



VETERANS EDUCATION SUCCESS

STATEMENT FOR THE RECORD

SUBCOMMITTEE HEARING ON PENDING LEGISLATION

SUBMITTED TO THE

SUBCOMMITTEE ON ECONOMIC OPPORTUNITY

COMMITTEE ON VETERANS AFFAIRS

U.S. HOUSE OF REPRESENTATIVES

March 10 2020

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

Veterans Education Success 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 research, providing free case work to students having trouble with the GI Bill or impacted by predatory schools, and elevating the voices of students 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 pending legislation before the Subcommittee:

Proposed Legislation on Consumer Testing of the Comparison Tool

We share the Committee's desire to improve the Comparison Tool.

However, we do not believe \$5 million in consumer testing is needed – especially not when there are obvious usability improvements needed in the Comparison Tool that Members of this Committee (along with students and veterans and military service organizations) have been requesting since 2012.

Members of the Committee who were present in 2012 will recall the discussions about what the Comparison Tool should look like and enable. These discussions resulted in Public Law 112-249, which required VA to create the Comparison Tool.

Members of the Committee urged VA to make sure the Comparison Tool would:

1. Enable side-by-side comparison of schools.
2. Enable students to search for schools by geographic area and the program they are seeking (e.g., Associates Degree in Accounting vs. Bachelors Degree in Engineering vs. Masters Degree in Nursing).
3. Create a “Yelp-style” student feedback, where students could see how their fellow student veterans rated the school.
4. Provide clear indicators to help students be fully informed about schools that are already in trouble with law enforcement or government for defrauding students or for financial instability.

Chairman Takano led a [letter](#) to VA urging the adoption of a “Risk Index” on the Comparison Tool¹ and has urged VA to improve the Caution Flags on the Comparison Tool to ensure students can make an informed choice.

Similarly, since 2012, both students and veterans and military service organizations have been asking for Comparison Tool to be more user-friendly and more modern. As many students point out, the Comparison Tool is clunky and does not enable side-by-side comparisons of schools or searches by major. Many students point out that Sears and Walmart make it easier to research and compare dishwashers, by enabling side-by-side comparisons of the price, features, and ratings.

If VA were to conduct consumer testing, we believe it would hear the same suggestions it has already been hearing since 2012. Therefore, the consumer testing seems redundant to the already existing consumer requests for improvement and the \$5 million spent would be wasted.

Instead, we recommend using the \$5 million to address the following suggestions to make the Comparison Tool more user-friendly, rather than surveying students who would say that the Comparison Tool should be more user-friendly and less clunky.

Specifically, the following common-sense, user-friendly fixes are needed:

- Side-by-side comparisons of three or more schools, where students can clearly see the differences in tuition and key student outcome metrics.

¹ Letter from Rep. Mark Takano and other Members of Congress to Secretary of Veterans Affairs Robert McDonald (June 19, 2015), available at https://www.blumenthal.senate.gov/imo/media/doc/Letter%20to%20Sec%20McDonald_Risk%20Index_Final%20Signed%20Copy.pdf.

- Searches by major or degree sought.
- Searches by geographic area.
- Student outcome metrics from College Scorecard/College Navigator. These used to be present on the Comparison Tool, but have been taken down in the past few months;
- A “Risk Index”² to enable students to avoid risky schools.
- Improved “Caution Flags” and show any negative government action against the school, any negative action by the school’s accreditor, including risk of loss of accreditation, and Heightened Cash Monitoring Level 2.
- Show all student complaints VA has received – whether validated or not and whether open or closed, and, if closed, whether it was closed to the student’s satisfaction or not.
- Yelp-style student ratings of colleges, but this needs to be implemented carefully to prevent colleges from gaming the reviews.
- Automate the ED/VA data-crosswalk; some GI Bill schools do not have a crosswalk and it is labor intensive for VA employees to keep it up to date manually.
- Include data in the “Download Data” section on closed schools. Although the Comparison Tool college search tool is oriented toward consumers, the “Download Data” section at the bottom is used primarily by researchers. Generally, when a school closes, VA deletes the school from the college search database – which makes sense from the student’s viewpoint – but VA also is deleting all of the enrollment and revenue data for closed schools from the “Download Data” section. Including closed school data in the “Download Data” section would allow researchers to further study the causes and effects of these impactful college closures.

Proposed Legislation for Online Institutions of Higher Learning

We support this legislation that would align VA and ED on the definition of where a school is headquartered. require for the approval process of GI Bill funds that the address of a solely online institution actually be where the institution is registered with the Department of Education (ED) or where the majority of records, operational leadership, and administrative staff are located. This is a sensible provision that aligns with what the typical understanding of the headquarters of institutions and makes sense for approval of VA educational funds.

Proposed Legislation to Clarify Eligibility for Yellow Ribbon

We support this bill to change the language from “established charges” to “tuition and fees for a program of education” to allow students to use Yellow Ribbon who are studying outside of the United States. This change will help students better understand when they are eligible for the Yellow Ribbon program while attending programs abroad.

H.R. 5056 – Modern GI Bill Act

While we understand and support the desire to ensure those who have served our country are not negatively impacted by student debt, we do not believe the use of GI Bill benefits is the best way to address this issue. There are currently student debt assistance programs already in place in the different military services as well as Public Service Loan Forgiveness, as well as many loan

² Id.

forgiveness programs at the Education Department, including Closed School Discharges, False Certification Discharges, Total & Permanent Disability Discharges, Borrower Defense, and income-based repayment options. We recommend strengthening these programs that are already in existence and not use the GI Bill for something it was not originally intended for.

Proposed Legislation to Ensure Members of the Armed Services are Repaid Money They Paid into the Montgomery GI Bill

We support this legislation to allow VA to refund students the money they paid into the Montgomery GI Bill before the last day of class if they elect to use their Post 9/11 GI Bill. We believe this bill could be strengthened by stating a time frame or final date for when the VA should refund the money to the veteran. We think adding clarity on this point will ensure student veterans know the latest date for when they can expect to receive this money.

Proposed Legislation to Rename the Vocational Rehabilitation Program

We support this legislation to rename the Vocational Rehabilitation Program to the Vocational Readiness and Employment program. It updates an outdated title and is appropriate for what the program offers veterans.

H.R. 5324

Significant others often play a vital role in the service member's transition out of military service yet often are not aware of what assistance and benefits the individual is eligible for. We support this bill as it would establish a pilot program to make this information available through information sharing between VA and designated family members or friends of transitioning service members. We believe this would help ease the transition into civilian life from military service and ensure the right people possess necessary information to assist a veteran in a successful transition to civilian life.

Proposed Legislation on the GI Bill, Transition Assistance Program, and the SkillBridge Program

Expanding parity to members of the Reserve and National Guard for Title 38 and 10 benefits is crucial to guaranteeing all members of the Armed Forces are on equal footing in terms of the benefits they are eligible to receive. Additionally, we support the provision which provides the necessary counseling support for sexual assault, gender harassment, and domestic violence between partners during the Transition Assistance Program.

While we agree with expanding the SkillBridge program to military spouses, we have a few questions about the potential implementation of the expansion. SkillBridge gives servicemembers the opportunity to pursue apprenticeships or internships during their last 180 days of service, providing them meaningful civilian experience that help lead to employment. Will the spouses be utilizing the program for experience alone or will they be paid by Department of Defense or VA?

Additionally, while we believe the SkillBridge program has the potential to provide necessary opportunities for transitioning service members, we also believe there is a lot of opportunity for improvement. Nearly one-third of veterans seeking employment are underemployed, a rate that is 15.6% higher than others seeking employment.³ Some of this is due to the immediate need of a transitioning service member to take any job that will help them support their families. It is also due to the lack of ability by the veteran and the workforce to translate equivalent military experience to civilian language.⁴ SkillBridge works to address this by providing opportunities for transitioning service members to garner civilian experience and gain the training and credentialing necessary for employment within the civilian workforce.

While this program has the potential to create necessary pipelines to viable career options, it will be successful only if it provides access to quality programs, trainings, and certifications. Subpar programs will not aid a transitioning servicemember attain a job after service and find employment that utilizes their skills and experience at the same level as their civilian counterparts who have similar experience.

There is work currently underway to address concerns around quality and identifying reputable organizations to participate in SkillBridge, but we believe much more can be done. This includes further conversations with key stakeholders such as Congressional Representatives, leaders in the workforce and higher education, government officials, and the Armed Services to better define what quality looks like and to create useful parameters to protect transitioning service members from programs looking only to capitalize on access to federal dollars and hard-earned GI Bill benefits. More clearly articulating these issues will strengthen the SkillBridge program and increase opportunities for employment, build out a lifelong learning model that creates stackable credentials, and provide a strong return on investment for the time and energy put into this program by the service member as well as the tax payer.

We appreciate the focus by Committee on this issue and look forward to working with the Committee to further address these issues moving forward.

Proposed Legislation on Creating a Pilot Program of VetSuccess Counselors on Tribal Colleges and Universities

We support this legislation to create a pilot program as these counselors have proven to be extremely helpful to at-risk student populations. Further expanding VetSuccess counselors to Tribal Colleges will continue to promote higher education success for military-connected students.

Amendment to H.R. 5687 offered by Representative Dunn

We support this amendment to extend temporary closure payments from 4 weeks to 8 weeks. Unfortunately, natural disasters can cause students to be out of school for longer than the current

³ Barrera, Cathy and Phillip Carter. Challenges on the Homefront: Underemployment Hits Veterans Hard. https://www.callofdutyendowment.org/content/dam/atvi/callofduty/code/pdf/ZipCODE_Vet_Report_FINAL.pdf; November 2017.

⁴ Ibid.

4 weeks allotted for housing allowance extensions. When trying to recover from unforeseen circumstances such as natural disasters, the last thing military-connected students need is to be worried about is how they will pay their monthly bills. This amendment would provide peace of mind for military-connected students when faced with situations beyond their control.

Conclusion

We urge the Committee to remember that in order to ensure these legislative ideas are implemented in an effective and expeditious manner, the Veterans Benefits Administration (VBA) must have a functioning modern IT-system. We hope Congress will continue to put at the forefront the importance of giving the VBA the necessary funding to address and update its IT-system to ensure student veterans are put first and not needlessly harmed by old IT infrastructure.

Veterans Education Success sincerely appreciates the opportunity to express our views on legislation before the Subcommittee today. Pursuant to Rule XI2(g)(4) of the House of Representatives, Veterans Education Success has received no federal grants in Fiscal Year 2020 nor in the previous two years.