



**TESTIMONY OF  
STUDENT VETERANS OF AMERICA**

**BEFORE THE  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY  
OF THE  
COMMITTEE ON VETERANS' AFFAIRS  
U.S. HOUSE OF REPRESENTATIVES**

**HEARING ON THE TOPIC OF:  
PENDING LEGISLATION**

**October 18, 2023**

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Chairman Van Orden, Ranking Member Levin, and Members of the Subcommittee: Thank you for inviting Student Veterans of America (SVA) to submit testimony on the legislation pending before you today.

With a mission focused on empowering student veterans, SVA is committed to providing an educational experience that goes beyond the classroom. Through a dedicated and expansive network of on-campus chapters across the country, SVA aims to inspire yesterday's warriors by connecting student veterans with a community of like-minded chapter leaders. Every day these passionate leaders work to provide the necessary resources, network support, and advocacy to ensure student veterans, military-connected students, their families and survivors can effectively connect, expand their skills, and ultimately achieve their greatest potential.

SVA thanks the Subcommittee for considering several pieces of legislation that would impact student veterans and other military-affiliated students in higher education.

### **H.R. 5702, the Expanding Access for Online Veteran Students Act**

SVA supports this bill which would increase the online Monthly Housing Allowance (MHA) rate to the full national average for GI Bill students enrolled fully online during the summer.

For years, online GI Bill students have received only half the national average in MHA. This is despite the GI Bill paying tuition and fees similarly for both in-person and online students. Due to the steadily increasing number of online courses at many institutions, including flagship colleges and universities, we now see this disparity, paradoxically, even impacting otherwise in-person students.

Many of SVA's policy priorities come from student veterans themselves. Student Veteran of the Year and former SVA Chapter President at Loyola University in Chicago, Josh Jones, flagged this issue for SVA. Josh saw firsthand how the substantially reduced MHA rate for online learners negatively impacted his in-person peers. Josh and some of his peers needed to enroll in certain courses over the summer but soon realized the institution was only offering those courses online. They eventually found themselves enrolled fully online and left with no choice but to wrestle with the drastic cut in their housing allowance. In Chicago, the full MHA rate is roughly \$2,700, which is reduced to just slightly more than \$1,000 if students are enrolled fully online—a roughly 63 percent reduction.

With support from SVA, Josh spearheaded an effort to raise awareness about this issue and find a legislative fix. After discussing the matter and possible solutions with committee leadership and staff earlier this year, we are pleased to see this legislation receiving the attention it deserves. This was only possible with the dedicated work of committee staff and the bipartisan leadership of Representatives Ciscomani, Stanton, Stansbury, and Van Orden.

The Expanding Access for Online Veteran Students Act would substantially increase the online MHA rate for GI Bill students enrolled in summer courses from half the national average to the full national average, which is roughly \$2,100.<sup>1</sup> While SVA would have preferred full parity between local in-person and the online rates, we recognize that this bill will nevertheless have a substantially positive financial impact on VA education beneficiaries enrolled online over the summer by helping them cover a far greater percentage of their housing

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<sup>1</sup> In some locations, this would result in online GI Bill students receiving larger MHA payments than in-person students in the same area. This incongruity underscores the need to comprehensively address the issue by matching online MHA rates directly to local in-person MHA rates. VA could require online GI Bill beneficiaries to regularly attest to their home address with penalties for false statements and verify their home of record via official documentation like that used to verify voting eligibility. The VA already has regular touchpoints with beneficiaries thanks to the enrollment certification requirement, and address verification could simply be integrated into that or a similar process. The Department could then use the verified address information to determine the appropriate Military Housing Area by which to calculate online students' MHA. As one of the most well-resourced agencies in the federal government that is well into a multi-year GI Bill modernization effort, we believe VA is more than capable of managing such a system.

costs.

This bill is a groundbreaking piece of legislation that represents the first legislative attempt in recent memory to address the disparity in MHA rates between in-person and online GI Bill students. As the prevalence of online courses surges, even within prominent public and non-profit universities, and the noticeable decrease in MHA rates for online learners starts affecting otherwise in-person students, it is imperative that we acknowledge the lack of a valid justification for these rate disparities.<sup>2</sup>

SVA firmly believes there are pragmatic ways to ensure that all online GI Bill students receive a full monthly housing allowance tied to their local cost of living. We stand ready to share and explore those proposals with members of this Subcommittee and hope this legislation is just the first step toward the ultimate goal of achieving true parity in MHA rates for online GI Bill students.

We thank Subcommittee staff for their work on this legislation, and we applaud the leadership of Representatives Ciscomani, Stanton, Stansbury, and Van Orden in introducing this forward-thinking legislative proposal. We encourage the Subcommittee to advance this bill swiftly.

### **H.R. 3601, the Student Veteran Work Study Modernization Act**

SVA supports this legislation which would allow VA education beneficiaries to participate in the Department of Veterans Affairs (VA) Work Study (VAWS) program if they are enrolled on a half-time basis.

VAWS is an invaluable program that provides participants with critical financial support during their studies. Unfortunately, the program limits eligibility to those who are enrolled least  $\frac{3}{4}$  time. According to SVA's most recent census, roughly 50 percent of respondents have children and approximately 20 percent identify as single parents.<sup>3</sup> For some of these individuals, enrolling at a rate that is less than  $\frac{3}{4}$  time might be the best fit for them and their families, but it cuts them off from the benefits of VAWS.

The Student Veteran Work Study Modernization Act would address this issue by establishing a pilot program that expands eligibility for VAWS to those enrolled at least half-time. The bill would also require VA to collect and report new information about VAWS, including the total number of participants, how many graduate with a four-year degree, and the number who secure full-time employment with VA.

This legislation represents just one step in the effort to modernize VAWS. We commend this bill's sponsor, Congressman Cartwright, for his leadership on the complementary and comprehensive H.R. 3600, the VA Work-Study Improvement Act.<sup>4</sup> This bill was first conceived by former VFW-SVA Fellow John Randolph and would make critical refinements to the VAWS program so it can better serve participants. It would expand the type of qualifying activities participants can pursue to better align with academic and professional goals, increase pay, modernize the time-keeping process, and require VA to report detailed information about how the program serves participants. The VAWS program must continue to create avenues of success on campus and beyond, and the

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<sup>2</sup> The legislative history provides a confusing rationale for the reduced online MHA rate. According to a 2010 senate report on the legislation that set the rate, Congress seemed to assume that online GI Bill students had no need for the full allowance because they were learning from home and the full allowance was intended to "offset the cost of housing away from home." S. REP. 111-346, 11, 2010 U.S.C.C.A.N. 1503, 1505. It is not clear what "the cost of housing away from home" means, especially in the context of student veterans—many of whom are independent, have families, and are not necessarily living on campus.

<sup>3</sup> DR. ABBY KINCH, STUDENT VETERANS OF AMERICA, 2022 SVA CENSUS 5 (2023) (on file with author).

<sup>4</sup> See generally *H.R. 3600 – VA Work-Study Improvement Act*, CONGRESS.GOV, <https://www.congress.gov/bill/118th-congress/house-bill/3600> (last visited Oct. 11, 2023).

VA Work-Study Improvement Act will ensure it does just that.

We applaud Congressman Cartwright for his leadership on this issue and his staff for their extensive work on these bills. We ask that the Subcommittee advance the Student Veteran Work Study Modernization Act and endeavor to do the same for the VA Work-Study Improvement Act.

**H.R. 5785, To amend title 38, United States Code, to modify the requirements of the Edith Nourse Rogers STEM Scholarship**

SVA supports this legislation that would make needed improvements to the Edith Nourse Rogers STEM Scholarship and help more beneficiaries access this critical benefit.

STEM careers are vital to our Nation's economy, ability to be competitive on the world stage, and national defense, among other things. Student veterans are an excellent match for STEM careers. In fact, SVA research shows that STEM majors are among the most popular degree paths for GI Bill students.<sup>5</sup> Yet, STEM degrees often take longer to complete than others and can push student veterans and other military-connected students beyond the 36 months of education benefits provided by the Post-9/11 GI Bil.

The Edith Nourse Rogers STEM scholarship provides an important extension of VA education benefits for those pursuing STEM degrees. However, a Government Accountability Office (GAO) report from September 2022 showed the scholarship has had an alarmingly low participation rate since its inception, raising concerns about barriers preventing beneficiaries from accessing the benefit.<sup>6</sup>

This bill aims to increase scholarship participation rates by eliminating requirements that restrict eligibility and delay beneficiaries' ability to apply. The legislation also expands scholarship eligibility to graduate students pursuing STEM degrees. Together, these fixes represent substantial refinements to the scholarship that should enable more beneficiaries to access this valuable extension of education benefits and ultimately complete their STEM programs.

SVA thanks Representative Budzinski for her leadership on this legislation.

**H.R. 5956, To amend title 38, United States Code, to direct the Secretary of Veterans Affairs to provide additional information about certain postsecondary educational institutions to individuals entitled to educational assistance under the laws administered by such Secretary**

SVA supports this legislation which would add important categories of new information to the GI Bill Comparison Tool and ensure it provides information on certificate and professional licensing programs.

The GI Bill Comparison Tool is a critical resource that helps student veterans and other military-affiliated students make informed decisions about their academic futures. Over the last several years, VA has made substantial improvements to the tool, such as allowing users to compare institutions and search by location via a map interface. We commend VA for their demonstrated commitment to continually improving this vital resource.

Yet, more can and must be done to improve not just the functionality of the tool, but the quantity and quality of information it provides. There is currently a glaring lack of publicly available information on student veteran

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<sup>5</sup> CATE, C.A., LYON, J.S., SCHMELING, J., & BOGUE, B.Y., STUDENT VETERANS OF AMERICA, NATIONAL VETERAN EDUCATION SUCCESS TRACKER: A REPORT ON THE ACADEMIC SUCCESS OF STUDENT VETERANS USING THE POST-9/11 GI BILL 34 (2017).

<sup>6</sup> See *generally* U.S. GOV'T ACCOUNTABILITY OFFICE, GAO-22-105326, HIGHER EDUCATION: VA COULD IMPROVE SUPPORT FOR VETERANS PURSUING STEM DEGREES (Sept. 29, 2022), available at <https://www.gao.gov/products/gao-22-105326>.

outcomes. While the Department of Education provides a variety of information on student outcomes broadly at institutions of higher education via its College Scorecard, similar information on student veterans is conspicuously absent from the GI Bill Comparison Tool.

This bill would add several new categories of critical information to the GI Bill Comparison Tool. The new information would include second-year re-enrollment rates, completion rates disaggregated by degree, license, and credential type, and how long it takes GI Bill students to complete their programs. The legislation would also increase transparency about post-graduation earnings by requiring VA to link to a database that provides the average annual earnings for each program. The bill further requires VA to enter into a memorandum of understanding with other relevant federal agencies to obtain outcome data for those using VA education benefits.

SVA offers two pieces of technical feedback. First, it may be worth considering how the bill language can be amended to ensure students are captured in the re-enrollment data point if their institutions do not operate on a standard academic year calendar. The current language references reenrollment after “the first year,” which may exclude students in programs that operate on non-traditional terms. Second, we recommend removing the “seek to” language in directing VA to enter into MOUs with other federal agencies. The Department will already have had two years to plan and orchestrate the MOUs, which is ample time. Any further delay only pushes back the date by which VA can incorporate the new data into the GI Bill Comparison Tool.

SVA greatly appreciates this legislation and looks forward to working with the Subcommittee to advance it.

**H.R. 5914, To amend title 38, United States Code, to improve the processes to approve programs of education for purposes of the educational assistance programs of the Department of Veterans Affairs, and for other purposes**

SVA supports the intent of this legislation which would clarify the institutional disclosure requirements and require VA to create a central online repository for School Certifying Official (SCO) training information. We offer minor recommendations for improving the bill’s language.

Current law requires institutions to disclose certain information to VA education beneficiaries about the cost of attendance, financial aid, program outcomes, and more.<sup>7</sup> These are important disclosures, and SVA continues to support them. However, institutions must have some flexibility in providing these disclosures because there can be limitations on the information available to them and their ability to provide exact cost estimates at specific points in time. This legislation clarifies that the disclosure requirements are intended to be fulfilled to the greatest extent possible, thus maintaining the mandate that institutions provide this critical information where and when able but affording them reasonable flexibility in doing so.

Separately, this bill seeks to address longstanding communication issues between VA and SCOs. For years, SCOs have raised concerns about the quality of VA’s communications and transparency with them, including issues with VA not providing timely, accurate, and consistent information. This legislation attempts to address these issues by requiring VA to create a central online repository to house SCO training information. While SVA supports the intent of this provision, we note that VA already maintains an SCO training webpage and SCO Online Training Portal.<sup>8</sup> Nevertheless, we believe there may be ways to improve this webpage by expanding the scope of information that VA makes available. We support the American Council on Education’s (ACE) recommendation to establish “a dedicated webpage for all VA’s Education Service policies, guidance, and

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<sup>7</sup> 38 U.S.C. § 3679(f)(1).

<sup>8</sup> *School Certifying Official (SCO) Training*, U.S. DEPARTMENT OF VETERANS AFFAIRS (Sept. 28, 2023), [https://www.benefits.va.gov/gibill/resources/education\\_resources/school\\_certifying\\_officials/online\\_sco\\_training.asp](https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/online_sco_training.asp).

training.”<sup>9</sup> Lastly, we recommend including a requirement that VA update the information in a timely manner in addition to doing so regularly.

SVA supports the intent of this legislation and welcomes the opportunity to explore additional improvements to VA’s communications with SCOs and institutions.

**H.R. 3738, To amend title 38, United States Code, to establish in the Department of Veterans Affairs the Veterans Economic Opportunity and Transition Administration, and for other purposes**

SVA supports this legislation which would create a new Veterans Economic Opportunity and Transition Administration within VA.

For years, SVA and others have called for the creation of a fourth administration at VA—a Veterans Economic Opportunity and Transition Administration (VEOTA). This new administration would provide VA’s several economic opportunity programs with the dedicated, senior-level leadership they deserve. As DAV, PVA, and VFW pointed out in the 2019 Independent Budget, a “new undersecretary for EO would refocus resources, provide a champion for these programs, and create a central point of contact for veterans service organizations and Congress.”<sup>10</sup>

As we’ve noted in the past, a greater focus must be placed on economic opportunity for veterans, including through higher education. VA can best achieve this by building on the success of the current office dedicated to transition and economic opportunity and elevating it, and Education Service, to its own administration. Presently, economic opportunity programs such as the GI Bill, home loan guaranty, and many other empowering programs for veterans are buried within the bureaucracy of the Veterans Benefits Administration and functionally in competition with disability compensation for resources and prioritization.

The Veterans Benefits Administration’s (VBA) portfolio includes several massive business lines—a reality well-illustrated by the disability compensation and pension and VA education benefits programs. According to VA, “[i]n 2022 alone, [VBA] completed more than 1.7 million disability compensation and pension claims for Veterans, an all-time VA record that broke the previous year’s record by 12%.”<sup>11</sup> As for education benefits, recent data show there are roughly 850,000 GI Bill students enrolled in nearly 40,000 educational programs and 20,000 apprenticeship and on-the-job-training programs.<sup>12</sup> A VEOTA would recognize the enormity of the many benefit programs currently siloed under VBA, separate them, and, in doing so, ensure they receive the appropriate resources, attention, and prioritization that they require.

Over the past century, VA has focused on compensating veterans for loss. Still, the reality of the 21st century and beyond also demands that we empower veterans to excel financially post-service. Financial stability is a key social determinant of health that compliments other VA goals like caring for veterans’ “Whole Health” and

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<sup>9</sup> *Less is More: The Impact of Bureaucratic Red Tape on Veterans Education Benefits: Hearing Before the H. Comm. on Veterans’ Affairs Subcomm. on Economic Opportunity*, 118<sup>th</sup> Cong. 5 (2023) (written testimony of Anne H. Meehan, Assistant Vice President, Government Relations, American Council on Education), available at <https://docs.house.gov/meetings/VR/VR10/20230920/116307/HHRG-118-VR10-Wstate-MeehanA-20230920.pdf>.

<sup>10</sup> DISABLED AMERICAN VETERANS ET AL., *THE INDEPENDENT BUDGET: VETERANS AGENDA FOR THE 116<sup>TH</sup> CONGRESS 120-22* (2019), available at [https://www.independentbudget.org/wp-content/uploads/2023/01/IndependentBudget\\_2019.pdf](https://www.independentbudget.org/wp-content/uploads/2023/01/IndependentBudget_2019.pdf).

<sup>11</sup> *Veterans Benefits Administration Reports*, U.S. DEPARTMENT OF VETERANS AFFAIRS (Oct. 10, 2023), [https://www.benefits.va.gov/reports/detailed\\_claims\\_data.asp](https://www.benefits.va.gov/reports/detailed_claims_data.asp).

<sup>12</sup> *GI Bill Comparison Tool*, U.S. DEPARTMENT OF VETERANS AFFAIRS, <https://www.va.gov/education/gi-bill-comparison-tool/> (providing downloadable data on all schools).



combatting veteran suicide. A VEOTA would bolster these shared goals while also resulting in impressive returns on the taxpayers' investments.

Lastly, a VEOTA would enhance VA's ability to serve transitioning servicemembers effectively through the Transition Assistance Program (TAP). If, as highlighted at the May hearing on transition before the House Committee on Veterans' Affairs, Committee members believe VA should take the lead on TAP, that is all the more reason to establish a VEOTA.<sup>13</sup> VA's TAP efforts must have dedicated and accountable leadership if we are to do right by our transitioning servicemembers.

We thank Representative Wenstrup for championing this important legislation.

## **H.R. 3816, the Veterans' Entry to Apprenticeship Act**

SVA supports the intent of this legislation but opposes it in its current form.

SVA represents chapter members who are largely enrolled at institutions of higher education. However, we recognize and respect the versatility of VA education benefits which allow beneficiaries the freedom to pursue a plethora of education and training opportunities, including apprenticeship programs.

Quality pre-apprenticeship programs can be a helpful steppingstone in accessing entry-level Registered Apprenticeship Programs (RAPs). This bill would allow VA education benefits to be used for pre-apprenticeship programs. While SVA is not opposed to this in principle, we have concerns about the legislation's current language. First, the bill's language appears to indirectly preclude approval of any pre-apprenticeship program governed by state standards.<sup>14</sup> Second, the bill provides just two primary requirements for program approval: that the curriculum be approved by a "sponsor" who certifies it will prepare participants for a RAP, and that the program comply with the sponsor's attendance and conduct policies. There are no limits on who can sponsor a pre-apprenticeship program or any requirement that the sponsor or its program curriculum be formally associated with or approved by a RAP. The bill's language allows "any...public, private, or nonprofit entity" to be a program sponsor subject to the Secretary's discretion.

SVA offers the following recommendations to help ensure only quality pre-apprenticeship programs receive approval for VA education benefits:

- Require program compliance with state pre-apprenticeship standards where applicable
- Add additional approval criteria to ensure participants get a reasonable return on their investment such as:
  - Certification that a program trains to industry standards and is approved by a RAP
  - A requirement that programs provide hands-on learning opportunities
  - A requirement that programs provide the opportunity to earn at least one industry-recognized credential

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<sup>13</sup> See generally *The Transition Assistance Program: Steps to Ensure Success for Servicemembers as they Enter Civilian Life: Hearing Before the H. Comm. on Veterans' Affairs, Subcomm. on Economic Opportunity*, 118<sup>th</sup> Cong., (May 17, 2023), available at <https://veterans.house.gov/calendar/eventsingle.aspx?EventID=6175>.

<sup>14</sup> The bill provides that "a pre-apprenticeship program may be covered...in the case of a program for which a State does not require any such standards..." and makes no additional reference to programs which are subject to state standards. Veterans' Entry to Apprenticeship Act, H.R. 3816, 118<sup>th</sup> Cong. § 2(a) (2023) (emphasis added).



- A requirement that programs offer opportunities for facilitated entry into a RAP through a formal agreement with at least one RAP<sup>15</sup>

SVA appreciates the intent of this bill and looks forward to working with members and staff to refine its language to ensure pre-apprenticeship program participants get the training they need and that sets them up for success in a RAP.

## Additional Legislation

SVA also supports the intent of the following legislation:

- H.R. 5190, Military Family Protection from Debt Act<sup>16</sup>
- H.R. 2830, Veteran Improvement Commercial Driver License Act of 2023<sup>17</sup>
- ANS to H.R. 3722, the Daniel J. Harvey, Jr. and Adam Lambert Improving Servicemember Transition to Reduce Veteran Suicide Act

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The continued success of veterans in higher education in the Post-9/11 era is no mistake or coincidence. In our Nation's history, educated veterans have always been the best of a generation and the key to solving our most complex challenges. Today's student veterans carry this legacy forward.

We thank the Chairman, Ranking Member, and the Subcommittee Members for your time, attention, and devotion to the cause of veterans in higher education. As always, we welcome your feedback and questions.

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<sup>15</sup> These recommendations are based on the elements of quality pre-apprenticeship programs as identified by the Department of Labor and the definition of pre-apprenticeship program under the Workforce Innovation and Opportunity Act. *Explore Pre-apprenticeship*, UNITED STATES DEPARTMENT OF LABOR, <https://www.apprenticeship.gov/employers/explore-pre-apprenticeship> (last accessed Oct. 5 2023); 20 C.F.R. § 681.480.

<sup>16</sup> This bill's language appears to unintentionally remove spouses from the relevant interest rate cap protection. SVA's support for this legislation is conditioned on our belief that this was unintentional and that it will be remedied.

<sup>17</sup> Since SVA's initial endorsement, we have learned that State Approving Agencies have multiple concerns with this bill's language. We strongly encourage the Subcommittee to reengage in stakeholder conversations with SAAs and VSOs so the bill's language can be appropriately refined.