



# Expanding Opportunity Through Education

## Annual Report 2024





# Our Impact: By the Numbers

**604** Student veterans and military family members contacted us for assistance



**5** **Groundbreaking** federal reports studying the **Post-9/11 GI Bill**



**10** Letters to the **White House & Federal Departments** or Agencies

**9** Letters to **accreditors** to expose **substandard schools**



**24** Veterans presented their **experiences** at the **Department of Education Rulemaking**

**49**

News stories highlighting our team's work



**8** Grassroots Coalition Letters

**5** Statements for the Record and Letters to **Congress**



**9** Veterans came to Washington, DC, for our Fly-In Day to share their stories



**2** Freedom of Information Act (**FOIA**) Requests





# What We Do

We stand with and for veterans, learning from their experiences, which shapes our advocacy efforts. This is our recipe for success:



**Bipartisan Policy Advocacy.** Non-partisan assistance to policymakers to improve higher education quality and veterans' success and to protect the integrity of the GI Bill.



**Research & Reports.** Non-partisan research on issues of concern to student veterans, including student outcomes and federal oversight.



**Free Help for Veterans and Military-Connected Students.** Our team provides free legal services, and college and career counseling, which gives us insight into school practices and student veterans' challenges. This informs our policy formulation.



**Civic Engagement.** Bringing veterans to Washington to amplify their voices for policymakers and directly share their personal experiences.



**Legal Advocacy.** Legal work building cases to stop predatory colleges from engaging in consumer fraud that harms veterans, taxpayers, and all students.



# Elevating Veterans' Voices

**Student veterans and their family members offered powerful statements during the U.S. Department of Education rulemaking, and 14 made news.**

“

The instruction entirely consisted of YouTube videos that I could have watched for free on my own... The teachers seemed practically non-existent to me.

- *Sonoran Desert Institute Student*

“

I graduated... after 5 years, and in all that time, I never had a real-time conversation or interaction with a single teacher, not in a group or one-on-one.

- *DeVry University Student*

“

Accreditors need to do a better job of making sure that doctoral programs are meeting legitimate educational and professional development goals...

- *Grand Canyon University Student*

“

I entered my last term only two classes short of earning my degree. This is when we learned the school was closing immediately.

- *Art Institute Student*

“

It did not have the accreditation that would make us eligible for the jobs we thought we could get... I had spent fourteen months in an expensive program and it turned out to be total junk.

- *Colorado Technical University Student*

“

The educational setup was ridiculous... The teachers did not interact or engage in the discussion... I had to teach myself.

- *Walden University Student*



# Sharing Their Stories

In June, we hosted a fly-in event, bringing veterans to Washington to amplify their voices and share their experiences with policymakers to drive meaningful change.



*“I believe we made an impact and it’s all thanks to you and the rest of the team. So it’s me who is grateful for all the work you do behind the scenes. You and the team really are the unsung heroes.”*

*“It was really an honor to be a part of this week and I’m hopeful it helps vets everywhere. Thank you for your advocacy and support for veterans.”*

*“I was happy to have a chance to advocate for other veterans who share similar experiences, and I would love the opportunity to continue to work with VES. I’m thankful for all you do for veterans.”*



# Exposing Bad Actors

In our enforcement work, we alerted accreditors and the Department of Education when schools engaged in deceptive practices and provided low-quality education.



**We alerted accreditors to alleged bad practices at numerous schools**

- [Remington College](#)
- [American InterContinental University System](#)
- [Lincoln Technical Institute](#)
- [IntelliTec](#)
- [Concorde Career College](#)
- [Aviation Institute of Maintenance](#)
- [DeVry University](#)
- [California Institute of Applied Technology](#)
- [MyComputerCareer](#)



**We exposed the failures of accrediting agencies to the Department**

- [Western Association of Schools and Colleges](#)
- [Council on Occupational Education](#)
- [Accrediting Commission of Career Schools and Colleges](#)



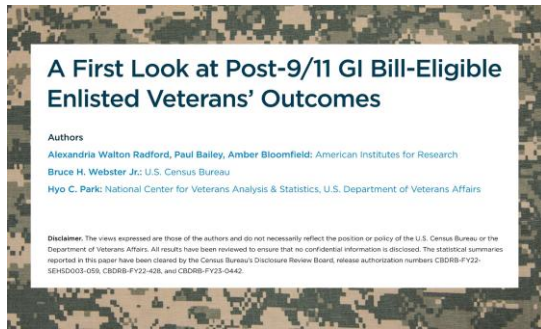
**We petitioned the Department to investigate fraud & help student veterans**

- [Perdoceo \(formerly CEC\) Schools](#)
- [EDMC Schools](#)
- [Borrower Defense Group Loan Discharge coalition letter for multiple institutions, including Ashford University and Florida Career College](#)

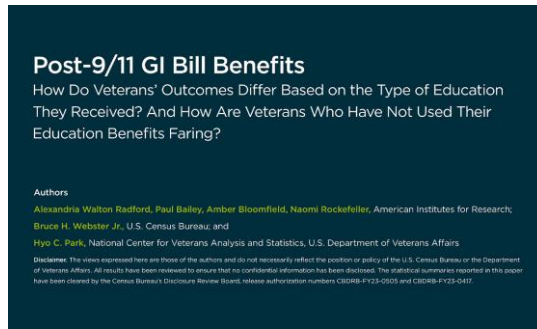


# Achieving Groundbreaking Research

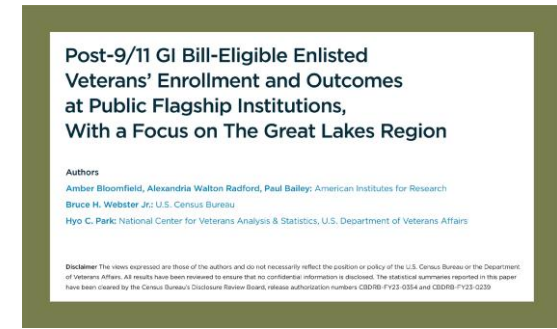
After a decade of persistence, we are thrilled to announce the results of the first-ever comprehensive analysis of Post-9/11 GI Bill outcomes for 2.7 million students, using data from DOD, VA, IRS, the Census Bureau, and the National Student Clearinghouse, from an interagency research team.



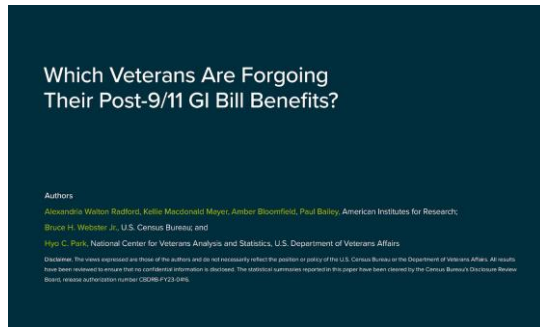
The first-ever analysis of GI Bill usage and outcomes, including data on IRS earnings



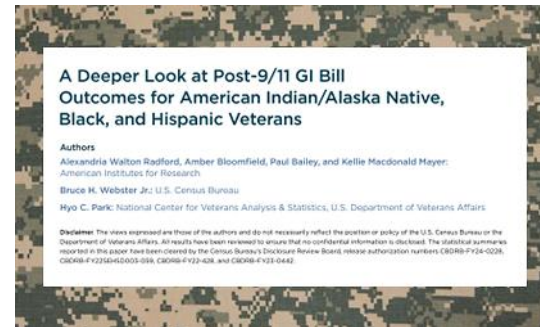
Findings on which types of programs and colleges have the best GI Bill outcomes



A review of GI Bill outcomes at public flagship universities, as compared to other colleges



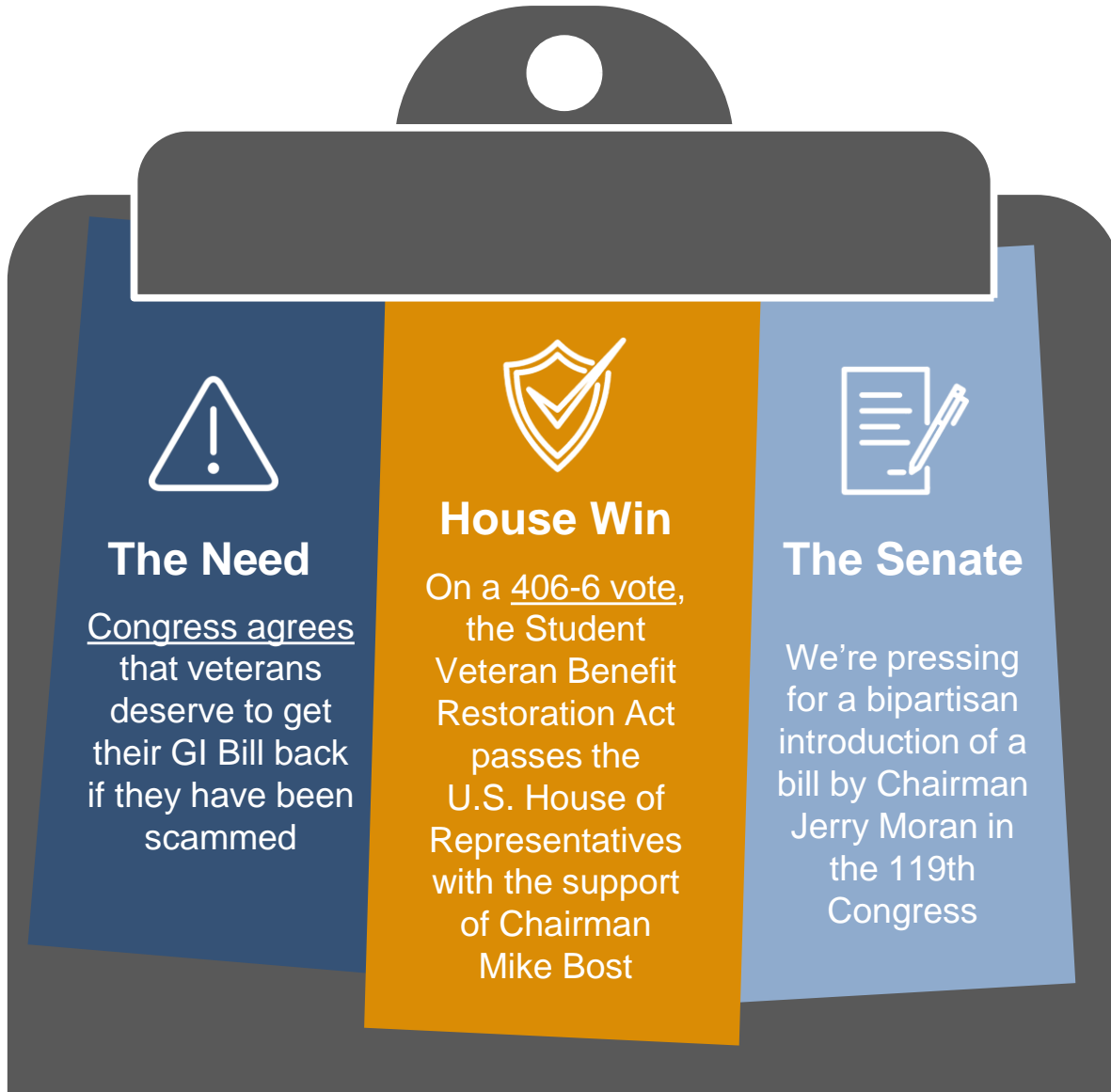
A closer look at the outcomes of veterans who did not use their GI Bill



A deeper dive into outcomes for Black, Hispanic, and Native American GI Bill students

Learn more about our research reports.

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### The Need

Congress agrees that veterans deserve to get their GI Bill back if they have been scammed



### House Win

On a 406-6 vote, the Student Veteran Benefit Restoration Act passes the U.S. House of Representatives with the support of Chairman Mike Bost



### The Senate

We're pressing for a bipartisan introduction of a bill by Chairman Jerry Moran in the 119th Congress

# Advancing Bipartisan Solutions

We worked closely with both sides of the aisle to ensure student veterans get the best advocacy possible in front of policymakers. We will continue to fight for veterans to have their GI Bill benefits restored if they were scammed.





# Department of Education Rulemaking

We leveraged our seat at the negotiating table to achieve outsized influence, ensuring students' interests shape the Department of Education rulemaking and hold both institutions and the Department accountable.

## Representing Veterans

- Under the Higher Education Act, the Department of Education is required to hold formal negotiated rulemaking sessions before issuing new Title IV regulations.
- In 2024, the Department convened a negotiating committee, composed of various stakeholders, to address a complex range of regulatory issues.
- We were selected as a negotiator to ensure that veterans' interests were fully represented.
- Although the committee included a disproportionate number of institutional representatives, our in-depth policy expertise and advocacy significantly influenced the final regulatory language.

- ✓ Accreditation
- ✓ State Authorization





# Rulemaking Topic: Accreditation

We advocated for reforms to improve accreditation's effectiveness as a federal gatekeeper and limit undue institutional influence.



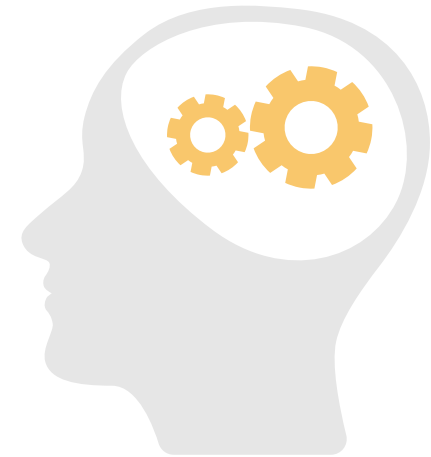
- Historically, accreditation has been dominated by the very institutions it is meant to oversee, weakening its role as a gatekeeper for federal student aid.
- Our technical and policy expertise provided a strong counterweight to accreditors' attempts to maintain the status quo.
- In its final draft, the Department adopted several of our strictest requirements for accreditors, including measures to limit the influence of school owners and executives.
- We successfully argued for language to strengthen accreditors' enforcement of their standards while also working to prevent "accreditor shopping" by institutions to avoid a "race to the bottom" among recognized accreditors.



# Rulemaking Topic: State Authorization

We worked to strengthen state oversight of distance education.

- Although the Higher Education Act requires institutions to be authorized in every state where they operate, the growth of online programs allowed institutions to sidestep direct state supervision through a state authorization reciprocity organization that they themselves substantially control.
- We proposed reforms, despite strong institutional opposition, to ensure that states regain meaningful oversight of these programs. This included a requirement that state regulators, not the regulated institutions, govern and administer any reciprocity agreements.
- Our proposals to remove bans on enforcing state education consumer protections were adopted by the Department in its final draft to restore state authority over reciprocity agreements and limit enrollment sizes.





# Holding VA Accountable

We consistently pressed the Department of Veterans Affairs (VA) to support student veterans and protect them from fraudulent schools and deceptive practices.

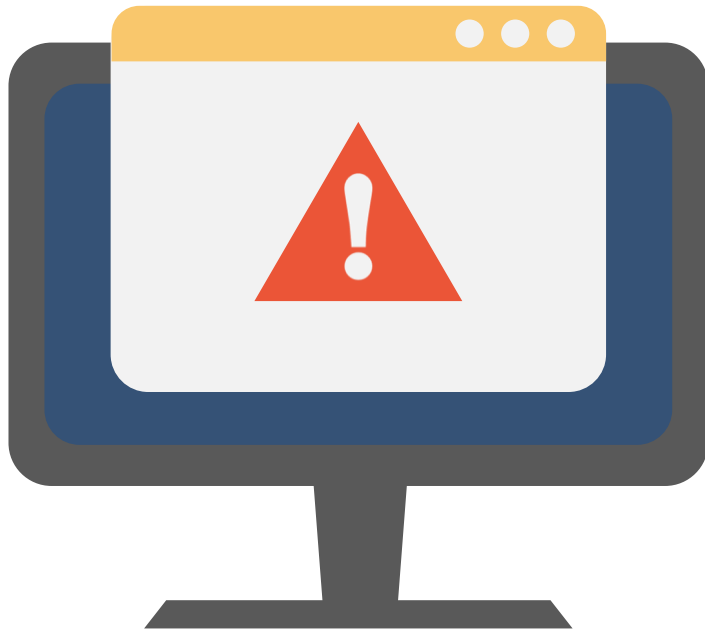


- **Demanding Accountability in the Feedback Tool.** We challenged VA and OMB on the lack of transparency in the GI Bill® School Feedback Tool, pushing for a system that empowers veterans while minimizing bureaucratic inefficiencies.
- **Reducing Government Overreach.** After bringing veterans to meet with VA in June, we proposed actionable steps to streamline support for student veterans, cutting through red tape to deliver results more efficiently.
- **Opposing New Hurdles for Veterans.** We rejected VA's overly complicated proposal for restoring education benefits after school closures, calling for a leaner process that respects veterans' time and rights.
- **Fighting Against Misguided Regulations.** Through letters and FOIA requests, we exposed VA's reckless push to fund unaccredited online programs, advocating for stronger oversight and accountability to protect taxpayer dollars.



# Reforming Online Program Management

The Higher Education Act bans incentive compensation-based student recruiting, but a current loophole fuels exploitation.



## The Loophole

- In 2011, the Department of Education’s “bundled services” memo created a loophole.
- It allowed Online Program Managers (OPMs) to exploit Title IV funding through revenue-sharing agreements.
- The result: an unregulated industry using institutional branding to promote often subpar programs.

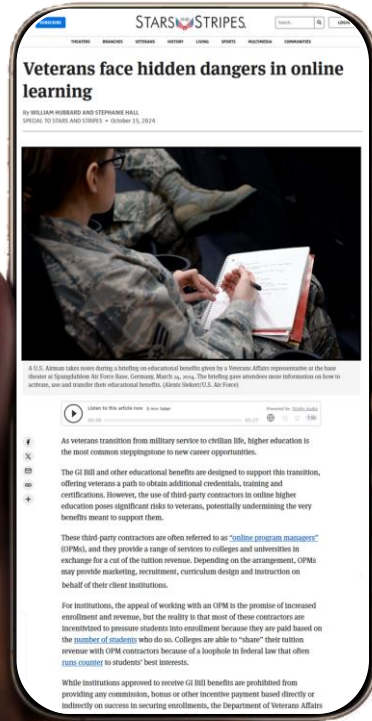
## Impact on Veterans

- OPMs heavily market predatory online programs to veterans, who are almost always considered nontraditional students.
- Student veterans with disabilities and/or families seeking flexible learning are especially targeted.
- In January 2025, our advocacy, and that of our allies, led to new federal guidance barring OPMs from misrepresenting roles or course quality.



# Driving the News

We elevated the importance of government accountability and federal action in support of student veterans by working with local and national outlets to amplify our calls to action.



The New York Times

INSIDE HIGHER ED

NEXTGOV/FCW

FOX NEWS channel

AP

Military Times

CBS

## In 2024, We Did:

25	4	5	1
Print Appearances	TV & Video Appearances	Radio & Podcast Appearances	Op-Ed Piece

[Learn more](#) about our news coverage.

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# Looking at 2025

The new political landscape is likely to bring swift policy changes. Our work bringing veterans' voices forward will be especially important.

1

## Advancing Higher Education Policy

We anticipate significant policy debates on accreditation, state authorization, institutional accountability, risk-sharing, and other student loan reforms in 2025.

2

## Program Approval

Veterans and taxpayers expect to receive a high-quality education for their earned benefits. Standards for approval of college programs must be raised to meet this expectation.

3

## GI Bill Restoration

The return on investment is lost when a veteran is scammed or doesn't complete their program due to a lack of value. These students deserve a fighting chance again.





# Our Executive Team

Bringing decades of combined experience, our team is led by accomplished subject matter experts, each hand-selected for their unique knowledge and experience.



**Carrie Wofford,  
President**



**Della Justice,  
Vice President for  
Legal Affairs**



**Barmak Nassirian,  
Vice President for  
Higher Education Policy**



**Will Hubbard,  
Vice President for  
Veterans & Military Policy**





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