

James Haynes, Veterans Education Success
Oral Testimony
National Advisory Committee on Institutional Quality and Integrity
February 24, 2022

Good afternoon, my name is James Haynes and I am the Federal Policy Director for Veterans Education Success. We are a nonprofit research, policy, and student veteran advocacy organization. We work on a bipartisan basis to advance higher education success for veterans, service members, and their families, and to protect the integrity of the GI Bill and other federal postsecondary education programs.

Student veterans are significantly impacted by the quality assurance and program integrity safeguards that fall under the Department of Education's jurisdiction. Of these, none is more consequential than accreditation. Despite the hard work of this Committee, there continue to be egregious cases of waste, fraud, and abuse. This indicates that accreditors recognized by the Department are proving inadequate to the task of ensuring that no student is victimized by an institution enjoying accredited status.

I am here today to discuss our concerns with the transparency of the review process of accreditors and ways to improve accountability.

Transparency

Accreditation has historically operated as an opaque insider's activity. While we appreciate the recent steps the Department has taken to make public the staff analysis of accreditors up for recognition and implementing the accreditor dashboard, we strongly believe more work is needed as the current review process fails to provide the public and NACIQI members with the ability to meaningfully evaluate each accreditor's performance.

As highlighted in a [letter](#) we joined from 16 higher education groups submitted last month, there are a number of steps that can be taken to improve transparency. We believe the Department should allow the public and NACIQI to review all the documents submitted by the accreditor as part of its review prior to its final federal register notice announcing the opportunity for public comment.

The Department should also make public its staff's full report on accreditor compliance to NACIQI prior to any final federal register notice, and ensure maintenance of relevant records submitted by the accreditor in the Department's file review. Finally, comments

submitted by members of the public should be considered if they were submitted at any stage in the review process.

Accountability

Accountability is a critical element to a functioning accreditation system; students rely upon an institution's accreditation as a stamp of approval, as accreditors are the only member of the accountability triad solely focused on the substantive educational adequacy of academic programs. We have helped thousands of veterans who were hurt by inadequate accountability measures. One student veteran who attended Westwood College told the Department:

“Westwood convinced me that I needed to take out student loans in order to pursue my education...Recruiters also created a false sense of urgency to get me to enroll...Westwood featured advertisements claiming that they offered “game developer degrees” ... After I enrolled, I discovered that Westwood did not actually offer “game developer degrees”...Westwood claimed that teachers were “industry experts” who would help me get my foot in the door in the gaming industry. I discovered that teachers were inexperienced . . . [and] were unable to answer basic questions.”

Just last week, the Department [announced](#) the discharge of tens of thousands of former students' federal loans under borrower defense. NACIQI should urge accreditors to take action against institutions that cause such large-scale harm to students.

Improvements to the evaluation process of accreditor performance are needed. We recommend these evaluations include a thorough review of data on student outcomes, examine risk factors such as lawsuits and investigations, and determine whether a pattern and practice exist of failing to address institutional weaknesses.

Thank you for the opportunity to share our views.