



**SCHOOL ADVOCATES FOR VETERANS' EDUCATION AND SUCCESS**  
444 N Capitol Street NW, Suite 207 Washington, DC 20001-1511

November 18, 2014

The Honorable Bill Flores  
Chairman  
Subcommittee on Economic Opportunity  
U.S. House of Representatives Committee  
335 Cannon House Office Building  
Washington, DC 20515

Dear Mr.Chairman,

I am providing the attached written statement on behalf of the National Association of School Advocates for Veterans' Education and Success for the Subcommittees oversight hearing titled, " The Role of the State Approving Agencies in Ensuring Quality Education Programs for Veterans".

We are happy to further discuss any of our views on the role of the State Approving Agencies. Our current board expertise is in the private and public sector with 90 years of combined experience. Please contact me at (707) 845-4788 or [president@veterans-succes.org](mailto:president@veterans-succes.org) if you need any further information.

Sincerely,

A handwritten signature in black ink that reads "Kim Hall". The signature is written in a cursive, flowing style.

Kim Hall  
President  
National Association of School Advocates for Veterans' Education and Success  
Director, Veterans Enrollment & Transition Services (VETS)  
Humboldt State University, California State University



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Statement for the Record  
November 19, 2014

The National Association of School Advocates for Veterans' Education and Success is a non-profit whose members are Veteran Program and Service Managers. Our mission is to bring a consolidated voice to the issues that affect veteran's education and success by creating a strong network of partners to provide communication, advocacy and support for educational and training institutions.

**The State Approving Agencies play a critical role in the approval process for veterans' education and training.** The formal definition of "deemed approved" as stated in PL 111-377 remains unclear. We would recommend clear procedural guidance for those programs that still require specific approval. We support the continued approvals of Non-College Degree (NCD) programs, apprenticeships and all new institution or campuses. For those institutions of higher learning that have already been evaluated and approved by accrediting agencies, federal and state agencies, no additional action on the part of the SAA should be required. This will save time and money to build a stronger training process for programs and educational facilities. Non-College Degree (NCD) programs at institutions of higher learning, certificate programs that are not vocational in nature should follow degree program approvals for those institutions. In all cases we support the Secretary's authority to approve/disapprove programs and in no case should the Secretary's authority be omitted from the approval process, or as it relates to the administration of federal veterans education programs.

**The Structure and Role of State Approving Agencies needs to be brought into the 21<sup>st</sup> century by providing clear structure that emphasizes training and consistent guidelines.** State Approving Agencies are in a position to provide optimal support for institutions of higher learning by providing timely, consistent and clear summaries of VA policies, guidelines, and best practices. SAA's should provide approval oversight in cases where no other federal agency already has oversight. SAA's should also provide on the ground training and assistance for schools, respond to inquiries and questions, and clarify VA guidance to ensure accurate and appropriate application by schools. Training must be a priority. The support the SAA's provide NCD's and apprenticeship programs would be invaluable.



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We encourage the SAA's to expand their scope of training and to collaborate with the Department of Veterans Affairs to provide thorough guidance and training for all educational institutions/facilities. We would recommend a best practice that focuses on consistent policies and implementation among and between states as should be the processing among and between RPO's. We believe that to combine compliance with training constitutes a conflict of interest.

**The process of Compliance Surveys can be daunting and confusing. Effective and consistent training and a clear process will help institutions maintain compliance with the rules governing the administration of these programs.** The VA needs more staff to adequately conduct compliance surveys; however, it should continue to be the VA's responsibility. It would be beneficial for all partners to have written official guidance on all changes included in PL 111-377. The lack of regulatory guidance means schools have no official source document for the administration of education and training programs. At minimum, schools must know the rules governing the administration of these programs. What's more, the rules must be consistent nationwide. We offer that high-volume schools with a solid track record of successful compliance visits do not require surveys annually, rather suggest that the VA use risk-based scheduling for determining the need for annual compliance surveys. We also recommend that the VA track their findings, compile the overall findings, type of discrepancies and payment errors. And, as a basis for risk-based scheduling, summarize the information to be used to identify common errors among schools and evaluate trends over time as recommended by the United States Government Accountability Office report published in February 2011, titled, VA Education Benefits: Actions Taken, but Outreach and Oversight Could Be Improved.

We want to thank you and the committee members for your time and the opportunity to address these issues. We are available for questions.

Respectfully submitted,

Kim Hall, President  
SAVES