



TESTIMONY OF
STUDENT VETERANS OF AMERICA

BEFORE THE

COMMITTEES ON VETERANS' AFFAIRS
U.S. SENATE
U.S. HOUSE OF REPRESENTATIVES

HEARING ON THE TOPIC OF:
"LEGISLATIVE PRIORITIES OF 2024"

MARCH 6, 2024

Chairman Tester and Bost, Ranking Member Moran and Takano, and Members of the Committees,

Student Veterans of America (SVA) deeply appreciates the opportunity to present testimony on our policy priorities and critical issues impacting student veterans, students who are active duty or belong to a National Guard or Reserve component, as well family members, caregivers, and survivors, as they transition to civilian life. SVA is dedicated to ensuring an inclusive educational journey that extends beyond the classroom.

SVA fosters connection and support through a global network of campus-based chapters. We seek to drive student veteran success by increasing sense of belonging and supporting attainment of equitable jobs with the lowest possible financial burden and by created a complementary ecosystem that provides many different entry points for transitioning service members and their families. Our dedicated chapter leaders advocate for resources and provide support, networking opportunities, and camaraderie to help student veterans thrive in their educational pursuits, expand their skills, and reach their full potential post-military service.

Introduction

Founded in 2008, Student Veterans of America (SVA) emerged from a dedicated group of Post-9/11 veterans who encountered challenges accessing their GI Bill benefits upon returning from service in Iraq and Afghanistan. Recognizing the lack of support services for student veterans, these individuals, initially connected through local campus clubs and organizations, began advocating for change. They shared their firsthand experiences through social media exchanges and phone calls, which led to in-person meetings. This grassroots movement advocated for the Post-9/11 GI Bill and other major changes. In 2008, these advocates officially united under the banner of SVA during the organization's inaugural conference, marking the beginning of a global network of college campus chapters.

The SVA chapters on the more than 1,600 college and university campus across the country and in three nations abroad provide a community and the sense of belonging lost when transitioning servicemembers take off their uniforms to embark on their journeys through the transformative power of higher education. This culture of inclusion and belonging is at the core of the successes of the SVA chapter at Marshall University. Founded in 2018, the SVA at Marshall University not only kept going through a world-wide pandemic that dispersed hundreds of student organizations, but it also thrived. Now with forty chapter members, the SVA at Marshall University fosters and ensures a welcoming community for all student-veterans and military-connected students attending Marshall University. Their goal is to support the professional growth and academic success both in, and outside of the campus for student veterans, as well advocate for their needs through proactive involvement with local, state, and federal governments, while establishing resources and support systems within the campus and community.

In 2023, the SVA at Marshall University established itself amongst the national network of chapters by providing innumerable opportunities to connect, mentor, and provide peer support necessary for success in higher education. Additionally, through continued service, camaraderie, and art, the chapter became a place where all student veterans felt like they belonged. The group worked with community partners to provide funding for a local school with primarily underprivileged children. Through their network, they raised the funds to allow the girls' basketball team to purchase their uniforms. The impact was significant as it gave Marshall's student veterans a true sense of accomplishment and put a secondary meaning behind what their SVA is capable of. They also set up a routine place to connect and provide lunch for student veterans and chapter members, to provide space for them to talk about their week, and to provide support for each other. The "Friday Hangouts," as they call them, allow everyone to meet and share community involvement ideas and personal development updates. It is also an excellent way for veterans to bring new students in to meet everyone. This time has also proven to be a well-needed stress reducer after a long week. Finally, they invited chapter members to participate in a program called Veteran Ceramics. The goal is to provide a fun atmosphere for veterans to meet other individuals while creating lasting art. The impact has been incredibly therapeutic. Veterans look forward to these events, and many bring friends, significant others, and children to participate.

A person close to the chapter said, "Marshall's SVA chapter fosters and ensures a welcoming community for all

student-veterans and military-connected students attending Marshall University. They serve to support their professional growth and academic success both on and outside of the campus. Additionally, MU SVA goes above and beyond the realm of military students and passionately serves as an active support system for veterans and military-connected members of the community in general.”

Individual SVA chapter leaders make an impact individually as well. Angelina Trillo, the former chapter president at Oregon State University SVA was described as “a force multiplier beyond any that has been. Without error, she single-handedly has been vital to the entire OSU community’s veteran affairs while distinguishing herself as an Army Reserve Medic for her unit, where she remains a key member of staff even as a full-time student. Angelina is, in my heart, the definition of a veteran who continues to serve in all aspects, regardless of whether or not she is wearing a uniform,” said one of her nominators for SVA’s prestigious Student Veteran of the Year honor. As a first-generation student in her final year at Oregon State University, she is simultaneously earning her degree and applying to graduate school while serving as a medic in 1-186th Infantry Battalion, Army National Guard. With her degree, she plans to improve veterans' health care. Angelina’s biggest goal upon joining the SVA was the establishment of free mental health services free of charge for students attending OSU. Her persistence at the University directly led to the creation of a military psychiatric service provider and the expansion of the Military Veteran Resource Center budget by more than \$15,000 for career development and social engagement programs. She has sat on the OSU Diversity Council and pushed for further education for faculty and staff about the unique needs of military students. She led the effort to re-evaluate the academic policy for currently serving students to provide more flexibility and accommodations during drill weekends. She has facilitated many community forum conversations about diversity and inclusion within the OSU MVRC, community centers, and student government, and has been known to speak against unfair treatment of and stigma around veterans on campus. Her story is much like the others found in the network of SVA chapters – someone dedicated to education and service, who wants to leave their campus and community better than they found it.

At SVA headquarters, we are committed to the student veteran community and our allies by supporting our chapters, mental health resources, as well as diversity, equity, and inclusion efforts. In addition, we foster strong relationships between students and employers to assist with career opportunities during college and following graduation for a successful future. Stories like those above inspire us every day in our work at SVA, and we hope they do the same for the members of these Committees as they strive to improve the lives of student veterans in higher education.

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The GI Bill as the Front Door to VA

SVA has long championed the benefits of the GI Bill for student veterans. It offers unparalleled opportunities to beneficiaries, assisting them in accomplishing their educational and professional dreams, but it remains a deep source of untapped potential for VA. The GI Bill is one of VA's greatest assets and, if properly harnessed, can aid the Department in growing the number of veterans it serves.

For many veterans, the GI Bill is the first touchpoint they will have with VA upon their transition from military service, making their experience with the benefit the barometer by which they will judge any potential future interactions with VA.¹ A positive GI Bill experience builds veterans' trust and confidence in VA, and, in turn, increases veterans' likelihood of taking advantage of the full range of VA programs and services over the course of their lives. The GI Bill is truly the front door to VA, but to fully realize its great potential, Congress must conduct strong oversight and ensure VA reprioritizes education services internally, updates their aging IT infrastructure, and makes use of technological advances to better serve the needs of veterans.

We applaud the steps VA has taken to embrace this vision. With an overhaul of Veterans Benefits Administration's (VBA) IT systems underway, the agency is making huge improvements in GI Bill customer service and user experience by reducing call center wait times, enhancing communication options, and ensuring quicker benefit transactions. These improvements will help lay the groundwork for the trust and confidence that will build VA's brand among current GI Bill beneficiaries and all those to come. At the same time, it will help VA better communicate with veterans about all the services the Department offers.

While VA's recent efforts to prioritize the GI Bill through modernized IT infrastructure are laudable, there is more work to be done. SVA calls on VA and Congress to explore how the GI Bill can better integrate with the U.S. Department of Education and within the higher education system to reduce friction points that negatively impact veterans. Student veterans using their earned education benefits sit at a confusing crossroads between the higher education policies at the Department of Education (ED) and those at VA. To address this issue, we encourage, among other things, greater interagency collaboration, data sharing, and automation between relevant agencies like DOD, ED, and VA.

The effects of embracing the GI Bill as the front door to the VA will be substantial. VA will welcome more veterans through its doors and outperform their expectations by delivering a top-of-the-line experience with the GI Bill, laying the groundwork for future engagement and utilization of the entire scope of VA's programs and services.² SVA's 16th annual National Conference ("NatCon") demonstrated this very point. Over 20 program offices, and 150 VA experts connected with NatCon attendees over a three-day period. In addition to a Mobile Vet Center, VA also helped with Veterans Health Administration (VHA) enrollment, and disability claims assistance. We look forward to focusing on this concept as we work with our partners at VA and our veteran advocate counterparts in 2024 and beyond.

SVA Research Findings and Initiatives

Over the past decade and a half, SVA has dedicated significant resources to researching the efficacy and impact of the Post-9/11 GI Bill, the journey of student veterans in their transition through higher education, and the gaps in economic and social opportunity caused by service in the U.S. military. The bottom line is this: student veterans are among the most successful students in higher education.³ We hope the information below is helpful in

¹ See *generally Journeys of Veterans Map*, U.S. DEPARTMENT OF VETERANS AFFAIRS, *Journeys of Veterans Map*, <https://www.blogs.va.gov/VAntage/wp-content/uploads/2020/02/Veteran-Journey-Map.pdf>; (last visited Feb. 25, 2021); *VA Welcome Kit*, DEPARTMENT OF VETERANS AFFAIRS, *VA Welcome Kit* (Nov. 12, 2020) <https://www.va.gov/welcome-kit>.

² THE U.S. DEPARTMENT OF VETERANS AFFAIRS, *FY 2018 – 2024 STRATEGIC PLAN 5* (May 31, 2019).

³ Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). *National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill*. Student Veterans of America, Washington, D.C., https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf.

providing a more robust understanding of who student veterans are and how we can better serve them.

One decade ago, our team produced the first-of-its-kind Million Records Project (MRP) and then, in 2017, published the National Veteran Education Success Tracker Project (NVEST).⁴ The purpose of these studies was to address a straightforward question: “What is America getting for its multi-billion-dollar investment in the education of veterans?” In partnership with VA and the National Student Clearinghouse (NSC), we studied the individual education records of the first 854,000 veterans to utilize the Post-9/11 GI Bill to find that student veterans are succeeding above their peers in the classroom.

Not satisfied with just knowing student veterans’ level of success in higher education, SVA launched the Life-Cycle Atlas project to begin “mapping” student veterans’ educational journeys from high school to the present to better understand *how* student veterans succeed in higher education.⁵ With over 5,000 responses, the project produced three key findings.

First, much of the public has an outdated view of veterans’ post-secondary educational journey: high school, military service, college, then workforce. This view has persisted since the World War II era when service members returned from service to use the GI Bill to earn a college degree and enter the workforce. However, our research has found veterans’ educational journeys are more diverse than ever before due to more options to serve and greater accessibility of college courses.

A second key finding was discovered within these journeys. Service members are exposed to implicit messaging that they are not college material and thereby discouraged from considering a college education after service. This implicit messaging sometimes starts with high school guidance counselors and is reinforced throughout military service. It is often not until after they have separated and hear about other veterans succeeding in college that veterans realize their potential and enroll.

Finally, examining the transition from school to the workforce, the Life Cycle Atlas Project finds that student veterans are not utilizing the variety of career preparation opportunities available to them, such as internships and externships. This puts student veterans at a disadvantage in a system established to serve traditional student groups who have taken advantage of these career preparation opportunities. The deficit is not because of a lack of awareness or willingness to seize these opportunities, but because of the financial responsibilities weighing on student veterans.

SVA's research on student veteran demographics further illuminates their continued status as post-traditional students.⁶ In looking at over a decade of responses to the annual SVA Census, right around eighty-five percent of student veterans using the GI Bill are prior enlisted, while the remaining fourteen percent are prior warrant and commissioned officers. Ninety-three percent are over the age of twenty-five, with the largest majority between twenty-five and thirty-five. Over half are married, and over half have children, while around twenty percent are single parents. Between seventy and seventy-five percent of student veterans demonstrate the need to work while enrolled in school, and this need varies by race, ethnicity, and gender.

In terms of school and degree choice, a vast majority of student veterans attend a public or non-profit institution.⁷ Student veterans are using their GI Bill to earn degrees in this order: first, bachelor’s degrees, then master’s degrees, followed by associate degrees, and finally terminal degrees, such as a PhD, JD, MD, etc.⁸

⁴ See *generally Research*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/> (last visited Feb. 24, 2021).

⁵ See *generally Life Cycle Atlas*, STUDENT VETERANS OF AMERICA, <https://studentveterans.org/research/life-cycle-atlas/> (last visited February 15, 2021).

⁶ Kinch, A. & Wooten, M. Student Veteran Census Survey 2011-2023. Student Veterans of America, Washington, D.C. (on file with authors).

⁷ *Id.* at 8.

⁸ Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill. Student Veterans of America, Washington, D.C., <https://studentveterans.org/wp->

While the national grade point average (GPA) for undergraduate college students is a respectable 3.15, the GPA for student veterans is 3.35. Student veterans are out-graduating nearly all other students achieving a success rate of seventy-two percent compared to the national average of sixty-six percent. Additionally, NVEST data and a report recently published by the American Institutes of Research⁹ demonstrate that student veterans have a substantially higher graduation rate when compared to other adult students who are comparable peers.¹⁰

GI Bill benefits have helped nearly two million veterans to complete college.¹¹ SVA projects the Post-9/11 GI Bill will support approximately one-hundred thousand veterans graduating every year, with an overwhelming majority graduating from premier schools. That is 100,000 new doctors, accountants, scientists, financial analysts, nurses, social workers, lawyers, cybersecurity engineers, and teachers, or enough to fill the largest college football stadium in America, every single year, and as we recognize March as Woman's History Month, we note that thirty-four percent are women.¹²

However, despite decades of hard work, SVA has come to realize that all of what we know of student veteran success is based on measures designed for first-time-in-college students, or traditional students. Our research team is at work to redefine the question. Instead of asking about graduation in terms of four- and six-year rates, SVA is exploring the patterns of enrollment, pre-, during-, and post-military service. By understanding how veterans have engaged in higher education, the nation can truly understand their outcomes and impacts to the nation's economy.

Identified within each exploration, SVA has discovered that military service comes at a cost to the individual. These opportunity gaps come in losses in potential career progression, where veterans are less likely to progress to an executive position,¹³ losses in potential wealth accumulation, where, when conservatively estimating retirement savings, veterans may have to work an additional seven years to close the wealth gap¹⁴ despite higher earnings,¹⁵ and higher indicators of social poverty,¹⁶ a correlate with mental health outcomes.

When looking at income, veterans with degrees out-earn their civilian peers who have never served. Veterans with a bachelor's degree earn \$84,255 annually compared to \$67,232 annually for those who have never served,

content/uploads/2020/08/NVEST-Report_FINAL.pdf.

⁹ Walton Radford, A., Bailey, P., Bloomfield, A., Webster Jr., B.H., Park, H.C. (2024). A First Look at Post-9/11 GI Bill-Eligible Enlisted Veterans' Outcomes. AMERICAN INSTITUTES FOR RESEARCH. <https://www.air.org/sites/default/files/2024-02/First-Look-Post-9-11-GI-Bill-Outcomes-Enlisted-Veterans-February-2024.pdf>

¹⁰ *Id.* Walton Radford, A., Bailey, P., Bloomfield, A., Webster Jr., B.H., Park, H.C. (2024). A First Look at Post-9/11 GI Bill-Eligible Enlisted Veterans' Outcomes. AMERICAN INSTITUTES FOR RESEARCH. <https://www.air.org/sites/default/files/2024-02/First-Look-Post-9-11-GI-Bill-Outcomes-Enlisted-Veterans-February-2024.pdf>

¹¹ LYNN MILAN, NATIONAL CENTER FOR SCIENCE AND ENGINEER STATISTICS, INFO BRIEF: CHARACTERISTICS OF COLLEGE GRADUATES, WITH A FOCUS ON VETERANS 5 (Oct. 2018), <https://www.nsf.gov/statistics/2019/nsf19300/nsf19300.pdf> (showing 3,625,00 veterans had graduated college as of 2017, with more than 50 percent using GI Bill assistance).

¹² See Cate, C.A., Lyon, J.S., Schmeling, J., & Bogue, B.Y. (2017). National Veteran Education Success Tracker: A Report on the Academic Success of Student Veterans Using the Post-9/11 GI Bill. Student Veterans of America, Washington, D.C., https://studentveterans.org/wp-content/uploads/2020/08/NVEST-Report_FINAL.pdf; Kinch, A. Student Veteran Census Survey 2022. Student Veterans of America, Washington, D.C. (on file with author).

¹³ See LinkedIn. Veteran Opportunity Report (November 2023). LINKEDIN <https://socialimpact.linkedin.com/content/dam/me/linkedinforgood/en-us/veteran-report-2023/veterans-opportunity-report-2023.pdf>

¹⁴ *Preliminary findings in* Kinch, A., Wooten, M. (forthcoming) An assessment of potential opportunity cost of military service: The Veteran Wealth Gap. STUDENT VETERANS OF AMERICA.

¹⁵ *Student Veterans: A Valuable Asset to Higher Education*, INSTITUTE FOR VETERANS AND MILITARY FAMILIES AND STUDENT VETERANS OF AMERICA (2017), https://studentveterans.org/wp-content/uploads/2020/08/Student-Veterans_Valuable_9.8.17_NEW.pdf.

¹⁶ *Preliminary findings in* Kinch, A., Wooten, M. (forthcoming) Understanding social poverty in student veterans. STUDENT VETERANS OF AMERICA.

and at the advanced degree level the difference is even higher, veterans with advanced degrees earn \$129,082 annually compared to \$99,734 annually.¹⁷

Finally, after a successful pilot study, SVA is exploring the unmet needs of student veterans through the delivery of a basic needs survey, comprising physical needs, financial support needs, and social needs. Through this study, SVA hopes to identify core resources and interventions that will serve to better the experience, increase the successes, and bolster outcomes for this talented group of veterans.

The GI Bill is creating an ever-growing network of successful veterans who are going to run businesses, invent new technologies, teach young minds, and lead in their communities, which is why we need to bolster empowering policies and programs that best support student veteran success to, through, and beyond higher education. Quality data is key to these efforts. We encourage these Committees to take advantage of the full breadth of SVA's research as they endeavor to craft policies that will serve current and future generations of student veterans.

Diversity, Equity, and Inclusion

SVA has long advocated for the creation of inclusive spaces, not only among its chapter membership, but also on campuses across the nation. We realized the platform we stood upon in the summer of 2020, following the murder of George Floyd, when chapter leaders came to us asking what they could do to support their Black and Brown chapter members and classmates. Since then, we've partnered with the Rutgers Center for Minority Serving Institutions on a first-of-its-kind collaboration that helped SVA collect more data and hear more voices that informed our policy work on Capitol Hill.

SVA also created a senior fellow position to oversee the diversity, equity, and inclusion (DEI) initiatives at our national headquarters, which has included leading our Racial Justice Task Force. The goal of the task force is to expand representation and inclusion of communities of color across SVA's operations including chapter membership, organizational programming, and advocacy. Since her hiring, SVA's senior fellow of DEI has mobilized the task force to create materials of inclusion for chapters, to help chapters navigate anti-DEI legislation that impacts their own veteran spaces, as well as spaces for other identities, and has influenced programming aimed at expanding the inclusiveness on campuses, both within the chapters and for student veterans.

Last, but not least, SVA began its Visibility Exchange program, visiting college campuses and having the hard conversations about what it means to be inclusive. Through this program, SVA is ensuring that Black, Indigenous, and People of Color student veterans and service members, as well as their families, feel that same sense of belonging that SVA chapters bring, and that their contributions to higher education are at the forefront of conversations about diversity, equity, and inclusion. Representation is imperative where diversity, equity, and inclusion are a goal, and SVA sees this program as an opportunity to build community and create space that is more representative of our nation rather than focus only on the groups that have historically dominated spaces in higher education.

In addition, these visits serve to engage university leadership in their own offices to discuss all that student veterans bring to campus and to the classroom so that these leaders understand the assets that are applying to and graduating from their institutions every semester. We hope the Visibility Exchange program continues the discussions that help reframe the national conversation around inclusion and representation in higher education. We invite everyone here today to engage with SVA's diversity, equity, and inclusion efforts, to take part in these meaningful dialogues, and allow these experiences to inform and reshape how we think about our legislative priorities going forward.

¹⁷*Id.* at 15.

Priorities Overview

SVA remains steadfast in our dedication to advocating for the needs of student veterans and elevating their voices on Capitol Hill. In this testimony, we will highlight our top policy priorities for 2024 and beyond, most of which originate from direct interactions with students during the SVA Regional Summits, Leadership Institute, Washington Week, and National Conference. Our policy priorities are also informed by industry research from our partners at public and private organizations as well as our own research conducted on behalf of our members and chapters. Our priorities fall into the following five categories.

- VA Modernization
- GI Bill Improvements
- Post-Traditional Student Success
- Strengthening Higher Education
- Transparency and Accountability

SVA is committed to the next phase of thinking about the GI Bill, elevating the voices of student veterans, and better addressing their everyday needs. With the collective input of student veterans provided during SVA programming throughout the last year, we have finalized our legislative priorities, which are shared in detail in the sections that follow and in a brief summary available to all Committee Members, student veterans, and interested advocates.

Top Priorities

1. *Monitor VA's ongoing efforts to modernize IT and communications systems, closely tracking the rollout of initiatives like the Digital GI Bill with a sharp focus on how these upgrades affect GI Bill users navigating their studies.*

First and foremost, from within our priorities focused on VA modernization, SVA is committed to being an ally of the VA in its efforts to modernize its systems as an improvement to both customer service and user experience for the veterans who use the GI Bill to earn a degree or credential to improve the economic opportunity for their future. Typically, using the GI Bill is one of the first interactions a newly transitioned veteran will have with VA in the universe of post-service benefits and programs.¹⁸ This means a seamless GI Bill process is key to establishing trust and confidence in the agency with every veteran they serve.

In turn, SVA has been a vocal supporter of a full-scale IT modernization effort at VA for some time.¹⁹ To meet the needs of our veterans, VA Education Service platforms must become a system that can adapt and change with the evolving landscape of higher education. This modernization effort is already underway thanks to the steps Congress took to provide VA with the funds needed to start this process.²⁰ We appreciate VA's prompt efforts to begin implementing these changes. Still, the project is ongoing, and we will continue to call on Congress to provide the necessary funds to complete the task. In addition, strong oversight of this years-long process must be

¹⁸ See generally *Journeys of Veterans Map*, U.S. DEPARTMENT OF VETERANS AFFAIRS, *Journeys of Veterans Map*, <https://www.blogs.va.gov/VAntage/wp-content/uploads/2020/02/Veteran-Journey-Map.pdf>; (last visited Feb. 25, 2021); VA Welcome Kit, DEPARTMENT OF VETERANS AFFAIRS, VA Welcome Kit (Nov. 12, 2020) <https://www.va.gov/welcome-kit>.

¹⁹ See generally STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE SUBCOMMITTEE ON ECONOMIC OPPORTUNITY AND TECHNOLOGY MODERNIZATION OF THE H. COMM. ON VETERANS' AFFAIRS ON MOVING BEYOND PATCHWORK SYSTEMS: THE FUTURE OF EDUCATION SERVICES IT, 116th Cong. (Sept. 16, 2020), available at https://studentveterans.org/wp-content/uploads/2020/09/HVAC-EO_-IT_Testimony_Sept16_2020.pdf; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H. AND S. COMMS. ON VETERANS' AFFAIRS ON LEGISLATION PRIORITIES OF 2020, 116th Cong. 6 (March 3, 2020), available at <https://www.veterans.senate.gov/imo/media/doc/03.03.2020%20-%20SVA%20Testimony.pdf>; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H. AND S. COMMS. ON VETERANS' AFFAIRS ON LEGISLATIVE PRIORITIES OF 2019, 116th Cong. 7 (March 7, 2019), available at <https://www.veterans.senate.gov/imo/media/doc/5%20-%20SVA%20Testimony%2003.07.19.pdf>.

²⁰ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. J, Title V, § 515.

maintained as student veterans cannot afford for it to falter.

SVA recommends taking full advantage of the ongoing modernization effort at VA and establishing pre-emptive, automatic qualification to transferring service members and electronic Certificate of Eligibility (COE) disbursement. This is one of the most obvious and impactful ways to turn the modernization effort into a reality for our veterans. Streamlining the qualification process and automating the issuance of COE reduces bureaucratic hurdles for transitioning service members. It ensures they can access their benefits promptly and without unnecessary delays, allowing them to make timely decisions regarding their education and other opportunities. Simplifying the process encourages more veterans to take advantage of their earned benefits under the GI Bill. This maximizes the impact of the modernization effort by ensuring that as many eligible beneficiaries as possible have access to it.

SVA encourages the VA to consider the impacts that the implementation of modernization efforts has on GI Bill users. Specifically, GI Bill users rely on timely access to their education benefits to pursue their academic goals. Disruptions or delays in accessing these benefits due to modernization efforts could directly affect veterans' ability to enroll in classes, pay tuition, and cover living expenses. Further, the stress and uncertainty caused by changes to benefit delivery processes can impact the mental and emotional well-being of veterans. By considering the needs and concerns of GI Bill users during modernization, the VA can mitigate potential negative effects on veterans' overall well-being.

SVA looks forward to working with committee members and officials at VA to ensure this modernization effort is successful. The educational experiences of current and future generations of student veterans depend on it.

2. *Comprehensively review and update Monthly Housing Allowance (MHA) calculations to address gaps and disparities such as those related to Veteran Readiness & Employment (VR&E), break pay, overseas institutions, and online instruction.*

Prompted by student veteran voices, this policy priority from within the GI Bill improvement section advocates for legislatively updating the Monthly Housing Allowance (MHA) to account for factors such as Veteran Readiness & Employment (VR&E), break pay, overseas institutions, and online instruction. These updates are crucial to ensuring that student veterans have the financial support they need to pursue their education without undue financial strain, especially given the unique challenges they may face as non-traditional students balancing military service with academic pursuits. Several factors necessitate urgent legislative action to modernize the MHA.

It is worth noting that DOD has implemented emergency BAH rate corrections for the last two years to address the “financial burden of rising housing costs facing Service members” and circumstances making “it especially challenging for Service members and their families in the affected [areas] to find affordable housing...”²¹ Data also show that more than a quarter of student veterans take out student loans, with 58 percent doing so to cover living expenses and the most common being housing costs.²² Whether it be the lower subsistence rates for VR&E compared to Post-9/11 MHA, the lack of payment for periods between academic terms, the flat rate for overseas learners, or inequities in distance learners' MHA, students have raised concerns about the efficacy of MHA broadly and its disconnect from the needs of today's students. SVA believes it is time to review certain fundamental assumptions underlying MHA.

The inclusion of factors such as Veteran Readiness & Employment (VR&E), break pay, and online instruction is essential for accurately reflecting the full cost of living for student veterans. We encourage Congress to consider

²¹ Press Release, Department of Defense, DoD Authorizes a Temporary Increase to 2021 Basic Allowance for Housing Rates for Certain Locations (Sept. 24, 2021), <https://www.defense.gov/News/Releases/Release/Article/2788871/dod-authorizes-a-temporary-increase-to-2021-basic-allowance-for-housing-rates-f/>; DoD Authorizes an Automatic Increase to 2022 BAH Rates for Certain Locations, DEPARTMENT OF DEFENSE (Sept. 22, 2022), <https://www.travel.dod.mil/About/News/Article/Article/3167951/dod-authorizes-an-automatic-increase-to-2022-bah-rates-for-certain-locations/>.

²² Phillip Oliff, Scott Brees & Richa Bhattarai, *Why Veterans with GI Bill Benefits Still Take Out Student Loans*, PEW (Jan. 7, 2022), <https://www.pewtrusts.org/en/research-and-analysis/articles/2022/01/07/why-veterans-with-gi-bill-benefits-still-take-out-student-loans>,

the following recommendations to ensure MHA meets the needs of today's student veterans.

VR&E subsistence rates. For years, student veterans have shared concerns about affording basic necessities while pursuing their VR&E individualized training and education plans, concerns echoed in a 2014 Government Accountability Office (GAO) report which found that veterans may discontinue their plans before completion due to financial pressures.²³ This issue exists primarily due to VR&E having two different subsistence rates: the internal VR&E subsistence rate and the much higher Post-9/11 MHA rate.

The standard VR&E rate is substantially lower than the Post-9/11 MHA rate and based on several factors, such as rate of attendance, number of dependents, and training type.²⁴ The maximum rate possible under this model requires a student to have two dependents and scarcely reaches the national average MHA under Ch. 33. Raising the VR&E subsistence rate to the Post-9/11 MHA rate reduces bureaucracy, eliminates confusion, encourages program utilization, and ensures greater fairness in benefits for veterans with service-connected disabilities.

Break pay. Break pay provisions are crucial for addressing financial gaps that arise during academic breaks, such as summer recess or holiday periods. Many student veterans rely on housing allowances to cover living expenses during these breaks, but current MHA policies may not adequately address these periods of non-enrollment. The Post-9/11 Veterans Educational Assistance Improvements Act of 2010 removed interval pay, otherwise known as break pay, from the GI Bill. Reinstating break pay is one of the top policy recommendations shared by student veterans.

We understand there are significant cost considerations when it comes to break pay, but it is important to remember that student veterans are post-traditional, meaning they are pursuing education without parity in the support structure many traditional students use during school breaks. We continue to hear from student veterans throughout the year about the financial difficulties that occur between terms. SVA asks that Congress explore options to provide relief to our student veterans in a way that is both consistent with the intent of the law and fiscally responsible. Updating the MHA to include break pay ensures continuous financial support for student veterans throughout the academic year, reducing the risk of financial instability during periods of transition between semesters.

Overseas rates. Recognizing the unique circumstances of student veterans attending overseas institutions is essential for promoting access to higher education opportunities abroad. Many student veterans choose to pursue academic programs offered by international institutions, either through study abroad programs or distance learning options. We have also heard from students about the overseas MHA rate, recently changed to the U.S. national average, not being adequate for their training locale. However, existing MHA policies may not accurately reflect the cost of living in foreign countries, or the additional expenses associated with studying abroad.

By updating the MHA to account for overseas institutions, Congress can facilitate greater educational mobility for student veterans and promote global engagement through higher education. We recommend these Committees review ways to either more appropriately match the MHA rate with overseas locations, or simply use the relevant DOD Overseas Housing Allowance (OHA) rate or national average, whichever is greater. VA already uses DOD's BAH rates to determine MHA rates for domestic students and OHA rates for those in U.S. territories. We believe using the OHA rate for overseas GI Bill students is a common-sense solution that provides a more equitable housing rate and establishes consistency in the methods VA uses to establish those rates.

²³ U.S. GOVERNMENT ACCOUNTABILITY OFFICE, VA VOCATIONAL REHABILITATION AND EMPLOYMENT PROGRAM – FURTHER PROGRAM MANAGEMENT IMPROVEMENTS ARE NEEDED 6 (Feb. 27, 2014), available at <https://www.gao.gov/products/gao-14-61>.

²⁴ *Veteran Readiness and Employment (VR&E) Subsistence Allowance Rates*, U.S. DEPARTMENT OF VETERANS AFFAIRS (Sept. 29, 2021), https://www.benefits.va.gov/vocrehab/subsistence_allowance_rates.asp.

Distance learner rates. Many student veterans opt for online degree programs to accommodate their military obligations or family responsibilities or have been shifted into online courses by their institution, post-pandemic, but current MHA rates may not adequately account for the cost of living in their respective locations. By adjusting the MHA to reflect the unique needs of online learners, Congress can ensure that student veterans receive equitable financial support regardless of their mode of instruction.

SVA supports H.R. 5702, *the Expanding Access for Online Veteran Students Act*, which would increase the online Monthly Housing Allowance (MHA) rate to the full national average for GI Bill students enrolled fully online during the summer. While SVA would have preferred full parity between local in-person and the online rates, we recognize that this bill will nevertheless have a substantially positive financial impact on VA education beneficiaries enrolled online over the summer by helping them cover a far greater percentage of their housing cost.

We thank the House Veteran Affairs Committee – Economic Opportunity Subcommittee staff for their work on this legislation, and we applaud the leadership of Representatives Ciscomani, Stanton, Stansbury, and Van Orden in introducing this forward-thinking legislative proposal. For years, online GI Bill students have received only half the national average in MHA. This is despite the GI Bill paying tuition and fees similarly for both in-person and online students. Due to the steadily increasing number of online courses at many institutions, including flagship colleges and universities, we now see this disparity, paradoxically, even impacting otherwise in-person students.

Lag in BAH rate revisions and updates translating to MHA. Student veterans do not see updates to their MHA reflective of changes to underlying BAH rates until August of every year. This issue was brought to our attention by student veterans at the Massachusetts Institute of Technology, an institution located in an area for which DOD had sanctioned a temporary BAH increase in 2022. As noted above, DOD has implemented temporary BAH increases for the past two years to address the fact that rates weren't keeping pace with the cost of living in certain areas. DOD also implements new standard rates every January. Statute requires MHA rates be updated every August, but that means there is a period of several months where student veterans are receiving what is, by that time, an outdated housing allowance.²⁵ SVA believes this lag time is wholly unnecessary and that it negatively impacts student veterans' ability to pay for housing. We ask that Congress eliminate the gap period by requiring MHA rates to be updated immediately upon DOD implementation, whether on a temporary or standard basis.

We thank the Committees for considering the various buckets of MHA reform that are needed to ensure the benefit appropriately and adequately addresses the needs of today's student veterans to pursue higher education without facing undue financial strain. By addressing factors such as VR&E participation, break pay, overseas institutions, and online instruction, Congress can promote equity, accessibility, and opportunity for those who have served our country in uniform. Failure to act risks undermining the educational aspirations and economic well-being of our nation's veterans, with far-reaching consequences for individuals, families, and communities across the country.

3. *Ensure National Guard and Reserve parity of benefits and expand protections against administrative issues that create barriers to degree completion.*

Also from our GI Bill improvements policy priorities section, SVA advocates for improvements to the GI Bill to ensure that all veterans, including members of the National Guard and Reserves, receive equitable education benefits. This includes addressing disparities in benefits for those on active duty versus those serving in Guard and Reserve components. Regardless of when and where, those who made the decision to raise their right hand and swear to defend the constitution deserve equity in benefits. Firstly, National Guard and Reserve members

²⁵ See 38 U.S.C § 3313(i) (requiring that “[a]ny monthly housing stipend payable under this section during the academic year beginning on August 1 of a calendar year shall be determined utilizing rates for basic allowances for housing payable under section 403 of title 37 in effect as of January 1 of such calendar year.”) (emphasis added).

play a vital role in our nation's defense. They often serve alongside active-duty servicemembers and are subject to the same risks and sacrifices. Many National Guard and Reserve members are deployed to combat zones or participate in other high-risk missions, just like their active-duty counterparts. Therefore, denying them equitable education benefits undermines the principle of equity for those who serve our country.

National Guard and Reserve members face unique challenges when pursuing higher education due to the nature of their service. Unlike active duty servicemembers who may have more predictable schedules and access to on-base resources, National Guard and Reserve members typically balance their military obligations with civilian careers and family responsibilities. This dual commitment can make it difficult for them to attend classes, complete assignments, or participate in extracurricular activities. Equitable education benefits can help alleviate some of the financial burdens associated with pursuing higher education, making it more feasible for National Guard and Reserve members to balance their military service with academic pursuits. Additionally, we urge Congress to expand protections for National Guard and Reserve members who face challenges balancing their military obligations with their studies, and to address administrative burdens that negatively impact student veterans, such as inefficiencies in VA education policies. Many student veterans juggle their military responsibilities with coursework and exams, and it is essential that they receive adequate support to succeed academically while serving their country.

Maintaining a disparity in education benefits between National Guard/Reserve and active-duty servicemembers and the inequities in policies can have detrimental effects on morale and retention within the Component. If National Guard and Reserve members perceive that they are being unfairly treated compared to their active-duty counterparts, they may become disillusioned with military service and choose to leave the Component altogether. This could weaken our nation's overall military readiness and diminish the pool of highly trained and experienced personnel available to respond to national security threats. Additionally, denying equitable education benefits to National Guard and Reserve members can perpetuate socioeconomic disparities within the military community. Many National Guard and Reserve members come from diverse socioeconomic backgrounds and may rely on education benefits to improve their economic prospects and provide for their families. By denying them access to the same level of education benefits as active duty servicemembers, we risk widening the gap between those who can afford higher education and those who cannot, exacerbating inequality within the military community. Ensuring equitable education benefits for National Guard and Reserve members is not only a matter of equity but also essential for maintaining morale, retention, and military readiness. Denying them these benefits can have detrimental effects on individual servicemembers, their families, and the overall effectiveness of our Armed Forces. Therefore, it is imperative that Congress takes action to address and rectify any disparities in education benefits between National Guard/Reserve and active duty servicemembers.

SVA would like to recognize efforts from the 17th Congress to address this issue, and, specifically, Representative Levin's H.R. 1836, *the Guard and Reserve Parity Act of 2021*. We thank Chairman Levin of the HVAC EO Subcommittee for his tireless work to make every day in uniform count the same for everyone who wears it. SVA continues to work with members and committee staff to refine bill language to reintroduce. We encourage these Committees to pass legislation that finally brings parity to benefits for members of the Guard and Reserve who undertake the same duties and risks as their active-duty counterparts.

SVA encourages Congress to work in tandem with ED, VA, and DOD to explore other ways to provide student service members with additional protections and flexibility so military duty does not negatively impact academic progress. We look forward to working with these committees and others to reduce the friction that can be caused by military activations for members of the National Guard and Reserve in higher education.

4. *Better integrate and support VA healthcare on campuses, particularly through the VA VITAL program.*

A recent report from the Government Accountability Office (GAO)²⁶ inspired this top policy priority from the post-traditional student support section and reinforced what student veterans have demonstrated to us, that student veterans are more inclined than other veterans to seek mental healthcare services. A recommendation from the

²⁶ See VA Health Care: Opportunities Exist to Further Meet Student Veterans' Mental Health Needs. (2024). GOVERNMENT ACCOUNTABILITY OFFICE. GAO-24-106620 <https://www.gao.gov/products/gao-24-106620>

report suggested that the VA make mental healthcare options more readily available to student veterans. We agree vehemently, as Congress should prioritize efforts to better integrate and support VA healthcare on campuses, particularly through initiatives such as the VA VITAL program, for several reasons.

Many student veterans rely on VA healthcare services for their medical needs, including physical and mental health care related to their military service. Student veterans have often noted that institutional support in these facets have not been appropriate for post-traditional students. Integrating VA healthcare on campuses ensures that student veterans have convenient access to comprehensive healthcare services without having to navigate complex and potentially inaccessible healthcare systems off-campus. This can lead to improved health outcomes, better management of chronic conditions, and enhanced overall well-being among student veterans. Primarily, the VA VITAL program aims to establish partnerships between the Department of Veterans Affairs (VA) and academic institutions to expand access to VA healthcare services on college campuses. By leveraging existing infrastructure and resources within academic settings, the VA VITAL program can enhance the accessibility and availability of healthcare services for student veterans, including primary care, mental health services, and specialized care for service-related disabilities. This integrated approach to healthcare delivery promotes continuity of care, facilitates collaboration between VA providers and campus health professionals, and ensures that student veterans receive comprehensive and coordinated care tailored to their unique needs.

Better integrating and supporting VA healthcare on campuses can contribute to the overall success and retention of student veterans in higher education. Access to timely and accessible healthcare services can alleviate barriers to academic success, such as untreated medical conditions, mental health challenges, and disabilities. By addressing these health-related barriers, student veterans can more effectively focus on their academic pursuits, engage in campus life, and achieve their educational goals. Additionally, integrating VA healthcare on campuses can foster a culture of support and inclusion for student veterans within the academic community. By providing on-campus healthcare services through VA VITAL specifically tailored to the needs of student veterans, colleges and universities demonstrate their commitment to supporting the health and well-being of this population. This, in turn, can enhance the sense of belonging and connectedness among student veterans, promote peer support networks, and facilitate their successful transition to civilian life.

To fully realize VA's commitment to treating the whole health of veterans, we call on Congress to prioritize efforts to better integrate and support VA healthcare on campuses, particularly through initiatives like the VA VITAL program, to ensure that student veterans have access to the healthcare services they need to thrive in higher education and beyond. By improving access, coordination, and collaboration between VA healthcare providers and academic institutions, policymakers can enhance the health, well-being, and success of student veterans in college and beyond.

5. Explore ways to modernize federal student financial aid to account for the unique circumstances of student veterans, military connected students, their families and caregivers-- transitioning service members.

SVA has heard from transitioning veterans that say their federal financial aid packages do not reflect their true economic circumstances, prompting SVA to include this as a top priority from our post-traditional student success category. Modernizing federal student financial aid to accommodate transitioning service members is critical for ensuring fair access to higher education. The current FAFSA system, tailored for traditional students, often fails to accurately assess the financial status of transitioning service members. One major issue lies in the calculation of the expected family contribution (EFC), which may not reflect the actual financial situation of service members transitioning from active duty. Adjusting the EFC calculation formula to exclude certain military benefits and allowances or developing alternative methodologies for income assessment is vital. Additionally, implementing flexible documentation requirements, such as accepting military separation paperwork, can streamline the application process and accurately assess the financial needs of transitioning service members.

Moreover, establishing dedicated support services within federal student aid offices can provide personalized guidance to transitioning service members throughout the application process. Trained counselors can help navigate the complexities of the FAFSA, explore available aid options, and advocate for their unique needs.

Increasing awareness through targeted outreach efforts in collaboration with military transition assistance programs and veterans' organizations is crucial for informing transitioning service members about available financial aid opportunities and support services. By modernizing federal student financial aid to address the specific circumstances of transitioning service members, policymakers can ensure equitable access to education, supporting their successful transition to civilian life and integration into the workforce.

We ask the Committees to explore ways in which VA may be able to partner with the Department of Education to automatically identify recently transitioned veterans and provide them with the option to have their financial aid award reevaluated based on a change in financial circumstances. There is an existing process called professional judgment, which could be leveraged for this very purpose. SVA believes that through inter-departmental collaboration, there may be ways to automatically notify recently transitioned veterans about the professional judgment option—one many students may not be familiar with and that takes individual action to initiate.²⁷ This is just one example of how this issue could be addressed. SVA is eager to work with these Committees to explore solutions to this issue.

6. *Understand these multifaceted dimensions of economic outlook disparity is crucial for informing policies and interventions aimed at fostering economic equity and opportunity for veterans as they transition to civilian life.*

SVA is currently investigating the significant potential for veterans, even those with higher education degrees, to experience disparities in their economic outlook when compared to their civilian peers, prompting this to be included in our top priority efforts from the transparency and accountability section.²⁸ Amongst conservative estimates between veterans and nonveterans with bachelor's degrees, the gap in wealth experienced by veterans can reach 41 percent, as measured by retirement savings.²⁹ To achieve parity, veterans would have to work for an additional 7 years. These disparities highlight the unique challenges faced by veterans in achieving economic stability and prosperity. One significant aspect of the veteran wealth gap is the variance in employment opportunities. Veterans may encounter obstacles such as employer perceptions, difficulties in transferring military skills to civilian jobs, and gaps in civilian work experience.³⁰ These challenges can limit veterans' access to certain industries or occupations with limited prospects for career advancement,³¹ hindering their ability to secure meaningful employment and achieve financial security.

Additionally, while veterans earn more on average than non-veterans,³² there are still disparities in economic potential. Despite their higher earnings, veterans may face barriers to wealth accumulation, such as limited access to financial resources like inheritances or family wealth. This disparity in wealth accumulation can lead to divergent economic trajectories, with non-veterans enjoying greater opportunities for investments, homeownership, and retirement savings, while veterans struggle to build long-term financial security. Veterans

²⁷ See generally *What is professional judgement?*, FEDERAL STUDENT AID, <https://studentaid.gov/help-center/answers/article/what-is-professional-judgment> (last accessed Feb. 16, 2023).

²⁸ Fitzgerald, K. G. (2006). The Effect of Military Service on Wealth Accumulation. *Research on Aging*, 28(1), 56-83. <https://doi.org/10.1177/0164027505281574>

²⁹ *Preliminary findings in* Kinch, A., Wooten, M. (forthcoming) An assessment of potential opportunity cost of military service: The Veteran Wealth Gap. STUDENT VETERANS OF AMERICA.

³⁰ Keeling, M., Kintzle, S., & Castro, C. A. (2018). Exploring U.S. Veterans' post-service employment experiences. *Military Psychology*, 30(1), 63–69. <https://doi.org/10.1080/08995605.2017.1420976>

³¹ See LinkedIn. *Veteran Opportunity Report* (November 2023). LINKEDIN showing that veterans are less likely to attain executive-level positions due to their service. <https://socialimpact.linkedin.com/content/dam/me/linkedinforgood/en-us/veteran-report-2023/veterans-opportunity-report-2023.pdf>

³² Gumber, C., & Vespa, J. (2020). *The employment, earnings, and occupations of post-9/11 veterans*. US Department of Commerce, US Census Bureau.

are often more vulnerable to economic downturns, layoffs, or unexpected expenses due to factors such as service-related disabilities or challenges transitioning to civilian life.³³ These financial vulnerabilities can exacerbate the economic divide between veterans and non-veterans, further widening the wealth gap. Differences in access to benefits and support services compound the economic disparities faced by veterans. Veterans navigate a complex system of entitlements, which may not adequately address their needs or provide sufficient support for economic stability. In contrast, non-veterans may have broader access to social safety net programs, offering them greater financial security and stability.

Finally, the prospect of a wealth gap or disparities in economic outlooks for veterans may serve as a disincentive for military service. Understanding the multifaceted dimensions of these inequities for veterans is crucial for informing policies and interventions aimed at fostering economic equity and opportunity as they transition to civilian life. By addressing the systemic barriers and disparities that contribute to this disparity, we can help ensure that veterans have the support and resources they need to achieve economic success and prosperity after their military service.

Additional Priorities

The following priorities represent the remainder of SVA's policy recommendations to the committees. While not listed amongst our top priorities, these issues continue to impact student veterans, students who are active duty or members of a National Guard or Reserve component, as well as family members, caregivers, and survivors every day. They should, therefore, be considered with the urgency deserved by the population.

VA Modernization

SVA supports VA modernization of IT and communications as it is essential for improving efficiency, enhancing care coordination, strengthening cybersecurity, leveraging emerging technologies, and demonstrating commitment to innovation in serving veterans. By investing in modernization efforts, we can ensure that veterans receive the best possible care and support. Recall from our top priorities, SVA's advocacy to monitor VA's ongoing efforts to modernize IT and communications systems, closely tracking the rollout of initiatives like the Digital GI Bill with a sharp focus on how these upgrades affect GI Bill users navigating their studies.

- 7. Expand and Improve VA Work Study to bring awareness to the program and barriers to increase pay and expand job opportunities, so they better align with student goals.*

Improving the VA Work Study program can help address the unique needs and circumstances of student veterans as they transition from military service to civilian life and higher education. Many student veterans face financial challenges, family obligations, and other responsibilities that may impact their ability to pursue traditional part-time employment opportunities. The VA Work Study program offers a flexible and supportive alternative that accommodates these needs while providing valuable experiential learning and professional development opportunities.

SVA recommends that Congress advocate for improvements to the VA Work Study program by increasing pay rates and expanding job opportunities to better align with student veterans' goals. Currently, the program offers valuable work experience and income for student veterans, but the pay rates may not adequately reflect their skills and qualifications. By raising pay rates, Congress can ensure fair compensation for student veterans' contributions, making the program more attractive and beneficial. Additionally, SVA's research shows that most student veterans who are working while in school are not in a position that aligns with their future career goals, with a majority working in food service or retail.³⁴ Expanding job opportunities across various departments within

³³ Rolf Pendall, Brett Theodos & Kaitlin Franks (2012) Vulnerable people, precarious housing, and regional resilience: an exploratory analysis, Housing Policy Debate, 22:2, 271-296, DOI: 10.1080/10511482.2011.648208

³⁴ Kinch, A. & Wooten, M. Student Veteran Census Survey 2011-2023. Student Veterans of America, Washington, D.C. (on file with authors).

the VA and other eligible organizations can expose student veterans to diverse career pathways and environments that are aligned with their goals, helping them make informed decisions about their futures. By aligning work-study positions with student goals and aspirations, Congress can enhance the program's effectiveness in supporting student veterans' academic and career success, ultimately promoting their overall well-being and satisfaction with the program.

To begin addressing this disparity, the recent Isakson-Roe bill re-established the ability of students to qualify for VA Work-Study when performing veteran liaison duties for members of Congress.³⁵ This is a step in the right direction, and we greatly appreciate the work these Committees did to expand the program to include these opportunities, but more can be done to expand opportunities available to student veterans through the program. Congress can do more to ensure that student veterans have access to valuable work experiences, financial support, and professional development opportunities that contribute to their overall well-being and success in higher education and beyond.

While not a member of these Committees, SVA recognizes Congressman Cartwright's stellar leadership on this issue. Representative Cartwright introduced what is arguably the most comprehensive VAWS improvement legislation. H.R. 3600, *the VA Work Study Improvement Act*, which would make critical refinements to the VAWS program so it can better serve participants. It would expand the type of qualifying activities participants can pursue to better align with academic and professional goals, increase pay, modernize the time-keeping process, and require VA to report detailed information about how the program serves participants. H.R. 3601, *the Student Veteran Work Study Modernization Act*, would allow VA education beneficiaries to participate in the Department of Veterans Affairs (VA) Work Study (VAWS) program if they are enrolled on a half-time basis. According to SVA's most recent census, roughly 50 percent of respondents have children and approximately 20 percent identify as single parents.³⁶ For some of these individuals, enrolling at a rate that is less than $\frac{3}{4}$ time might be the best fit for them and their families, but it cuts them off from the benefits of VAWS. We applaud Congressman Cartwright for his leadership on this issue and his staff for their extensive work on these bills.

8. *Protect and restore study abroad opportunities for GI Bill and VR&E students.*

In August 2020, VA enacted a revised interpretation of 38 U.S.C. § 3680A(f), the statute underlying the approvals of study abroad programs for student veterans. These requirements restricted students' ability to attend some of the most common and popular study abroad programs available.³⁷ In response to these changes, SVA and NAFSA wrote a letter to Secretary McDonough asking him to reconsider these administrative changes that create obstacles to student veterans pursuing opportunities to study abroad.³⁸ VA's response to our letter made clear that the agency believes their revised interpretation is strictly compliant with the underlying statute and they have no room to provide relief to the affected students.³⁹

While we understand VA's position as appropriate to the letter of the law, we believe this change creates unnecessary obstacles to an increasingly necessary component of many higher education programs and inequity between the treatment of student veterans and Title IV students as it relates to studying abroad. SVA believes that student veterans should be given the same opportunity to study abroad and develop the skillset they need to enter a global workforce as ED provides their Title IV classmates.

³⁵ Johnny Isakson and David P. Roe, M.D., Veterans Health Care and Benefits Improvement Act of 2020, Pub. L. No. 116-315, Title I, Subtitle A, § 1006.

³⁶ DR. ABBY KINCH, STUDENT VETERANS OF AMERICA, 2022 SVA CENSUS (2023) (on file with author).

³⁷ Institute of International Education (IIE), "Duration of Study Abroad," Open Doors Report 2020 (New York: IIE, 2020), <https://opendoorsdata.org/data/us-study-abroad/duration-of-study-abroad>.

³⁸ Letter from NAFSA and SVA to the Honorable Denis R. McDonough, Secretary of the Department of Veterans Affairs (April 20, 2021), <https://www.nafsa.org/sites/default/files/media/document/nafsa-sva-042021.pdf>.

³⁹ Letter from Thomas J. Murphy, Acting Under Secretary of Benefits to NAFSA and SVA (June 15, 2021), <https://www.nafsa.org/sites/default/files/media/document/va-nafsa-061521.pdf>.

In short, and as seen in our joint letter to VA:

“It is vital to ensure all students have access to a quality education that will prepare them for the global workforce into which they will graduate. Therefore, we urge the Department to work with relevant stakeholders in higher education and study abroad to review the current VBA guidance on the use of Post-9/11 GI Bill benefits for study abroad and to consider following a similar approach to that of the U.S. Department of Education’s Title IV Federal Student Aid program, which allows the use of these funds for study abroad programs that award academic credit.”⁴⁰

Thankfully, these Committees stewarded critical legislation that passed as part of the *Veterans Auto and Education Improvement Act of 2022*, which provides a five-year grace period allowing additional study abroad programs to be approved for VA education benefits subject to certain requirements. SVA is grateful for the Committees’ work on this issue.

We look forward to working with the Committees to ensure timely and effective implementation of the study abroad approval provision.

9. *Prioritize the successful transition of servicemembers into civilian life through VA-led programs and services, to include the Transition Assistance Program (TAP), that close the economic opportunity gaps caused by military service with elevated structural focus from VA administration.*

In December of 2022, the GAO reported failures in the DOD implementation of the National Defense Authorization Act for Fiscal Year 2019 (FY 2019 NDAA) required improvements to the Transition Assistance Program, citing critical failures for those most in need of the program’s services.⁴¹ Almost six months later, the office published a supporting report further outlining the need for improvements to TAP, under the DOD.⁴²

A successful implementation of TAP is crucial because, simply, TAP helps servicemembers transition from military service to civilian life smoothly by providing them with the necessary tools, resources, and information to navigate the process effectively. Where enlistees are required to participate in 8-to-13-week transition programs preparing them for military service through the branches’ Basic Military Training,⁴³ the TAP requirements to transition out of the military must be managed as rigorously.

TAP provides information about educational opportunities and training programs available to servicemembers, including how to use their GI Bill benefits for higher education or vocational training. This empowers servicemembers to pursue further education or training that can enhance their career prospects in the civilian workforce. Arguably, this key service included in the TAP program has not been implemented with the impetus that SVA feels is required for 21st century veterans.

Moreover, TAP ensures that servicemembers are aware of the benefits and support services available to them as veterans, including healthcare, disability compensation, and housing assistance. By understanding their entitlements, servicemembers can access the support they need to thrive in civilian life. Overall, TAP plays a vital role in supporting servicemembers as they transition to civilian life by providing them with the needed knowledge,

⁴⁰ Letter from NAFSA and SVA to the Honorable Denis R. McDonough, Secretary of the Department of Veterans Affairs (April 20, 2021), <https://www.nafsa.org/sites/default/files/media/document/nafsa-sva-042021.pdf>.

⁴¹ GAO. (December 2022). *Servicemembers Transitioning to Civilian Life: DOD Can Better Leverage Performance Information to Improve Participation in Counseling Pathways*. GOVERNMENT ACCOUNTABILITY OFFICE. GAO-23-104538 <https://www.gao.gov/products/gao-23-104538>

⁴² GAO. (May 2023). *Servicemembers Transitioning to Civilian Life: DOD Can Better Leverage Performance Information to Improve Participation in Counseling Pathways*. GOVERNMENT ACCOUNTABILITY OFFICE. GAO-23-106793 <https://www.gao.gov/products/gao-23-106793>

⁴³ Broadhurst, L., McNeill, K. M., Hendrix, R. M., Wright, J., & May, L. (2003). *The basic training environment*. Textbook of Military Medicine, Military Preventive Medicine, Mobilization And Deployment Vol, 1.

skills, and resources to succeed in the next chapter of their lives.

SVA feels that TAP is best housed within the VA due to the agency's extensive experience and expertise in veterans affairs. As the primary federal agency responsible for veterans' affairs, the VA is uniquely positioned to understand the needs and challenges faced by transitioning servicemembers and veterans. With access to a wide range of resources, including funding, facilities, and personnel, the VA can offer comprehensive support to transitioning veterans, including employment assistance, education benefits, healthcare services, and more. Placing TAP within the VA ensures seamless access to VA benefits for transitioning veterans, who may also require ongoing support beyond their initial transition period. Additionally, the VA can easily integrate TAP services with other VA programs aimed at supporting veterans' transition to civilian life, providing veterans with a comprehensive and coordinated approach to transition support. Overall, the VA's expertise, resources, and commitment to serving veterans make it the ideal owner of the TAP program, ensuring that transitioning servicemembers receive the support and assistance they need to successfully transition to civilian life.

Currently, various VA programs support veterans' economic integration and transition to civilian life, including education benefits, vocational rehabilitation, job training, entrepreneurship assistance, and small business support. However, the fragmented organizational structure and lack of centralized leadership can lead to inefficiencies, duplicative efforts, and gaps in service delivery. By establishing a dedicated administration with comprehensive oversight and leadership, Congress can ensure that these programs are effectively coordinated, aligned with veterans' needs, and optimally resourced to support their economic success and well-being by not only moving the existing TAP program into alignment with these other transition supports within VA, but by additionally establishing them within an elevated structural position with focus from VA administration.

SVA thanks Representative Wenstrup and Senator Rubio for championing H.R. 3738 and S. 291, Veterans Economic Opportunity, and Transition Administration Act.

10. Expand and improve VA VET TEC program.

SVA advocates for the expansion of and improvement to the VA VET TEC program as an additive in the competitiveness of veterans graduating with higher education degrees. VET TEC offers veterans an opportunity to gain valuable skills and training in high-demand fields, aligning with the evolving needs of the job market.⁴⁴ By expanding the program, more veterans can access training in industries such as information technology, healthcare, and advanced manufacturing, increasing their employability and economic prospects. The program additionally provides veterans with a pathway to successful civilian careers by partnering with reputable training providers and offering rigorous, job-ready programs.

Expanding VET TEC contributes to closing the skills gap America is currently facing in key industries⁴⁵ and bolsters the nation's workforce competitiveness. As industries continue to evolve rapidly, particularly in technology and healthcare sectors, investing in veteran training through VET TEC can help address critical shortages and drive innovation in these fields. Additionally, improving VET TEC involves streamlining administrative processes, increasing funding, and enhancing outreach efforts to ensure that all eligible veterans are aware of and can access the program's benefits. This includes simplifying the application process, providing adequate support services, and promoting the program through targeted outreach campaigns.

Overall, expanding and improving the VA VET TEC program not only supports veterans in their transition to civilian careers but also strengthens the nation's economy and workforce readiness.

⁴⁴ Dortch, C., Bradley, D. H., & Hegji, A. (2020). Direct Federal Support of Individuals Pursuing Training and Education in Non-Degree Programs. CRS Report R46306, Version 2. Congressional Research Service.

⁴⁵ See How to Address the Skills Gap. (2021). SOCIETY FOR HUMAN RESOURCE MANAGEMENT. <https://www.shrm.org/topics-tools/tools/how-to-guides/how-to-address-skills-gap>

GI Bill Improvements

SVA supports GI Bill improvements because it is not only a matter of fulfilling our moral obligation to support those who have served our country but also a smart investment in our nation's future prosperity and security. By enhancing the GI Bill, we can empower veterans to succeed in civilian life and continue to make valuable contributions to our communities and society. Recall from our top priorities SVA's advocacy to comprehensively review and update Monthly Housing Allowance (MHA) calculations to address gaps and disparities such as those related to Veteran Readiness & Employment (VR&E), break pay, overseas institutions, and online instruction. Recall also from our top priorities SVA's advocacy to ensure National Guard and Reserve parity of benefits and expand protections against administrative issues that create barriers to degree completion.

11. Address concerns with VR&E processes and personnel to ensure accountability and consistency for eligible veterans.

In 2021, VA announced a self-identified change in how it assesses eligibility for VR&E as it relates to other veterans' education benefits. In short, a veteran may use their VR&E eligibility up to a 36-month cap and then, separately, use another education benefit, such as the Post-9/11 GI Bill, up to its own 36-month cap, with a total cap of 48 months.⁴⁶ SVA would like to commend VA for identifying and changing its interpretation. This change provides a greater benefit to eligible veterans and complies with the underlying statute.

To continue this positive trend, SVA encourages more discussion around the VR&E program with VA and a focus on specific areas of concern, such as the lack of counselors, difficulty in contacting VA to determine eligibility, long timelines in the assessment process, inconsistent counselor guidance and accessibility, among others.⁴⁷

VR&E is one of the most flexible and important programs in VA's portfolio. Indeed, in certain scenarios, it provides a vastly greater benefit than even the generous Post-9/11 GI Bill. Particularly considering the recent change to entitlement charges by VA, it is more important than ever to thoroughly review this program for obstacles, barriers, and shortfalls that prevent it from fulfilling its true potential as a benefit. We look forward to working with the Committees on the best path forward for the program.

12. Address negative trickle-down impacts of institutional administrative burdens by reviewing VA education policies for inefficiencies and exploring ways to add more school certifying officials (SCO) on campuses.

Over the last three years, a myriad of important requirements passed into law that govern the administration of VA education benefits. VA has worked diligently to implement these provisions. Unfortunately, in many cases, implementation has not been as timely or seamless as necessary.

SVA has heard from many school certifying officials (SCO) about the increased administrative burden resulting from these policies, which is exacerbated by a lack of timely and consistent guidance from VA. The resulting confusion and strain on SCOs' time diminishes their ability to serve student veterans at the level many hope to. Based on extensive feedback from SCOs, this appears to be an issue impacting many institutions, with the negative impacts ultimately trickling down to student veterans.

Our organization does not represent SCOs, but their concerns become ours when they relate to an SCO's ability to properly serve student veterans. We also hear from student veterans that there are not enough SCOs on their campuses to adequately address the needs of all the student veterans using benefits.⁴⁸ This overlap in feedback from SCOs and the student veterans they serve is concerning because it suggests there may be a very real problem with VA's currently recommended ratio of one SCO to every 200 GI Bill students.

⁴⁶ See VBA FAQ: 48 Month Rule FAQ. DEP'T VETERANS AFFAIRS. https://www.benefits.va.gov/GIBILL/docs/48_Month_Rule_FAQs.pdf

⁴⁷ See VA VOCATIONAL REHABILITATION AND EMPLOYMENT Additional Assessment Could Enhance Consistency among Counselors (2019). GOVERNMENT ACCOUNTABILITY OFFICE. GAO 20-28 <https://www.gao.gov/assets/gao-20-28.pdf>

⁴⁸ Dudley-Miller, V., & Radel, J. (2020). Experiences and challenges of students with a military background at an academic medical center. *Journal of Veterans Studies*, 6(1), 112-121.

SVA encourages these Committees to review VA education benefit policies to identify redundancies and inefficiencies that can be eliminated to decrease the current administrative burden on SCOs. We also ask the committee members to explore ways to better support SCOs, including options for encouraging institutions to hire more of these professionals so our student veterans have appropriate access to their critical services and timely access to their earned benefit.

Further, by monitoring the approval processes for institutions seeking to enroll GI Bill students. The Committees are able to remain committed to properly supporting student veterans using their GI Bill to earn a degree or credential. They are additionally empowered to stay informed about trends and developments in the higher education landscape for veterans, including emerging challenges and opportunities facing veterans as they pursue their education and career goals. This enables effective responses to changing needs and circumstances, ensuring that the GI Bill program remains relevant and responsive to the evolving needs of veterans and their families.

Post-traditional Student Success

SVA supports post-traditional student success, particularly among veterans, as a moral imperative and a wise investment in our nation's future. By providing the necessary support and resources, we honor veterans' service, maximize the return on their education benefits, strengthen the workforce, enrich our communities, and empower individuals to achieve their aspirations. Recall from SVA's top policy priorities our recommendation to better integrate and support VA healthcare on campuses, particularly through the VA VITAL program, and to advocate for the exploration of ways to modernize federal student financial aid to account for the unique circumstances of student veterans, military connected students, their families and caregivers-- transitioning service members.

13. Identify and establish better support for post-traditional students' basic needs, including food, shelter, and childcare.

In December 2018, the GAO released a report on food and housing insecurity among college students.⁴⁹ After reviewing 31 separate studies, they concluded that “[n]one of these studies... constitute a representative study” of our nation's students.⁵⁰ In fact, no federal agency has assessed food and housing insecurity among postsecondary students and that will remain true until the most recent National Postsecondary Student Aid Survey (NPSAS) is completed.⁵¹

Other research designed to fill current gaps paints a potentially concerning picture. A 2020 survey conducted by The Hope Center found that in 2019, nearly 40 percent of student respondents reported being food insecure during the previous 30 days, more than 46 percent reported experiencing housing insecurity in the past year, and 17 percent reported being homeless during the past year.⁵²

While SVA works to collect its own data through our Student Veteran Basic Needs Survey, we call on Congress to support efforts to collect additional data at the federal level on student basic needs.

Childcare needs are another pressure point for post-traditional students, including many student veterans. Increasing access to childcare is a near-universal conversation among SVA Chapters. This is no surprise given that more than fifty percent of student veterans are parents.⁵³ Childcare challenges create added pressures for

⁴⁹ GOVERNMENT ACCOUNTABILITY OFFICE, FOOD INSECURITY: BETTER INFORMATION COULD HELP ELIGIBLE COLLEGE STUDENTS ACCESS FEDERAL FOOD ASSISTANCE BENEFITS, GAO-19-95. December (Dec. 2018.), available at <https://www.gao.gov/assets/gao-19-95.pdf>.

⁵⁰ *Id.*

⁵¹ *Real College Survey 2020: Five Years of Evidence on Campus Basic Needs Insecurity*, THE HOPE CENTER, https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf (last visited Feb. 24, 2021).

⁵² *Id.*

⁵³ *The 2020 SVA Census Survey: Student Veteran General Breakdowns*, STUDENT VETERANS OF AMERICA 6 (Jan. 2021),

student veterans and other post-traditional students which can complicate academic journeys.

With childcare costs comprising about 10 percent of an average family's income, and presumably more for single parents, financial pressures can compound more quickly for student parents.⁵⁴ These pressures have predictable outcomes: twenty-four percent of students pursuing bachelor's degrees reported that they have considered stopping taking courses in the latter half of 2020 due to childcare or caregiver responsibilities.⁵⁵ This number rises to thirty-two percent for those students pursuing associate degrees.⁵⁶

According to the Center for Community College Student Engagement (CCCSE), twenty-two percent of parent students reported a lack of childcare made it difficult for them to complete their coursework.⁵⁷ And, of those that manage to graduate, the Institute for Women's Policy Research (IWRP) reports that "[m]edian student parent debt is nearly 2.5 times higher than debt among students without children."⁵⁸

The only federal program dedicated solely to providing childcare assistance for lower-income students in higher education is Child Care Access Means Parents in Schools, or CCAMPIS, but historical challenges with underfunding and available childcare providers, particularly in evening and weekend hours, limit its effectiveness.⁵⁹ Other federal programs that provide childcare assistance, such as the Child Care Development Block Grant (CCDBG), have more difficult eligibility rules, thus limiting their effectiveness as a support pillar for post-traditional students.

SVA recommends that Congress increase funding for CCAMPIS and build in enhanced flexibility for CCDBG applicants. We also recommend Congress investigate how they might expand or create new programs modeled off the pilot programs established for childcare at VA medical facilities.

Finally, we recommend that the members of these Committees renew their consideration of draft legislation first proposed by former VFW-SVA Fellow El'ona Kearney of The Evergreen State College as part of the VFW-SVA Legislative Fellowship. El'ona's work highlighted the lack of assistance for non-traditional childcare options, such as care from relatives and neighbors who are more likely to be available and willing to assist with childcare during off-peak times like evenings and weekends. This stipend proposal would provide at least some flexibility and assistance to student veterans, many of whom need alternative childcare options.⁶⁰

<https://studentveterans.org/wp-content/uploads/2021/04/SVA-Census-2020-Report.pdf>

⁵⁴ Rasheed Malik, Working Families Are Spending Big Money on Child Care, CENTER FOR AMERICAN PROGRESS (June 20, 2019), <https://cdn.americanprogress.org/content/uploads/2019/06/19074131/Working-Families-SpendingBRIEF.pdf> (citing U.S. CENSUS BUREAU 2014 SURVEY OF INCOME AND PROGRAM PARTICIPATION, WAVE 3 (2019)), <<https://www.census.gov/programssurveys/sipp/data/datasets/2014-panel/wave-3.html> (last visited Feb. 24, 2021).

⁵⁵ Gallup. *Gallup State of the Student Experience: Fall 2020 Report*. <https://www.gallup.com/education/327485/state-of-the-student-experience-fall-2020.aspx>.

⁵⁶ *Id.*

⁵⁷ CCCSE. The Impact of COVID-19 on Entering Students in Community Colleges. Spring 2021. https://cccse.org/sites/default/files/SENSE_COVID.pdf.

⁵⁸ Institute for Women's Policy Research. *The Student Parent Equity Imperative: Guidance for the Biden-Harris Administration*. https://iwpr.org/wp-content/uploads/2021/04/Student-Parent-Equity-Imperative_final.pdf.

⁵⁹ See generally TERRY BRIDGET LONG, THE HAMILTON PROJECT, HELPING WOMEN TO SUCCEED IN HIGHER EDUCATION: SUPPORTING STUDENTPARENTS WITH CHILD CARE (Oct. 2017), available at http://www.hamiltonproject.org/assets/files/higher_education_student_parents_womenLong.pdf

⁶⁰ Discussion Draft, To amend title 38, United States Code, to direct the Secretary of Veterans Affairs to pay to certain veterans, who receive certain educational assistance furnished by the Secretary, a weekly stipend for childcare services (2021), available at <https://docs.house.gov/meetings/VR/VR10/20210921/114046/BILLS-1172ih-U1.pdf>.

14. *Call for additional funding for VetSuccess on Campus (VSOC) locations and veteran centers.*

The VSOC program is one of the few SVA hears about that is uniformly positive. Despite this, over its lifetime, the program has only expanded to approximately twenty schools beyond its original ninety-or-so. This program is popular, providing tremendous help and guidance to student veterans and schools. We encourage Congress to provide adequate funding to ensure it can expand to meet the growing needs of student veterans everywhere.

On-campus student veteran centers are crucial to student veteran success. According to the results of a survey conducted by Operation College Promise, “the most beneficial campus service was a veteran center on campus especially one with a specific office/lounge where veteran students can meet, work together, and learn about veteran/military student benefits and programs.”⁶¹ This closely parallels what SVA hears directly from student veterans, many of whom often request additional support for their veteran centers. These requests for additional support are coming at a time when veteran-support services are facing reduced funding on many campuses.⁶² We thank Representative Frankel and Senator Rosen for their efforts to address this issue through *The Veteran Education and Empowerment Act*, which would, among other things, reauthorize grant funding to support student veteran centers on campuses across the country.⁶³

We encourage the committee to prioritize support for VSOC and campus veterans' centers.

15. *Expand access to reliable broadband internet.*

As SVA has testified before, higher education's rapid transition to online instruction in the wake of COVID-19 has made students' access to affordable and reliable broadband internet more important than ever.⁶⁴ This transition has accelerated investment in online program infrastructure at institutions around the country. As a result, we expect online learning to play an increasingly mainstream role in higher education, even well after the pandemic. It is concerning, then, that millions of Americans cannot either access or afford reliable broadband internet. Put another way, the digital divide in this country is real, and the pandemic laid bare these inequities.

SVA would like to recognize the passage of the *Infrastructure Investment and Jobs Act* which provides \$65 billion to improve broadband access in rural areas and affordability in lower-income communities.⁶⁵ As part of this, the Emergency Broadband Benefit Program, which we applauded for its direct benefit to communities of need, has been turned into a permanent program called the Affordable Connectivity Program. Programs like this, with funding to support and flexibility in how they are applied, serve as remarkable examples of how Congress can help those in need quickly.

However, despite the much-needed influx of funding to support these programs, the work to bridge the digital divide is not yet complete. According to the FCC, there are at least 2.2 million veteran households in this country without either fixed or mobile broadband connections, with price and location described as the top barriers to

⁶¹ WENDY A. LANG ET AL., COMPLETING THE MISSION II: A STUDY OF VETERAN STUDENTS' PROGRESS TOWARD DEGREE ATTAINMENT IN THE POST 9/11 ERA 10 (Nov. 2013), available at https://campussuite-storage.s3.amazonaws.com/prod/1280306/3a32f069-629b-11e7-99ef-124f7febbf4a/1691064/278b511c-024e-11e8-8b36-0a8d44716112/file/completing_mission_ii-Nov2013.pdf (emphasis added).

⁶² Military Times Staff, *About 1 in 3 colleges have cut funding for veteran-support programs, survey says*, MILITARYTIMES (Feb. 22, 2021), <https://www.militarytimes.com/education-transition/2021/02/23/about-1-in-3-colleges-have-cut-funding-for-veteran-support-programs-survey-says/>.

⁶³ Veteran Education and Empowerment Act, H.R. 3686 (2021); Veteran Education and Empowerment Act, S. 1881 (2021).

⁶⁴ Student Veterans of America, Testimony of Justin Monk before the U.S. Senate Committee on Veterans' Affairs hearing on the topic of "SUCCESS AFTER SERVICE: IMPROVING VETERANS' EMPLOYMENT, EDUCATION, AND HOME LOAN OPPORTUNITIES." <<https://www.veterans.senate.gov/imo/media/doc/10.27.21%20Monk%20SVA%20Testimony1.pdf>>.

⁶⁵ Infrastructure Investment and Jobs Act. https://www.epw.senate.gov/public/_cache/files/e/a/ea1eb2e4-56bd-45f1-a260-9d6ee951bc96/F8A7C77D69BE09151F210EB4DFE872CD.edw21a09.pdf.

adoption.⁶⁶ For student veterans, over half of whom are parents, the consequences of being unable to access reliable broadband extend beyond themselves to their dependents.

The digital divide has had an outsized impact on communities of color and low-income households.⁶⁷ Courses shifting online during the pandemic only worsened these inequities. Without other options than dropping out entirely, students increasingly began to sit outside their schools, local libraries, or coffee shops to connect to free wireless internet and complete their schoolwork, a practice FCC Chairwoman Jessica Rosenworcel has called “Parking Lot Wi-Fi.”⁶⁸

SVA recognizes that much has been done recently to address these concerns, and we applaud that work. But with so many more veterans still in need of help, we urge these Committees and Congress to continue exploring innovative ways to make sure students can access this essential service, which will continue to play an ever-larger role in their higher education journeys.

Strengthening Higher Education

SVA advocates for strengthening the systems and institutions within higher education because it is essential for advancing individual opportunity, promoting social mobility, driving economic prosperity, fostering innovation, and upholding democratic values. By investing in higher education systems and institutions, we invest in the future of our nation and ensure a brighter, more inclusive, and more prosperous future for all.

16. Pass a comprehensive reauthorization of the Higher Education Act.

Reauthorizing the Higher Education Act (HEA) and ensuring student veterans’ voices are heard during the process remains a priority for SVA. While HEA generally falls outside the jurisdiction of these Committees, SVA implores all Members, as engaged veteran advocates, to prioritize and participate in efforts to reauthorize HEA. VA significantly impacts the lives of student veterans and military-connected students, but the agency’s education business lines handle only a fraction of the higher education legislation and regulation that ultimately affect student veterans, service members, and their families.

The unfortunate reality is that HEA is woefully out-of-date, and as a result, unable to adequately serve students in a 21st Century higher education system. Reauthorization is well overdue given the frequency with which Congress has addressed the statute in the past. SVA encourages Congress to take the steps necessary to reauthorize the HEA.

17. Empower the higher education triad to prevent predatory practices across all education sectors.

Empowering the higher education triad—comprising federal, state, and institutional stakeholders—to prevent predatory practices across all education sectors, prioritize student outcomes, and support innovative learning practices is crucial for student veterans. Student veterans often face unique challenges and vulnerabilities as they transition from military service to higher education. Predatory practices, such as aggressive recruiting tactics, misleading marketing, and low-quality educational programs, disproportionately target veterans, exploiting their GI

⁶⁶ The Federal Communications Commission, *Report on Promoting Broadband Internet Access Service for Veterans, May 2019*. Accessed July 20, 2020. <https://docs.fcc.gov/public/attachments/DOC-357270A1.pdf>.

⁶⁷ See Sara Atske and Andrew Perrin, *Home Broadband Adoption, Computer Ownership vary by race, ethnicity in the U.S.*, PEW RESEARCH CENTER (July 15, 2021), <https://www.pewresearch.org/fact-tank/2021/07/16/home-broadband-adoption-computer-ownership-vary-by-race-ethnicity-in-the-u-s/>; Emily A. Vogels, *Digital Divide Persists Even as Americans with lower incomes make gains in tech adoption*, PEW RESEARCH CENTER (June 22, 2021), <https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>.

⁶⁸ STATEMENT OF JESSICA ROSENWORCEL COMMISSIONER FEDERAL COMMUNICATIONS COMMISSION BEFORE THE SUBCOMMITTEE ON COMMUNICATIONS & TECHNOLOGY COMMITTEE ON ENERGY AND COMMERCE UNITED STATES HOUSE OF REPRESENTATIVES SEPTEMBER 17, 2020. <<https://docs.fcc.gov/public/attachments/DOC-366984A1.pdf>>

Bill benefits and leaving them with substantial debt and few marketable skills.⁶⁹ By empowering the higher education triad to prevent predatory practices, Congress can protect student veterans from exploitation and ensure that they have access to high-quality, reputable educational opportunities that lead to meaningful career outcomes.

Prioritizing student outcomes is essential for ensuring that student veterans receive the support and resources they need to succeed academically and professionally.⁷⁰ Student veterans may require additional assistance and accommodations, such as academic counseling, disability services, and mental health support, to address the unique challenges they face during their transition to civilian life and higher education. By prioritizing student outcomes, the higher education triad can allocate resources and implement programs that specifically address the needs of student veterans, promoting their retention, graduation, and post-graduation success.

Supporting innovative learning practices is important for meeting the diverse needs and preferences of student veterans, many of whom are non-traditional students with family, work, and military responsibilities.⁷¹ Flexible learning options, such as online courses, hybrid programs, and competency-based education, can accommodate veterans' busy schedules and provide them with the flexibility to balance their academic pursuits with their other commitments. By empowering the higher education triad to support innovative learning practices, Congress can enhance access and equity for student veterans and promote their academic and professional success. Fostering collaboration and coordination among federal, state, and institutional stakeholders within the higher education triad can facilitate the sharing of best practices, resources, and expertise for supporting student veterans. This collaborative approach can help identify and address systemic barriers and challenges that hinder student veterans' access to and success in higher education.

18. Ensure accurate and timely implementation of the improved 90/10 Rule, which now counts VA and DOD educational benefits as federal education funds.

Congress has finally closed the harmful 90-10 loophole in a move that will protect student veterans and service members from bad-actor institutions more interested in prioritizing profit than student outcomes.

The 90/10 rule was intended to serve as a market viability test to ensure proprietary schools were fit enough to attract healthy, diverse sources of revenue.⁷² In other words, it was intended to prevent bad-actor schools from subsisting entirely off federal taxpayer money. To that end, Congress crafted a rule requiring that proprietary schools obtain a minimal amount of their revenue, now just 10 percent, from sources other than federal financial aid.⁷³

Unfortunately, the law suffered from a critical oversight—it excluded VA and Department of Defense (DOD) education benefits like the GI Bill and Tuition Assistance.⁷⁴ This loophole created a perverse incentive for bad-

⁶⁹ Government Accountability Office. (2018). *Va needs to ensure that it can continue to provide effective school oversight* (GAO Publication No. 19-3). U.S. Government Printing Office. <https://www.gao.gov/assets/gao-19-3.pdf>

⁷⁰ Lopez, J. (2019). *Evaluating the Efficacy of Programs for Veteran Students*. University of Arkansas.

⁷¹ Kinch, A. *Life-Cycle Atlas Project*. Student Veterans of America. (with author)

⁷² See generally *Cleland v. National Coll. of Business*, 435 U.S. 213, 216 (1978) (discussing the purpose of the Department of Veterans Affairs' 85-15 rule—the model for the 90/10 rule—as “allowing the free market mechanism to operate” by ensuring “[t]he price of the course...respond[ed] to the general demands of the open market as well as to those with available Federal moneys to spend.”).

⁷³ The original rule required proprietary institutions to obtain at least 15 percent of their revenue from sources other than title-IV federal financial aid. Pub. L. No. 102-325 (1992). Congress amended the rule in 1998 to require that these schools earn just 10 percent of their revenue from sources other than federal financial aid. Pub. L. No. 105-244 (1998).

⁷⁴ It is clear the loophole was an unintentional oversight because that is how congressional staff who drafted the rule's statutory language described it afterward, and because excluding such massive sources of federal education assistance flies in the face of the law. See WALTER OCHINKO, VETERANS EDUCATION SUCCESS, DEPARTMENT OF EDUCATION DATA SHOWS INCREASED TARGETING OF VETERANS AND SERVICE MEMBERS, HIGHLIGHTING URGENCY OF CLOSING 90/10 LOOPHOLE 3-4 (Nov. 2017), available at <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/5a043bdfc83025336298845f/1510226911840/VES+90%3A10+Report+-+FINAL.pdf> (citing Daniel Golden, *For Profit Colleges Target the Military*, BLOOMBERG NEWS (Dec. 30, 2009), available at <https://www.bloomberg.com/news/articles/2009-12-30/for-profit-colleges-target-the-military>).

actor schools to target student veterans and service members for their earned education benefits.⁷⁵ These students became the linchpin of a scheme by low-quality, bad-actor schools to evade the 90/10 rule.⁷⁶ For every one VA or DOD education benefit dollar that bad-actor schools took in from service members and veterans, they gained access to another nine dollars in federal financial aid.⁷⁷ The result was that bad schools had a pathway to subsist entirely off federal taxpayer dollars.

The loophole's impact on student veterans and service members has been disastrous. Bad-actor institutions employed well-documented, deceptive, aggressive, and downright fraudulent recruitment tactics to enroll student veterans.⁷⁸ Some student veterans attending these schools fully expended their earned VA education benefits, and many took out federal student loans in addition.⁷⁹ Low-quality schools have left student veterans with worthless degrees, non-transferrable credits, depleted benefits, and mountains of debt.⁸⁰ Simply put, the loophole emboldened bad-actor schools and negatively impacted the academic and financial futures of thousands of student veterans and service members.⁸¹

Fortunately, Congress saw fit to close the loophole, an effort which garnered bipartisan support.⁸² The law requires that all "federal education assistance" be appropriately counted on the 90 percent side of the 90/10 equation.⁸³ Congress delayed the law's implementation until January 1, 2023, and subjected the change to negotiated rulemaking to begin no later than October 1, 2021.⁸⁴

Encouraged by ED's release of regulations that appropriately complement the statute, SVA is committed to ensuring the updated 90/10 rule is faithfully implemented and that parties beholden to its requirements comply

⁷⁵ See Tanya Ang and Lauren Augustine, *The '90-10 rule' in higher education is a target on veterans' backs*, THE HILL (June 24, 2019, 7:00 AM), <https://thehill.com/opinion/education/449445-the-90-10-rule-in-higher-education-is-a-target-on-veterans-backs>.

⁷⁶ See ALEXANDRA HEGJI, CONGRESSIONAL RESEARCH SERVICE, R46773, THE 90/10 RULE UNDER HEA TITLE IV: BACKGROUND AND ISSUES 40 at n.50 (April 26, 2021) (referencing "several reports of false or predatory marketing or advertising practices on the part of some proprietary IHEs attempting to enroll GI Bill and TA participants, in part to pass the 90/10 requirement."), *available at* <https://files.eric.ed.gov/fulltext/ED614219.pdf>.

⁷⁷ OCHINKO, *supra* note 53 at 4.

⁷⁸ See generally *Why For-Profit Institutions are Targeting Veterans Educational Benefits*, VETERANS EDUCATION SUCCESS (Jan. 1, 2014), <https://vetsedsuccess.org/why-for-profit-institutions-are-targeting-veterans-education-benefits> (summarizing numerous accounts of predatory recruitment of student veterans at bad-actor proprietary institutions); U.S. SENATE HEALTH, EDUCATION, LABOR, AND PENSIONS COMM., 113TH CONG., IS THE NEW G.I. BILL WORKING? FOR-PROFIT COLLEGES INCREASING VETERAN ENROLLMENT AND FEDERAL FUNDS 9-11 (July 30, 2014), *available at* <https://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/56100b87e4b0147725a71e86/1443892103628/GI-Bill-data-July-2014-HELP-report.pdf>.

⁷⁹ IS THE NEW G.I. BILL WORKING?, *supra* note 57 at 10-11; OCHINKO, *supra* note 53 at 13 (discussing reports of proprietary schools aggressively steering student veterans toward federal student loans or fraudulently authorizing loans on behalf of these students).

⁸⁰ See generally IS THE NEW G.I. BILL WORKING?, *supra* note 57 at 9-11 (discussing the aggressive and deceptive recruitment of student veterans at proprietary institutions and the consequences for these students such as debt, inability to find a job after graduation, and wasted GI Bill benefits); *Why For-Profit Institutions are Targeting Veterans Educational Benefits*, *supra* note 57 (discussing student veterans attending bad-actor proprietary institutions and being left with worthless degrees, non-transferable credits, and debt).

⁸¹ See generally Kimberly Hefling, *Vets snared in for-profit college collapse want GI Bill Money back*, POLITICO (July 2, 2015), <https://www.politico.com/story/2015/07/veterans-gi-bill-for-profit-colleges-119697>; Chris Kirkham and Alan Zarembo, *For-profit colleges are using the GI Bill to make money off veterans*, LOS ANGELES TIMES (Aug. 18, 2015), <https://www.latimes.com/business/la-fi-for-profit-colleges-gi-bill-20150809-story.html>; Danielle Douglas-Gabriel, *Veterans are getting short shrift as for-profit colleges close down, report says*, THE WASHINGTON POST (Oct. 21 2016), <https://www.washingtonpost.com/news/grade-point/wp/2016/10/21/veterans-are-getting-the-short-shrift-as-for-profit-college-close-down-report-says/>.

⁸² Pub. L. No. 117-2, § 2013 (2021); *U.S. Senate Closes 90/10 Loophole in Bipartisan Amendment to COVID Relief Reconciliation Package*, VETERANS EDUCATION SUCCESS (March 6, 2021), <https://vetsedsuccess.org/u-s-senate-closes-90-10-loophole-in-bipartisan-amendment-to-covid-relief-reconciliation>; see also Protect Veterans' Education and Taxpayer Spending Act of 2019, S. 2857, 116th Cong. (2019) (demonstrating landmark bipartisan support for an earlier legislative effort in the Senate to close the 90/10 loophole).

⁸³ Pub. L. No. 117-2, § 2013 (2021).

⁸⁴ *Id.*

with the full letter of the law.⁸⁵

19. Restore a strong Gainful Employment rule and protect the improved Borrower Defense rule to defend students and taxpayers against fraud, waste, and abuse.

Borrower Defense to Repayment (BD) and Gainful Employment (GE) are important policies that can protect students against bad actors and low-quality institutions in higher education. The BD rule is supposed to provide federal student loan relief to students who were defrauded by bad-actor schools.⁸⁶ The GE rule was designed to ensure certain programs provide a worthwhile education—one that is affordable relative to earnings after graduation.⁸⁷ Together, these measures can help protect both students and taxpayers against fraud, waste, and abuse.

The BD and GE policies were meant to provide critical assurances that guard students against bad actors in higher education. The 2015 and 2016 closures of ITT Technical Institute and Corinthian Colleges respectively highlight why these policies are so important for student veterans. These schools closed abruptly after being mired in controversy for having allegedly engaged in false or deceptive representations to students. After the schools closed, thousands of students were left with debt, depleted education benefits, and few, if any, viable ways to transfer credits to other institutions to continue their educations.⁸⁸ The events surrounding ITT and Corinthian Colleges were not isolated occurrences, with thousands of student veterans impacted by other proprietary school closures in the years that followed.⁸⁹ The documentary *Fail State* illuminates the practices of bad actor schools in higher education by revealing their aggressive recruiting practices, poor student outcomes, and how they contribute to growing student debt in America.⁹⁰

The Forever GI Bill sought to correct some of the damage done by low-quality institutions that shut down by allowing beneficiaries to restore GI Bill entitlement. However, for student veterans and service members who hold federal student loans, BD may be their only option for relief after being defrauded. The Gainful Employment rule could work to protect students at the outset of their academic journey by ensuring that only quality career education programs have access to title IV funds.

Unfortunately, BD was substantially weakened in recent years, and GE was rescinded altogether in 2019. SVA opposed these rollbacks and continues to work to restore these important student safeguards. In 2020, SVA was proud to partner with a diverse coalition of student groups and VSOs that led the charge to overturn ED's weakening of the BD rule. That effort resulted in a bipartisan rebuke of the regulation in both houses of Congress.⁹¹

⁸⁵ See generally *Education Department Unveils Final Rules to Protect Veterans and Service Members, Improve College Access for Incarcerated Individuals and Improve Oversight When Colleges Change Owners*, U.S. DEP'T OF EDUCATION (Oct. 22, 2022), <https://www.ed.gov/news/press-releases/education-department-unveils-final-rules-protect-veterans-and-service-members-improve-college-access-incarcerated-individuals-and-improve-oversight-when-colleges-change-owners>.

⁸⁶ *Why Students Need a Strong Borrower Defense Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS, 1 (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Borrower-Defense-Rule.pdf>.

⁸⁷ *Why Students Need a Strong Gainful Employment Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS, 1 (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Gainful-Employment-Rule.pdf>.

⁸⁸ See generally *Why Students Need a Strong Borrower Defense Rule*, THE INSTITUTE FOR COLLEGE ACCESS AND SUCCESS (2021), <https://ticas.org/wp-content/uploads/2021/02/Why-Students-Need-a-Strong-Borrower-Defense-Rule.pdf>.

⁸⁹ Natalie Gross, *Thousands of veterans had education derailed when for-profit college chains abruptly closed*, MILITARY TIMES (June 20, 2019), <https://rebootcamp.militarytimes.com/news/education/2019/06/20/thousands-of-veterans-had-education-derailed-when-for-profit-college-chains-abruptly-closed/>.

⁹⁰ DIRECTOR ALEX SHEBANOW, *FAIL STATE*, FAILSTATE.COM (A SDCF LLC Film 2018), <https://failstatemovie.com>.

⁹¹ Michael Stratford, *Congress sends rebuke of DeVos 'borrower defense' rule to Trump's desk*, POLITICO (May 19, 2020, 9:29 PM), <https://www.politico.com/news/2020/05/19/congress-devos-rebuke-270077>.

ED recently reevaluated BD and GE regulations through the Negotiated Rulemaking process as required under the HEA.⁹² This process incorporates input from diverse experts representing constituencies throughout higher education who debate and work toward consensus on HEA regulations. SVA was privileged to have one of our staff represent service members and veterans in the negotiated rulemaking session that addressed BD. The negotiations produced strong draft regulatory language that enjoyed near universal consensus among negotiators. SVA was pleased to see the Department release a vastly improved BD rule resulting from this thorough negotiation and comment process.⁹³

We look forward to continued participation in the rulemaking ahead and eagerly await the Department's proposed rule on GE, which is expected later this year.

SVA encourages members of Congress to support, defend, and strengthen these critical policies that protect student veterans, service members, and their families.

20. Protect and monitor the Public Service Loan Forgiveness program.

Protecting and monitoring the Public Service Loan Forgiveness (PSLF) program is critically important for veterans. Primarily, ensuring that military service counts toward the public service requirement is essential in ensuring that veterans gain credit for their service. Many veterans choose to pursue careers in public service fields, such as government, non-profit organizations, and public education, following their military service. The PSLF program offers a pathway for these veterans to manage their student loan debt by forgiving the remaining balance of their federal student loans after making 120 qualifying payments while employed full-time in a qualifying public service position.⁹⁴ By incentivizing veterans to pursue careers in public service, the PSLF program not only supports their professional development but also enables them to continue serving their communities and country in meaningful ways.

Veterans, particularly those with service-connected disabilities, may face unique financial challenges that make managing student loan debt burdensome. The PSLF program provides financial relief to veterans by offering a mechanism for loan forgiveness, reducing the financial strain associated with student loan repayment and enabling veterans to focus on their career and personal goals. Moreover, the PSLF program serves as a vital recruitment and retention tool for public service organizations, including those that employ veterans.⁹⁵ By offering loan forgiveness as an employee benefit, public service employers can attract and retain talented veterans who may otherwise be deterred by student loan debt. This helps ensure a skilled and diverse workforce within public service sectors, benefiting both veterans and society as a whole.

SVA supports S. 2949, *Ensuring Military Access to Higher Education Benefits Act of 2023*. The bipartisan bill puts this initiative back on track by requiring DOD and ED to share existing information, so borrowers receive automatic credit toward PLSF for their qualifying military service. SVA applauds Senators Cortez Masto and Moran for their leadership on this common-sense legislation to ensure military borrowers get the PSLF credit they have earned

21. Improve oversight and accountability of trends in higher education such as institutional conversions, online program management, and lending practices.

⁹² *Negotiated Rulemaking for Higher Education 2021-21*, U.S. DEP'T OF EDUCATION, <https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/index.html> (last updated January 10, 2023).

⁹³ *See generally Education Department Releases Final Regulations to Expand and Improve Targeted Debt Relief Programs*, U.S. DEP'T OF EDUCATION (Oct. 31, 2022), <https://www.ed.gov/news/press-releases/education-department-releases-final-regulations-expand-and-improve-targeted-debt-relief-programs>.

⁹⁴ Federal Student Aid, *Public Service Loan Forgiveness (PSLF)*, <https://studentaid.gov/manage-loans/forgiveness-cancellation/public-service#qualifying-employment>

⁹⁵ VA Careers, *Let a VA career pay you back for school with loan forgiveness*, VA | News (2022), <https://news.va.gov/104348/let-a-va-career-pay-you-back-for-school-with-loan-forgiveness/#:~:text=If%20you're%20looking%20for,work%20in%20high%2Dneed%20fields>.

Today's students, including student veterans, have more learning options than ever, with many, quite literally, right at their fingertips. These new, often innovative ways of learning are compelling options for post-traditional students, like student veterans, especially as the cost of higher education and student loan debt continue to rise. As higher education changes, it is important that policy makers weigh the risks and benefits posed to students by new learning options and investigate ways to address affordability more broadly.

Bad-actor proprietary schools in higher education have come under increased scrutiny in recent years, due in large part to numerous high-profile closures and repeated allegations of fraud. As these schools face growing attention from legislators, regulators, and law enforcement, there has been a corresponding trend in schools converting to non-profit status or being acquired by or rebranding under the umbrella of public institutions.

The overarching concern with conversions is that a converting proprietary school may not sufficiently untangle itself from its former profit-driven motives and structure.⁹⁶ This means students, including veterans and service members who enroll at these institutions at disproportionate rates,⁹⁷ run the risk of believing converted schools are dedicated to a public or non-profit mission when, in reality, the schools may still prioritize profits over student outcomes.⁹⁸

These concerns are exacerbated by the growing adoption of online content in higher education, which has been compounded itself by the forced shift to online learning during the pandemic. The growth in online programs has given rise to a concerning method of conversion where public or non-profit institutions acquire for-profit schools to manage online courses.⁹⁹ This is an appealing maneuver for some public and non-profit schools looking to expand online options because certain proprietary institutions have well-established, robust capacity for online program management. These arrangements have also come under scrutiny because schools—even prominent ones—will cede core responsibilities, like student recruitment, to proprietary OPMs in lucrative revenue-sharing deals.¹⁰⁰ Such contracts run the risk of recruitment and profits being prioritized over quality student outcomes.¹⁰¹

Institutional conversion was addressed to some extent in VA laws through additional oversight measures passed in the *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*. Specifically, the law increased oversight of converted proprietary institutions by subjecting them to annual risk-

⁹⁶ See generally Robert Shireman, *How For-Profits Masquerade as Non-profit Colleges*, THE CENTURY FOUNDATION (Oct. 7, 2020), <https://tcf.org/content/report/how-for-profits-masquerade-as-nonprofit-colleges/>.

⁹⁷ CAREN A. ARBEIT AND LAURA HORN, U.S. DEPARTMENT OF EDUCATION, A PROFILE OF THE ENROLLMENT PATTERS AND DEMOGRAPHIC CHARACTERISTICS OF UNDERGRADUATES AT FOR-PROFIT INSTITUTIONS 16 (Feb. 2017), available at <https://nces.ed.gov/pubs2017/2017416.pdf> (explaining that “Compared with other undergraduates, larger percentages of students at for-profit institutions were military students (9 percent vs. 4 percent in public and nonprofit). Military students constituted a larger percentage of students enrolled at for-profit 4- year institutions than at any other level of for-profit institution (12 percent vs. 2–7 percent), public (3 –5 percent), or nonprofit institution (4 percent).”).

⁹⁸ See generally Robert Shireman, *These Colleges Say They're Nonprofit—But Are They?* THE CENTURY FOUNDATION (Aug. 6, 2018), <https://tcf.org/content/commentary/colleges-say-theyre-nonprofit/>; Robert Shireman and Yan Cao, *Dubious Conversions of For-Profit Colleges: Decoding the GAO Report*, THE CENTURY FOUNDATION (Jan 27, 2021), <https://tcf.org/content/commentary/dubious-conversions-profit-colleges-decoding-gao-report/>.

⁹⁹ See generally Lindsay McKenzie, *University of Arizona's Big Online Push*, INSIDE HIGHER ED (Aug. 4, 2020), <https://www.insidehighered.com/news/2020/08/04/university-arizona-acquires-ashford-university>.

¹⁰⁰ See *TCF Analysis of 70+ University-OPM Contracts Reveals Increasing Risks to Students, Public Education*, THE CENTURY FOUNDATION (Sept. 12, 2019), <https://tcf.org/content/about-tcf/tcf-analysis-70-university-opm-contracts-reveals-increasing-risks-students-public-education>; See also Lindsay McKenzie, *Key Senators Turn Up Heat on OPMs*, INSIDE HIGHER ED (Feb. 5, 2020), <https://www.insidehighered.com/news/2020/02/05/online-program-management-companies-face-washington-microscope>.

¹⁰¹ See *TCF Analysis of 70+ University-OPM Contracts Reveals Increasing Risks to Students, Public Education*, THE CENTURY FOUNDATION (Sept. 12, 2019), <https://tcf.org/content/about-tcf/tcf-analysis-70-university-opm-contracts-reveals-increasing-risks-students-public-education>.

based reviews for three years following conversion.¹⁰² We thank Congress for passing this important oversight measure. Still, as a recent GAO report illuminates, these conversions continue to pose major risks to students.¹⁰³

In recent years, higher education has seen a boom in innovations with the potential to expand pathways to higher education to untold numbers of new students. These innovations, like distance education programs and competency-based education models, offer compelling incentives to students and institutions as alternatives to traditional brick-and-mortar classes. The affordability and flexibility of these programs are key selling points among post-traditional students, like veterans, but these new trends are not without risk.

As we reshape how we think of workforce development, and the interactions between students and institutions, we must commit to fully understanding these trends and establish appropriate guardrails to protect students from unscrupulous actors and low-quality programs. We encourage Congress to continue monitoring institutional conversions as well as online program management and to legislate additional safeguards where appropriate to protect students. SVA was encouraged by ED's launch of a review of the prohibition on incentive compensation for recruiters in higher education, an effort specifically intended to address issues with OPMs. We intend to follow this process closely.¹⁰⁴

Institutional lending practices are also worthy of Congress's attention. The CFPB recently signaled they would begin reviewing such activity. The Bureau identified the following areas of concern: enrollment restrictions, transcript withholding, improper payment acceleration, failure to issue refunds, and improper lending relationships.¹⁰⁵

Some institutions have also begun offering an alternative financing product to traditional private student loans. This product, known as an Income Share Agreement (ISA), is an arrangement between the institution or other lender and a student which provides the student with up-front cash to pay for their studies and ties their monthly repayment amount to their post-graduation earnings. These agreements are attractive to students because there is no interest and because repayment is often capped both as to term and amount. As with any financial product, however, there are risks involved, and students may be unable to identify them.¹⁰⁶ This is particularly problematic given that many proponents of ISAs argue that these agreements are exempt from federal consumer credit laws.¹⁰⁷

We ask that Congress be mindful of these and other institutional lending issues as it crafts legislation that may provide the opportunity for any needed oversight in this area.

Transparency and Accountability

¹⁰² Johnny Isakson and David P. Roe, M.D., Veterans Health Care and Benefits Improvement Act of 2020, Pub. L. No. 116-315, Title I, Subtitle A, § 1022.

¹⁰³ See Robert Shireman and Yan Cao, *Dubious Conversions of For-Profit Colleges: Decoding the GAO*, THE CENTURY FOUNDATION (Jan. 27, 2021), <https://tcf.org/content/commentary/dubious-conversions-profit-colleges-decoding-gao-report/>.

¹⁰⁴ *U.S. Department of Education Launches Review of Prohibition on Incentive Compensation for College Recruiters*, U.S. DEP'T OF EDUCATION (Feb. 15, 2023), <https://www.ed.gov/news/press-releases/us-department-education-launches-review-prohibition-incentive-compensation-college-recruiters>.

¹⁰⁵ *Consumer Financial Protection Bureau to Examine Colleges' In-House Lending Practices*, CFPB (Jan. 20, 2022), <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-to-examine-colleges-in-house-lending-practices/>.

¹⁰⁶ STUDENT BORROWER PROTECTION CENTER, SOLVING THE STUDENT DEBT CRISIS OR COMPOUNDING THE CRISIS? (2020), available at https://protectborrowers.org/wp-content/uploads/2020/07/SBPC_Hayes_Milton_Relman_ISA.pdf.

¹⁰⁷ STUDENT BORROWER PROTECTION CENTER, CREDIT BY ANY OTHER NAME 5 (2020), available at https://protectborrowers.org/wp-content/uploads/2020/07/Pearl.Shearer_Credit-By-Any-Other-Name.pdf.

SVA supports transparency and accountability for student veterans through robust data collection, sharing, and analysis processes as it is essential for protecting veteran interests, preventing fraud and abuse, ensuring quality education, promoting equity and inclusion, and building trust within the higher education community. Recall from SVA's top policy priorities our urging that the committees understand the multifaceted dimensions of economic outlook disparity is crucial for informing policies and interventions aimed at fostering economic equity and opportunity for veterans as they transition to civilian life.

22. *Improve data collection and sharing practices across government agencies and call for more publicly available data, including timelier and more accurate counts of transitioning servicemembers.*

There are many ways to improve data collection practices across government so we can better serve student veterans and military-connected students. One of the most important things we need is accurate and timely data on how many service members transition each year. From the government agencies most closely connected with and specifically tasked with serving this population, including DOD, DOL, and VA to private research initiatives, like the Veterans Metrics Initiative, the commonly cited figure is that approximately or more than 200,000 service members transition every year.¹⁰⁸ SVA has reason to believe that is not accurate. As such, we are calling on Congress to put greater pressure on DOD to release more accurate and timely data on the number of transitioning service members.

23. *Call for improved data and studies on how student debt impacts student veterans, service members, and their families.*

The rising level of student debt is a well-documented issue facing today's college students, with this debt growing by more than 100 percent between 2010 and 2020 and the cumulative national total surpassing \$1.7 trillion.¹⁰⁹ What is less understood is how student debt specifically impacts student veterans. SVA's annual census data confirms that some veterans graduate with student debt, but exactly why this is and how it affects their academic and financial futures remains unknown.

SVA has been privileged to welcome the Pew Charitable Trusts to our National Conferences in recent years to present research about veteran student debt. Findings indicate more than a quarter of student veterans borrowed student loans in the 2015-16 academic year.¹¹⁰ Pew's analysis also shows most student veterans who borrow student loans do so to cover living expenses.¹¹¹ The research so far has been illuminating, and SVA looks forward to the release of additional insights.

We believe more can be done at the federal level to improve data collected on veteran student loan debt and to make it available to the public. Better understanding this debt is critical before determining what must be done to address it. To do so, SVA recommends these Committees consider creating new federally funded research grants to support student veteran research initiatives.

¹⁰⁸ *Military Discharge Data*, DODSKILLBRIDGE, <https://skillbridge.osd.mil/separation-map.htm> (last updated, April 22, 2022); THE U.S. DEPARTMENT OF VETERANS AFFAIRS, *THE MILITARY TO CIVILIAN TRANSITION 2018 III* (2018), available at <https://benefits.va.gov/TRANSITION/docs/mct-report-2018.pdf>; *Your VA Transition Assistance Program (TAP)*, THE U.S. DEP'T OF VETERANS AFFAIRS, <https://www.benefits.va.gov/transition/tap.asp> (last updated Nov. 10, 2022), HARRY M. JACKSON FOUNDATION FOR THE ADVANCEMENT OF MILITARY MEDICINE, *THE VETERANS METRICS INITIATIVE 1* (202), available at https://www.hjf.org/sites/default/files/2020-11/TVMI%20FinalRpt_4%5B1%5D.pdf.

¹⁰⁹ See Abigail Johnson Hess, *U.S. student debt has increased by more than 100% over the past 10 years*, CNBC (Dec. 22, 2020), <https://www.cnbc.com/2020/12/22/us-student-debt-has-increased-by-more-than-100percent-over-past-10-years.html> (citing Federal Reserve figures).

¹¹⁰ Phillip Oliff, Ama Takyi-Laryea, Scott Brees & Richa Bhattarai, *Veteran Student Loan Debt Draws New Attention*, PEW (Sept. 13, 2021), <https://www.pewtrusts.org/en/research-and-analysis/articles/2021/09/13/veteran-student-loan-debt-draws-new-attention>.

¹¹¹ Phillip Oliff, Ama Takyi-Laryea, Scott Brees & Richa Bhattarai, *Why Veterans With GI Bill Benefits Still Take Out Student Loans*, PEW (Jan. 7, 2022), <https://www.pewtrusts.org/en/research-and-analysis/articles/2022/01/07/why-veterans-with-gi-bill-benefits-still-take-out-student-loans>.

We look forward to amplifying future data in this area and working with Congress, VA, and ED to identify ways the federal government can improve data gathered on student loan debt held by veterans.

24. Support ongoing improvements to the GI Bill Comparison and Feedback Tools.

The Comparison Tool can be invaluable to veterans trying to understand the value of their GI Bill as they consider their educational options.

As it stands, the lack of coordination between ED and VA on College Navigator, College Scorecard, and GI Comparison Tool reduces the overall delivery of powerful data to veterans.¹¹² The Comparison Tool has unique data, justifying itself as a separate tool from ED's options, but the underlying data is not being shared effectively between these tools, leaving prospective students an incomplete view of their options. We encourage members to explore ways to better share and integrate the data across ED and VA resources.

SVA also believes student outcome measures should be displayed in the GI Bill Comparison Tool. Establishing the appropriate data feeds and displaying the information in the tool would require IT upgrades that fit neatly alongside those currently happening at VA. In one of the most common-sense recommendations we have, each institution should be required to disclose how effective it is at delivering on its promise to students. By informing military-connected students about the effectiveness of GI Bill-eligible programs, we allow them to make informed decisions about how to spend their education benefits.

Additionally, we ask that these Committees encourage VA to note whether an institution participates in the VA VITAL Program. The GI Bill Comparison Tool highlights whether institutions participate in the Yellow Ribbon Program; it should do the same for VITAL which can provide critical mental health support for student veterans, assistance with academic accommodations, and foster a more veteran-inclusive culture on campuses.

The GI Bill Comparison Tool also suffers from a lack of detailed information about student complaints. For any given school, the tool simply shows a tally of complaints across broad categories. The tool also only publishes complaints from the prior 24 months. We have previously provided specific recommendations to address these issues in a public comment on VA's continued collection of information through the GI Bill Feedback Tool:

VA should publish and maintain a comprehensive database of all school-specific complaints submitted through the Feedback Tool. Students should be given the option to disclose their narrative comments publicly, and those comments should be included in the database. The feedback database should be presented in a familiar interface, preferably one that mirrors other popular review websites. This means it should include helpful user features like search, filters, and sorting. We further recommend the Department include a link on each school's profile page in the GI Bill Comparison Tool that directs students to a full, detailed list of complaints submitted about that institution. This will help students identify and better understand the true nature of complaints submitted about each school. It will also improve the ability of advocates and researchers to monitor and analyze past and present institutional compliance with the Principles of Excellence and other laws.¹¹³

To address concerns about fake or inaccurate reports, we believe VA should verify that reports come from current or former students of the institution for which feedback is being provided and that schools be given the opportunity to issue public responses to complaints.

¹¹² See generally *College Navigator*, NATIONAL CENTER FOR EDUCATION STATISTICS, US DEPARTMENT OF EDUCATION, <https://nces.ed.gov/collegenavigator> (last visited March 1, 2020); *College Scorecard*, US DEPARTMENT OF EDUCATION, <https://collegescorecard.ed.gov> (last visited March 1, 2020); *GI Bill Comparison Tool*, US DEPARTMENT OF VETERANS AFFAIRS, <https://www.va.gov/gi-bill-comparison-tool/> (last visited Feb. 24, 2021).

¹¹³ *SVA Comment on OMB Control No. 2900-0797 Agency Information Collection Activity: Principles of Excellence Complaint System Intake*, STUDENT VETERANS OF AMERICA 3 (2020), available at <https://www.regulations.gov/comment/VA-2020-VACO-0001-0084>.

VA should also place caution flags on schools in the GI Bill Comparison Tool that receive an inordinate number of student complaints. VA currently only places caution flags on schools with a program of education subject to “increased regulatory or legal scrutiny” by VA or other federal agencies.¹¹⁴ We support this use of caution flags, but student veterans also deserve to be alerted when a school has received a troubling number of student complaints.

We also ask that VA develop a mechanism to maintain closed schools within the tool, versus having them simply disappear. This removal of schools from the tool means associated data also disappears, leaving significant gaps in the overall picture for how those schools served students. We look forward to working with Congress and VA to update this valuable resource so it can better serve student veterans, service members, and their families.

SVA recommends that the DOD equivalent to the GI Bill Comparison Toolkit, called Tuition Assistance (TA) DECIDE, undergo the same stringent oversight in order to provide the best information for active-duty servicemembers using their TA dollars to achieve their higher education goals.

SVA applauds Senators Schatz, Rounds, Portman, and Coon’s leadership on this issue with their championing of the *Student Veterans Transparency and Protection Act* last congress. The bill would make numerous improvements to the GI Bill Comparison and Feedback tools, while also providing entitlement restoration for beneficiaries that are the victims of misconduct perpetrated by bad-actor institutions. We look forward to that bill being reintroduced this Congress and encourage the Committees’ members to support it as well the other improvements we have outlined here. Finally, we acknowledge and applaud VA’s current efforts to address many of the recommendations above, and we look forward to working in close collaboration with the Department as it continues to refine these important tools.

25. Provide a pathway to permanent status for Afghans who have entered the United States since August 2021.

Passing the Afghan Adjustment Act (AAA) provides a humanitarian solution for Afghan evacuees who fled their country in the wake of political instability and conflict. Many of these individuals risked their lives to support U.S. missions in Afghanistan, including interpreters, translators, and other personnel who played critical roles in supporting American forces, many supporting those veterans currently working on their higher education degrees, who would not be with us today if not for the support of our Afghan allies.¹¹⁵ By offering a path to permanent status and eventual citizenship, the AAA honors the sacrifices and contributions of these individuals, providing them with the opportunity to rebuild their lives in safety and security. This is essential for upholding America’s moral obligation to protect vulnerable populations and provide refuge to those fleeing persecution and violence. The United States has a long history of serving as a beacon of hope and freedom for individuals seeking asylum and refuge from oppression and tyranny. By passing the AAA, Congress reaffirms America’s commitment to humanitarian values and demonstrates solidarity with Afghan evacuees who have been forced to flee their homes due to circumstances beyond their control.

Additionally, moving forward on AAA is in the national interest of the United States, promoting stability and security both at home and abroad. Providing a pathway to permanent status and eventual citizenship for Afghan evacuees strengthens America’s reputation as a compassionate and welcoming nation, fostering goodwill and cooperation with other countries and international partners. Moreover, integrating Afghan evacuees into American society contributes to the diversity, resilience, and strength of our nation, enriching our communities and strengthening our social fabric.¹¹⁶ This bill demonstrates Congress’s bipartisan commitment to addressing

¹¹⁴ *GI Bill® Comparison Tool: About This Tool*, U.S. DEPARTMENT OF VETERANS AFFAIRS (June 11, 2020), https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp#sourcedata.

¹¹⁵ Secretary Mayorkas Designates Afghanistan for Temporary Protected Status <https://www.uscis.gov/newsroom/news-releases/secretary-mayorkas-designates-afghanistan-for-temporary-protected-status>

¹¹⁶ Re-Introduction of Afghan Adjustment Act Provides Chance <https://refugees.org/re-introduction-of-afghan-adjustment-act-provides-chance-to-fulfill-promise-to-afghan-allies/>
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humanitarian crises and upholding American values of freedom, democracy, and human rights. By coming together across party lines to support legislation that provides relief and protection to Afghan evacuees, Congress sends a powerful message of unity and solidarity, transcending political divides and demonstrating the best of American leadership and compassion.

SVA supports the passage of the Afghan Adjustment Act (AAA) because it is important to student veterans as it reflects America's moral responsibility to protect vulnerable populations, promotes national security and stability, and upholds bipartisan values of compassion and solidarity. By providing a pathway to permanent status and eventual citizenship for Afghan evacuees, the AAA honors their sacrifices, strengthens America's reputation as a beacon of hope and freedom, and reinforces our commitment to humanitarian principles and human dignity.

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In closing, SVA is grateful for the opportunity to submit testimony on our policy priorities for the 2023 legislative calendar. Our top priorities are codifying the temporary COVID-19 protections, improving support for student veterans' basic needs, Guard and Reserve benefit parity, MHA reform, integrating VHA onto college campuses, and making Vet Tec permanent. They are the best ways we have identified to improve our nation's student veterans' physical, emotional, and financial well-being. By addressing these issue areas, our country delivers on the promise we made every veteran the day they chose to serve – that service to our country would not just be rewarding on its own but would leave veterans better off than when they joined.

President Franklin Delano Roosevelt transformed America into the modern nation we know today. His administration launched massive programs and agencies like Social Security, the SEC, and more. Then in 1944, he signed into law a 'little' program being called "the Servicemen's Readjustment Act," better known as the GI Bill. But this 'GI Bill idea' almost never made it out of congress; there were some who said this new program would be the ruin of our returning GI's.

The President of Harvard famously penned, "We may find the least capable among the war generation, instead of the most capable, flooding the facilities for advanced education in the United States." And the President of the University of Chicago, a World War I veteran himself, argued, "Colleges and universities will find themselves converted into educational hobo jungles."

In 1948, just four years after their original opposition, there was widespread retraction, with Harvard's president stating, "for seriousness, perceptiveness, steadiness, and all other undergraduate virtues," the veterans of World War II were "the best in Harvard's history."

The continued success of veterans in higher education in the Post-9/11 era is no mistake or coincidence. At SVA we use the term, "the best of a generation." In our nation's history, educated veterans have always been the best of a generation and the key to solving whatever problems our nation faces, this is the legacy we know today's student veterans carry.

We thank the Chairmen, Ranking Members, and Committee Members for your time, attention, and devotion to the cause of veterans in higher education. As always, we welcome your feedback and questions, and we look forward to continuing to work with the Committees and the entire Congress to ensure the success of all generations of veterans through education.