Swords to Plowshares Statement on 90/10 Loophole

Good afternoon, to the officials and staff of the Department of Education. My name is Victor Inzunza. I’m a Marine Corps veteran and I serve as a Policy Analyst at Swords to Plowshares. Our agency was established in 1974 to heal the wounds of war, restore dignity, hope, and self-sufficiency to all veterans in need, and prevent and end homelessness and poverty among veterans. We offer employment and job training, supportive housing programs, permanent housing placement, counseling and case management, and legal services.

One of the most significant, life-changing opportunities for veterans is their time in college, made possible by the benefits earned during their time in service.

The Policy department at Swords to Plowshares has spent over 5 years researching and advocating on behalf of military-connected students. We’ve developed partnerships with students and leadership across the country to determine why institutional support systems matter. Institutions must have integrity and they must make a commitment to support the students who come through their doors to provide quality education and a reputable degree.

Our work with military-connected students has revealed inconsistencies in support systems, leading many to seek outside resources in their communities. For example, in many of our recent studies we found that students often struggled with financial issues, causing housing instability and food insecurity. The reality is that our military communities already face multiple challenges in their efforts to assimilate back into society. Predatory colleges exacerbate this unfortunate situation and can derail futures entirely.

Our agency administers VA Supportive Services for Veterans and Families (or SSVF) funds that helps veterans on the verge of financial disaster and homelessness. Student veterans come to us for help. Meanwhile, the 90/10 loophole allows predatory colleges to rob veteran students of their educational benefits and deny them the promise of future careers which require a college degree.

Today we ask the Department of Education to ensure strong implementation of the new law to close the 90/10 loophole. As you know, the 90/10 loophole resulted in the targeting of our community by aggressive and deceptive colleges. Countless servicemembers, veterans, family members and survivors were seen as “nothing more than dollar signs in uniform” and had their lives ruined because of this loophole. We thank bipartisan Members of Congress for listening to us and finally closing the 90/10 loophole.

The closure of the 90/10 loophole does not take effect for several years. This means veterans, service members, their families and survivors will continue to be targeted, due to a bipartisan compromise to give the schools time to adjust to the requirements. This compromise and delay in implementation mean any request from these schools to weaken the Department's implementation of the law in any way would be in bad faith, as their
demands were already considered by Congress, and they were already given a mechanism built-in to account for the upcoming changes.

Veterans deserve to spend their hard-earned benefits at an institution of their choice, and any attempts from these schools to say closing the loophole limits that choice is another false argument. When bad schools target veterans for the purpose of scamming them out of their GI Bill, there is nothing honorable about standing by to watch the scam occur in plain sight. If these for-profits were relying on their merits, they would not resort to predatory marketing to veterans that misleads and jeopardizes their academic career.

Any legitimate college can improve its quality enough to attract at least 10% funding from employer sponsors or students who see enough value that they are willing to pay.

At Swords to Plowshares, our commitment to veterans comes first. Any institution of higher learning must make that same commitment, by providing a quality curriculum for student veterans, a supportive resource system, and by making every dollar spent there worth all the time they spent in military service earning them. Thank you for the time to present our views, and please reach out to us if you have any clarifying questions.