



STATEMENT FOR THE RECORD
THE VALUE OF EDUCATION FOR VETERANS AT PUBLIC, PRIVATE AND FOR-PROFIT COLLEGES AND UNIVERSITIES
BEFORE THE
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
COMMITTEE ON VETERANS AFFAIRS
U.S. HOUSE OF REPRESENTATIVES
JUNE 20, 2013

Chairman Flores, Ranking Member Takano, and Members of the Subcommittee:

Wounded Warrior Project (WWP) appreciates your holding this hearing and welcomes the opportunity to share our perspective on wounded warrior-student experiences in higher education.

With WWP’s mission to honor and empower wounded warriors, our vision is to foster the most successful, well-adjusted generation of veterans in our nation’s history. Achieving economic empowerment is clearly a critical element to that end, and education is key.

With the Post 9/11 GI bill, Congress has provided this generation of veterans an especially valuable gateway to economic success. Wounded warriors are using this benefit; in fact, more than one in three of the more than 5,600 wounded warriors who responded to our 2012 survey was enrolled in school.¹ However, as this Committee considers the value of post-secondary education for veterans, we urge you to take account of the stark challenges some of our wounded warriors face in pursuing higher education. In many instances, their injuries – and particularly the invisible wounds they have incurred – create obstacles their student-peers do not experience or even understand. Some wounded warriors simply need modest accommodations and supports. But without such supports some are struggling, dropping out, or even failing.

While a growing number of colleges are instituting some type of programs and services for veterans, there is great diversity in how these institutions serve veterans, and in the scope of

¹ Franklin, et al., 2012 Wounded Warrior Project Survey Report, 66 (June 2012). Hereinafter, “WWP Survey.”

DUTY ★ HONOR ★ COURAGE ★ COMMITMENT ★ INTEGRITY ★ COUNTRY ★ SERVICE



the services they provide.² VA has begun efforts to improve support services for veterans on campus; however, these are limited to a few, mostly large institutions.³

On-Campus Challenges for Wounded Warriors

Wounded student-warriors report a range of challenges – difficulty assimilating on campus and adapting to student-life; insufficient or non-existent accommodations to their disabilities; and lack of understanding on the part of faculty and fellow students of needs arising from PTSD and TBI. Family issues, finances, and health problems often compound these school-related stresses.⁴

Emblematic of the experience of many, the experiences of a wounded student-warrior, who suffers from combat PTSD and migraines, is telling:

While going to school...my anxiety and frustration began to kick in. Some days with my migraines it was too unbearable to show up in the class room...My grades continued to drop...it was still very difficult for me to focus in the classroom. I wined up failing classes and having to pay out of pocket costs. It was very frustrating for me sometimes to experience public panic attacks and keep up with my classmates.⁵

Studies confirm the experiences our warriors have reported to WWP campus-services staff. For example, one study found that the “average” student-veteran has experienced moderate anxiety, moderately severe depression, and symptoms of PTSD.⁶ Specifically, nearly 46 percent of the sample experienced “significant symptoms of PTSD,”⁷ almost 35 percent suffered from severe anxiety, and nearly 24 percent had severe depression.⁸ Another study found that most of the student veteran survey and focus group participants encountered substantial transition challenges while adapting to life on campus.⁹ Among these students, one of the most frequently discussed challenges was coping with service-related disabilities and PTSD.¹⁰ Overall, about 68 percent of survey respondents rated the extent to which they had to cope with such disabilities, and of those, 55 percent reported it as a moderate or major challenge.¹¹ Participants cited such difficulties as being unable to move quickly from one class to the next

² Id. at 21, 22; Lesley McBain, et al., “From Soldier to Student II: Assessing Campus Programs for Veterans and Service Members,” American Council on Education, 8 (2012).

³ GAO, “VA Education Benefits: VA Needs to Improve Program Management and Provide More Timely Information to Students,” 20-22, GAO-13-338 (May 2013).

⁴ Id. at 9-12; Wounded Warrior Project Campus Services Roundtable Discussion Event, July 14-15, 2011.

⁵ Wounded Warrior Project Alumnus Kathleen Evans (June 2013).

⁶ David Rudd, Jeffery Goulding, and Craig Bryan, “Student Veterans: A National Survey Exploring Psychological Symptoms and Suicide Risk.” 42(5) *Professional Psychology: Research and Practice*, 354, 357-358 (2011).

⁷ Id. These exceed the cutoff score for PTSD in accordance with the PCL-M score for OIF/OEF veterans, Dept. of Veterans’ Affairs and the National Center for PTSD Fact Sheet, “Using the PTSD Checklist,” available at: <http://www.ptsd.va.gov/professional/pages/assessments/assessment-pdf/pcl-handout.pdf>.

⁸ Rudd et al., *supra* note 6, at 357-358.

⁹ Jennifer Steele, Nicholas Salcedo, and James Coley, “Service Members in School: Military Veterans’ Experiences Using the Post-9/11 GI Bill and Pursuing Postsecondary Education,” RAND Corporation (2011).

¹⁰ Id. at 36.

¹¹ Id. at 39.

across campus, hyper-alertness and anxiety caused by PTSD, difficulty concentrating due to TBI, and difficulty relating to other students.¹²

Wounded warriors entering schools through the assistance of the Post-9/11 GI Bill and Vocational Rehabilitation and Employment (VR&E) are not simply grappling with adjustment to the demands of higher education. Many are also having difficulties relating to their non-veteran peers. Staff and faculty are typically unaware of their challenges with PTSD, TBI, and other often-severe disabilities. One student-warrior cited returning to college as “perhaps the hardest thing I have done.”¹³ Another student-warrior added, “The transition to an academic institution is delicate because of the close interaction with students and faculty. The student veteran cannot hide and is exposed in the class room. They are often misunderstood if a [PTSD] flare-up occurs.”¹⁴

With these issues, wounded warriors face a steeper climb than their fellow students. Reliable data on veteran graduation rates from traditional non-profit schools are elusive.¹⁵ As existing studies from VA and the Department of Education on outcomes of student veterans generally don’t capture Post 9/11 GI Bill beneficiaries,¹⁶ it has been very difficult to confirm statements that graduation rates are low and drop-out rates are high. VA’s reported agreement with the National Student Clearinghouse to obtain targeted completion data for veterans who have attended college under the GI Bill, as well as the prospect of further data from schools that voluntarily report graduation and program completion rates, offer some hope for greater clarity on these important questions.¹⁷ Recent statements by VA officials that they have not yet determined how they will use this new data or if they would publicly release it concern us. We urge the Subcommittee to pursue these issues – to make certain VA is collecting the most appropriate data, and to press the Department to improve management of education benefit programs, assist veterans in making informed academic choices, and facilitate their academic success.¹⁸

Lack of Wounded Warrior Support Services

We further urge the Subcommittee to address wounded warriors’ need for support to foster educational success. The issue has several facets. To illustrate, some wounded warriors do not understand how their injuries affect their learning, and may be unaware what

¹² Id.

¹³ WWP Survey, at 107.

¹⁴ Id.

¹⁵ David Wallis, “Coming Home From War to Hit the Books,” *The New York Times* (Feb. 29, 2012).

¹⁶ Paul Fain, “Colleges Fail to Track Performance of Student Veterans, Survey Finds,” *Inside Higher Ed.* (Dec. 4, 2012) available at: <http://www.insidehighered.com/news/2012/12/04/colleges-fail-track-performance-student-veterans-survey-finds>; GAO, “VA Education Benefits,” supra note 3, at 24.

¹⁷ Paul Fain, “Do Veterans Graduate?” *Inside Higher Ed.* (Jan. 8, 2013), available at: <http://www.insidehighered.com/news/2013/01/08/new-effort-collect-student-veterans-graduation-rates>; See also Remarks by Secretary Eric Shinseki, Student Veterans of America 5th Annual Convention, (January 4, 2013), available at: http://www.va.gov/opa/speeches/2013/1_04_13.asp.

¹⁸ GAO, “VA Education Benefits,” supra note 3, at 29-30.

accommodations they need (and might be able to receive) to be successful.¹⁹ Conversely, many colleges and other institutions of higher education appear not to recognize the unique transitional challenges facing matriculating wounded veterans. While a recent report found that a growing number of colleges have instituted some type of programs and services for veterans – 62 percent in 2012 up from 57 percent in 2009 – the report found great diversity in how these institutions serve veterans and in the variety of these programs and services.²⁰

According to an American Council on Education report, only 36 percent of postsecondary institutions with student-veterans have an established department to assist these students and their families; approximately 36 percent of these institutions have transition assistance services available; less than 40 percent employ qualified staff trained to assist with veterans' needs (or employ a single individual who is expected to meet all these needs); nearly 36 percent of college and universities with student-veterans have trained counseling staff to assist students with brain injuries; and almost 42 percent of institutions with student-veterans have support groups or mentoring programs available to active duty and veteran students.²¹ The same report cited the presence of staff and faculty with some level of training in meeting the needs of military and veteran students, including basic familiarity with the military culture, as a critical factor in the success of student servicemembers and veterans.²² The fact that schools are generally building these support services without the guidance and assistance from VA – which could play an important role by disseminating best practices – is especially troubling.²³

Evidence that wounded warrior-students are not thriving academically highlights the importance of fostering efforts to provide them needed accommodations. Some institutions of higher education have offered meaningful assistance, including providing accessible on-campus mental health staff trained in military culture, counseling and tutoring services for warrior-students; full-time staff to assist student-warriors; training for faculty on TBI and PTSD; and peer-support services. While model programs exist, they represent the exception, not the rule. This Subcommittee can play an important role in promoting efforts to expand the establishment of these models.

Efforts to Provide Student-Veterans On-Campus Supports

While some schools have recognized the value of such programs, others may simply not have sufficient resources to mount such new programs. Given the vulnerability associated with warriors' transition into higher education and the very substantial federal investment already being made under Post 9/11 GI Bill, it is timely to consider steps to foster the development of

¹⁹ American Council on Education, "Accommodating Student Veterans with Traumatic Brain Injury and Post-traumatic Stress Disorder: Tips for Faculty and Staff," at 5 available at <http://www.acenet.edu/news-room/Documents/Accommodating-Student-Veterans-with-Traumatic-Brain-Injury-and-Post-Traumatic-Stress-Disorder.pdf>.

²⁰ Lesley McBain et al., "From Soldier to Student II: Assessing Campus Programs for Veterans and Service Members." American Council on Education 8 (2012) available at <http://www.acenet.edu/news-room/Pages/From-Soldier-to-Student-II.aspx>.

²¹ Id. at 49-53.

²² Id. at 48.

²³ GAO, "VA Education Benefits," supra note 3, at 22-23.

campus programs that address the very specific needs of wounded warriors. Past generations of veterans have benefitted from congressional support aimed at fostering success in post-secondary education.

In 1972, for example, Congress established a program to encourage colleges and universities to serve the special needs of Vietnam veterans who were using the Vietnam Era GI Bill to enroll in school.²⁴ That initiative, the Veterans Cost-of-Instruction Program (VCIP), was a mandatory grant program, targeted particularly at service-connected disabled veterans and administered through the Department of Health, Education and Welfare (HEW). VCIP grantees were required “to maintain a full-time office of veterans’ affairs with adequate support services...in the areas of outreach, recruitment, special education programs, and counseling.”²⁵ With the numbers of veterans enrolling in higher education declining in the 1980’s, Congress allowed VCIP to expire and established the Veterans Education Outreach Program (VEOP).²⁶ The VEOP program provided formula grants to institutions based on the number of enrolled veterans receiving veterans’ educational benefits or vocational rehabilitation services.²⁷ Institutions that received VEOP grants were required to maintain a veterans’ affairs office and provide outreach programs, counseling and tutorial services, and special education programs for veterans, with an emphasis on programs for the disabled and educationally disadvantaged.²⁸

As recently as 2010, the Department of Education initiated a grant program to encourage institutions of higher education to develop model programs to support veteran student success in postsecondary education.²⁹ The Fund for the Improvement of Postsecondary Education (FIPSE) program, “Centers of Excellence for Veteran Student Success” granted awards to fifteen institutions nationally over a three year period.³⁰ Grant awards were made to institutions that were required to provide a single point of contact to coordinate comprehensive support services for veteran students; establish a veteran student support team (including representatives from such campus offices as financial aid, academic advising, student health, mental health counseling, career advising, and disability support); monitor the rates of enrollment, persistence, and completion; and develop a plan to sustain the program after the

²⁴ Dept. of Ed. Archived Information Biennial Report FY 93-94 Chapter 512, “Veterans Education Outreach Program,” available at: <http://www2.ed.gov/pubs/Biennial/512.html>; *H.R. 996-Veterans Education Outreach Program: Hearing Before the Subcomm. on Education, Training and Employment of the H. Comm. on Veterans’ Affairs*, 103rd Cong. 26 (Mar. 25, 1993)(Opening statement of Chairman G.V. (Sonny) Montgomery).

²⁵ Dept. of Health, Education, and Welfare, Departmental Grant Appeals Board Decision, Docket No. 78-11 (June 19, 1979) citing 45 C.F.R. § 189.12 (1974). Under the program, HEW provided payments to educational institutions based on increased veteran enrollments by required percentages and establishment of special education programs for veterans, that is, specifically designed remedial, tutorial, and motivational programs designed to promote postsecondary success. Federal regulations governing the program also set criteria for evaluating the adequacy of such special educational programs. *Id.* citing 45 C.F.R. §§ 189.11(d), 189.16(d) (1974).

²⁶ *H.R. 996-Veterans Education Outreach Program: Hearing before the Subcommittee on Education, Training and Employment of the H. Comm. on Veterans’ Affairs*, 103rd Cong. 26 (1993).

²⁷ Dept. of Ed., *supra* note 24.

²⁸ *Id.* The program was not reauthorized and VEOP grant awards ended in 1992.

²⁹ Dept. of Ed. Office of Postsecondary Education; Overview Information Centers of Excellence for Veteran Student Success; Notice Inviting Applications for New Awards for FY 2010, 75 Fed. Reg. page 37776 (June 30, 2010).

³⁰ Dept. of Ed., Office of Postsecondary Education, Centers of Excellence for Veteran Student Success, FY 2010 Awards, available at: <http://www2.ed.gov/programs/cevss/cevssabstracts2010.pdf>.

grant period.³¹ While performance data on these awards are forthcoming, they should provide valuable insights on assessing success of veteran students on campus (many of whom also identify as wounded warriors).

While WWP is encouraged with a new VA proposal currently in development, which would provide grants to selected large schools, or those with large veteran enrollments, to demonstrate and share results of student veteran support services, the lack of scope and timeframe for the initiative, coupled with it moving slowly through the approval process, concerns us.³² Additionally, we agree with the Government Accountability Office and question whether it would even impact smaller institutions, with less financial resources to mount their own support services or have dedicated staff positions or offices to assist student veterans.³³ These smaller schools collectively serve a large number of student veterans.³⁴

As earlier Congresses recognized the challenges wounded warriors faced in making the transition from combat zone to campus, the Subcommittee can play a critical role today in helping this generation of wounded student-warriors make that transition successfully. The objective would be to enable student-warriors to thrive – not struggle – on campus. Congress and the American people are, of course, already investing in the future of this generation of veterans through the Post-9/11 GI Bill. But we owe it to those wounded in war to make a small additional investment in their academic success. Some institutions have paved the way by taking steps to support student-veterans. But more must be done. Federal funding can be invaluable in helping colleges and universities to become “centers of excellence” in supporting America’s heroes on campus. In establishing model programs, and thereby attracting student-veterans, such institutions will effectively raise the bar – making it vital for many more institutions of higher education to invest in campus services for student veterans and student warriors.

Fostering Informed Decision-making on Educational Options:

Achieving academic success can also be a matter of individual warriors finding their “right” school and program. With the country’s important investment in the education of this generation of veterans,³⁵ it is incumbent on government and institutions of higher education to provide those veterans as much information as possible to assess their education options. With the additional challenges many face in returning to school, wounded warriors, in particular, need to know whether a school has credible support services for them and whether other warriors have had a track-record of academic success. VA’s current efforts to develop and collect outcome information on student veterans, including coordinating with DoD and the Department of

³¹ 75 Fed. Reg. page 37776, supra note 29. According to the FIPSE Program Coordinator, these grants, made available as one-time specially-authorized funding, would be up for renewal in 2013, subject to the availability of funding. Telephone interview, November 6, 2012.

³² GAO, “VA Education Benefits,” supra note 3, at 23.

³³ Id.

³⁴ Id.

³⁵ VA anticipates serving over 590,000 veterans using their VR&E and Post 9/11 GI Bill benefits in 2013, spending over \$10 billion providing these benefits. Dept. of Veterans’ Affairs Annual Budget Submission (FY 2013), Vol. III, Benefits and Burial Programs (February 2012), 2B-8 and 2B-21.

Education and the development of a long-term study,³⁶ and its agreement with the National Student Clearinghouse to obtain targeted outcome data for veterans who have attended college under the GI Bill, could ultimately be very helpful to prospective warrior-students as they weigh educational options and choices. As mentioned above, WWP is troubled that VA officials have not yet determined how they will use this important new data and whether they would publicly release it, potentially missing a critical opportunity to assist veterans in making informed academic choices and facilitate their academic success.³⁷

Prior to adjournment, the 112th Congress passed legislation aimed at helping veterans make more informed choices in pursuing higher education.³⁸ That measure requires the VA Secretary to develop a comprehensive policy to improve the transparency and dissemination of education information to veterans, to include establishing a centralized mechanism for tracking and publishing student feedback on quality of instruction, recruiting, and post-graduation employment and information on postsecondary institutions' enrollment, retention, and graduation rates. In WWP's view, however, the measure falls short, as it fails to address information of greatest significance to wounded warriors. For example, while the measure requires publication of retention and graduation rates as well as information on the availability of support services, these requirements are not specific to veterans and servicemembers, but to the overall student population. A wounded warrior who wants to know how supportive a college-community is to warrior-specific needs; whether that institution has veteran-specific programs and what those are; or whether other wounded warriors have had a track record of academic success at that institution would gain little or no insight under the measure. WWP believes it is important to go further so that wounded warriors can access the kind of information they need to make well-informed decisions on their educational options. Wounded warriors considering education as a pathway to employment would benefit greatly from the publication of reliable school-specific information on availability and types of academic support, disability, and career counseling and job placement services; specific programs and services principally or exclusively targeted to assist student-veterans, particularly those with disabilities or disabilities which impair learning; and designated point(s) of contact for academic, financial, disability, benefits, and veterans support services.

Recognizing the difficult transition many wounded warriors are making, we also urge the Subcommittee to provide warriors every opportunity to receive vocational and educational counseling at multiple points in their transition and after. Currently, the VA is authorized to provide educational and vocational counseling to individuals eligible for education benefits regardless of disability.³⁹ However, veterans' awareness of this counseling option is very low,

³⁶ VA has initiated several efforts to develop and collect outcome data on student veterans, including coordinating with DoD and the Department of Education to develop common measures to permit comparisons across various education programs and types of institutions as required by Exec. Order 13607 "Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members," as well as developing a long-term study to track student veteran outcomes over the next 20 years. GAO, "VA Education Benefits," *supra* note 3, at 27-8.

³⁷ *Id.* at 29-30.

³⁸ "Improving Transparency of Education Opportunities for Veterans Act of 2012," Public Law 112-249 (Jan. 10, 2013).

³⁹ 38 U.S.C. § 3697A.

and it is only available upon request.⁴⁰ While VR&E provides such counseling, the Post 9/11 GI Bill does not, and thus, wounded warriors who opt for the GI Bill are surrendering – intentionally or not – beneficial educational-counseling services. Such counseling could be invaluable to wounded warriors going back to school, to include assessing whether the wounded warrior is academically and emotionally ready to engage in post-secondary education. Legislation passed at the end of the 112th session requiring the Secretary of the VA to conduct more effective and efficient outreach to make veterans more aware of this benefit is an important first step.⁴¹ But we urge the Subcommittee to go further and make this provision an “opt-out” rather than an “opt-in” benefit.

Providing these modest, but important services – while offering schools incentives to create model programs to support wounded warriors on campus – would not only assist them in making informed decisions about their education, but further the promise underlying these educational benefits and improve the likelihood of warriors’ achieving success in higher education and beyond.

For-Profit Colleges

As this Subcommittee reviews the value of education for veterans, we urge you to look hard at circumstances where the costs of higher education may be outweighing the benefits. The for-profit college industry is one such area for scrutiny. As documented in a widely disseminated 2012 report by the Senate Committee on Health Education Labor and Pensions (HELP Committee), for-profit colleges account for 13 percent of students in higher education in this country, but receive 38 percent of all Post-9/11 GI Bill funds, and yet represent 47 percent of student loan defaults.⁴² The Committee found that taxpayers spend more than twice as much to train veterans at for-profit colleges than at public colleges, and that some 86% of 2009 revenue at publicly traded for-profit education companies came from taxpayer dollars, while marketing alone represented more than 23% of spending at those institutions that year, with profits approaching 20%.⁴³ There are for-profit schools that are seen as having solid credentials and a history of success for their graduates. Overall, however, studies have questioned the relative value of a degree or certificate from for-profit institutions, with one such study finding higher rates of unemployment and lower earnings among students who attend for-profit colleges than comparable students from other types of colleges,⁴⁴ and another finding that for students in associate degree programs there are large benefits from obtaining certificates and degrees from public and not-for-profits institutions, but not from for-profits.⁴⁵ Of particular significance to

⁴⁰ U.S. Government Accountability Office, “VA Education Benefits: Actions Taken, but Outreach and Oversight Could be Improved,” GAO-11-256, 13 (2011).

⁴¹ Public Law 112-249, *supra* note 38.

⁴² S. Comm. on Health, Education, Labor, and Pensions, “Senator Harkin’s Findings Regarding Veterans and For-Profit Colleges,” 5, 16 available at: <http://www.harkin.senate.gov/documents/pdf/4f9ac62292704.pdf> (2012).

⁴³ *Id.* at 4, 10-11.

⁴⁴ Center for Analysis of Postsecondary Education and Employment, “The For-Profit Postsecondary School Sector: Nimble Critters or Agile Predators?” (February 2012).

⁴⁵ The National Bureau of Economic Research, “Evaluating Student Outcomes at For-Profit Colleges,” NBER Working Paper No. 18201 (June 2012).

WWP, for-profit schools often lack the academic and counseling support services that many wounded warriors need to thrive in higher education.

For-profit colleges have a strong incentive to enroll servicemembers and veterans because the so-called 90/10 rule – which requires a for-profit college to obtain at least 10 percent of its revenue from Title IV education funds – where GI Bill (and Tuition Assistance) funds count toward that 10 percent. With this incentive to enroll veterans and servicemembers, the industry has employed aggressive and sometimes deceptive, exploitative recruiting practices. As the HELP Committee report found, for-profit colleges employ many recruiters, but very few placement staff.⁴⁶

Against this backdrop and acting administratively, the Administration last year established a set of principles for educational institutions that serve servicemembers, veterans, and their family members to rein in deceptive practices and promote better information and academic and financial advising.⁴⁷ That Executive Order is a good first step, but we urge this Subcommittee to review its enforcement as well as opportunities to strengthen it.

We urge the Subcommittee as well to support efforts to avert warriors' taking on substantial debt to pursue for-profit education that carries high risk for default or of failing to prepare students to earn a livelihood. Our own most recent survey of wounded warriors found that 43% of respondents were carrying more than \$20,000 in personal debt (excluding mortgage debt); 35.7% of those respondents listed education expenses as comprising part of that debt, and 38% of respondents said that their financial situation was worse off than the year before.⁴⁸

For-Profit schools have a long history – dating back to the World War II GI Bill – of taking advantage of veterans.⁴⁹ GI Bill money (and additional student loans encouraged by the schools) for programs that don't provide skills that employers recognize or credits that other educational institutions will accept will not foster the well-adjusted, economically successful generation of wounded warriors that WWP pursues and in which our nation is investing.

Thank you for consideration of WWP's views on this important matter.

⁴⁶ S. Comm. on Health, Education, Labor, and Pensions, "Senator Harkin's Findings Regarding Veterans and For-Profit Colleges," at 14.

⁴⁷ Exec. Order 13607, "Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members," (April 2012).

⁴⁸ WWP Survey, at 78-79, 83.

⁴⁹ See Senate Report accompanying the Vietnam-era Veterans Readjustment Assistance Act of 1976 detailing problems in that Education Assistance program.