Chairman Levin, Ranking Member Bilirakis, and Members of the Subcommittee:

Veterans Education Success (VES) is a non-profit organization with a mission to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill and other federal education programs.

In addition to nonpartisan research and policy advocacy, we provide free case work to students having trouble with their GI Bill or who are impacted by predatory schools, and help elevating their voices to share with policy makers both their positive and negative experiences in higher education. We are focused on addressing ways to increase the continued academic success of military-connected students in their pursuit of their academic goals.

We appreciate the opportunity to share our perspective on the continued efforts of the Department of Veterans Affairs (VA) to implement the Harry W. Colmery Educational Assistance Act of 2017 (Public Law 115-48) also known as the Forever GI Bill (FGIB).

Since the Fall 2018 semester, when VA faced significant challenges as it attempted to implement sections 107 and 501 of the FGIB, we have seen continued efforts and commitment by VA to institute a smoother implementation moving forward. While we remain hopeful, we believe continued oversight by Congress is of the utmost importance.
**Recommendations Moving Forward**

As such, Veterans Education Success makes the following recommendations:

1. **The Lagging IT Infrastructure Must be Promptly and Thoroughly Addressed.** This includes ensuring the $30 million allotted to VA is **appropriated to VA.** - There is clearly a significant issue with the existing education IT systems. They are failing. Addressing this issue is critical.
   a. While VA was allocated $30 million for IT upgrades, this money has yet to be appropriated. Asking VA to implement such a significant program without the necessary money to do so is setting them up for long-term failure. Without the necessary resources to implement this law, VA is having to continue to work with a broken system. Given the history and number of times the VA IT education system has failed when trying to upgrade an old and decrepit system, it is inevitable that, without the appropriate resources, delays may happen again. We ask that members of Congress to make it a priority to address these issues in a timely and efficient manner.
   b. We also ask the Secretary of Veterans Affairs to ensure this money is used specifically for what it is intended: to build a new enhanced IT system for Education. The current outdated system is failing and has had too many patches added to it to try to fix it. Like a boat, there can be only so many patches before it risks sinking. This IT system has now negatively impacted the lives of hundreds of thousands of veterans and their families and must be addressed.

2. **Continued Communication** – VA has gone to great lengths to increase communication with key-stakeholders, including monthly meetings and updates, campus tours around the country, and publishing information on many social media forums. We appreciate their hard work and their dedication to clear, transparent, and timely communication. As they continue to move forward, we suggest the following:
   a. **Articulate a Clear and Defined Timeline on When Students Will be Made Whole and What That Process Will Look Like.** This includes answering the following questions we have heard from students and schools:
      i. When does VA plan to start making students whole for their Monthly Housing Allowance (MAH) underpayments?
      ii. How does VA plan to implement this rollout?
      iii. Has VA communicated to the students about any role they will or will not need to play in order to be made whole? Will they need to self-certify?
      iv. What communication has taken place with schools that need to recertify? Will they have ample time to stay on top of current certifications while also recertifying students for past semesters?
v. Does VA foresee any similar issues experienced last year with the rollout of the new IT system? Will the current system be able to handle the large influx of certifications?

vi. For students who are being recertified for a lower MAH, what safeguards have been put in place to ensure they will not get a debt collection letter?

3. General Recommendations

a. **Continued Engagement of Key Stakeholders** – Among other things, VBA has been hosting monthly meetings with military and veteran groups to provide updates on the implementation process. We hope they will continue.

b. **Enforce Mandatory Overtime When Needed** – VA needs all hands-on deck to ensure students receive their MHA in a timely manner and endure no more hardships.

c. **Conduct a Study on Feasibility of Batch Payments** – Unlike VA, the Department of Education (ED) processes batch payments to schools prior to the semester starting based on the enrollment of past years. This process has been effective for both schools and ED, and we believe there might be lessons learned for VA on ways to more effectively process education benefit payments. In theory, this process could alleviate the work of VA on the front end, so VA can focus on processing the MHA for students. While we understand there are many variables between how VA processes payments and how ED processes payments, we believe there might be potential for better streamlining the current system at VA. Additionally, it would protect students from being dropped from classes, charged late fees, and/or being prohibited from registering for class for the following semester.

d. **Provide Students Accurate Benefits Information** – Create a document, similar to a check stub, that students can use to show landlords and other loan guarantors. This stub will confirm the amount of money they will be receiving each month in their MHA and will help them in securing housing, utilities, etc.

We appreciate the work VA has done to address these concerns and hope these recommendations can provide helpful guidance moving forward. Those who served our country and are using their hard-earned benefits to attend school and ensure their civilian economic success deserve to pursue their education with the peace of mind they will receive their education benefits in a timely fashion.

We also appreciate the amount of time, effort, and attention the committee has dedicated to providing oversight of the implementation of the Forever GI Bill.

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