



**TESTIMONY OF WILLIAM HUBBARD,
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SUBMITTED TO THE
SUBCOMMITTEES ON ECONOMIC OPPORTUNITY
AND TECHNOLOGY MODERNIZATION,
U.S. HOUSE OF REPRESENTATIVES
PRESENTED AT THE
SUBCOMMITTEE JOINT OVERSIGHT HEARING
ON THE TOPIC OF
“MODERNIZING VETERAN EDUCATION
IN THE SHADOW OF COVID-19”**

July 20, 2022

Chairmen Levin and Mrvan, Ranking Members Bost and Rosendale, and Members of the Subcommittees:

We thank you for the opportunity to share our perspective about modernizing veteran education in the shadow of COVID-19. Veterans Education Success works on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill® and other federal education programs.

COVID-19 has spotlighted the undeniable imperative for the U.S. Department of Veterans Affairs (VA) to have a flexible modern process for administering veteran education benefits. We are grateful for the dedicated work of these Subcommittees in helping to shape and pass many important legislative proposals over the past several years to accomplish this goal.

Below we address several important topics on GI Bill modernization. We'd like to call to your attention two overarching themes that must be kept in mind when it comes to the modernization efforts at VA:

1. Fraud Remains A Problem. Irrespective of VA's efforts to modernize and improve the administration of education benefits, student veterans continue to face the threat of predatory actors in higher education, and in many cases with alarming consequences. Recently, the FBI conducted multiple raids across the country on a system of GI Bill-approved schools that are affiliated under the banner of “House of Prayer.”

These raids demonstrated the importance of remaining vigilant against harmful conduct, and of establishing much-needed minimum quality standards. In addition, over the course of the pandemic, the landscape of higher education has become dramatically less predictable; keeping a watchful eye for unscrupulous behaviors and low-quality programs is critical.

2. Outcome Measures Matter. It is now more important than ever for VA to produce academic and workforce outcomes, so Congress and taxpayers have a better understanding of the value of the education benefits programs. Insight on the efficacy and impact of education benefits is necessary to ensure the effective long-term integration of all modernization efforts. We urge the Subcommittees to help VBA's Education Service move towards inter-agency data-sharing and reporting of robust student veteran outcomes.

In addition, we are pleased to alert you to an effort we have engaged in under the auspices of the U.S. Census Bureau to produce a one-time report on GI Bill student outcomes using data from the U.S. Census Bureau, Department of Defense, Internal Revenue Service, VA Data Analytics, and the National Student Clearinghouse. We look forward to sharing the findings this Fall.

Below, we offer our thoughts and suggestions on a number of important initiatives and programs at VA with the hope of advancing the modernization of veteran education benefits. Our testimony below is structured by focusing on strategic, operational, and technical issues, with associated policy recommendations throughout.

Strategic Issue: Improving the Approval Criteria for GI Bill Programs

Updating the antiquated program approval process is critical to the modernization of the GI Bill. Veterans actively rely on VA's "stamp of approval" as an indication that the programs are worthy of hard-earned GI Bill benefits. Unfortunately, there are too many approved programs that fail to educate veterans effectively and prepare them for a lifetime of success.

At present, no effective system exists to proactively prevent bad programs from being approved to begin with. The statutes governing program approval are seriously outdated, still referencing classes taught "by radio," and they continue to allow a low standard of entry.¹ We strongly believe that both veterans and taxpayers are entitled to a reasonable return on investment for the GI Bill.

Unfortunately, there are numerous examples of programs that cause serious harm to the veterans they intend to train and educate. The consequences of veterans getting stuck at bad programs includes: unrecoverable wasted time, burdensome debts, and personal reputational damage. Despite showing poor results, many of these programs and schools continue to rake in millions of taxpayer dollars through the recruitment and exploitation of veterans and the abuse of their education benefits.

Veterans who attend fraudulent or low-quality schools continue to ask why VA would approve schools known for producing poor outcomes. For example, FastTrain College was raided by the FBI and ordered to pay over \$20 million for "having defrauded the U.S. Department of Education (ED) by submitting falsified documents to obtain federal student aid funds in connection with ineligible students."^{2, 3}

¹ 38 USC 3672 has almost no requirements. It also incorporates, by reference, the program approval requirements of Chapters 34 and 35, but those are also extremely minimal, forbidding only, for example, bartending and personality development courses, and restricting "radio" courses (indicating an out-of-date statutory framework). 38 USC 3675 (approval of accredited courses) requires only that the school is recognized by a recognized accreditor and keeps records on students and credits, and that the State Approving Agency looks at the catalog, with no further guidance. But some accreditors offer no real service, like ACICS (which accredited ITT Tech, Corinthian, and was caught this year by USA Today accrediting a school with no teachers). 38 USC 3676 (approval of nonaccredited courses) has more restrictions, but many are undefined, including no definition of "quality" in (c)(1); no definition of teacher "qualifications" in (c)(4); no definition of "financially sound" in (c)(9) (which could easily be defined by reference to US Department of Education standards); inadequate ban on deceptive advertising in (c)(10) (which should be clarified to ban any school that has faced legal or regulatory concerns over its advertising in the prior 5 years); and no definition of "good character" in (c)(12) (which should be clarified to ban administrators and teachers who have faced legal or regulatory action or any action by a licensing board).

² Dana Treen, *FBI raids Jacksonville offices of business college* (May 16, 2012), The Florida Times-Union <https://www.jacksonville.com/story/news/crime/2012/05/16/fbi-raids-jacksonville-offices-business-college/15866622007/>.

³ Department of Justice Press Release, *United States Prevails in Civil Suit Against For-Profit College Chain and its President for False Claims Act Violations* (Feb. 21, 2017),

In another example, “Retail Ready Career Center” ran a scam offering a 6-week HVAC training for veterans while also subjecting them to abusive practices, including taking their housing allowance and making them live in a substandard [disgusting] motel.⁴ The owner falsely claimed, “We have the highest success rate of any other GI Bill program out there,”⁵ but the FBI and the U.S. Department of Justice (DOJ) found differently.

The owner of ‘Retail Ready’ was eventually sentenced by a federal court to more than 19 years in jail and ordered to forfeit \$72 million of VA benefits to the federal government for lying to gain approval to enroll veterans.⁶ According to DOJ, the owner had spent veterans’ GI Bill funds on a Lamborghini, a Ferrari, a Bentley, two Mercedes Benzes, a BMW, and real estate worth \$2.5 million, among other purchases.⁷

Sadly, these are not isolated occurrences. In a similar incident in 2020, the owner of “Blue Star Learning” was sent to prison for 45 months and ordered to repay VA \$30 million in GI Bill for his fraudulent GI Bill program with falsified job placements.⁸

Most recently, the FBI raided numerous churches associated with the House of Prayer, which remained approved for GI Bill and listed on the GI Bill Comparison Tool for more than a week after the FBI raid.⁹ We received numerous complaints from veterans and employees that the school was misleading VA and defrauding students, which were included in a detailed report we delivered two years ago to VA and the SAAs.¹⁰

Veterans wonder why obvious scams like FastTrain College, Retail Ready Career Center, and House of Prayer were approved in the first place.^{11, 12} All of these schools proved to be a significant waste of taxpayer money, even before the FBI stepped in, and yet so many similar examples continue to reap the benefits veterans earned.

We thank the Members and staff of the Economic Opportunity Subcommittee for ongoing efforts to update the statutes with more responsive quality requirements; however, much more needs to be done.

- *Recommendation:* We look forward to working with the Subcommittee this Fall to modernize the statute. We must ensure that programs that are approved for GI Bill

<https://www.justice.gov/usao-sdfl/pr/united-states-prevails-civil-suit-against-profit-college-chain-and-its-president-fals-0>.

⁴ Eva-Marie Ayala, *Hundreds of veterans scramble after Garland for-profit college closes*, The Dallas Morning News (Sept. 28, 2017), <https://www.dallasnews.com/news/education/2017/09/28/hundreds-of-veterans-scramble-after-garland-for-profit-college-closes/>.

⁵ *ibid.*

⁶ Department of Justice Press Release, *For-Profit Trade School Owner Charged with Defrauding VA, Student Veterans* (Nov. 23, 2020), <https://www.justice.gov/usao-ndtx/pr/retail-ready-owner-forfeit-72m-va-tuition-fraud>.

⁷ *ibid.*

⁸ Department of Justice Press Release, *Owner of Local Technical Training School Sentenced for Defrauding the VA out of almost \$30 Million in G.I. Bill Education Benefits* (Oct. 27, 2020), <https://www.justice.gov/usao-sdca/pr/owner-local-technical-training-school-sentenced-defrauding-va-out-almost-30-million-gi>.

⁹ Alexandra Koch, *FBI raids Georgia churches near military bases, sources say church was targeting soldiers*, USA Today (June 24, 2022), <https://www.usatoday.com/story/news/nation/2022/06/24/fbi-raids-house-prayer-churches/7724801001/>.

¹⁰ Veterans Education Success, *Letter to VA and Georgia SAA Regarding House of Prayer Christian Church*, Nov. 7, 2020, <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

¹¹ Carli Teproff, *Now defunct for-profit college must pay the government \$20 million, a court rules*, Miami Herald (Feb. 21, 2017), <https://www.miamiherald.com/news/local/education/article134161714.html>.

¹² *Supra* note 7.

deliver an education that is worthy of the veteran's hard-earned GI Bill benefits. We believe the following standards must be addressed for there to be a meaningful process to screen schools who wish to access these valuable benefits:

- *Quality.* Ensure that programs that are approved for GI Bill deliver sufficient quality that is worthy of the veteran's hard-earned education benefits.
- *Overcharging.* Ensure that schools are not overcharging VA and that VA tuition funds are spent on education.
- *Outcomes.* Require a demonstrated track record of minimum student outcomes for a school to maintain Title 38 eligibility.
- *Qualified Faculty.* Require appropriate faculty credentials relevant to their level and subjects of teaching.
- *Finances.* Require screening of a school's financial stability before its approval.
- *History.* Prohibit approval of any school subject to punitive law enforcement or federal regulatory actions within the last five years.
- *Fiduciaries.* Ensure school recruiters have the fiduciary responsibility to tell the truth.

Operational Issue 1: Digital GI Bill

We believe VA and Accenture merit recognition for their efforts to implement the Digital GI Bill platform using a human-centered design approach, and for developing a user-friendly interface that has received broadly positive feedback to date.

However, from a historical perspective, recall that VA's antiquated IT infrastructure was highlighted as a significant problem amidst the delays in GI Bill distribution of benefits in Fall 2018.¹³ Both the Inspector General and VBA Undersecretary agreed there had been insufficient oversight of the project, and the poor implementation of that system had tremendously negative consequences for student veterans.¹⁴ As modernization efforts enter the anticipated final year of implementation, we stress the importance of learning from those prior experiences.

For many, the Digital GI Bill is a welcome update, which will give student veterans a more comprehensive view of their benefits, and also allow School Certifying Officers (SCO) to more effectively serve those beneficiaries. The Digital GI Bill improvements unveiled in mid-May were focused on addressing improved claims processing and enhanced automation capabilities through updates.

The intent of the latest release was to provide consistent calculations of Monthly Housing Allowance debts, entitlement transfer improvements, updated language of awards, and the ability for Education Call Center (ECC) staff and Veterans' Claims Examiners (VCEs) to update the verification screen.¹⁵ These are much-needed improvements that will provide student veterans with a more seamless experience.

¹³ Nicole Orgysko, *Reoccurring management challenges at the heart of VA's recent GI bill confusion, agency admits*, Federal News Network (Dec. 3, 2018), <https://federalnewsnetwork.com/veterans-affairs/2018/12/reoccurring-management-challenges-at-the-heart-of-vas-recent-gi-bill-confusion-agency-admits/>.

¹⁴ Tajha Chappellet-Lanier, *Forever GI Bill implementation failed because no one was in charge, says IG*, Fedcoop (March 22, 2019), <https://www.fedscoop.com/forever-gi-bill-implementation-failed-no-one-charge-says-ig/>.

¹⁵ GI Bill Stakeholders Meeting, Veterans Benefits Administration, Education Service, June 16, 2022.

Given the lack of sufficient oversight of the 2018 implementation challenges, we urge the Subcommittees to carefully monitor the Digital GI Bill rollout this Fall. We also have concerns about whether schools will be ready to adapt to the fast-approaching launch of the Digital GI Bill this fall semester. SCOs and institutions are currently experiencing issues communicating with Education Liaison Representatives (ELR); important questions related to time-sensitive educational benefits concerns have gone unanswered.

- *Recommendation:* We suggest VA hire and train additional ELRs and accompanying support staff. It is essential these positions are filled to ensure the rollout doesn't interfere with student veterans' fall enrollment.

We look forward to working closely with VA and these Subcommittees in addressing any challenges that may arise in the coming months.

Operational Issue 2: Outcome Measures

Upon the passage of the Post-9/11 GI Bill in 2008, the focus was appropriately centered on providing a "New GI Bill" for the wave of veterans serving in the Global War on Terror as part of the Post-9/11 era of service. Notwithstanding the widely discussed success of the Post-9/11 GI Bill – now entering the 15th year since the bill's passage – comprehensive information about the economic impact of this legislation remains unknown.

Both Congress and the Executive Branch have attempted to require VA to collect data on outcomes and to work with other agencies to share data in order to better understand GI Bill student outcomes. These attempts have included Executive Order 13607, establishing Principles of Excellence for schools serving veterans, which required VA and the Department of Education to collaborate on student veteran outcome measures; Section 404 of the *Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act of 2016* addressing institution-level data requirements; and Section 114 of the Forever GI Bill, which mandates VA to submit an annual report that includes a summary of the information provided by educational institutions under the Miller-Blumenthal Act.^{16, 17}

Despite these legislative successes, data efforts have continued to fall short. Interagency data-sharing on student veteran outcomes remains lacking and VA is unable to populate the GI Bill Comparison Tool with student veteran outcome measures. From a Congressional oversight viewpoint, moreover, a key question remains unanswered: "What is the economic impact of the GI Bill?" Further, VA's own efforts are inherently limited to internal data, often neglecting the wide variety of life circumstances that contribute to unique pathways in education typical of non-traditional students.

- *Recommendation:* VA should align outcome measures data efforts with the U.S. Department of Education (ED) and engage in inter-agency data sharing. This is important for Congressional oversight of the success of the GI Bill; to empower student veterans to make an informed school choice based on the data; and to provide greater interoperability of future research.

Beginning in 2016, we collaborated with VA to spur a one-time inter-agency data-sharing effort to document both student outcome and workforce outcome measures, notably incorporating earnings data to show the true economic impact of the GI Bill – drawing on data from the U.S

¹⁶ Public Law 114-315 - Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act of 2016, 115th. Cong. (2017), <https://www.govinfo.gov/content/pkg/COMPS-12668/pdf/COMPS-12668.pdf>.

¹⁷ Public Law 115-48 - Harry W. Colmery Veterans Educational Assistance Act of 2017, 115th Cong. (2017), <https://www.congress.gov/115/plaws/publ48/PLAW-115publ48.pdf>.

Department of Defense (DoD), U.S. Internal Revenue Service (IRS), U.S. Census Bureau, VA's Statistics & Analytics team, and VBA.

We anticipate being able to report on these educational and economic outcomes this Fall in a report co-authored by the American Institutes for Research (AIR), VA, and the Census Bureau. We believe this information will substantially demonstrate what American taxpayers are getting for their generous investment in the future of student veterans.

- *Recommendation:* Leaders at VBA and within Education Service must work in close collaboration with the VA's Statistics & Analytics team; incorporating key metrics on outcome measures into the coding infrastructure of the new systems will ensure the long-term accuracy and value of outcomes reporting.

Operational Issue 3: GI Bill Comparison Tool

The GI Bill Comparison Tool is an essential instrument that assists student veterans in making informed decisions about their educational future. We appreciate the recently added new features to the Comparison Tool as they bring added value and better functionality.

The ability to compare up to three programs, view schools by map, filter by cost and other metrics, and use the Tool on a mobile device are necessary improvements. Despite the recent improvements, we strongly encourage these Subcommittees to work with VA to adopt additional metrics to further markedly improve the Tool.

- *Recommendation:* Adopt additional metrics on the GI Bill Comparison Tool, including:
 - *Data Consistency.* Update student outcome metrics using data from ED.
 - *Rating.* As Members of Congress have already suggested, VA should include a "Risk Index" to enable students to avoid risky schools and improve "Caution Flags" to show government or accreditor action against a school.
 - *Transparency.* VA must be required to show all student veteran complaints about a school, in order to give potential student veterans full transparency. VA currently hides older complaints as well as complaints it deems "invalid." VA also should provide the redacted narrative text of student complaints.
 - *Total Display.* Include closed schools like ITT Tech on the data dashboard, which is used for government oversight and by researchers for historical reference.
 - *Public Comments.* Give students the option to make the narrative portion of their complaint public.
 - *Annotations.* When a school is withdrawn from the platform, provide a public narrative of the school's removal.

Additionally, we believe it is critical to improve caution flags on the Comparison Tool as noted in our response to the Federal Register Notice calling for comment on the Tool.^{18, 19} Caution flags on the Tool are crucial because veterans frequently report that they view a school's GI Bill eligibility as amounting to a "VA stamp of approval." Veterans should always be warned if a

¹⁸ Department of Veterans Affairs Federal Register Notice, Agency Information Collection Activity: Principles of Excellence Complaint Feedback Tool, December 20, 2021, <https://www.federalregister.gov/documents/2021/12/20/2021-27490/agency-information-collection-activity-principles-of-excellence-complaint-feedback-tool>.

¹⁹ Veterans Education Success, Our Letter to VA on the Principles of Excellence Complaint Feedback Tool, February 18, 2022, <https://vetsedsuccess.org/our-letter-to-va-on-the-principles-of-excellence-complaint-feedback-tool/>.

school has experienced legal or regulatory problems. As we have raised since 2016, caution flags are neither consistently nor uniformly posted.²⁰

- *Recommendation:* Develop uniform standards and expectations associated with caution flags, including an illustrative list of triggers, requirements of what details must be shared with prospective students, and expected timelines of posting the flag to a school's page.

We also believe several common sense changes could make the new location-based functionality better serve students.

- *Recommendation:* Add several common-sense technical changes to the new location-based functionality:
 - *User Guidance.* Provide an explanation of how the location search function works. This information could be included on the opening page of the GI Bill Comparison Tool, or a link could be provided to another page that contains the information. It would also be helpful if the opening page of the Comparison Tool linked students to College Scorecard and College Navigator in order to alert GI Bill beneficiaries to the extensive information those resources provide on institutional outcomes.
 - *Initial Filtering.* Describe how to filter a location search upfront, before users initiate a location search, not after.
 - *School Sectors.* Identify the institutional sector of a school, even if students do not filter their search.
 - *Detailed Filtering.* Add additional filtering options, including the ability to search for schools that are eligible for federal student aid, schools that offer specific types of credentials and degree programs (e.g., nursing, business, welding), and schools that offer exclusively online instruction. The search could also be enhanced by allowing students to sort the results by cost.
 - *Exclusions.* Do not include schools outside of the search radius in search results. Currently, location searches list other campuses for multi-campus schools that happen to have a single campus located within the search radius, even when the other campuses are situated all across the country. This obscures the true list of schools that are located nearby and ends up promoting low-quality chain schools with worse student outcomes.
 - *Data Consistency.* Resolve inconsistencies in the number of schools identified in location search results. On several different days in January 2022, our team performed the same location search, and the school results varied significantly each time. VBA should ensure that all location searches provide consistent results.

Operational Issue 4: Risk-Based Reviews

We urge continued Congressional oversight of VA's implementation of the *Johnny Isakson and David P. Roe, M.D., Veterans Health Care and Benefits Improvement Act of 2020*.²¹

²⁰ Letter to Robert Worley, Director of the Education Service, Department of Veterans Affairs, from Walter Ochinko, Policy Director, Veterans Education Success, and Derek Fronabarger, Director of Policy, Student Veterans of America, May 10, 2016, <https://vetsedsuccess.org/wp-content/uploads/2019/01/gi-bill-comparison-tool-letter-worley.pdf>.

²¹ H.R. 7105 - Johnny Isakson and David P. Roe, M.D., Veterans Health Care and Benefits Improvement Act of 2020, January 5, 2021, <https://www.congress.gov/bill/116th-congress/house-bill/7105/text>; 38 USC § 3673A, <https://www.law.cornell.edu/uscode/text/38/3673A>.

Specifically, Section 1014 requires VA to develop a robust risk-based review process alongside State Approving Agencies (SAA). The goal is to review GI Bill-approved education programs that pose the greatest risk to veterans.

In order to fulfill the intention of the Isakson-Roe Act and to continue as trusted stewards of taxpayer dollars, it is imperative that SAAs implement risk-based reviews where appropriate. As previously demonstrated, institutions demonstrating obviously negative behavior continue to be approved for GI Bill benefits. VA and SAAs must take action when there is evidence from federal or state government or from college accreditors of predatory behavior by institutions.

When asked about the implementation plans of Section 1013 of the Isakson-Roe Act, VA stated:

VA and State Approving Agencies (SAA) have been performing risk-based surveys since fiscal year 2019, following the codification of such reviews by section 310 of the Harry W. Colmery Veterans Educational Assistance Act of 2017 (P.L. 115-48). In October 2021, VA and SAA personnel established a working group to implement the additional triggers, risk factors and other requirements added by P.L. 116-315 § 1013. The group meets regularly and is finalizing tools and resources for the revised risk-based review model. Training is planned for the 2022 National Association of State Approving Agencies Summer Business and Training Conference in San Antonio, Texas, August 19-26, 2022, with full implementation anticipated by October 1, 2022.

While we are encouraged to learn about the official intentions of VA on the full implementation of Section 1013 of the Isakson-Roe Act, we maintain reservations about the nature of these plans. We urge the Subcommittee to provide oversight to VA as it rolls out risk-based reviews. We especially encourage reliance on a recent pilot program conducted by six SAAs which demonstrated great promise.²²

The new risk-based review model was developed from the ground up, successfully tested, and thoroughly studied by our colleagues at The American Legion, EdCounsel, and the National Association of State Approving Agencies (NASAA).²³ It clearly identified best practices for risk-based reviews.

We strongly believe this new model is the blueprint for successfully enacting the congressionally-mandated program. We are concerned that VBA will not engage in robust risk-based reviews based on the tested model, but will instead simply use a modified version of its long-running compliance survey model. This would be a grave disservice to student veterans.

These students deserve the highest quality of education for their hard-earned GI Bill benefits, and strong risk-based reviews are critical to ensuring those standards are uniformly met or exceeded.

- *Recommendation:* VBA should embrace and utilize the risk-based review pilot study conducted by six SAAs with the American Legion and EdCounsel.

Finally, we believe SAAs should use complaints to trigger risk-based surveys. The Isakson-Roe Act requires SAAs to include student complaints submitted through the GI Bill School Feedback Tool in risk-based surveys.²⁴ Although the statute does not require student complaints to trigger risk-based reviews, such complaints are an important early warning sign to VBA of fraud. VBA

²² Nathan Arnold, Joe Wescott, Beth Stein, and Bethany Little, *Lessons from a Risk-Based Oversight Model Designed to Protect Students and Taxpayers*, January 2022 <https://educationcounsel.com/wp-content/uploads/2022/01/RiskBasedReviewReportFinal012822.pdf>.

²³ *ibid.*

²⁴ 38 USC § 3673A(b)(2)(C), <https://www.law.cornell.edu/uscode/text/38/3673A>.

should exercise its discretion to direct SAAs to conduct a risk-based survey of a school if complaints show a pattern of abuse or a serious violation of law or VA regulation.

- *Recommendation:* The Subcommittees should amend the existing statute to add student complaints as a trigger for risk-based reviews of education programs.

Technical Issue: Veteran Rapid Retraining Assistance Program

As implemented by the Veterans Economic Recovery Act of 2021, the Veteran Rapid Retraining Assistance Program (VRRAP) requires VA to provide up to 12 months of nontransferable retraining assistance – including a housing stipend – to up to 35,000 eligible veterans for the pursuit of a specified program of education.²⁵

As of June 6th, the program has obligated \$176 million, less than 50% of the congressionally provided \$386 million in total funding.²⁶ Despite the high number of applications to-date (roughly 19,000), only 1,394 veterans have graduated, with a total of just 304 reporting finding meaningful employment after completing their program.²⁷

We urge Subcommittee oversight given the current lack of success with the program. Additionally, we recommend a technical change we believe will benefit some of the program participants in need of funding the cost of certification exams. At present, students who need to take certification or licensure exams upon completion of their program must pay for these costs out of pocket.²⁸

- *Recommendation.* Given the abundance of remaining resources of the program, and the obvious need to overcome the barrier of certification costs, we believe Congress should provide VA with the appropriate authority to cover certification and exam costs as required by state and industry standards.

Separately, we would like to applaud Senate Majority Whip Dick Durbin and Representatives Lauren Underwood and Danny Davis for their role in championing the Veteran Rapid Retraining Assistance Program Restoration And Recovery Act to restore these important pandemic education benefits to veterans defrauded by unscrupulous schools.²⁹

After Veterans Education Success learned of the Illinois SAA cutting off a program that was defrauding veterans, our team quickly moved to ensure those veterans would be able to restore their benefits. While these students may never recover their time wasted at the program, they would still have the opportunity to benefit from the program.³⁰

Conclusion

Veterans Education Success sincerely appreciates the opportunity to express our views before these Subcommittees today. Veterans must be able to count on VA's "stamp of approval" to

²⁵ H.R. 637 - Veterans Economic Recovery Act of 2021, 117th Cong. (2021), <https://www.govinfo.gov/content/pkg/BILLS-117hr637ih/pdf/BILLS-117hr637ih.pdf>.

²⁶ GI Bill Stakeholders Meeting, Veterans Benefits Administration, Education Service, June 16, 2022.

²⁷ *ibid.*

²⁸ Veteran Rapid Retraining Assistance Program (VRRAP) Frequently Asked Questions (FAQs), https://benefits.va.gov/gibill/docs/VRRAP_FAQs.pdf.

²⁹ Public Law 117-138 - Veterans Rapid Retraining Assistance Program Restoration and Recovery Act of 2022, 117th Cong. (2022), <https://www.govinfo.gov/content/pkg/PLAW-117publ138/pdf/PLAW-117publ138.pdf>.

³⁰ Veterans Education Success, Press Release: Congress to Restore Rapid Retraining Assistance Benefits For Veterans of Disapproved Programs, May 19, 2022, <https://vetsedsuccess.org/our-press-release-congress-to-restore-rapid-retraining-assistance-benefits-for-veterans-of-disapproved-programs/>.

mean what it implies. Too often we hear from veterans “I wish I had known” after they learn their benefits have been wasted at a low quality school. We also hope further emphasis is especially placed on the importance of intergovernmental collaboration in regards to ongoing data efforts.

We look forward to working with you and members of your staff on these important issues. Thank you for your consideration of our testimony on these critical issues.

DISCLOSURE

Information Required by Rule XI, clause 2(g)(5) of the Rules of the House of Representatives

Pursuant to Rule XI, clause 2(g)(5) of the Rules of the House of Representatives, Veterans Education Success has not received any federal grants in Fiscal Year 2022, nor has it received any federal grants in the two previous Fiscal Years.

WITNESS BIOGRAPHY

William Hubbard, Vice President for Veterans & Military Policy

William Hubbard serves as the Vice President for Veterans & Military Policy at Veterans Education Success, focused on advancing higher education success for service members, veterans, and their families, and protecting the promise of federal education programs. Previously, he served as the Vice President of Government Affairs and Chief of Staff for Student Veterans of America. He has been frequently called to testify to Congress on a variety of topics related to higher education and veterans.

Prior to his roles in higher education advocacy, Will worked as Federal Strategy and Operations Consultant at Deloitte, and spent several years serving government agencies to include the Department of the Navy, Department of State, and the State of Indiana Department of Revenue in his role. Also, as a National Executive Committee Member of Deloitte's Armed Forces Business Resource Group.

Will joined the Marine Corps Reserves in 2006, and continues his service today, based out of Bolling Air Force Base in Washington, DC. He most recently deployed to Kabul City, Afghanistan, where he served in the Special Operations Joint Task Force as a member of a small cell of intelligence professionals. He also worked with Southern Command (SOUTHCOM) to conduct activities in Honduras, Guatemala, and El Salvador, and humanitarian assistance/disaster relief in Haiti.

He serves on the American University President's Council on Diversity and Inclusion, is an Advocacy Ambassador Advisor for the National Marrow Donor Program, and was previously a member of the U.S. Small Business Administration's Interagency Task Force on Veterans Small Business Development.

He graduated with a bachelor's degree in international studies from American University and has a certificate in Diversity, Equity and Inclusion in the Workplace from the University of South Florida. Will and his wife, Noelle, presently reside in Arlington, VA with their daughter, Lucy.