



Representative Mike Bost, Chairman
House Committee on Veterans' Affairs
364 Cannon House Office Building
Washington, D.C. 20003

Representative Juan Ciscomani
1429 Longworth House Office Building
Washington, DC 20515

Dear Chairman Bost and Representative Ciscomani,

We write regarding the release of the *Senator Elizabeth Dole 21st Century Veterans Healthcare and Benefits Improvement Act*. We appreciate all the work that went into this legislation, and we thank you and your staff for considering our input on the education elements in the package.

We would like to highlight the following provisions which we strongly support:

- **Section 201.** Temporary expansion of eligibility for Marine Gunnery Sergeant John David Fry Scholarship.
- **Section 202.** Removal of expiration on entitlement to Marine Gunnery Sergeant John David Fry Scholarship for surviving spouses.
- **Section 206.** Expansion of Department of Veterans Affairs oversight of certain educational institutions.
- **Section 211.** Retroactive effective date of law regarding change to entitlement to educational assistance for individuals who do not transfer credits from certain closed or disapproved programs of education.

Generally, these provisions will contribute to a more transparent education benefits ecosystem, and will improve oversight of the valuable benefits veterans have rightfully earned. This is especially important given the long track record of predatory institutions abusing GI Bill benefits, an issue that unfortunately persists with great prevalence to this day.

We would also like to express our support for **Sections 208, 210, and 214.**

However, we have concerns and technical feedback regarding the following sections as briefly outlined below.

- **Section 204.** We believe this section should be stricken to prevent institutions from exploiting additional time to hide improper activities before the execution of a targeted risk-based review. The very reason for Section 12 of the *Veterans Auto and Education Improvement Act of 2022* was to ensure institutions could not hide fraud in scenarios that necessitate a surprise visit to execute a targeted risk-based review.
- **Section 205.** We oppose this section as currently drafted because it effectively nullifies Section 1015 of the Isakson-Roe Act and would allow predatory institutions to regain access to GI Bill funds.
- **Section 207.** While this section aims to preserve access to academic records for student veterans, we believe the current text would not meet this intent. Most employers and virtually all institutions will insist on the direct receipt of a transcript from the prior institution, and would not trust a transcript provided by a student, as it could have been altered. We would recommend records management by trusted third parties to maintain record integrity.

- **Section 209.** We believe this section should be stricken, as exempting branch campuses from the two-year market-viability requirement poses undue risks. Removing this protection would subject student veterans to risky branches that are set up for the purpose of siphoning off VA educational benefits.
- **Section 212.** We strongly recommend modifying this section to a one-year extension for the VET TEC program, as the current program has shown a consistent decline in employment outcomes. One year would be sufficient time to make the necessary improvements to the program.
- **Section 215.** Section 215 is an important provision, but with some critical flaws. We strongly oppose the provision allowing institutions to contest publishing student feedback data, as this would incentivize unscrupulous schools to contest valid feedback from student veterans for the sole purpose of keeping the student's concerns from becoming public. We also believe that schools should not be allowed to publish their responses if the narrative portion of student complaints are not also published. Finally, we appreciate the requirement that data appearing in the GI Bill Comparison Tool, including institutional information and student feedback, are publicly available, but strongly urge that it not be limited to six years.
- **Funding Structure.** We have serious reservations about the funding structure of the bill, and would like to see the final text include adequate funding without compromising future programs.

We thank the Committee and the dedicated staff for negotiating this legislation with the intent of supporting veterans, their families, and survivors. We support the bill's goals of increasing transparency and the quality and delivery of earned GI Bill education benefits. We encourage the Committee to work towards bipartisan and bicameral agreement on this legislation and stand ready to provide technical expertise as the bill is negotiated.

Sincerely,



William Hubbard
Vice President for Veterans & Military Policy