



VETERANS
EDUCATION SUCCESS

2022 Year in Review

A Voice for Military-Connected Students

A YEAR OF WINS

MAJOR PROGRESS ON MULTIPLE FRONTS

EXPERTISE

Negotiated Rulemaking: We provided leadership on numerous student loan and college oversight policies during ED rulemakings - securing key wins.

85/15 Rule: We provided technical assistance and expertise on the legislative revision of the 85/15 Rule and engaged with VA regulators.

GI Bill Comparison Tool: We pressed VA on a range of strategic and tactical changes, especially transparency & caution flags.

PRESENCE

Elevating Voices: We mobilized the veterans policy community and individual student veterans to testify before federal policymakers.

Congressional Leadership: We joined Speaker Pelosi and Chairman Takano to discuss leading policy priorities & also passed the Veterans Eligible to Transfer Schools Credit Act.

Federal Relations: We delivered key input to partners at ED, VA, DoD, DoL, FTC and CFPB; we led 2 meetings with the ED Secretary.

ACCOUNTABILITY

Bad Faith: We called for VA to fully apply the law when UAGC (formerly Ashford) put 3,000+ GI Bill students at risk; we alerted the DoD to the issue & triggered a review under the MOU.

School Accountability: We led a task force force alerting accreditors and federal agencies to illegal practices; we exposed several college scams, including "House of Prayer."

Risk-Based DoD Compliance: We championed House passage of Sec. 1099B in the NDAA to apply risk triggers for schools, mirroring VA.

CLOSING THE DOOR ON THE 90/10 LOOPHOLE

Beginning in 1998, the 90/10 Rule neglected to include GI Bill benefits as part of the calculation, creating a loophole that for-profit colleges manipulated to use GI Bill to offset a cap on federal student aid that the schools otherwise face, a powerful incentive to target veterans and their family members for recruitment. After a decade of our advocacy, we finally got the loophole closed in the law in Congress in 2021 to count VA and DoD education benefits as part of the “90” side of the 90/10 equation.

This year, we worked hard on the final rulemaking at the Department of Education to implement the statutory change, brokering a compromise with industry to reach a consensus among all players to finally lock the door on over a decade of bad policy. The new regulations are set to take effect in 2023.

IN THE PRESS



BY WILL HUBBARD
04/27/22

OP-ED: For-profit colleges prey on veterans — the Department of Education must say ‘no more’

“...the Department of Education should move to comprehensively ensure a clean closure of the 90/10 loophole. The department must prioritize service members, veterans and their families to make this the year our community represents “dollar signs in uniform” no more.”

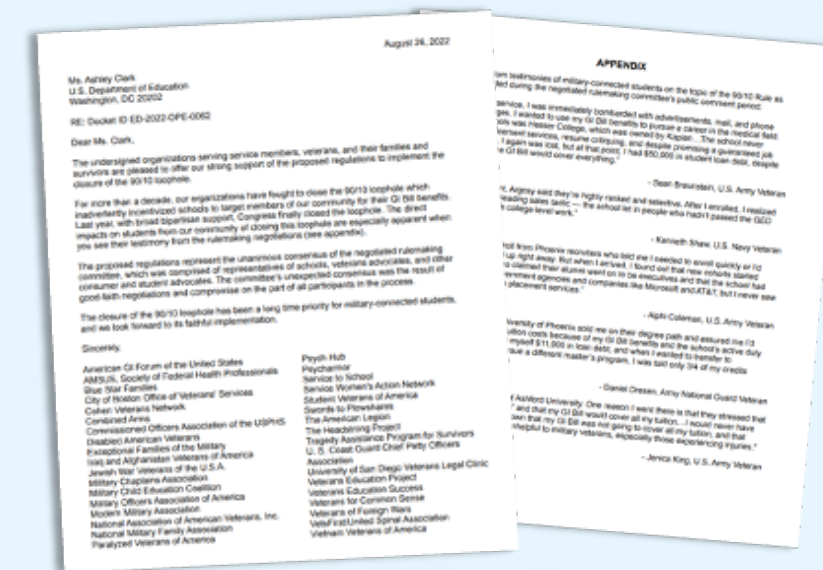
[READ THE FULL OP-ED](#)

AT THE TABLE



Our VP, Barmak Nassirian, served as an official negotiator at the Department of Education rulemaking and brokered an unprecedented consensus with industry

STANDING RESOLUTE



[READ THE FULL COALITION LETTER](#)

Learn [more](#) about our work on 90/10

Veterans Education Success 2022

A YEAR OF REGULATORY IMPROVEMENTS

Our team provided expertise and leadership during an intense year of public rulemaking negotiations over key rules at the Department of Education:

STUDENT LOAN ASSISTANCE

BORROWER DEFENSE	Establishing appropriate conditions for discharging student loans due to school misconduct
CLOSED SCHOOL DISCHARGE	Streamlining loan discharge for students attending schools that precipitously close
TOTAL & PERMANENT DISABILITY	Loan discharge for borrowers who become disabled
FALSE CERTIFICATION	Discharge of loans that should not have been made
INCOME-DRIVEN REPAYMENT	Providing borrowers with affordable repayment options
INTEREST CAPITALIZATION	Eliminating excess interest charges wherever possible
MANDATORY PRE-DISPUTE ARBITRATION	Prohibiting schools from forcing students into arbitration in case of future disputes
PELL FOR PRISON EDUCATION	Providing access to Pell for incarcerated students
PUBLIC SERVICE LOAN FORGIVENESS	Improving terms and conditions for public service loan forgiveness

COLLEGE ACCOUNTABILITY RULES

ABILITY TO BENEFIT	Creating postsecondary pathways for students without high school diplomas
ADMINISTRATIVE CAPABILITY	Improving the rules for administrative capability of institutions
GAINFUL EMPLOYMENT	Instituting outcomes-based safeguards against excessive borrowing at for-profit and non-degree programs
FINANCIAL RESPONSIBILITY	Strengthening financial criteria for institutional access to federal funds
CHANGE OF OWNERSHIP	Better oversight of participating schools that change owners
CERTIFICATION PROCEDURES	New federal criteria to establish institutional eligibility to access federal student aid
90/10 RULE	Reinstating a key market-viability test to ensure taxpayers are not fully propping up otherwise failing for-profit enterprises. Also protects veterans from predatory for-profit schools

EXPERT CONTRIBUTIONS

We got the word out, and into the hands of the right people

9
LETTERS

addressing school quality with federal regulators

6
LETTERS

to federal officials on accreditation

3
LETTERS

proposing technical system improvements to IPEDs, the Direct Loan Program, and the GI Bill Feedback Tool

7
LETTERS

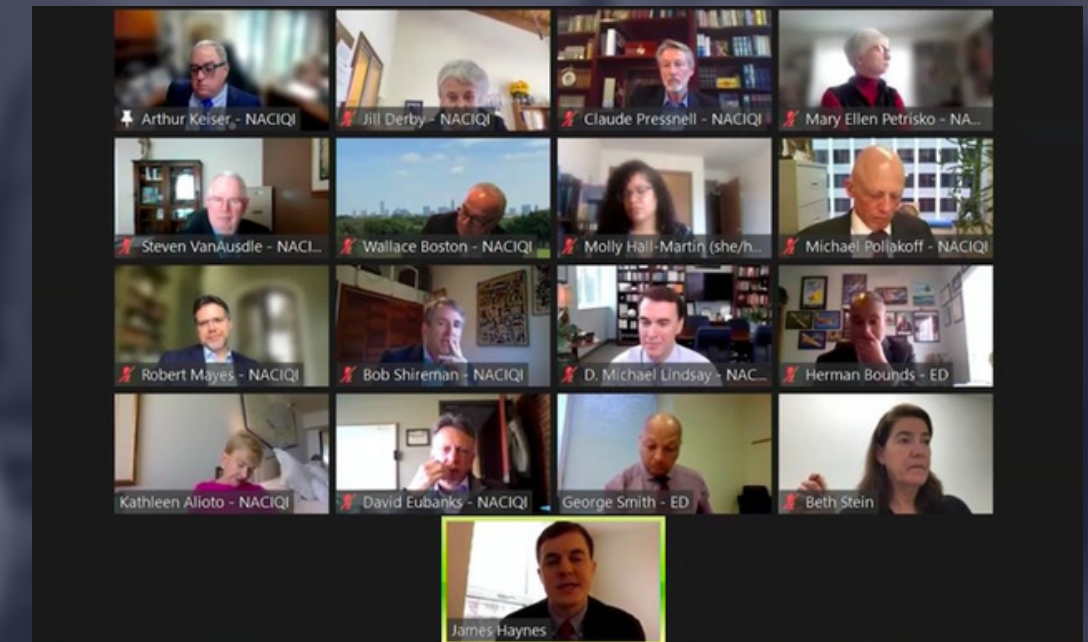
from coalitions on a range of topics including 90/10, NDAA, Incentive Compensation Ban, and more

We led meetings to provide expertise to the heads of **CFPB**, **Federal Student Aid**, and the **Department of Education**.

We engaged significantly with **VA** on protecting veterans and providing better oversight of schools.



Our VP for Veterans & Military Policy, Will Hubbard, testified before the House Veterans' Affairs Subcommittees on Economic Opportunity and Technology Modernization on modernizing veteran education and before the Department of Education on its rulemaking.



Our Federal Policy Director, James Haynes, testified twice before the Department of Education's National Advisory Committee on Institutional Quality and Integrity about accreditation, and in front of the Federal Trade Commission on lead generators.

DEPARTMENT OF EDUCATION RULEMAKING

We Mobilized 18 Student Veterans to Testify at Department of Education Rulemaking Hearings and Share Their Stories



“DeVry recruiters said I would get a job as a cop within 6 months of graduating.... I felt strong-armed to sign up immediately, and recruiters had me pose for photos in a cap and gown as if I already graduated.”



“Argosy said they’re highly ranked and selective. After I enrolled, I realized this was just a misleading sales tactic—the school let in people who hadn’t passed the GED and couldn’t handle college-level work.... admissions counselors had to meet quotas or risk getting fired.”



“The bottom line is that Ashford made promises to get me to enroll ... that did not turn out to be true. I would never have gone to Ashford if I had known that my GI Bill was not going to cover all my tuition, and that Ashford is unfriendly and unhelpful to military veterans...”



“DeVry also threw on extra required courses every semester, which meant I had to take out more loans than the recruiters had originally said I would need.... DeVry recruiters had told me my credits would transfer to any school in the US, but this was a lie too. I couldn’t find a single school that accepted them.”



“The program failed to provide quality teaching and instruction. Teachers... did not know how to teach. They just said, “here’s your book, here are your assignments.” I assumed it was a legitimate program since it was approved by the VA, but it was a real scam.”



“The financial aid office told me that the GI Bill took too long to come in and I would have to take out loans to cover tuition They also told me that my benefits did not cover all the tuition and extra loans were required. That didn’t make sense, but I trusted them.”

DIRECT SERVICE

OUR LAWYERS GAVE ONE-ON-ONE SUPPORT TO **750+ VETERANS:**

- Loan forgiveness applications
- Complaints to VA, CFPB, FTC, ED, and state AGs
- Disabled veterans' education benefits
- Appeals of denial of VA benefits
- Transferring VA benefits to dependents
- Educated almost 400 veterans about student loan forgiveness options
- Co-hosted a webinar on accessing Public Service Loan Forgiveness
- Convinced the Department of Education to accept military paperwork (DD-214s) to prove military service for PSLF eligibility

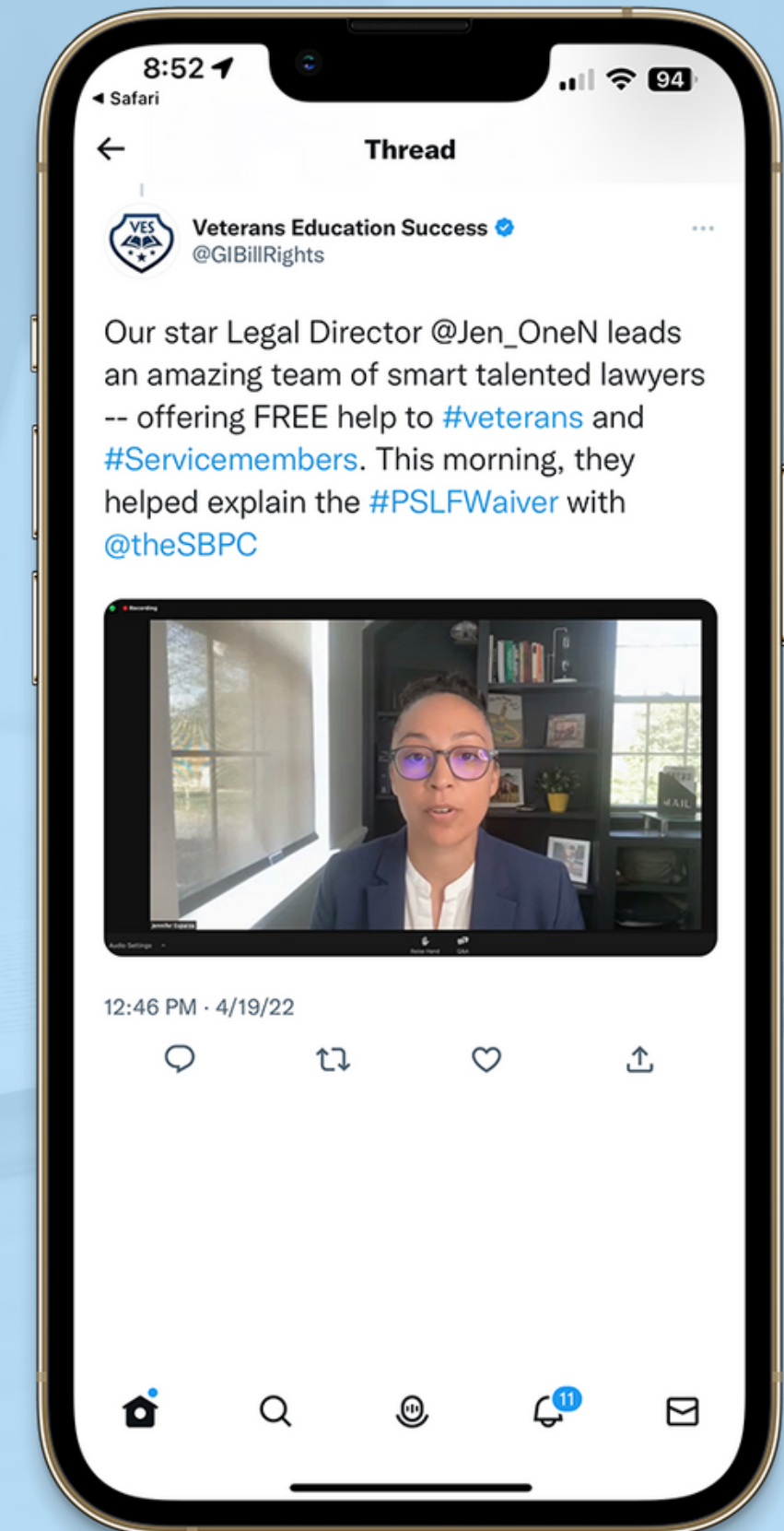
"THANK YOU TRULY FOR EVERY SINGLE THING YOU'VE DONE. I'VE BEEN SO FORTUNATE TO HAVE BEEN ASSISTED BY YOU. I WISH YOU PEACE AND PROSPERITY AND ALL OF YOUR UPCOMING ENDEAVORS! GOD BLESS YOU!"

"FOR THE FIRST TIME I FEEL LIKE THERE'S SOMEONE IN MY CORNER... THIS IS EXPONENTIALLY MORE HELP THAN I'VE RECEIVED SINCE TRYING TO NAVIGATE ANY OF THIS."

"WE DID IT, WE DID IT AND THANK YOU FOR YOUR HELP AND SUPPORT DURING ALL OF THIS TIME!! THANK YOU, THANK YOU, THANK YOU!!!"

"WOW WHAT GREAT NEWS!!! I CAN'T WAIT!!! THANK YOU SOOOOO MUCH"

"I'LL FINALLY BE OUT FROM UNDER THIS NIGHTMARE"



LEGAL ADVOCACY

The Department of Education **publicly recognized our work** in its announcement of \$3.9 billion in loan discharge for 208,000 ITT Tech students:

*“The Department’s findings around ITT were assisted by significant and extensive work by attorneys general across the country, the Consumer Financial Protection Bureau, and **Veterans Education Success.**” (emphasis added)*

Our years of work exposing fraudulent schools helped the Department of Education approve loan forgiveness for more than one million borrowers, including hundreds of veterans we’ve assisted.

The Department of Education **praised our work** laying out the “trends” in student complaints, which the Department calls a “roadmap” for borrower defense claims. Check out our trends reports: DeVry, EDMC/Dream Center, Grand Canyon University, ITT, Kaplan University/Purdue University Global, Perdoceo/CEC, and University of Phoenix.

- **We exposed illegal practices** by 7 schools, including a cult-like bible school now cut off from GI Bill
- We urged VA and DoD to **end recognition** for Ashford University/UAGC
- **Our report led to** the Department of Education's warning schools against deceiving veterans into taking out loans
- **We delivered 6 whistleblowers** to law enforcement, and worked with USA Today on a profile of one of them

“It’s immensely helpful, the work you’re doing.... In a nutshell, thank you. The evidence you provided was really essential. Your student statements help corroborate the claims and [your whistleblowers] are incredibly helpful.”

–Federal official to Veterans Education Success.

RESEARCH REPORTS

Learn [more](#) about our research and reports.



VETERANS EDUCATION SUCCESS

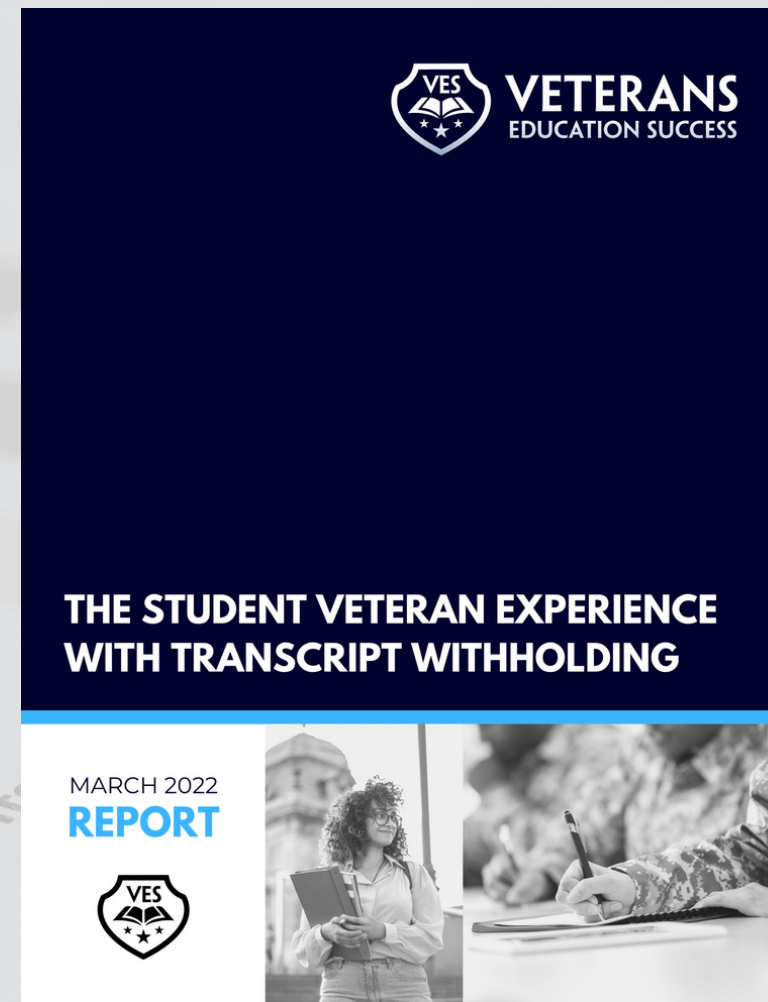
**VETERANS WITH STUDENT LOANS
THEY NEVER AUTHORIZED OR WANTED**

MARCH 2022
REPORT



A large number of veterans report that they have student loans they never authorized or knew about, or that they were forced to take out loans midway through their education program despite being promised that their GI Bill benefits would cover all tuition. The problem is so widespread that it is one of the most common complaints received at Veterans Education Success out of thousands of complaints over the past eight years.


[READ THE FULL REPORT](#)



VETERANS EDUCATION SUCCESS


**THE STUDENT VETERAN EXPERIENCE
WITH TRANSCRIPT WITHHOLDING**

MARCH 2022
REPORT



Colleges frequently withhold their students' academic transcripts for balances due, even when the debt is disputed. Indeed, transcript withholding is one of the most common debt collection tactics used by colleges across all sectors...The frequency of the practice has been estimated by the Ithaka S+R research group, which found that roughly 6.6 million students may be having their transcripts withheld for up to \$15 billion in unpaid balances to colleges.

[READ THE FULL REPORT](#)



VETERANS EDUCATION SUCCESS

**DESPITE A LONG HISTORY OF EMPLOYEE
CONFLICTS OF INTEREST WITH FOR-PROFIT
SCHOOLS, THE DEPARTMENT OF VETERANS
AFFAIRS' OVERSIGHT IS INSUFFICIENT**

DECEMBER 2022
REPORT



Failed oversight of predatory schools costs taxpayers. In the past two years, alone, student loan forgiveness from the Department of Education for students who were defrauded by a for-profit school cost taxpayers \$32 billion. If some of these costs to taxpayers are due to government employees' conflicts of interest or "regulatory capture," it may be a topic of interest to Congress.

[READ THE FULL REPORT](#)

IN THE NEWS

86 news stories quoted our work this year, including:



26

VETERANS
INTERVIEWED

11

TV
STORIES

19

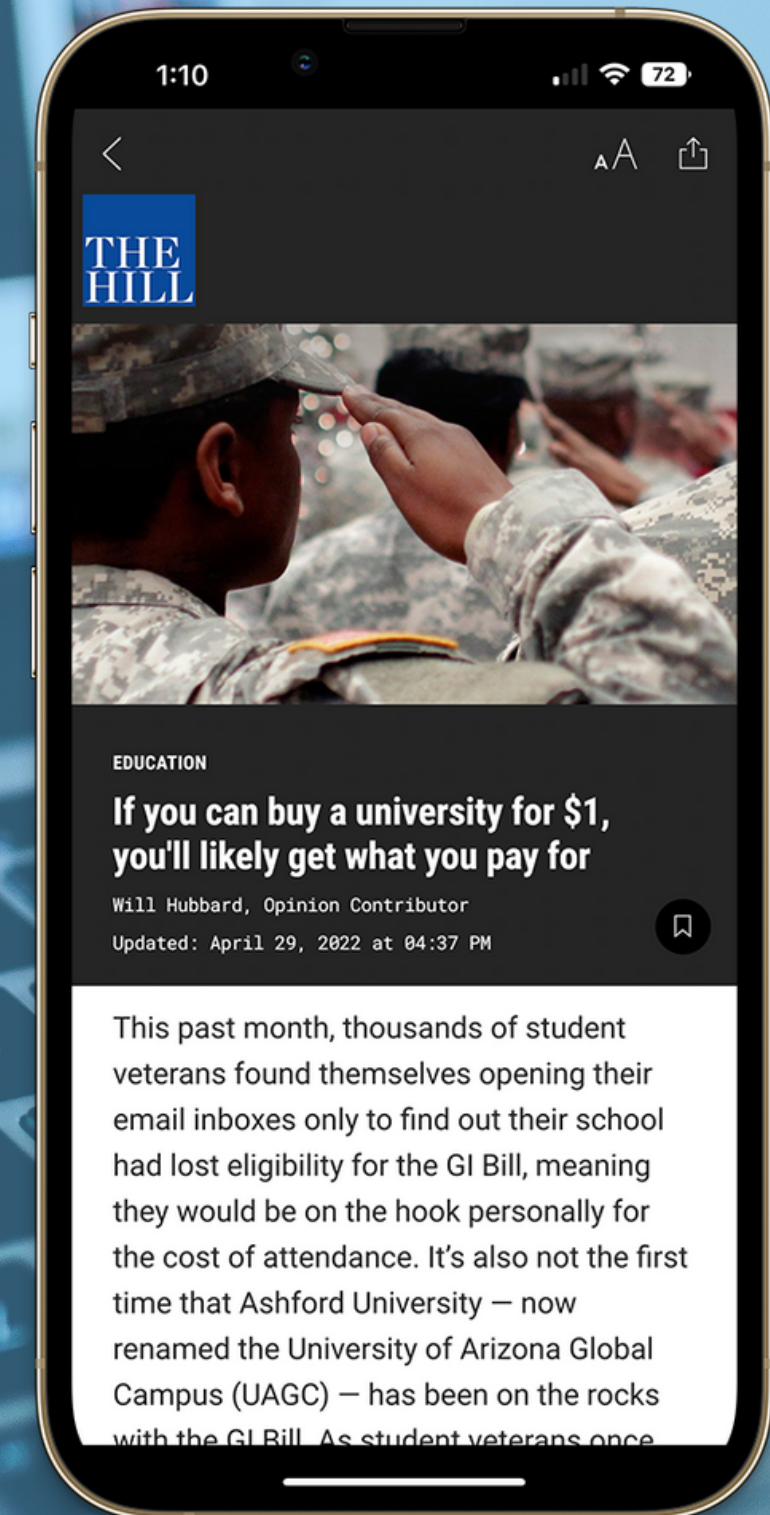
RADIO
STORIES

56

NEWSPAPER
STORIES

2 OF OUR VETERANS SPOKE AT EDUCATION
DEPARTMENT ANNOUNCEMENTS AND 4 JOINED PUBLIC
PANEL DISCUSSIONS

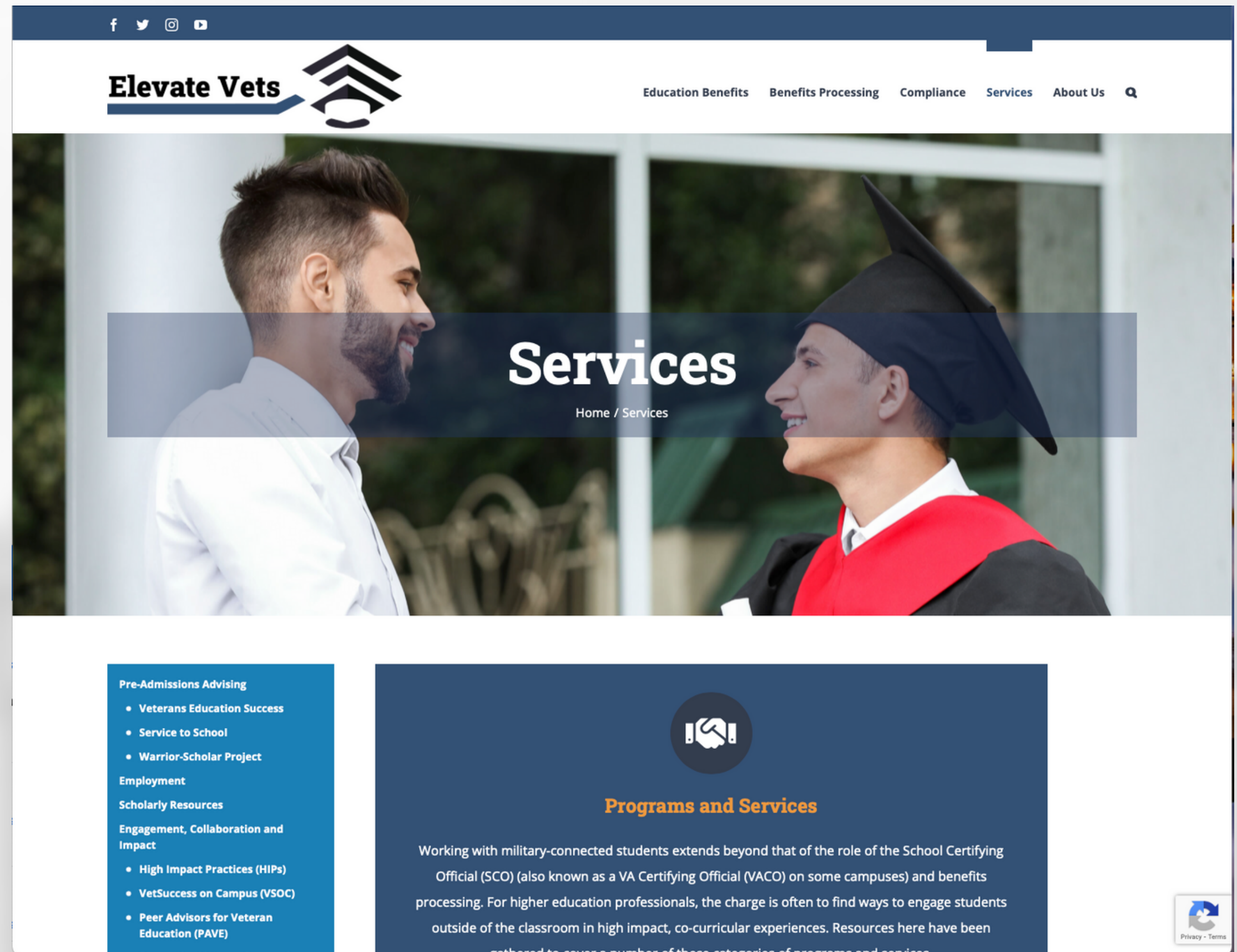
WE ALSO PUBLISHED 3 OP-EDS AND AN
IMPACTFUL PIECE ON VETERANS DAY



ELEVATE VETS

We successfully launched a major new initiative to provide technical assistance to campus officials administering the GI Bill: ElevateVets.

More than 400 campus officials so far have joined our webinars, training and compliance materials, practitioner's guide, and working groups – overseen by our advisory board of campus professionals.



Learn [more](#) about Elevate Vets

Veterans Education Success 2022

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