

March 6, 2016

The Honorable Robert McDonald Secretary of Veterans Affairs Department of Veterans Affairs 810 Vermont Avenue, NW Washington, DC 20402

Dear Secretary McDonald:

This letter summarizes issues identified and discussed during the Veterans' Advisory Committee on Education (VACOE) meeting held in Washington, DC on October 21-22, 2015. Committee members acknowledged the tremendous efforts toward improving access and communication with Veteran Affairs stakeholders over the past year. Consumer information and access to the GI Bill Comparison Tool will help veterans make informed decisions about their educational choices. Your personal commitment to improve the customer service experience for veterans in the MyVA conceptual plan resonated well with the Committee.

Committee members also recognized the considerable efforts that have been devoted to automating claims processing for VA's Education Benefits. It is our fervent hope that the Long Term Solution platform used to process "routine" claims will enable VA Regional Processing Office staff to focus on the unique and time-consuming supplemental claims that require the human and caring touch for accurate processing. Processing claims in a timely manner was the major veteran issue communicated, in both oral and written comments from the public, to VACOE in Fall 2015. As you well know, timely issuance of tuition payments and housing allowances impacts far more than a veteran's college attendance—it impacts a veteran's (and his/her family's) living conditions, financial stability, personal well being, and positive assimilation into the community. Numerous veterans shared personal stories of the financial risk factors that they experienced because of delayed processing of education benefits.

The Committee supports your commitment to improved customer service and recommends that VA's Veterans Experience Office work closely with VA Education Service to provide a plan for addressing the following education benefit customer concerns:



- Establish acceptable customer service benchmarks for processing education benefit claims to include timeliness and veteran satisfaction with the experience. These benchmarks should be provided in writing to the Committee Chair by September 1, 2016 for distribution to members.
- VA's Education Service office should identify strategies for improving the VA customer experience through the Education Call Center including the School Certifying Official (SCO) hotlines. User satisfaction and feedback on the Customer Resolution Management process demonstrated that Call Center service was inconsistent, with Hotline personnel possessing varying levels of knowledge and expertise in handling caller issues and questions. Examples of potential strategies for improving service may include extending operating hours, situational or scenario training for call center personnel, and additional staffing during peak call hours. Strategies identified and implemented for improving the user experience should be provided in writing to the Committee Chair by August 1, 2016 for distribution to members.
- Manage veteran expectations about the education benefits process. First-time benefit users and certifying officials need information about the "typical" claims processing cycle and normal processing timeline. VA's Digital Service Office should prominently display a current claims processing status on the Vets.gov GI Bill website (perhaps updated bi-monthly or weekly) to help manage the financial and benefit expectations of the key stakeholder group—veterans using education benefits. Communicating typical processing times in advance of semester start dates optimizes the customer experience and helps all stakeholders anticipate processing delays. This should be displayed on vets.gov/education by July 1, 2016.
- VA's Education Service office could better inform and manage Transfer of Education Benefit (TEB) expectations for veterans and their family members, explaining in detail that the benefit designation for eligible service members must be completed while still in the Armed Forces. Information about TEB is currently posted on the VA Web site (http://www.benefits.va.gov/gibill/post911_transfer.asp) but should be revised and also positioned within the "For Students" heading for optimal consumer information communication with education benefit users. Revisions and public relations strategies for managing customer expectations regarding the benefit should be provided by August 1, 2016 for distribution to VACOE members.
- The Secretary or his designee send a formal letter to higher education presidents, chief executive officers, and School Certifying Officers thanking them and recognizing their efforts in supporting education benefit work at the institution before August 1, 2016. The Committee strongly suggests that the letter also encourage reinvestment of annual reporting fee in professional development activities and training of SCOs and Veterans office personnel.



- VA's Deputy Under Secretary for Economic Opportunity send a congratulatory letter to all graduates who earn a college degree using GI Bill or Vocational Rehabilitation and Employment (VR&E) education benefits (based upon available data). These letters may be contracted through a third-party, subject to available funding, and should begin to go out no later than January 1, 2017.
- VA's Office of Public Affairs should provide a dedicated budget for the promotion and advertisement of GI Bill and VR&E education benefits for the next three fiscal years.
- VA's Digital Service office develop and display short videos on vets.gov/education that explain the basic concepts of the GI Bill and inform veterans of the resources available from VA to support their educational pursuits. Recognizing the production time to create and produce quality videos, the Committee would like to preview the videos by January 2017.

VACOE will devote time at our next Committee meeting to review the customer service improvement plan developed collaboratively by VA's Veterans Experience Office and Education Services designees.

Compliance and enforcement of the President's Executive Order 13607 was another priority concern of VACOE. The absence of any standard operating plan to enforce Principals of Excellence institutional standards, unless a violation is found in compliance survey, was noted. The Committee recommends that VA Education Service publish a comprehensive compliance framework policy for approved programs of education on the GI Bill website (vets.gov/education) by August 2016.

This document should include a comprehensive policy for how it enforces the President's Principles of Excellence and how participating schools may be subject to probation and/or removal based on the compliance framework and outcomes of the GI Bill Feedback System review process. It should also include a checklist VA employees use to measure compliance, all materials used to monitor compliance, and data (updated quarterly) on compliance surveys conducted listed by approved program of education. Development and publication of such a compliance policy would greatly demystify the compliance framework of Education Services and help manage expectations of participating schools. The Committee applauds the use of cautionary flags to alert potential veterans of increased government regulation and/or scrutiny for institutional activities. The compliance framework and corresponding policy document noted above, may consider employing additional Caution Indicators on the website to communicate other government actions or public notices regarding an Institute of Higher Learning.

Additional examples of compliance issues raised in the course of our meeting include:

 Provide Principle of Excellence compliance information in a timely manner on the website for veterans seeking consumer information for college enrollment decisions (perhaps as a cautionary indicator),



- Communicate findings and resolution of GI Bill Feedback System with the institution cited. Currently, there is no Education Service communication mechanism to notify affected schools of complaint resolution nor is the resolution featured on the GI Bill Comparison Tool. Currently, there is no Education Service communication mechanism to notify affected schools of complaint resolution nor is the resolution featured on the GI Bill Comparison Tool.
- VACOE recommends that VA Education Service modify its GI Bill Feedback System complaint intake process to include a notification to schools to convey the resolution of any valid complaint and how satisfied the complainant was to the school's response by August 2016.

It is the sense of the Committee that Congress should modify Title 38 to keep pace with changes in the higher education community with respect to distance learning, hybrid programs, competency based programs, and rate of pursuit calculations negatively affected by the loss of break pay. Title 38 legislation has not kept pace with the higher education practices and acceptance of non-traditional education options. Topics such as benefit calculation charges for licensure and certification, tuition and fee entitlement charges from monthly housing allowance if the Post-9/11 GI Bill is used for OJT/Apprenticeship programs, housing allowance for veterans pursuing distance learning may warrant modifications in the legislative language.

- VACOE will establish a Sub Committee to review and recommend legislative and regulatory changes to Chapter 36 of Title 38. The Sub Committee will report on their recommend changes by 1 August 2016 and VACOE will vote on which proposals to accept.
- VACOE recommends the Secretary agree to forward the accepted legislative proposals to the House and Senate Committees on Veterans Affairs through VA's Office of Congressional and Legislative Affairs no later October 1, 2016.

The Committee, based on significant public input, also recognizes that Congress should restore limited break pay to include Winter Break (Dec. – Jan.) with an opt-out/in option to preserve entitlement. The Committee recommends that you, along with Veteran Service Organizations, publicly call for the restoration of limited break pay. The Committee understands this is a sensitive issue, but recognizes the loss of break pay is a huge financial burden for veterans. Public statements of veterans communicated that they are unable to secure yearly housing leases or finance on-going household expenses without their full housing allowance between semesters. Restoring limited break pay will ensure Veteran success, reduce risk factors, and increase the likelihood of completing the degree without an interruption in receiving federal education benefits.

In closing, the Committee wishes to recognize the tremendous efforts devoted to improving both processes and access to the Post-9/11 GI Bill that currently funds more than a million veterans (and family members) in their educational endeavors. Over the



past 10 years VA's Education Service office has shifted from claims payment to a consumer protection and compliance focus—such a change in mission requires transforming the work force and shifting resources. We congratulate you and the Education Service team on the extraordinary vision and the resulting fruits of your determined implementation efforts. It is our hope as a Committee, to work closely with the Education Service leadership to refine and identify improvements for the provision of education programs to all veterans.

As committee chair, I wish to express my sincere thanks for the outstanding professional support provided to the Committee by Mr. Barrett Bogue of the VA Education Service Public Relations team.

Sincerely,

Kathy McMurtry Snead Kathy McMurtry Snead

Chair

202-667-0079; sneadk@aascu.org