

MEMORANDUM

TO: James Ruhlman, Education Service, U.S. Department of Veterans Affairs

FROM: Veterans Education Success

DATE: August 17, 2021

RE: Veterans Benefits Administration Webpage: *Restoration of Benefits After School Closure or if a School is Disapproved for GI Bill Benefits*

Dear Mr. Ruhlman:

We write to request your attention to important changes needed on VBA's website [page](#) on restoration of benefits. As you know, Center for Excellence in Higher Education (CEHE) recently closed and student veterans are reaching out to understand their rights. We know you agree that it is important to give student veterans clear and correct information about restoration of benefits.

First, the current language implies that students must transfer to a new school before they are allowed to apply for restoration of benefits. Specifically, the language says, "*A student cannot apply for restoration until after the student enrolls in a new school and is given a transferred credits determination from the new school.*" This is incorrect under the statute; this effectively incentivizes--and, indeed, directly instructs--student veterans to rush into transferring to a new school.

The statute absolutely does not require students to transfer to a new program; instead, the statute clearly provides that *for those students who have chosen to transfer* to a new program, they are ineligible for restoration if they transfer more than 11 credits. We imagine this is inadvertent poor drafting. The current wording on the VBA site is dangerous because, as you may know from the Education Department's chastising message to CEHE, CEHE is wrongly pushing students to transfer to low-quality partner schools from which CEHE has a benefit. We attach proposed changes to the wording to correctly describe the statute(s).

Second, we feel it is imperative that the web page offer clarity on the date delimiters and associated qualifying eligibility standards as set forth in the statutes. These factors are the primary drivers for a student's understanding of their options. We attach proposed language which would support a more veteran-centric understanding of their path forward.

Finally, we encourage VA to de-couple the school closure page from the Forever GI Bill web address hierarchy; though it was initiated under the Forever GI Bill, it may confuse some veterans if they are unfamiliar with the relationship to that law. Since closures will continue as a major topic of interest, we believe nesting the page as a standalone resource page under the broader GI Bill heading would be more accessible.

Sincerely,



William Hubbard

cc: Fay Fernandes, Senate Committee on Veterans' Affairs
Kelsey Baron, Senate Committee on Veterans' Affairs
Justin Vogt, House Committee on Veterans' Affairs
Jon Clark, House Committee on Veterans' Affairs

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