

**STATEMENT OF  
STEVE GONZALEZ, ASSISTANT DIRECTOR,  
NATIONAL VETERAN EMPLOYMENT AND EDUCATION DIVISION,  
THE AMERICAN LEGION  
BEFORE THE  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY  
COMMITTEE ON VETERANS' AFFAIRS  
UNITED STATES HOUSE OF REPRESENTATIVES  
ON  
"THE ROLE OF THE STATE APPROVING AGENCIES IN ENSURING QUALITY  
EDUCATION PROGRAMS FOR VETERANS"**

**NOVEMBER 19, 2014**

Chairman Flores, Ranking Member Takano and distinguished Members of the Subcommittee, on behalf of National Commander Mike Helm and the 2.4 million members of The American Legion, we thank you and your colleagues for the work you do in support of our service members and veterans as well as their families. The hard work of this Subcommittee in creating significant legislation has left a positive impact on our military and veterans' community.

We thank you especially for holding this hearing that aims to examine the current role of State Approving Agencies (SAAs) in ensuring that veterans have access to quality educational and job training programs. With the constantly shifting economic and social landscape faced by veterans, it is important to continually re-evaluate and – if needed – revise the role of these SAAs in order to protect veterans and taxpayers.

The American Legion is proud to work with the National Association of State Approving Agencies (NASAA) in order to provide veterans with the best educational and training opportunities possible.

**Background**

State Approving Agencies (SAAs) are responsible for approving and supervising programs of education for the training of veterans, eligible dependents, and eligible members of the National Guard and the Reserves. SAAs grew out of the original GI Bill of Rights that became law in 1944. Though SAAs have their foundation in Federal law, SAAs operate as part of state governments. SAAs approve programs leading to vocational, educational or professional objectives. These include vocational certificates, high school diplomas, GEDs, degrees, apprenticeships, on-the-job training, flight training, correspondence training and programs leading to required certification to practice in a profession.

In December 2010, Congress passed the *Post 9/11 Veterans Educational Assistance Improvements Act of 2010* (PL 111-377), which was signed into law in January 2011. That bill contained language that impacted the role of the State Approving Agencies in terms of program

approval authority. Due to the expansion of GI Bill-eligible programs to include many for-profit vocational training programs, non-registered apprenticeships, and on the job training establishments, the law “deemed approved” many programs that were otherwise accredited or approved by other institutions such as Department of Education-recognized accrediting bodies. This was done in order to relieve some of the work load of the SAAs, and to avoid redundancy between the work done by SAAs and other accrediting bodies. This had the effect of shifting the role of the SAAs from being the primary entity responsible for approving *all* GI Bill eligible programs to examining only those that were not deemed approved for the purposes of the legislation (viz. programs at for-profit institutions, non-registered apprenticeships, on the jobs training establishments, non-accredited institutions, non-public licensure/certification examinations, and new institutions).

### **Our Position**

While The American Legion applauds the expansion of the GI Bill applicability, we find it problematic that SAAs have been removed from a large portion of the approval process. SAAs focus explicitly on the GI Bill and serve to protect it, and, by extension, the veterans using it. They ensure that programs meet certain eligibility criteria, in order to see that the funds are not wasted, but are put to the best use possible. Their unique focus on how GI Bill funds are spent makes their mission distinct from all other oversight and approving bodies. Furthermore, as federally authorized arms of their respective state governments, SAAs are in a unique position to evaluate programs that are offered in their state, given their proximity. This arrangement also maintains the federalism required by the Constitution.

Therefore, The American Legion supports the SAAs, and believes that they should have a role in reviewing, evaluating, and approving all educational and training programs for GI Bill use.

While some may argue that the work that the SAAs do is redundant to the work of accrediting bodies, The American Legion believes that SAAs approval is, in fact, unique. This is because the charge of the SAAs is to specifically focus on protecting GI Bill funds. While traditional accreditation provided by Department of Education-recognized accrediting bodies does a significant portion of work toward ensuring quality programs, SAA approval should work in tandem with that accreditation, rather than the stark division that is represented in the current statute.

However, under PL 111-377, SAAs lack the statutory authority to inspect many questionable programs that have sprung up since the passage of the Post 9/11 GI Bill at not-for-profit institutions. Given that the original mandate of the SAAs was to protect GI Bill funds from being squandered in unscrupulous programs, it seems reasonable that SAAs should be allowed to inspect all suspicious programs, even if they are housed in not-for-profit institutions.

As such, The American Legion supports the portion of the legislative proposal submitted by NASAA that would statutorily make SAAs the primary approving body for all programs approved for GI Bill use. Programs may still be deemed approved, but at the discretion of the SAAs, not the VA secretary.

Additionally, The American Legion supports the proposed shift in the statutory requirement for SAA compliance surveys. As NASAA has indicated, the current mandate (annual surveys for every institution offering anything other than non-standard degrees, and any institution that enrolls more than three hundred GI Bill beneficiaries is needlessly burdensome, and is, frankly impossible given the limited resources available.

In light of this, The American Legion believes that their funding should be increased to ensure that they are able to adequately perform their crucial role. Even if SAAs compliance survey requirement is reduced, an increased role as primary approving body seems likely to require more resources.

### **Conclusion**

The American Legion supports SAAs, and recognizes the critical role they play in ensuring quality programs for veterans using their GI Bill benefit. This hearing should serve as a starting point for an ongoing conversation regarding the role that SAAs currently play in quality assurance.

How SAA approvals interact with accreditation remains somewhat unclear. This legislation would make strides toward clarifying and codifying the terms of that interaction. That said, The American Legion believes that more insight into how the process works is needed in order to ensure that veterans receive the highest quality education and training, while preventing redundancy and wasting resources.

Chairman Flores, Ranking Member Takano, we thank the subcommittee for looking into this issue that is crucial to veterans and look forward to your questions.