

Tyson Manker | Veterans Education Success
Testimony
US Education Department
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Good morning, my name is Tyson Manker. I am a former infantry Marine and combat veteran of Iraq, and now Director of Veterans Engagement with Veterans Education Success. I appreciate the opportunity to share my thoughts and concerns with you regarding the Department's proposed regulatory changes. VES understands the desire to encourage and improve innovation in higher education but takes issue with several of the regulatory rollbacks that consequently undermine critical protections for students while permitting low-quality education providers to waste taxpayer dollars. Of these numerous proposed changes, today I want to focus on the following two key issues: the repeal of the credit hour definition and competency-based education.

Credit Hour: The credit hour requirement was implemented as a way to ensure bad actor colleges were not misrepresenting the amount of actual instruction given to students. The Department found in 2010 through its independent inspector general that institutions were inflating the value of their college courses, with minimum to no oversight from accreditors. The credit hour was a quantitative way of providing a baseline measurement of instruction to protect against bad actor schools. We support working with colleges to best address how to properly measure meaningful instruction, but outright repeal of the credit hour would hurt students and increase deceptive practices by schools. Since we understand the Department wants to remove the credit hour rule as currently constructed, we encourage the Department to work with key stakeholders, like the American Council of Education and other top tier schools to find a quantitative metric that would both protect students and veterans from predatory practices.

Competency Based Education: We support competency-based education and thank the Department for addressing it. It is important tool for servicemembers, veterans, and military families who relocate frequently as part of their military service. We encourage the promotion of competency-based education and recognition of prior learning credits. Prior learning credits account for a students' knowledge and allows those students to take classes equal with the level of skill they possess instead of wasting time, resources, and taxpayer dollars on duplicative and unnecessary instruction. In addition, we support a standard definition for competency-based education and prior learning credits, thereby allowing students to be fully informed and understand how their prior training will be applied to the educational programs they pursue.

Conclusion: The Department must be a good steward of taxpayer dollars and therefore keep quality standards that protect both students and taxpayers. This is evidenced by the Department's findings by its independent inspector general that institutions were inflating the value of college courses. These schools, along with the recent closings of ITT Tech and Corinthian Colleges, amply show that there are bad actors attempting to defraud students and

the government. The outright removal of the credit hour without an appropriate quantitative replacement would pave the way for similar bad actors to charge excessive fees for pointless education and ultimately hurt those we represent - service members, veterans, and their families who use their hard-earned military education benefits to go to school and are often the targets of predatory schools looking to capitalize on these benefits. Similarly, it is important that competency-based education and prior learning credits are allowed in a manner that facilitates veterans, as well as all students, the ability to utilize their skill and training without unnecessary delay. It is often the case that veterans, many who are first generation, and other underserved student populations believe the federal government's stamp of approval for the school to offer title IV funds means the school is a high-quality school. Unfortunately, we know all too well, this is not always the case. Unfortunately, students find out too late that this is not always the case.

The Education Department's mission is to promote student achievement and quality education. Weakening or removing current protections would directly contradict that mission.

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