Good morning. I am Tanya Ang, Director of Policy and Outreach at Veterans Education Success. Our mission is to protect and defend the integrity and priority of the GI Bill and other federal education programs for veterans and servicemembers. I appreciate the opportunity to share with you how both the Gainful Employment and Borrower Defense rules help ensure necessary student protections as they work to successfully accomplish post-secondary education and contribute to a stronger workforce.

For the past seventeen years, I have had the privilege to work in some capacity or another on supporting military-connected student populations navigate post-secondary education. I have worked directly with the students as their academic advisor helping them prepare for graduation and then at a more national level where I supported institutions of higher learning on building out and expanding support systems for these students. Through that process I have learned a significant amount about these students and the various challenges they may face.

Approximately 67% of all military-connected students are first-generation, low-income, minority, and other under-served student populations who have very little understanding of the complexities of higher education. To them, all education is created equal and they believe that the programs approved by the government to accept title IV funding, tuition assistance, or GI Bill benefits are trustworthy institutions. They pursue education with the hopes of helping improve the socioeconomic standing of their family and trust that at the end of their academic tenure they and their families will reap the benefits of a college education. Unfortunately, these are many of the students who have found out the hard way that all higher education programs, are in fact, not created equal and that the return on investment for their hard work, dedication, and often incurred debt was less than satisfactory. They find it difficult to find a job in their field of study and are still saddled with significant debt that must be paid off. Others, unfortunately, do not even have the opportunity to finish their degree program due to school closures.

Last year I worked with thousands of students who had their higher education dreams ripped out from underneath them as ITT Tech closed its doors. Some students were just getting ready to start their program, others were half way through, and others were getting close to graduation. Even though they had military benefits, many still had to take out loans to help cover the cost of their programs. When the school closed, they were left with no degree, wasted benefits, and now debt with no job to help pay off their loans.

Consider a 31-year old combat veteran who was unable to join us today but asked us to share his personal experience. This gentleman served in the Army National Guard from 2004 to 2013, and deployed to Iraq and Afghanistan. He was interested in pursuing a career in IT so, after leaving the Army, he used his GI Bill benefits at ITT Tech. Here is some of what he shared with us:

I maintained a 3.67 grade point average but I noticed that me and my fellow students weren’t getting the best education at all. Why are we getting outdated course material? Why are instructors not even competent in what they teach? How can I know more about the subject than my own instructor? ...I brought it (these concerns) to the attention of the faculty but to no surprise they weren’t any help at all. Fast forward months later, ITT-Tech closes down for good. I knew this was going to happen and I left before they closed their doors on all of us. What more can I do since they LIED to me? They didn’t explain a lot about the Loan which was taken out and now I owe almost $5,000 to Nelnet....
My experience at ITT Tech sometimes brings me to tears.

...You try so hard to get your education in order and then this happens...Why are schools like ITT Tech taking so much money from my Post 9/11 GI Bill that me and my fellow veterans have earned by volunteering to DEFEND this great Country? What more can we do about this because at the end of the day veterans are the ones taking the biggest hit. We can’t recoup our GI Bill and we’ve lost time away from family and friends and have nothing to show for it....

Unfortunately, the experience of this gentleman is not unique. Thousands of students have been impacted by predatory institutions looking to take advantage of them. Due to the 90/10 rule, many of these are military-connected students. They are left without a quality education and are saddled with debt they cannot pay off due to their inability to find gainful employment. This is not only unfair to these students, but to the American tax payer whose money is subjected to the waste, fraud, and abuse of these predatory institutions. This has got to stop.

Post-secondary education offers an opportunity for those who might not otherwise have it to better their life and the lives of their families. Many served in the military, not only to serve our country, but with the dreams of being able to one day go to college and change the trajectory of their family. These students want to contribute to the American economy, find a viable career, and provide opportunities for their children they never had. Instead they were left with debt, limited ability to further their career, and at best, a poor education.

You have heard and will continue to hear from many of my colleagues whose requests are similar to ours. So I will keep our requests simple and brief:

1. We ask that the Department ensure those defrauded by schools receive loan forgiveness and that the many pending applications are quickly granted relief under the current regulations.
2. We ask that defrauded students have access to the courts and their right to financially sound colleges through the financial responsibility triggers and warnings.
3. We ask that the Department continue to uphold the Gainful Employment Rule in order to ensure those pursuing career education programs are able to make well-informed decisions related to where they chose to pursue their education.
4. We also ask that the Department renew its MOU with CFPB and reinstate the working group it used to have with CFPB, DoD, and VA. This collaborative effort provides opportunity for the various key-stakeholders to adequately implement policy and regulation.

These requests will continue to protect the students from fraudulent institutions looking to take advantage of their military benefits while also protecting tax payer money from waste, fraud, and abuse.

Thank you for the opportunity to provide comment.