STATEMENT OF

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VETERANS BENEFITS ADMINISTRATION

DEPARTMENT OF VETERANS AFFAIRS

BEFORE THE

SUBCOMMITTEE ON ECONOMIC OPPORTUNITY

HOUSE COMMITTEE ON VETERANS' AFFAIRS

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Good afternoon, Mr. Chairman, Ranking Member Takano, and other Members of the Subcommittee. Thank you for the opportunity to be here today to discuss legislation pertaining to the Department of Veterans Affairs' (VA) programs, including the following: H.R. 748, H.R. 2551, H.R. 3419, H.R. 4138, a draft bill to make certain improvements in the laws administered by the Secretary of Veterans Affairs relating to educational assistance, a draft bill entitled "GI Bill Oversight Act of 2016", and a draft bill entitled "Veterans Success on Campus Act of 2016." There are a couple of bills under discussion today which would affect programs or laws administered by the Department of Labor (DOL). Respectfully, we defer to that Department's views on H.R. 3286 and a bill to direct the Secretary of Labor to carry out a research program to evaluate the effectiveness of the Transition Assistance Program in addressing needs of certain minority Veterans. Accompanying me this afternoon is Ms. Carin Otero, Associate Deputy Assistant Secretary, HR Policy and Planning, for the office of Human Resources and Administration.

H.R. 748

H.R. 748 would add a new section 3320 of chapter 33 of title 38, United Stated Code, which would authorize VA to provide up to nine months of additional Post-9/11 GI Bill benefits to an individual who has used all of his or her Post-9/11 GI Bill educational assistance. An eligible individual is an individual who:

- Is or was entitled to educational assistance under section 3311 of title 38;
- Used all of the educational assistance to which the individual is entitled; and (A) Is enrolled in a program of education leading to a post-secondary degree that requires more than the standard 128 semester (or 192 quarter) credit hours for completion in biological or biomedical science; physical science; science technologies or technicians; computer and information science and support services; mathematics or statistics; engineering; engineering technologies or an engineering-related field; a health profession or related program; or a medical residency program; or (B) has earned a post-secondary degree in an above-referenced field and is enrolled in a program of education leading to a teaching certification.

VA supports the intent of the proposed legislation, subject to the availability of funds. However, VA has concerns regarding the phrases “is or was entitled to educational assistance” and “is enrolled in a program of education” from the perspective of implementation and recommends that the draft bill be amended to clarify these phrases. As currently drafted, individuals who have been enrolled in a science,

technology, engineering, mathematics (STEM) program of education for only one day, week, or month at the point they exhaust the normal 36 months of entitlement would be eligible for the additional nine months of educational assistance, even though that entitlement would not allow them to complete the STEM program. Additionally, it could also be interpreted to mean that individuals who enroll in a STEM program for the first time after they have exhausted all 36 months of basic entitlement in **a** non-STEM program would be eligible for the additional entitlement. Provision of educational assistance in these circumstances would not serve the purpose of the legislation.

To implement this legislation, VA would need to make modifications to its existing information technology (IT) systems. Specifically, it would need to make modifications to the VA Online Certification of Enrollment (VA-ONCE) and the Long Term Solution (LTS) in order to verify eligibility and allow for the award of additional months of educational assistance. VA estimates that it would require one year from the date of enactment to make the IT system changes necessary to implement the proposed legislation.

We estimate enactment of this legislation would result in benefit costs of $94.2 million in fiscal year (FY) 2017, $515.6 million over five years, and $1.2 billion over 10 years. We estimate the information technology (IT) cost to be $3 million, which includes the design, code development, testing, and deployment of the new functionality in existing IT systems. We do not estimate any administrative costs associated with this proposed legislation.

H.R. 2551

H.R. 2551 would amend chapter 36 of title 38, United States Code, by adding a new subsection 3687A to authorize VA to treat a pre-apprenticeship program in the same manner as an apprenticeship program for the purpose of providing educational assistance. A pre-apprenticeship program may be covered under the proposed legislation if the program is recognized under or compliant with any standards for a postsecondary pre-apprenticeship program required by the State in which the program is located, or, in the case of a program for which a State does not require any such standards, if the curriculum of the program is approved by a sponsor and the sponsor certifies to VA that the program will prepare an individual with skills and competencies needed to enroll in a registered apprenticeship program. The program must also maintain conduct and attendance policies in accordance with a sponsor if the State does not require such standards. The term "sponsor" would be defined to mean an entity that formally supports the pre-apprenticeship program, including a Registered Apprenticeship program; a department or agency of a State or local government; an institution of higher learning; or any other public, private, or nonprofit entity that VA determines to be a sponsor for purposes of this section. VA and the Department of Labor will work collaboratively to ensure consistency in the definitions.

A "covered individual" for purposes of this bill would be an individual who is entitled to educational assistance and seeking to use such assistance for a program of apprenticeship. A covered individual enrolled in a pre-apprenticeship program would receive educational assistance equal to the amount and kind received by an individual in an apprenticeship program. However, if the covered individual is not paid as part of

the pre-apprenticeship program, he or she would receive a monthly housing allowance (MHA). The MHA would be equal to the monthly amount of the basic allowance for housing payable under section 403 of title 37 for a member with dependents in pay grade E-5 residing in the military housing area that encompasses all or the majority portion of the zip code area of the pre-apprenticeship program. The covered individual's entitlement would be charged at a rate equal to the rate charged for an apprenticeship program.

The proposed legislation would apply to an individual who enrolls in a program of pre-apprenticeship beginning on or after the date of enactment of the bill.

VA generally supports the intent of the proposed legislation, but has concerns with implementation of this bill.

First, the proposed bill would place the onus of certifying programs as "pre-apprenticeship" on either the State in which the program is located or on VA. However, the bill provides no guidance regarding what standards should be used by either entity to make such determinations. Additionally, VA would be responsible for approving programs in States that do not require any standards for pre-apprenticeship programs. Similarly, the bill does not provide VA with adequate standards for approving such programs. Second, because the proposed legislation would authorize pre-apprenticeship programs for all educational assistance programs, it poses significant problems with regard to the MHA requirement in the proposed section 3687A(c). This bill would provide that if the enrollee is not paid as part of the pre-apprenticeship program, "each monthly allowance for housing payable" to the enrollee shall be an amount equal to the basic housing allowance of an E-5 with dependents in the same zip

code as the pre-apprenticeship program. This requirement would cause confusion since only chapter 33 pays a "monthly allowance for housing" based on the Department of Defense's basic allowance for housing. All other educational benefit chapters (e.g., chapter 30) provide a monthly training assistance allowance. Therefore, the intent of the proposed legislation is unclear as it targets "each monthly allowance for housing payable to the individual under such assistance." An individual enrolled in a pre-apprenticeship program may receive markedly more in benefit payments than if he/she was enrolled in a degree or non-degree program under chapter 30, 32, or 35 of title 38, or chapter 1606 of title 10. This inequity could negatively impact other types of training. VA recommends the proposal be amended to provide payment rates for pre-apprenticeships under chapter 30, 32, 35, or 1606 that are consistent with the amounts payable for apprenticeships under those benefit programs.

We estimate enactment of this legislation would result in benefit costs of $15.8 million in FY 2017, $83.4 million over five years, and $184.6 million over 10 years. Additionally, we estimate the IT cost to be $5 million, which includes the design, code development, testing, and deployment of the new functionality in existing IT systems. We do not estimate any administrative costs associated with this proposed legislation.

H.R. 3419

H.R. 3419 would authorize the Secretary of Veterans Affairs to make grants to eligible educational institutions to provide childcare services to students on campus.

Section 2(a) would amend chapter 36 of title 38, United States Code, to add a new section 3699. The new section 3699 would have five parts:

1. Section 3699(a) would state that the purpose of the grant is to provide childcare services on the campus of the educational institution to students enrolled in courses of education offered by the educational institution.

2. Section 3699(b) would provide the criteria for determining if the educational institution would be eligible for the grant. Specifically, the school would have to (1) offer a course of education that is approved as provided in 38 U.S.C. chapters 34, 35 and 36 by the State Approving Agency where the educational institution is located, and (2) submit to VA an application that includes the information and assurances VA may require.

3. Section 3699(c) would outline how the educational institution must use the funds. Specifically under paragraph (1)(A), the institution would establish or expand a childcare center on the campus of the educational institution, or under paragraph (1)(B), the institution would pay the costs of providing childcare services to students enrolled in courses of education offered by the educational institution at a childcare center located on the campus of the educational institution. Additionally, paragraph (2) would require that at least 75 percent of the new childcare services funded by the grant be provided to students who are Veterans.

4. Section 3699(d) would limit the number of grants to 50 for FY 2016.

5. Section 3699(e) would state that there is authorized to be appropriated such sums as may be necessary to carry out this section.

VA supports the goal of providing affordable childcare to those enrolled in higher education, but cannot support this bill as written for a number of reasons.

VA has concerns with the potential establishment of a childcare center due to the lifecycle costs involved to sustain it, as well as the management challenges associated with the variety of State and local laws and licensing requirements. Additionally, because the provisions of this draft legislation are not clearly defined, VA has multiple concerns as outlined below:

- There are not basic requirements for either the childcare services that will be provided or the licensing and staffing of the center.
- Childcare services would be available to "students enrolled in courses of education offered by the educational institution", which implies that any student, including those who are not Veterans, could receive these services. The bill only requires that "at least 75 percent" of such services be granted to students who are Veterans. Additionally, there are no other specific eligibility criteria for Veteran students who would receive these childcare services.
- The bill would prescribe no limit to childcare services based on the age of the child or economic indicators. Also, the bill would not require a link between the times the services are available to times when the student is attending class or engaged in related activities.
- VA could determine the required information and assurances needed to apply for the grant, but the bill would provide no criteria for determining the basic requirements of who would be eligible to apply for a grant, how the grants would be awarded, or limits on the amount of each grant.
- Given the administrative duties that would be required to establish the framework necessary to develop and implement such a grant program and

the fact that almost six months of FY 2016 have already passed, it would not be possible for VA to provide 50 grants during FY 2016. Establishing grant criteria and the process of administering a grant generally requires VA to engage in rulemaking.

VA is unable to determine the costs of enactment of this proposal. There are numerous factors that can affect the cost of childcare, such as the size of the childcare facility, the number of children, the age of the children, the duration and array of childcare services offered at the facility, the location of the facility, etc.

Draft Bill – "To make certain improvements in the laws administered by the Secretary of Veterans Affairs relating to educational assistance"

Section 2 of the proposed legislation would amend 38 U.S.C. §§ 3315(c) and 3315A to allow for the proration of entitlement charges for licensing and certification examinations and national tests under the Post-9/11 GI Bill. Specifically, the charge against an individual's entitlement for payment for licensing and certification examinations and national tests would be prorated based on the actual amount of the fee charged for the test. Section 2 would also add that an individual entitled to educational assistance under chapter 33 would be entitled to educational assistance for "[a] national test that evaluates prior learning and knowledge and provides an opportunity for course credit at an institution of higher learning as so described."

The amendments made by this section would apply to a test taken more than 90 days after the date of the enactment of this legislation.

VA supports section 2. This would benefit Post-9/11 GI Bill beneficiaries by reducing the negative impact of exam/test reimbursement on remaining benefit entitlement and increasing the months of training available for the beneficiaries, thus expanding educational opportunities.

Currently, under sections 3315 and 3315A, an individual is charged entitlement for the reimbursement of fees associated with a licensing or certification exam, or a national test, in whole months. More specifically, VA charges an individual one month of entitlement for each $1,759.08 reimbursed for the academic year beginning on August 1, 2015, rounded to the nearest whole month. Regardless of the cost of the test, be it $50 or $1,600, the Veteran is charged one full month of entitlement.

As noted in its FY 2016 legislative proposal, VA believes the law should be amended to charge entitlement for reimbursement of VA approved exams at a prorated number of days of entitlement based on the ratio of the cost of the test to the statutory amount. However, it should be noted that, as this legislation is currently written, the provisions would no longer specify the amount of benefit payment equaling one month of entitlement. VA suggests that the draft language be further amended in order to retain that amount. We would be happy to provide technical assistance to accomplish this.

The Department believes that mandatory costs associated with this section of the legislation would be insignificant. Also, there would be no administrative costs associated with this section of the legislation. However, we do estimate the IT cost to be $500,000 in order to make the system adjustments necessary to prorate the entitlement charge calculations in the LTS.

Section 3 would amend 38 U.S.C. §§ 3015(h)(2) and 3564(b) to provide that an increase in the amount of educational assistance after FY 2013 and before FY 2025 would be rounded down to the next lower whole dollar amount and that any increase after FY 2024 would be rounded to the nearest whole dollar amount.

VA supports section 3. Public Law 108-183 (Veterans Benefits Act of 2003) extended a previous authority in title 38, United States Code, to authorize VA to round down the yearly cost-of-living adjustments for basic educational assistance to the next lower whole dollar amount through FY 2013. Following the expiration of that authority on September 30, 2013, the yearly increases in educational assistance under the Montgomery GI Bill-Active Duty (MGIB-AD), the Reserve Educational Assistance Program, and the Dependents Educational Assistance Program are rounded to the nearest whole dollar amount.

This proposed legislation would reinstitute through FY 2024 the authority to round down to the next lower whole dollar amount to generate cost savings. For example, the current monthly rate under the MGIB-AD is $1,789. If the monthly rate for educational assistance increased based on the Consumer Price Index and National Center for Education Statistics by 5.4 percent ($96.61) under current law, the MGIB-AD monthly rate would be rounded to the nearest whole dollar -- $1,886, rather than $1,885 under the proposed legislation.

We estimate enactment of section 3 would result in benefit savings of $872,000 in FY 2017, $7.4 million over five years, and $25 million over 10 years. This cost estimate reflects the most current estimates for the cost of living adjustments (COLA) in

out-years. A slight change in the COLA in a given year can dramatically affect these estimated savings.

Section 4 would amend 38 U.S.C. § 3692(c) to re-authorize the Veterans' Advisory Committee on Education (VACOE) through December 31, 2021. VACOE provides advice to the Secretary on the administration of education and training programs for Veterans and Servicemembers, members of the National Guard and Reserve Components, and dependents of Veterans under chapters 30, 32, 33, and 35 of title 38, United States Code, and chapter 1606 of title 10, United States Code. Section 201 of Public Law 114-58 (the Department of Veterans Affairs Expiring Authorities Act of 2015) extended VACOE statutory authority through December 31, 2016.

VA supports section 4. If reauthorized, the Secretary would be able to continue to receive recommendations and seek advice from VACOE in order to enhance VA's educational assistance programs.

The administrative costs associated with enactment of section 4 would be insignificant.

Section 5 would authorize VA to provide training requirements for school certifying officials employed by educational institutions that offer courses of education approved under chapter 36 of title 38, United States Code. If an educational institution does not ensure that a school certifying official meets the training requirements, VA may disapprove any course of education offered by the educational institution. A "school certifying official" is defined as an employee of an educational institution with primary responsibility for certifying Veteran enrollment at the educational institution.

VA supports legislation that would require school certifying officials to meet certain training requirements as determined by VA. VA currently provides guidance and training opportunities for school certifying officials via webinars, the School Certifying Official Handbook, and on the GI Bill website. Currently, VA does not have the authority to require school certifying officials to complete this training or to disapprove educational programs if the training is not completed. The proposed legislation would provide VA with this authority. However, VA suggests that the proposed requirements be formally codified in chapter 36 of title 38, United States Code, and would be happy to provide technical assistance to accomplish this.

There would be no benefit or administrative costs or savings associated with enactment of section 5.

Section 6 would amend subsection (i) of section 3313 of title 38, United States Code, to authorize VA to reduce the amount of the monthly housing stipend on a pro rata basis if an individual reduces the number of course hours after the beginning of an academic period. Specifically, if VA determines that an individual received a monthly housing stipend at the beginning of a month and then reduced the number of course hours and was not entitled to the full amount of the payment received for that month, VA may reduce the amount payable for the subsequent month by an amount equal to the amount of the overpayment.

The amendments made by this section would apply to a month that begins on or after August 1, 2017.

VA does not support section 6.

In many cases, the monthly housing stipend is the sole source of funds that students use to pay for housing, food, utilities, and other basic necessities while attending school. Authorizing VA to offset an individual's monthly housing allowance the month after the individual is overpaid due to a reduction in his or her course hours could create a significant financial burden on students and their families. For example, an individual that relies on the monthly housing stipend to pay rent each month would be faced with a shortage of funding in order to maintain his or her housing while still being enrolled in school.

VA prefers to focus on strategies to minimize the frequency and magnitude of overpayments, rather than more aggressively recouping overpayments in a manner that may be detrimental to Veterans and eligible dependents. VA is already taking steps to reduce overpayments resulting from enrollment changes. Specifically, a plan has been developed to require beneficiaries to verify their enrollment status each month before VA releases the monthly housing payment, which is consistent with other education benefit programs. VA plans to add this functionality in its IT systems, subject to the availability of IT development funds.

There would be no benefit or administrative costs or savings associated with this section. We estimate the IT cost associated with enactment of this section to be $2 million, which includes the design, code development, testing, and deployment of the new functionality in existing IT systems.

Section 7 would amend section 3684(c) of title 38, United States Code, to place a limitation on the use of reporting fees payable to educational institutions and joint apprenticeship training committees. Currently, section 3684(c) of title 38, United States

Code, states that VA shall pay an annual reporting fee to any educational institution that furnishes education or training and submits reports or certifications to VA. The reporting fee is computed for each calendar year by multiplying $12 by the number of eligible individuals enrolled in VA's education and vocational rehabilitation and employment programs. In addition, VA also provides $15 for an eligible individual whose educational assistance payment is sent to the school for temporary custody and delivery at the time of registration. Section 7 would prohibit an educational institution or joint apprenticeship training committee from using or merging reporting fees from VA with the amounts available for the general fund of the educational institution or joint apprenticeship training committee.

VA does not support this proposed change that would prohibit schools from using or merging reporting fees with their general funds. Educational institutions are already required to use reporting fees solely for making certifications or otherwise supporting programs for Veterans, and it is possible for VA to verify compliance with this requirement without the establishment of a separate account for reporting fees. Consequently, VA views the proposed change as unduly cumbersome for educational institutions and joint apprenticeship training committees.

In addition, VA notes that under Public Law 113-175, § 406 the reporting fees were decreased to $9 and $13 for the one-year period beginning September 26, 2014. Subsequently, Public Law 114-58, § 410 extended those amounts for one additional year, until September 26, 2016. Based on VA's interpretation, those rates would automatically increase to $12 and $15 if the proposed change was to be enacted prior to September 26, 2016. VA is unsure whether or not this was intended.

There would be no benefit or administrative costs or savings associated with enactment of this section.

H.R. 4138

H.R. 4138 would authorize the Secretary of Veterans Affairs to recoup relocation expenses paid to or on behalf of employees of VA. Under this bill, the Secretary may direct an employee to repay the amount, or a portion of the amount, paid to or on behalf of the employee under title 5 for relocation expenses, if the Secretary determines such repayment appropriate under regulations to be prescribed by the Secretary and the employee is provided prior notice and an opportunity for a hearing. The VA has several concerns about H.R. 4138 and opposes this bill for the reasons expressed below.

The authority that would be provided to the Secretary under H.R. 4138 already exists under current law. Under the Federal Claims Collection Act, the Secretary may collect a debt owed by an employee if an employee has been paid incorrectly. H.R. 4138 and current law would not, however, allow the Secretary to collect relocation expenses, where such expenses are appropriately paid by VA to or on behalf of an employee and there is no evidence of fraud or wrongdoing on the part of the employee in applying for or accepting the relocation expenses.

VA is already challenged to recruit and retain highly-qualified staff and subject matter experts necessary to transform the Agency. Enactment of this legislation would allow the Agency to recoup relocation expenses paid directly to employees, as well as payments made to vendors such as relocation companies. Consequently, employees could be responsible for paying back expenses, which could pose a significant financial

burden on affected employees. While this bill would only address the repayment of relocation expenses, it is another in a number of separate personnel policy bills aimed solely at the VA, creating a disparity in the treatment of one group of career civil servants. Prior legislation established an abbreviated review process before an administrative judge for certain VA employees who are subject to adverse action. The implementation of provisions that reduce or remove important rights, protections, and incentives for VA employees, which are available to the majority of Federal employees in other agencies, compounds the challenges facing the Agency by making employment with VA significantly less attractive.

Subsection 1(c) of H.R. 4138 states that the authority provided under H.R. 4138 would apply "to or on behalf of" a VA employee "for relocation expenses before, on, or after the date of the enactment of this Act." VA has a number of legal concerns with this subsection. First, the legislation would authorize the Secretary recoup relocation expenses if "the Secretary determines such repayment appropriate pursuant to regulations" prescribed under an open-ended provision that provides no guidance as to the types of relocation expenses that can be recouped and the reasons for recoupment. Even under the lenient "intelligible principle" standard for delegations of legislative authority, *see Whitman v. Am. Trucking Ass'ns*, 531 U.S. 457, 472 (2001), this authorization raises non-delegation doctrine concerns.

Second, authorizing the Secretary to recoup relocation expenses paid to or on behalf of any VA employee even before the promulgation of the Secretary's regulations may have an impermissible retroactive effect. A bill has a "retroactive effect" if it increases an employee's liability for conduct that preceded the enactment of the bill.

See Landgraf v. USI Film Products., 511 U.S. 244, 280 (1994) (a bill has a "retroactive effect" if it "increases a party's liability for past conduct"). Under the bill, the Secretary could promulgate regulations that would require an employee to repay relocation expenses based on conduct that preceded the enactment of the bill. Because the employee was not aware that he or she would have to repay the relocation expenses at the time of the conduct, the bill may have a "retroactive effect" and may implicate the employees' due process rights to fair notice. *See BMW of North America, Inc. v. Gore*, 517 U.S. 559, 574 (1996). Recouping the relocation expenses based on new regulations may also be considered a taking, entitling the employee to "just compensation" for the amount of repayment.

VA believes strongly that Federal employees must be held accountable and supports taking action to collect debts owed by employees when employees have been paid incorrectly and has established strong internal policy implementing the Federal Claims Collection Act in VA Financial Policy, Volume XII –Chapter 4, Employee Debts, dated May 2010. However, because current law allows the Secretary to collect such debts, new legislation is not required to accomplish this goal. Establishing a new bill aimed solely at VA employees would be counterproductive and could have unintended consequences. The vague language in the bill that allows for an employee to be directed to repay relocation expenses when it is determined that such repayments are "appropriate," could make employment in VA significantly less attractive than in other Federal agencies or in the private sector. This may discourage outstanding VA employees from applying for promotion or reassignment opportunities with the Agency and impair VA's ability to recruit top talent, including Veterans.

Draft Bill – GI Bill Oversight Act of 2016

Section 2 requires VA's Office of Inspector General (OIG) to conduct investigations into institutions of higher learning (IHLs) that are defendants in class action lawsuits for deceptive or misleading practices, are being investigated by any Federal or State agency for deceptive or misleading practices, or have been found guilty by any Federal or State agency of deceptive or misleading practices. VBA defers to VA OIG regarding the requirements and position of Section 2 of this bill.

Section 3 of this bill requires VBA Education Service to disapprove courses of education at an IHL found guilty by OIG of deceptive or misleading practices. In general, the Department supports the intent behind the legislation.

Draft Bill – Veterans Success on Campus Act of 2016

Section 2(a) of this bill proposes to amend chapter 36 of title 38, United States Code, to add a new section 3697B. The title of this new section would be "On-campus educational and vocational counseling." The new 38 U.S.C. § 3697B would have three sections:

1. Section 3697B(a) states the Secretary shall provide educational and vocational counseling services for Veterans at locations on the campuses of IHLs, as selected by VA. These services shall be provided by VA employees who provide such services under 38 U.S.C. § 3697A.

2. Section 3697B(b) provides the criteria for the selection of IHLs to participate in these services, specifically (a) the IHL must provide appropriate space on campus

where counseling services can be provided, and (b) VA will seek to select locations where the maximum number of Veterans would have access to these services.

3. Section 3697B(c) provides guidance on reporting requirements. This section states that no later than 180 days after enactment, and each year thereafter, VA will submit a report to Congress. This report must contain the following: the average ratio of counselors providing these services to Veterans who receive these services at each location; a description of the services provided; recommendations for improving the provision of these services; and any other matters VA determines appropriate.

While VA already provides the VetSuccess on Campus (VSOC) program under the Secretary's current authority at 38 U.S.C. §§ 3115 and 3116, we are supportive of legislation to codify the existing program. VSOC aims to help Veterans, Servicemembers, and their qualified dependents succeed and thrive through a coordinated delivery of on-campus benefits assistance and counseling, leading to completion of their education and preparing them to enter the labor market in viable careers.

VA has one concern with the language in the draft legislation, as it refers to the population served. Educational and vocational counseling services, as outlined in 38 U.S.C. §§ 3697 and 3697A, are available to Servicemembers, Veterans, and, in some instances, their eligible dependents. VA recommends that Servicemembers and dependents be added to Section 2(a) of the draft legislation.

There would be no benefit or administrative costs associated with enactment of this legislation.

Mr. Chairman, this concludes my statement. Thank you for the opportunity to appear before you today. I would be pleased to respond to questions you or the other Members of the Subcommittee may have.