June 11, 2020

Department of Veterans Affairs
Readjustment Counseling Service (10RCS)
810 Vermont Avenue
Washington DC 20420
Via electronic submission to VHA10RCSAction@va.gov

Re: Advisory Committee on the Readjustment of Veterans

Dear Members of the Advisory Committee,

Veterans Education Success is a non-profit organization that works to advance higher education success for all military-affiliated students and provides free counseling and legal assistance to students using their GI Bill and military benefits. We offer the following comments for the Committee’s consideration.

Education benefits, particularly the Post 9/11 GI Bill, are key readjustment benefits. Veterans who use the benefits unwisely, however, may find themselves in worse circumstances after pursuing an education than they would otherwise have been. We ask that the Committee consider the unique experiences of veterans in education to ensure their readjustment to civilian life is as successful as possible.

One unique aspect about student veterans is that they tend to be disabled more often than non-veteran students. This may present unique challenges in pursuing their education. Veterans Education Success’s recent report, *Impact of Disability on First-Time Student Veterans’ Persistence and Attainment*, \(^1\) published in May 2020, found that amongst students seeking postsecondary degrees (bachelors and associates), veterans were more than twice as likely to have a disability than their non-veteran counterparts (33% compared to 15%). Of student veterans with a disability, almost half left school within six years without completing their degrees.

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Additionally, student veterans with a disability were more likely to be enrolled in associate degree programs than their non-disabled veteran counterparts. This is noteworthy because associate degree graduates generally have lower lifetime earnings than bachelor’s degree graduates.\(^2\) The Committee should carefully consider these factors when making recommendations to the Secretary.

Some veterans who are not interested in traditional degree programs may be attracted to trade schools. In a report published in September 2019, Veterans Education Success found that while student veterans were more likely to complete trade school certificate programs, 57% earned less than $28,000 a year (roughly equivalent to what a high school graduate could earn) and over half had to take out student loans to complete their courses of study.\(^3\) In other words, they came out of the trade school with more debt but no increased income potential.

![Image](image.png)

The Committee should recommend that the Secretary carefully examine the value provided by these schools in determining whether they should be eligible for GI Bill funds.

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\(^2\) *Lifetime Earnings by Degree Type*, The Hamilton Project (Apr 26, 2017), [https://www.hamiltonproject.org/charts/lifetime_earnings_by_degree_type](https://www.hamiltonproject.org/charts/lifetime_earnings_by_degree_type)

\(^3\) *Weak Return on Investment at Trade Schools that Enroll GI Bill Beneficiaries*, Veterans Education Success (Sep 2019), [https://vetsedsuccess.org/weak-return-on-investment-at-trade-schools-that-enroll-gi-bill-beneficiaries/](https://vetsedsuccess.org/weak-return-on-investment-at-trade-schools-that-enroll-gi-bill-beneficiaries/)
In our report, *The GI Bill Pays for Degrees That Do Not Lead to a Job*, we found that 20% of 300 GI Bill-approved degree programs we examined lacked the appropriate accreditation and, as a result, graduates were unable to obtain the state licensure or professional certifications needed to land a job. These low-quality programs covered a wide range of fields including clinical psychology and law school programs that were not properly accredited. This report led to passage of the 2016 “Career Ready Student Veterans Act” (section 409 of P.L. 114-315), but that did not solve the problem. In our 2018 follow-up report, *Despite a 2016 Statute, the GI Bill Still Pays for Degrees That Do Not Lead to a Job*, we found that about half of the programs identified in the 2015 report were still enrolling GI Bill students even though they did not qualify graduates for state licensure or certification. To avoid veterans utilizing their GI Bill benefits at schools that do not qualify them for potential careers, the Committee should recommend that the Secretary enforce quality standards contained in the Career Ready Student Veterans Act.

A veteran’s transition to civilian life is significantly disrupted when a school they are attending closes unexpectedly. In a report released in October 2019, *VA and States Should Act on Early Warning Signs When Risks to GI Bill Beneficiaries and Taxpayers Emerge at Participating Schools*, we found that since 2012 an estimated 22,000 GI Bill beneficiaries had their educations derailed because of the closures of Corinthian Colleges, Inc., and ITT Tech. Additional schools receiving GI Bill funds have closed and will continue to close in the future leaving veterans seeking alternative ways to complete their educations sometimes after having already exhaust most, if not all, of their GI Bill benefits. Our report contained recommendations on ways VA can abate some of these catastrophic impacts by being proactive in addressing early warning signs that schools may be going out of business. For example, VA can coordinate with other federal agencies to help ensure that VA is aware of their concerns about or actions against GI Bill-participating schools. This is particularly important because some schools have repeatedly violated laws designed to protect student veterans from abuses, yet continue to receive GI Bill funds.

Veterans Education Success would be pleased to assist the Committee by sharing additional research and historical information, as well as making our researchers and policy experts available to speak with the Committee in developing recommendations. Please feel free to contact Aniela Szymanski at aniela@vetsedsuccess.org or 702-234-5956.

Sincerely,

Aniela K. Szymanski
Senior Director of Legal Affairs and Military Policy

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Attachments:

*Impact of Disability on First-Time Student Veterans’ Persistence and Attainment*, Veterans Education Success (May 2020)

*Weak Return on Investment at Trade Schools that Enroll GI Bill Beneficiaries*, Veterans Education Success (Sep 2019)

*The GI Bill Pays for Degrees That Do Not Lead to a Job*, Veterans Education Success (Sep 2015)

*VA and States Should Act on Early Warning Signs When Risks to GI Bill Beneficiaries and Taxpayers Emerge at Participating Schools*, Veterans Education Success (Oct 2019)

*Many Corporate School Chains Repeatedly Settled Lawsuits for Misleading Advertising, High-Pressure Recruiting, and False Certifications*, Veterans Education Success (June 2020)