20 years ago with broad bipartisan support to reduce high-pressure, deceptive sales tactics. Sales commissions incentivize college recruiters to "do anything and say anything" to get veterans to enroll. Veterans, who are frequently encouraged to enroll on the spot, are particularly vulnerable to high-pressure recruiting: over 60 percent are the first in their family to attend college.
- Fourth, **the Enforcement Unit** at the Department, which has been taking steps to protect all students – and explicitly embraced a goal of prioritizing veterans and servicemembers – from any illegal conduct by any college.



The question that must be asked is, “what exactly is up for debate?” Some have called the previous rule-making a “muddled process”, a comment which deserves criticism for its sheer ignorance at the very least. Is the Department interested in protecting students, or is it interested in protecting companies?

Consider for a moment that the implementation of these student protections should be openly embraced by schools that achieve strong outcomes. These protections only negatively affect schools who appear committed to defrauding taxpayers, students, and the broader American public.

As institutions who have spent millions of marketing dollars cultivating the image that they are different, that they are outcome-driven, why is it that they now want to be “treated like all other schools”. The biggest loser in the scenario of reduced student protections are actually the schools who are doing it right.

Many for-profits have strong programs with good outcomes, but they get the short end of the stick as predatory programs continue to cheat the system. They’ve cheated veterans, their families, and indeed they’ve cheated capitalism itself. The Department’s stay of the Rule deprives states and students of protection and enforcement mechanisms that were developed out of a consensus-driven process with all parties at the table.

On behalf of national organizations representing our nation’s military servicemembers, veterans, survivors, and military families, we vehemently urge the Department to ensure important laws and regulations protecting students are not watered down or eliminated. We hope that agreement is possible in order to protect America’s military heroes and their families.



William Hubbard, Vice President of Government Affairs

Will Hubbard joined the professional staff of Student Veterans of America in February 2014. Mr. Hubbard is frequently called to testify to Congress on a variety of topics related to higher education and veterans. He also regularly advises the White House and senior executives of the Administration on the interests of student veterans and higher education policy.



Mr. Hubbard received his Bachelors in International Studies from American University. After graduating, he spent several years serving government agencies to include the Department of the Navy, Department of State, and the State of Indiana Department of Revenue in his role as a Federal Strategy and Operations Consultant.

As a National Executive Committee Member of Deloitte's Armed Forces Business Resource Group, Mr. Hubbard was dedicated to the achievement of veterans, and led the successful proposal of two veteran-focused pro bono projects. Prior to his career in consulting, he co-founded a successful startup business in the snack food industry, which expanded placement into 14 local stores.

Mr. Hubbard joined the Marine Corps Reserve in 2006 and initially served with 2nd Battalion, 24th Marines. Today, he continues to serve at Quantico, VA, and most recently deployed to Central America with a Special Purpose Marine Air-Ground Task Force. He has served SVA at both the chapter and national levels, and has been passionate about veterans' issues since entering the armed services.