



SCHOOL ADVOCATES FOR VETERANS' EDUCATION AND SUCCESS

444 N Capitol Street NW, Suite 207 Washington, DC 20001-1511

Statement for the Record

March 24, 2015

Chairman Wenstrup, Ranking Member Takano and distinguished members of the Economic Subcommittee, on behalf of the national association of School Advocates for Veterans' Education and Success, thank you for the opportunity to discuss the bills that may directly affect the success of our student veterans and the operation of Veterans' Centers on our school campuses.

School Advocates for Veterans' Education and Success is a national, non-profit association whose members are college and university Veterans' Program and Service Managers. Our mission is to bring a consolidated voice to the issues that affect veterans' education and success by creating a strong network of partners to provide communication, advocacy, and support for educational and training institutions. Our perspective comes from all sectors: public, not-for profit and for-profit private colleges and universities.

H.R. 456 Reducing Barriers for Veterans Education Act of 2015

H.R. 456 proposes to amend title 38, United States Code, to include college application fees as part of the benefits under Post 9/11 GI Bill Education Assistance Program. The admissions application fees for colleges can create a barrier for recently separated veterans who are balancing the transition process of supporting families, moving, and reintegrating into the labor force or simply waiting to be accepted to their school(s) of choice.

H.R. 456 allows payment up to \$750 for application fees that will be charged against entitlement according to Title 38, Section 3315A, National Tests. This section addresses the dollar amount that equates to a month of entitlement:

"c) Charge Against Entitlement.—The number of months of entitlement charged an individual under this chapter for a test described in subsection (a) shall be determined at the rate of one month (rounded to the nearest whole month) for each amount paid that equals—

(1) for the academic year beginning on August 1, 2011, \$1,460; or

(2) for an academic year beginning on any subsequent August 1, the amount for the previous academic year beginning on August 1 under this subsection, as increased by the percentage increase equal to the most recent percentage increase determined under section 3015(h)."



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SAVES supports the portion of H.R. 456 that allows payment of Application fees to institutions under the Post 9/11 GI Bill however, we recommend amending Title 38, USC, under section 3313 which includes the payment of all mandatory fees for student veterans and dependents using transferred benefits.

Section 3313 addresses the fees as follows:

“(a) Payment.—The Secretary shall pay to each individual entitled to educational assistance under this chapter who is pursuing an approved program of education (other than a program covered by subsections (e) and (f)) the amounts specified in subsection (c) to meet the expenses of such individual's subsistence, tuition, fees, and other educational costs for pursuit of such program of education.”

Completing a Bachelor's degree in 36 months is very difficult for many student veterans. Indeed, according to the National Center for Educational Statistics, “the median time to earn a degree was 55 months for 2008 bachelor's degree recipients graduating from public institutions, 45 months for graduates of private nonprofit institutions, and 103 months for graduates of private for-profit institutions” (<http://nces.ed.gov/fastfacts/display.asp?id=569>). According to the Principles of Excellence, Veterans Program and Services Managers and their staff spend many hours assisting student veterans with budgeting and financial matters to plan for the costs of their programs. Subtracting entitlement for their application fees is a tough beginning to their college careers.

H.R. 643 Veterans Education Survey Act of 2015

To direct the Secretary of Veterans Affairs to enter into a contract with a non-government entity to conduct a survey of individuals who have used or are using their entitlement to educational assistance under the educational assistance programs administered by the Secretary of Veterans Affairs, and for other purposes.

Many Institutions of Higher Learning have dedicated departments that are adept at defining data points, collecting data and measuring outcomes. According to the Executive Order 13607, establishing the Principles of Excellence “The Secretaries of Defense, Veterans Affairs, and Education shall develop a comprehensive strategy for developing service member and veteran student outcome measures that are comparable, to the maximum extent practicable, across Federal military and veterans educational benefit programs, including, but not limited to, the Post-9/11 GI Bill and the Tuition Assistance Program” [Sec. 3. (c)]. To fairly compare institutions, we must be asking the same questions to ensure standardized data points, which must be clearly articulated to our institutions and their Institutional Research departments. A few institutions can't be using the metric system while the rest are using yardsticks, and a yardstick is not a very efficient way to measure a mile. As institutions, we're good at measuring



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outcomes so, to the extent practicable, the student outcome measures should rely on existing administrative data. This will minimize the reporting burden on institutions participating in these benefit programs. Student outcome measures should permit comparisons across federal educational programs and across institutions and types of institutions. To do so, it is time to establish a common set of standards and a common measuring device that allows point in time comparisons and trends.

Given the importance of data to inform and support evidence based decisions, SAVES supports H.R. 643 directing the Secretary of Veterans Affairs enter into a contract with a non-government entity to conduct a survey of individuals who have used or are using their entitlement to educational assistance and conduct a survey of Institutions of Higher Learning whose programs are approved by the Department of Veterans Affairs for educational assistance.

H.R. 476 GI Bill Education Quality Enhancement Act of 2015

The State Approving Agencies (SAAs) play a critical role in the approval process for veterans' education and training. SAVES believes that the role of the SAAs should be brought into the 21st century by providing a 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. SAAs should provide approval oversight in cases where no other federal agency already has oversight. SAAs 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 SAAs provide Non-College Degree (NCD) programs and apprenticeship programs would be invaluable.

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 NCD programs, apprenticeships, and new institution or campuses. For those Institutions of Higher Learning that have already been evaluated and approved by accrediting agencies and/or 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. NCD programs at Institutions of Higher Learning and 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 to the administration of federal veteran's education programs.



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We support the expansion in scope of SAAs to provide training and to collaborate with the Department of Veterans Affairs to provide thorough guidance for all educational institutions/facilities. We recommend a best practice that focuses on consistent policies and implementation among and between states as should be the processing among and between RPOs.

We believe that combining 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 a 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. Instead, we 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 and compile the overall findings, including the type of discrepancies and payment errors. Additionally, 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*.

SAVES supports the expansion of duties for SAAs but strongly recommends their role be redefined to focus on training and approval of new IHL programs, Non-College Degree programs, apprenticeships, and vocational training and licensure/certification examinations.

Flight Training

Current legislation authorizes unlimited payment of tuition and fees for eligible beneficiaries attending a public school. However, the high cost of some programs, such as flight training, has become unmanageable. The National Association of State Approving Agencies' (NASAA) recommendation concerning flight training is reasonable as it relates to capping the amount the VA will pay for flight course tuition and fees each year. H.R. 476 will help level the playing field for private IHLs with flight that have been offering approved flight degree programs for decades.



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In the interest of reducing the high cost of the Post 9/11 Education program, SAVES supports the portion of H.R. 476 regarding capping the annual amount payable for flight training. SAVES agrees that payment for flight training at institutions of higher learning be limited to only those eligible individuals enrolled in degree programs that require flight training for degree completion. Payment for flight courses should not be permitted in the case of flight training that is not specifically required as part of a standard college degree, including undeclared, undecided, general studies, liberal studies, and other similarly termed programs or statuses as it pertains to IHL public or private.