



**TESTIMONY OF WILLIAM HUBBARD,
VICE PRESIDENT FOR VETERANS & MILITARY POLICY
SUBMITTED TO THE
U.S. HOUSE VETERANS' AFFAIRS COMMITTEE
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
ON THE TOPIC OF
“LESS IS MORE: THE IMPACT OF BUREAUCRATIC
RED TAPE ON VETERANS EDUCATION BENEFITS”**

September 20, 2023

Chairman Van Orden, Ranking Member Levin, and Members of the Subcommittee:

We thank you for the opportunity to provide testimony before the Subcommittee on the pressing topic of, “Less is More: The Impact of Bureaucratic Red Tape on Veterans Education Benefits.”

Veterans Education Success is a nonprofit organization with the mission of advancing higher education success for veterans, service members, and military families, and protecting the integrity and promise of the GI Bill and other federal education programs. Drawing from our team's experience and direct interactions with student veterans, their families, and stakeholders, we offer our observations for the Subcommittee's consideration.

We would like to note our general gratitude to the leadership and staff of the Veterans Benefits Administration's (VBA) team in the Office of Education Service under the U.S. Department of Veterans Affairs (VA). Their collaboration on many issues, and commitment to serving veterans, are worth highlighting specifically. We rely on this important relationship based on candor and trust to develop solutions based on the collective expertise of our team. We recognize the importance of this relationship with VA, especially moving forward in light of the specific recommendations we offer below.

In this testimony, we will highlight four specific issue areas that provide an illustration of times when VA's processes or decisions represent – in our view – unnecessary and unsupported interpretations of the law. These have made protecting veterans and their hard-earned benefits more difficult, and presents significant red tape for veterans to overcome:

- First, risk-based surveys have multiple issues which we believe require additional attention from Congress, including: implementation by VA so that schools warranting a risk-based survey are selected for review and a thorough review is completed in a timely manner; creating the statutorily-mandated database to aid SAAs in completing the surveys; and aligning VA's standard operating procedures with statutory requirements.

- Second, VA’s insistence that students must enroll in a new school to get their Certificate of Eligibility has created an unnecessary and complicated two-tiered process. VA also continues to misinform students in the required application that they must apply for restoration before September 30 in order to get their GI Bill restored, when in actuality this is false under the statute. VA continues sharing this guidance, despite legislation that passed thanks to Representative Vern Buchanan, the VETS Credit Act, which streamlines the process and protects veterans and their rights.
- Third, VA arbitrarily restricts consumer information on the GI Bill Comparison Tool, including factual information about SAA decisions and student complaints about a school.
- Fourth, VA refuses to exempt veterans already enrolled in school under the Marine Corps’ “Excess Leave Program” from a newly adopted interpretation. These students relied on the prior interpretation allowing them to receive the monthly housing allowance (MHA) provided with their GI Bill benefits while attending law school. Without an exemption, they receive no housing allowance at all while attending school. VA has the latitude – and we would argue the *legal obligation* – to apply the new interpretation only to new enrollees and exempt current students from the new policy. This would allow veterans already enrolled to continue to receive their MHA while they apply their earned GI Bill benefits.

Before exploring each of these issues in greater depth, we would like to provide a brief historical context for the rules and regulations governing veterans' education benefits under this Subcommittee's oversight. We have been fortunate to work closely with the professional staff and personal offices under the current leadership. And, as an organization, we have heard from thousands of veterans since our founding in 2013, many of whom have detailed harrowing accounts of persistent scams to defraud veterans of their hard-earned benefits. Indeed, since the very first GI Bill – the Servicemen’s Readjustment Act of 1944 – there have been examples of scammers looking to take advantage of VA benefits.^{1, 2}

In 1952, a House Select Committee, led by Congressman Olin Teague of Texas, who served several decades as Chairman of the House Veterans Affairs Committee, exposed the trend of predatory schools targeting veterans and the GI Bill, “an unfortunate pattern that has continued to this day.”³ In response, Congress passed several bipartisan landmark laws to address the need for stamping out fraud schemes of bad actor schools and programs to rightfully protect valuable veterans benefits and taxpayer dollars.

¹ U.S. National Archives, “Servicemen's Readjustment Act (1944),” Archives.gov, accessed September 14, 2023, <https://www.archives.gov/milestone-documents/servicemens-readjustment-act>.

² The Century Foundation, “The Cycle of Scandal at For-Profit Colleges,” accessed September 14, 2023, <https://tcf.org/topics/education/the-cycle-of-scandal-at-for-profit-colleges/>.

³ House Select Committee to Investigate Educational, Training, and Loan Guaranty Programs Under GI Bill. “House Report No. 1375: Report of the House Select Committee to Investigate Educational, Training, and Loan Guaranty Programs Under GI Bill,” 82nd Cong., 2nd sess., 1952. <https://vetsedsuccess.org/wp-content/uploads/2018/10/1952-house-committee-report-gi-bill-fraud.pdf>.

More recently, the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*⁴ (Isakson-Roe) established the statutory requirement for the VA to conduct risk-based surveys of schools. This approach is intended to be more efficient and effective in prioritizing quality assurance reviews for the riskiest schools and programs.

Also contained in Isakson-Roe, the *Protect the GI Bill Act*⁵ enhances oversight of programs, prohibits deceptive recruiting, restores education benefits for military-connected students at closed schools, ensures fair treatment regarding overpayments, safeguards students from failing schools, and additional key protections. In the years prior, we also successfully advocated for the unanimous passage of the *Career Ready Student Veterans Act*, ensuring that education programs funded by the GI Bill meet accreditation and state licensure requirements, preventing veterans from wasting their benefits on degrees that do not lead to jobs. These bills, and many others, provide necessary and common sense safeguards.

At the outset, we would urge the Subcommittee to consider that poor implementation of laws by VA and refusal by schools to devote adequate resources are often the real reason behind school complaints and opposition to perfectly reasonable laws. Institutions, in particular, tend to see any compliance requirements – intended to protect student veterans and taxpayers – as imposing unnecessary costs. Often, the real problem isn't the rules themselves, but how they are put into practice by VA and how unwilling some institutions are to invest resources in providing the appropriate staff support.

Take, for example, the fact that VA suggests that schools should have one school certifying official (SCO) for every 125 students, but most schools don't meet this standard. Many SCOs are overwhelmed with work, but SCOs' feeling overwhelmed is not a function of legitimate laws but instead of schools' failure to hire enough staff to perform the work. This is especially unfair in light of the generous GI Bill benefits that schools receive; too many institutions don't invest enough in providing the necessary services, like processing veterans' benefits. Moreover, protecting student veterans is a core responsibility of this Subcommittee, which should not be swayed by school complaints about common-sense laws to protect veterans and the GI Bill funds.

Also, VA has changed their operations, such that SCOs seeking support and information from VA have very few channels for direct feedback and guidance. It is important to balance the need to maintain rigorous protections on these earned benefits, while having schools spend these precious resources wisely on their intended recipients. Unfortunately, low-quality and sham schools continue to be approved for GI Bill benefits, indicating the need for more robust approval processes and oversight by VA. Further, VA's failures to interpret laws as Congressional staff and advocates believe they should be interpreted have prevented these laws from being effectively implemented.

⁴ Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020, H.R. 7105, 116th Cong., 2nd sess., 2020, <https://www.congress.gov/bill/116th-congress/house-bill/7105>.

⁵ Protect the GI Bill Act of 2019, H.R. 4625, 116th Cong., 1st sess., 2019, <https://www.congress.gov/bill/116th-congress/house-bill/4625>.

We believe VA can, and should, implement the proposed solutions bulleted throughout our testimony below. However, we have also provided potential Legislative Branch Solutions for consideration under the potential scenario that VA does not execute an Executive Branch Solution to these issues. Finally, we thank the Subcommittee for hosting this hearing to examine ways to streamline existing processes, and to make the system work better for VA's primary group of customers: *veterans*.

Fixing Risk-Based Surveys

Risk-based surveys aim to engage with educational institutions more meaningfully than the historical tool (compliance surveys) to address deficiencies and potential problems that would negatively affect student veterans. However, discrepancies persist in VA's execution of the statute, creating unfair doubts about the efficacy of the new risk-based approach. Specifically, three areas of risk-based surveys should be looked at closely: implementation, the database, and standard operating procedures. Addressing these issues and ensuring compliance with the law is crucial to maintaining the integrity of the risk-based survey system and providing adequate protection for veterans pursuing their education and training goals.

1. Implementation: The implementation of risk-based surveys by VA has been a subject of concern due to its failure to align with the statutory requirements. Despite the clear mandates set forth in 38 U.S.C. §3673A⁶, it has become evident that VA's execution of risk-based surveys has fallen short of the required standards. Risk-based surveys are not intended to be simply a revamped version of compliance surveys. We have contacted VA multiple times about our concerns that the surveys are not being implemented consistent with the law. We appreciate that VA has been responsive to some of our concerns, including its recognition that the nature or volume of student veteran complaints can lead to the need for a risk-based survey. However, there continue to be instances where VA's procedures do not accurately reflect the law, particularly in terms of the timeline for conducting surveys and the triggering events that should prompt immediate action.

For instance, until recently VA and the SAAs did not understand that certain events affecting a school, such as risk of loss of accreditation, automatically triggers a risk-based survey to be completed within sixty days of becoming aware of the event. Time is of the essence for completing a risk-based survey when one of the automatic triggers in the statute occurs. Those kinds of events indicate serious compliance and financial risk and often occur just before a sudden school closure. Addressing these shortcomings and ensuring compliance with the law is essential to maintain the integrity of the risk-based survey system, and to provide adequate protection for veterans pursuing education and training.

- **Executive Branch Solution:** Working with the National Association of State Approving Agencies, VA should implement the statutorily codified risk-based survey methodology, consistent with Congress' intent and the six-state pilot.⁷

⁶ 38 U.S.C. §3673A, "Risk-based surveys", [https://uscode.house.gov/view.xhtml?req=\(title:38%20section:3673a%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title38-section3673a\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:38%20section:3673a%20edition:prelim)%20OR%20(granuleid:USC-prelim-title38-section3673a)&f=treesort&edition=prelim&num=0&jumpTo=true)

⁷ In 2019, our colleagues at The American Legion, EducationCounsel, and the National Association of State Approving Agencies carried out an overwhelmingly successful six-state pilot

- **Legislative Branch Solution:** Provide additional oversight of VA’s implementation of 38 U.S.C. §3673A and risk-based surveys to ensure the effective implementation of policies and regulations aligned with the original Congressional intent of the statute.

2. *Searchable Database.* The statute requires VA to establish a comprehensive searchable database for risk-based surveys, yet they have fallen short of fulfilling these statutory obligations. In June, we provided a statement for the record annotating our concerns with the lack of progress of VA in implementing the statute governing this requirement.⁸ The phrase in the statute “in partnership with” not only signifies a cooperative relationship between Education Service and the SAAs, but also underscores the imperative for collaboration in accessing the database. This straightforward phrase conveys the importance of joint efforts rather than unilateral control ensuring that the SAAs have essential access to the database.

We also believe there is an opportunity to simplify current procedures by making schools report specific events to the relevant SAAs and VA. These events, as outlined in 38 U.S.C. 3673(e)(3), include punitive actions taken by a state and the loss or risk of losing accreditation. This is information schools will readily have available. The most efficient method for assuring that SAAs and VA receive timely notice when these events occur is to require the schools to provide notice.

- **Executive Branch Solution:** Establish a searchable database accessible by the SAAs, and import current data which is presently only accessible by VA officials.
- **Legislative Branch Solution:** Pass H.R. 3981, which will require VA to finally establish the database within 180 days of passage, so that risk-based reviews by SAAs can be conducted as Congress intended.⁹ This legislation would also require schools to self-report any adverse actions, which we believe to be an administratively simpler approach than asking VA to independently track every single action themselves. We thank Representative Morgan McGarvey for offering this important and timely legislation mandating an explicit timeline in complement with the statutory requirements as codified in Isakson-Roe.

3. *Standard Operating Procedures:* In response to concerns raised about the procedures for risk-based surveys under 38 U.S.C. §3673A¹⁰, VA shared their new Standard Operating Procedure (SOP) to address these issues. While the SOP is

of this new approach; American Legion, “Risk-Based Review Report Final,” January 28, 2022, accessed September 14, 2023, <https://www.legion.org/sites/legion.org/files/legion/publications/RiskBasedReviewReportFinal012822.pdf>

⁸ Veterans Education Success, “Statement for the Record on the June 14, 2023, Legislative Hearing of the House Veterans Affairs Subcommittee on Economic Opportunity,” accessed September 14, 2023, <https://vetsedsuccess.org/our-statement-for-the-record-on-the-june-14-2023-legislative-hearing-of-the-house-veterans-affairs-subcommittee-on-economic-opportunity/>.

⁹ H.R. 3981, Veterans Education Oversight Expansion Act, Subcommittee on Economic Opportunity, Committee on Veterans' Affairs, U.S. House of Representatives, July 26, 2023, accessed September 14, 2023, <https://docs.house.gov/meetings/VR/VR00/20230726/116265/BILLS-1183981ih.pdf>.

¹⁰38 U.S.C. §3673A, *ibid*.

very good, and beneficial for SAAs, we have expressed some notable concerns that it is not fully consistent with the statute.¹¹ Firstly, it suggests that SAAs should take action only upon receiving a formal notice, rather than when they become aware of an event – but the statute explicitly calls for SAA action upon “becoming aware” of an event. Secondly, the SOP starts the 60 days for completing the survey from the date the SAAs notify VA and allows SAAs to wait for up to 10 business days before notifying VA, which extends the 60-day timeline – and this is, again, at odds with the explicit language of the statute.

Lastly, when VA receives notice or becomes aware of an event, it is statutorily mandated to notify the SAAs within 30 days. VA’s current SOP, however, implies that notice will be provided within 30 days of the Oversight and Accountability Office completing review. VA should clarify with staff and in the SOP that the notification to the relevant SAA must be provided no later than 30 days after the date VA receives notice or becomes aware of the event. We are grateful to VA for developing the SOP’s and have offered further discussion or a marked-up version if needed.

- **Executive Branch Solution:** Align the standard operating procedures with statutory requirements, specifically addressing concerns raised about SAAs’ response to formal notices, potential delays in notification, and the need for clarity in VA’s timeline for notifying SAAs.
- **Legislative Branch Solution:** Provide additional oversight of 38 U.S.C. §3673A and VA’s standard operating procedures to ensure they are aligned with the original Congressional intent of the statute and are effectively implemented.

Reducing Administrative Burden

When a school closes or a program is disapproved, student veterans are left wondering what comes next. This is a difficult question for anybody in that situation to answer; however, it is further complicated when VA establishes unnecessary hurdles for student veterans who desire to take the next step in their education goals. We encouraged VA to remove their unwarranted barrier that had prevented students from applying for GI Bill restoration at any time.

Although Congress’ statutory language was clear in our view and that of Committee staff, under VA’s interpretation, student veterans were compelled to enroll in a new school before being eligible to obtain certificates of eligibility for benefits restoration. This policy raised valid concerns about students being rushed into decisions and the risk of enrolling in predatory institutions. What exacerbates the situation is the undeniable fact that VA inappropriately interpreted the statute to mean that a veteran would not find out if they could get their GI Bill restored until after they had actually transferred to a new school, but of course a student would not transfer to a new school if they didn’t know if they were going to get any GI Bill back.

Faced with VA’s reluctance, we collaborated with Rep. Vern Buchanan to pass H.R. 6604, known as the *Veterans Eligible to Transfer Schools (VETS) Credit Act*. This act ensures that veterans have the chance to learn about their GI Bill benefits before

¹¹ See Appendix for complete exchange between Veterans Education Success and VBA Education Service.

transferring. We find it unfortunate that such a legislative intervention was necessary due to VA's entrenched and narrow interpretation of existing statutes; VA could have chosen to address the issue administratively. Nevertheless, the VETS Credit Act strives to streamline and clarify the restoration process.

Today, however, we face a new hurdle, presenting yet another example of VA's failure to implement the law.¹² VA currently limits the new process for obtaining the Certificate of Eligibility before transferring to a new school solely to students enrolled in schools that close after December 27, 2022, when the VETS Credit Act became law. This directly contradicts the express provisions in the statute making the VETS Credit Act applicable to schools closing before September 30, 2023.^{13, 14} The VETS Credit Act amended 38 U.S.C. §3699(c) and as incorporated by statute, the provisions of the VETS Credit Act apply to courses and programs closed before September 30, 2023. Section 3699(c)(2)(C) expressly provides: "This paragraph shall apply with respect to a course or program of education closed or discontinued before September 30, 2023." The VETS Credit Act left this existing provision untouched. There is no justification for VA's decision to limit the provisions of the VETS Credit Act to students attending schools that close or lose approval after December 27, 2022.

The remaining discrepancies, along with inaccuracies in the VA's restoration application form, might discourage student veterans from fully accessing their earned benefits. Correcting these items is paramount to ensuring that veterans have an easier, more accessible avenue for restoring their education benefits in the aftermath of school closures. More importantly, we urge the Subcommittee's quick action because all of the statutory authorities for GI Bill restoration in case of school closure will expire September 30, 2023, unless Congress takes action. We strongly advocate that the law should be extended to afford student veterans the chance to get their GI Bill benefits reinstated when these situations outside of their control occur.

- **Executive Branch Solution:** Fully implement the VETS Credit Act, and apply to all veterans who apply for GI Bill restoration regardless of timeline, as Congress intended.
- **Legislative Branch Solutions:** Amend 38 U.S.C. 3699(c)(2)(A) to explicitly instruct VA to consider a student veteran's application for restoration under the provisions of the VETS Credit Act regardless of when their program was affected or when they apply as long as they meet other eligibility standards. Also, it is imperative for Congress to extend the current September 30, 2023, expiration date associated with GI Bill restoration in closure and disapproval scenarios.

¹² Veterans Education Success, "Letter from Rep. Buchanan Urging VA to Update Its Guidance on GI Bill Restoration After Closed Schools," accessed September 14, 2023, <https://vetsedsuccess.org/letter-from-rep-buchanan-urging-va-to-update-its-guidance-on-gi-bill-restoration-after-closed-schools/>.

¹³ Veterans Education Success, "Letter to VA Regarding the VETS Credit Act," June 14, 2023, accessed September 14, 2023, <https://vetsedsuccess.org/wp-content/uploads/2023/06/VA-VETS-Credit-Act-letter.pdf>.

¹⁴ U.S. Department of Veterans Affairs, "Restoration of Benefits After School Closure or if a School is Disapproved for GI Bill Benefits," accessed September 14, 2023, <https://www.benefits.va.gov/GIBILL/Restoration.asp>.

Streamlining Consumer Information

The GI Bill Comparison Tool provides important information to student veterans. We have commented often to this Subcommittee about the various ways in which the Comparison Tool should be implemented to provide better information to veterans. We are glad VA has implemented some of the changes we have recommended for the Feedback Tool and the Comparison Tool.¹⁵

However, we continue to find that information important to veterans and that could be easily available on the Comparison Tool is not provided. For instance, one particular issue we have continued to raise is the importance of retaining historical information on the Comparison Tool. Currently, when a school closes or a program loses approval, it simply disappears from the Comparison Tool and WEAMS (Web Enabled Approval Management System) without any explanation. The lack of transparency and information, including the relevant dates for when the school closed or lost approval, creates unnecessary hurdles for student veterans as well as for researchers and Congress.

We were recently contacted by a veteran who had attended an unaccredited school approved to receive GI Bill benefits. The student reported that they thought the school lost its VA approval. The Comparison Tool and WEAMS did not offer details about the student's school or program, including the timing and reasons for its approval loss, crucial information for GI Bill restoration. We attempted to help the student by reaching out to the appropriate agencies to obtain the information, but it's an unnecessary and inefficient way for students to learn about a school that lost its approval. A much more efficient and direct way to assist veterans is to provide information in the Comparison Tool.

Similarly, we continue to urge VA to retain information in the Comparison Tool about all student complaints received, and especially beyond the most recent two years. A school's history of complaints is information a prospective student veteran is entitled to know, and is information that may impact their school selection. Currently, VA publishes information about complaints closed in just the most recent two years, which denies prospective students important information about the history and volume of student complaints to VA about a school.

- **Executive Branch Solution:** Implement 38 U.S.C. §3698 so that the Comparison Tool provides information that is relevant to student veterans. The Comparison Tool is a centralized mechanism for delivering important information to student veterans and by statute should publish complaints and information from students and the State approving agencies.¹⁶ VA has incorrectly concluded that information about a history of complaints about a school or decisions by the SAA affecting a program – including program disapproval – is not relevant information for student veterans.

¹⁵ Veterans Education Success, "Our Letter to VA Regarding January 12, 2023 Meeting and Feedback Tool," February 15, 2023, accessed September 14, 2023, <https://vetsedsuccess.org/our-letter-to-va-regarding-january-12-2023-meeting-and-feedback-tool/>.

¹⁶ 38 U.S.C. § 3698(b): "In developing the policy required by subsection (a), the Secretary shall include each of the following elements: (1) A centralized mechanism for tracking and publishing feedback from students and State approving agencies regarding the quality of instruction, recruiting practices, and post-graduation employment placement of institutions of higher learning..."

- **Legislative Branch Solution:** Propose a companion bill to S. 1309 to increase student veterans' access to relevant consumer information.¹⁷

Delaying VA Policy

VA created an issue stemming from their abrupt policy shift concerning service members enrolled in the Marine Corps Excess Leave Program (ELP). This policy change, initiated by VA's Office of General Counsel, reclassifies ELP participants as being on "active duty," thereby stripping them of their MHA under their GI Bill benefits. Effective August 1, 2023, this new policy from VA imposes severe financial hardships on seven service members who embarked on law school studies with the assurance of MHA support. Under the new interpretation, service members attending school as ELP participants are not entitled to the MHA with their GI Bill benefits, while also not receiving housing benefits from DOD. VA has refused to exempt currently enrolled students from this new interpretation.

There are currently seven students who enrolled in law school based on the longstanding policy that ELP participants are entitled to the MHA. Despite starting their program under one set of rules, these student veterans now face substantial housing expenses and the likely need to take out loans with limited options to withdraw from school due to career repercussions and extended service obligations.

The situation underscores the need for immediate action to exempt current ELP participants from the new interpretation and explore legislative remedies in collaboration with the VA Committees. We have called on VA to make the commonsense and fair decision to not implement this new policy for these seven service members to prevent harm to these individuals, and to afford them to use their full GI Bill benefits they rightfully earned.¹⁸

- **Executive Branch Solution:** VA has both the discretion and, in our view, a *legal obligation* to apply the new interpretation exclusively to new students and exempt current students from the new policy. Additionally, VA should make it explicitly understood to all new program participants what the new policy is, and how it may affect students financially.
- **Legislative Branch Solution:** Amend 38 U.S.C. § 3313(e) to explicitly authorize a monthly housing allowance for Excess Leave Program participants notwithstanding their active-duty service status.

Conclusion

We would like to extend our gratitude to the Education Service staff and leadership for their diligent efforts in supporting student veterans and their families, as we continue to work through these issues. We acknowledge their hard work, though it's

¹⁷ Veterans Education Oversight Expansion Act of 2023, S. 1309, 118th Cong., 1st sess., 2023, <https://www.congress.gov/bill/118th-congress/senate-bill/1309>.

¹⁸ Veterans Education Success, "Our Letter to the Department of Veterans Affairs on the Marine Corps Excess Leave Program," June 21, 2023, accessed September 14, 2023, <https://vetsedsuccess.org/our-letter-to-the-department-of-veterans-affairs-on-the-marine-corps-excess-leave-program/>.

evident that we must prioritize the welfare of our veterans and address pressing issues that have occasionally led to unintended consequences. The four notable challenges we've highlighted continue to stand out: risk-based surveys, VA's interpretation of Congressional intent on GI Bill restoration, Comparison Tool Data, and the Excess Leave Program.

Unfortunately, we continue to see alarming examples of fraud that make it necessary to maintain a strong regulatory and oversight framework. Just last year, a school called House of Prayer Bible College had five campuses raided by the FBI after a multi-year investigation proved they were a sham operation.¹⁹ Two years prior, we alerted VA to student veteran concerns and whistleblower complaints about House of Prayer, but this unfortunate instance demonstrated the fact that current program standards are inconsistent with VA's implied "stamp of approval" for too many programs.²⁰

We sincerely appreciate the opportunity to express our views before this Subcommittee. As the higher education industry continues to evolve in these very dynamic times, we emphasize the importance of maintaining high standards of quality. Student veterans, taxpayers, and Congress must expect the best outcomes from the use of hard-earned GI Bill benefits. We look forward to the consideration and discussion of these issues, and we are grateful for the continued opportunities to collaborate with this esteemed body.

¹⁹ Beynon, Steve. "House of Prayer Church Accused of Squeezing Veterans' Benefits, Stripped of GI Bill Eligibility." Military.com, October 4, 2022. Accessed September 14, 2023.

<https://www.military.com/daily-news/2022/10/04/house-of-prayer-church-accused-of-squeezing-veterans-benefits-stripped-of-gi-bill-eligibility.html>.

²⁰ Veterans Education Success, "Our Letter to VA and Georgia SAA Regarding House of Prayer Christian Church," August 2020, <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church>.

Information Required by Rule XI2(g)(5) of the House of Representatives

Pursuant to XI2(g)(5) of the House of Representatives, we hereby confirm that neither William Hubbard nor Veterans Education Success has received any federal grants during Fiscal Year 2023, and there have been no federal grants awarded in the two preceding Fiscal Years. There is no existing fiduciary involvement with any organization or entity that holds a direct or indirect interest in the subject matter of this hearing. This disclosure statement is provided in adherence to the aforementioned rule and is presented as an accurate representation of the financial and fiduciary affiliations relevant to this testimony.