



**STATEMENT FOR THE RECORD
SUBMITTED TO THE
HOUSE COMMITTEE ON VETERANS AFFAIRS
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
118TH CONGRESS, SECOND SESSION**

MARCH 20, 2023

Chairman Van Orden, Ranking Member Levin, and Members of the Subcommittee:

We thank you for the opportunity to share this statement for consideration during this hearing, which includes several notable bills addressing topics in higher education and veterans' education benefits. Veterans Education Success is a nonprofit organization with the mission of advancing higher education success for veterans, service members, and military families, and protecting the integrity and promise of the GI Bill and other federal education programs.

Draft Bill Addressing 38 U.S.C. § 3696

This bill proposes restoring veterans' eligibility for education benefits during any period in which an institution is found to have violated 38 U.S.C. § 3696, chiefly violations of advertising, sales, and enrollment practices. The bill would also mandate recoupment of those funds from the school, and adds an additional disapproval clause for schools which have not repaid benefits for periods of violation. We support this legislation, and believe it is long overdue. However, we believe this bill does not go far enough to ensure student veterans have the same rights as traditional students.¹

We note that the bill's language limiting restoration to periods "when the violation occurred" may not allow for the restoration of benefits in the most egregious circumstances, such as when a school lured veterans into the program with substantial misrepresentations and then ended the misconduct after getting caught by law enforcement.

Here are several examples that would not be covered by the draft legislation:

A few years ago, the U.S. Department of Justice (DOJ) seized the bank accounts of the House of Prayer Christian Church – a purported "bible school" that we exposed and

¹ The term "traditional students" indicates students who are ages 18-24 years old, and generally reliant on U.S. Department of Education Title IV grants or loans, or private funding, versus student veterans frequently use Title 38 education benefits as their primary source of education funding.

brought to VA's attention, as veterans were being blatantly cheated out of their GI Bill and abused by an alleged cult leader.^{2, 3}

In another example, the DOJ recouped more than \$150 million from Retail Ready Career Center and sent the owner, Jonathan Dean Davis, to jail for 19 years after he had swindled thousands of veterans, taking their GI Bill and their housing allowance but providing nothing of value in return.⁴ But when the federal government recovered \$150 million, the veterans did not get their GI Bill benefits back.

Consider another example where traditional students have been able to obtain financial relief, but student veterans have not. Students with federal student loans from ITT Technical Institute have had their loans discharged due to the evidence of widespread fraud uncovered by the U.S. Department of Education (ED).

However, veterans who used their GI Bill to attend ITT Technical Institute currently have no rights to restoration of their GI Bill in cases of fraud. It seems an absolute betrayal to student veterans that they cannot get back their GI Bill benefits when traditional students get their loans discharged under Title IV rules.

The idea that veterans are defrauded out of their hard-earned GI Bill is a blatant insult counter to Congress' vision for the impact of the GI Bill. Student loans are forgiven if fraud is evident, but student veterans have no parity with regard to their U.S. Department of Veterans Affairs (VA) education benefits.

As the Subcommittee is aware, there are now several bills on this topic. The veterans community has always valued that the hallmark of the House Veterans Affairs Committee is its longstanding commitment to bipartisan work to protect veterans.

We encourage the Subcommittee to start work now on a bipartisan, bicameral solution that the President will sign. A bipartisan bicameral solution should ensure that student veterans have no fewer rights than non-veterans already enjoy. We believe a bipartisan solution should include the following elements:

- Establish authority for the Secretary of VA to restore GI Bill students if an educational institution faces punitive action from a State approving agency or the Secretary at any time, including seizure of property, disapproval of receiving educational assistance, or a finding of violation of a law or regulation due to fraudulent behavior and the GI Bill students were affected by the institution's action that was the subject of the punitive action.

² *United States of America v. \$115,800.00 in U.S. Currency Funds*, available at <https://vetsedsuccess.org/us-attorney-action-against-house-of-prayer-bible-seminary-january-2023>.

³ Veterans Education Success, *Our Letter to VA and Georgia SAA Regarding House of Prayer Christian Church* (Aug. 2020), <https://vetsedsuccess.org/letter-to-va-and-georgia-saa-regarding-house-of-prayer-christian-church/>.

⁴ United States Attorney's Office, Northern District of Texas Press Release, *For-Profit Trade School Sentenced to Nearly 20 Years for Defrauding VA, Student Veterans* (Sept. 22, 2021), <https://www.justice.gov/usao-ndtx/pr/profit-trade-school-sentenced-nearly-20-years-defrauding-va-student-veterans>.

- Establish authority for the Secretary of VA to restore GI Bill students' eligibility when ED has made a determination that the educational institution engaged in fraud entitling federal loan borrowers to financial relief and the GI Bill students would have been eligible for such financial relief had the GI Bill students had federal student loans.
- Establish authority for the Secretary of VA to restore GI Bill students' eligibility if a court of competent jurisdiction has found a school guilty of, or liable for, fraudulent behavior and has ordered the educational institution to pay financial relief to a student and the GI Bill student is in the same position as the student receiving financial relief.
- Establish authority for the Secretary of VA to restore GI Bill students' eligibility in cases where a school is found to be in violation of VA rules pertaining to fraud or misrepresentation, such as 38 U.S.C. § 3696, and the GI Bill student was negatively affected by such violation.
- Establish authority for the Secretary of VA to recoup funds from schools related to the aforementioned scenarios, but as a separate process from the question of restoration of entitlement. In other words, VA's recoupment of funds should not be a determining factor in whether or not VA should restore GI Bill entitlement.
- Establish the retroactive application of restoration not limited to the date of enactment

We also would like to note for the Subcommittee's awareness that VA has a long history of not enforcing 3696, and encourage close oversight of VA's application of this statute, or any lack thereof.⁵ This further underscores the importance of considering additional elements for a more comprehensive restoration bill as outlined above.

We are eager to work with this Subcommittee to finally provide veterans with parity to their peers in higher education, and we thank the Subcommittee for the continued commitment to make these students whole.

Draft Bill Addressing Flight Training

This bill proposes amending 38 U.S.C. § 3313 to add subsection (m) to establish a maximum total cost ceiling of \$100,000 per beneficiary on flight training at public institutions in order to bring them in line with the cap on non-degree flight training programs at private institutions.

Presently, there is no tuition cap for flight training programs that are part of a program leading to a degree, other than the annual cap on funding for private schools.⁶ There is

⁵ Ochinko, Walter, "VA Still Not Enforcing 1974 Ban on Schools that Engage In Deceptive Advertising and Recruiting," Veterans Education Success, (Oct. 2019), https://vetsedsuccess.org/wp-content/uploads/2019/10/Vets_Ed_Success_IB_3696-1.pdf.

⁶ If a flight training program is part of a program leading to a degree at an institution of higher learning the payment amount is just a part of the general provisions for standard college degrees covered by 38 U.S.C. § 3313(c). The specific provision for payment amounts to a public institution is in 38 U.S.C. §

an annual cap at all types of institutions for flight training programs that do not lead to a degree.⁷ The bill would also establish annual percentage cost increases tied to the Consumer Price Index.

We believe this legislation would provide an important savings for VA and represents a reasonable cap in line with industry requirements. As one commercial pilot training school notes, “becoming a pilot doesn’t require an exorbitant amount of money,” and they estimate a total cost ranging from \$55,000 to \$100,000.⁸

The proposed cap of \$100,000, however, should not be limited to public institutions. Because the total amount of GI Bill benefits paid for flight training programs leading to a degree at non-public institutions can exceed \$100,000,⁹ the Subcommittee should apply the proposed maximum total cost to non-public institutions as well. The Subcommittee could accomplish this by amending subsection (c) rather than subsection (g)(3)(C).¹⁰

We have previously provided testimony about our concerns regarding the historical abuses of the GI Bill by flight schools. Former House Veterans Affairs Committee Chairman, Rep. Jeff Miller, even famously stated, “The GI Bill flight school loophole is so big you could fly a 747 through it.”^{11, 12} Veterans should have the opportunity to pursue their passion for flying without facing excessive costs from overpriced flight programs.

3313(c)(1)(A)(i) and it does not set a cap. If the degree is from a "non-public or foreign institution" the payment amount is covered in (c)(1)(A)(ii) which sets a cap at \$17,500 per academic year with an annual percentage increase mechanism. The cost for flight programs that do not lead to a degree is specifically covered in 38 U.S.C. § 3313(g)(3)(C). It provides a \$10,000 per year cap, with an annual percentage increase mechanism as tied to 38 U.S.C. § 3015(h), at all types of institutions for flight training that do not lead to a degree.

⁷ *Id.*

⁸ Pilot Institute, “How Much Does It Cost to Become a Pilot?,” (Feb. 26, 2023), <https://pilotinstitute.com/pilot-license-cost/>.

⁹ VA Increase in Maximum Tuition and Fee Amounts Payable Under the Post-9/11 GI Bill Notice, 88 Fed. Reg. 24665,24665–66 (published Apr. 21, 2023), available at <https://www.federalregister.gov/documents/2023/04/21/2023-08450/increase-in-maximum-tuition-and-fee-amounts-payable-under-the-post-911-gi-bill>. (“For the 2023-2024 academic year, the Post-9/11 GI Bill allows VA to pay the actual net cost of tuition and fees not to exceed the in-state amounts for students pursuing training at public schools; \$27,120.05 for students training at private and foreign schools....”).

¹⁰ Section 2(a) of the bill adds the caveat, “Subject to the limitation under subsection (m)” and amends subsection (g)(3)(C). However, flight training programs that do not lead to a degree -- regardless of the institution -- have an annual cap under (g)(3)(C). Rather than amending subsection (g)(3)(C), Section 2(a) of the bill should amend subsection (c) which provides the payment amounts for programs leading to a degree at both public and non-public institutions.

¹¹ Veterans Education Success, “LEGISLATIVE HEARING ON PENDING AND DRAFT LEGISLATION,” (Oct. 11, 2017), <https://vetsedsuccess.org/wp-content/uploads/2020/03/VES-SFR-HVAC-Flight-Training-Schools.pdf>.

¹² Harress, Christopher, “GI Bill Flight School Benefits Could Be Slashed By Congress Amid Tuition Loophole Controversy,” International Business Times, (Feb. 9, 2016), <https://www.ibtimes.com/gi-bill-flight-school-benefits-could-be-slashed-congress-amid-tuition-loophole-2294612>.

This Subcommittee has previously worked in a bipartisan fashion to rein in the expenses of private flight training. This bill aims to continue that effort, ensuring that veterans aren't unfairly burdened by inflated costs. We do not want to hinder veterans from pursuing their career goals; rather, we advocate for reasonable limits on costs, especially considering past abuses by certain flight programs that took advantage of loopholes.

We support this legislation, and thank the Subcommittee for its work to make opportunities for flight training available to veterans, while balancing the interests of taxpayers.

Draft Bill Addressing In-State Tuition for Montgomery GI Bill

This bill would make the in-state tuition rate apply to Chapter 1606 (Montgomery GI Bill – Select Reserve) as a precondition of a school's eligibility to receive Title 38 benefits. We have been long-time proponents of military-connected students' receiving the in-state tuition rate due to the inability of these students to "claim a home state" based on the transient nature of military duty. We support this legislation offering this common sense technical change.

Draft Bill Addressing Expansion of Work-Study Authorities

This bill aims to expand the scope of the VA Work-Study program by allowing veterans to engage in casework, policymaking, and oversight activities at specific congressional offices within the Department. For instance, veterans could assist in a Member of Congress's district office or gain valuable experience on Capitol Hill.

This legislation not only provides beneficial opportunities for veterans, but also contributes to better serving the American people. The need for such expansion is underscored by the minimal representation of veterans in Congress at the staff level, where less than 2% have military experience.¹³

The bill would create a pathway for veterans to offer constituent support and bring a unique perspective to legislative matters. Additionally, we acknowledge the importance and broad value of the VA Work-Study program, particularly for student veterans seeking to supplement their income while pursuing training and education goals.

We support extending the program's authorities to encompass various public service roles related to the federal legislative branch and endorse this legislation.

Draft Bill Addressing the Transition Assistance Program

For many veterans, they choose to enter higher education as their next step on their career pathway.¹⁴ This should be no surprise, given that a majority of veterans want to

¹³ Shane, Leo, "Veterans welcome? Less than 2 percent of Capitol Hill staffers have military experience," (Jan 10, 2019), <https://www.militarytimes.com/news/pentagon-congress/2019/01/10/veterans-welcome-less-than-2-percent-of-capitol-hill-staffers-have-military-experience/>.

¹⁴ Zoli, C., Maury, R. & Fay, D., "Missing Perspectives: Servicemembers' Transition from Service to

change career paths from the jobs they were assigned in the military, which is also consistent with the usage rates of the GI Bill.¹⁵

We applaud the Committee's proposal to improve outcomes associated with the Transition Assistance Program (TAP), and strongly encourage consideration of the elements we propose below that focus on the issue of higher education.

Section 2 of this draft legislation would add technical requirements associated with pre-separation counseling, and prevent the U.S. Department of Defense (DOD) from separating someone who has not received the proper counseling.

The bill proposes to mandate presentations by veterans service organizations (VSOs), "warm handoffs" to VA's Solid Start Program, and would also require VA to have the Member's contact information before separation. The bill would also mandate a partnership with the U.S. Department of Labor (DoL) and their Employment Navigator program, and establish a TAP pilot specific to military spouses.

Finally, the bill would require several annual reports to monitor progress associated with the proposed changes. We see all of these proposals as common sense improvements that would enhance outcomes for service members and their families as they go through the transition process.

Section 3 proposes a U.S. Government Accountability Office (GAO) study on the outcomes of DOD's SkillBridge program, and Section 4 proposes expansion of current job counseling and placement services. Section 5 would mandate integration of VA's Solid Start Program into the overall TAP curriculum, and Section 6 would establish a pilot for VA Patient Pre-Enrollment. We also support each of these sections and appreciate their thoughtful consideration of the complexities associated with TAP.

We have the following suggestions to improve the legislation:

1. Align TAP Materials to Reflect the Education Pathway as the Majority Pathway of Transitioning Service Members

We believe this legislation would be stronger if it incorporated additional measures bolstering a stronger focus on education within the overall TAP experience. In general, we find that discussion of higher education as a transition pathway is underemphasized in both the current TAP curriculum as well as the cultural focus of DOD.

Civilian Life - Data-Driven Research to Enact the Promise of the Post-9/11 GI Bill," Syracuse University Institute for Veterans and Military Families, (Nov. 2015).

<https://surface.syr.edu/cgi/viewcontent.cgi?article=1006&context=ivmf>.

¹⁵ Radford, A. W., Bailey, P., Bloomfield, A., Webster, B. H. Jr., & Park, H. C., "A first look at post-9/11 GI Bill-eligible enlisted veterans' outcomes." American Institutes for Research. (2024), <https://www.air.org/sites/default/files/2024-02/First-Look-Post-9-11-GI-Bill-Outcomes-Enlisted-Veterans-February-2024.pdf>.

The last significant improvements to TAP came in the Fiscal Year 2019 National Defense Authorization Act, in large part thanks to the leadership of this Subcommittee and its staff.¹⁶ That legislation established the mandate for DOD to create separate pathways based on a service member's background and interests. The legislation also established the various "tracks" of curriculum, including preparation for employment, education, vocational training, and entrepreneurship.¹⁷

However, most of the information and materials throughout the TAP process are focused on immediate employment.¹⁸ Unfortunately, this overemphasis on "the resume" and underemphasis on "college applications" neglects the fact that the majority of transitioning service members choose to go to school as their next immediate step after the military. We believe service members would be better positioned for success if discussion of higher education as a pathway was not limited to a two-day elective session.

Fortunately, for those who do self-select to participate in DOD's "2-Day Education Track: DOD Managing Your (MY) Education," there are many helpful resources. For example, when discussing the differences between using Tuition Assistance resources, and post-military resources such as the GI Bill, we strongly applaud that the curriculum states, "the institution that worked best for you while connected to the military may not be the best choice for you after transition."¹⁹

We acknowledge the reality that service members often prioritize flexibility over outcomes for Tuition Assistance classes due to the demanding nature of military service. However, we believe material like this is buried in the curriculum, and that the guide should include an executive summary highlighting the importance of being an informed consumer when approaching higher education.

The curriculum also lists several important factors to consider when selecting a school. The first factor, however, is "location" and the second and third factors, respectively, are "quality," and "student outcomes."²⁰ While location is a major driver, service members and veterans deserve to get the most out of their earned benefits.

We would recommend moving quality and student outcome up as the primary factors, as location will ultimately be a logistical consideration regardless of school choice and is no more important than other logistical considerations such as net cost (which is arguably, more important).

¹⁶ John S. McCain National Defense Authorization Act for Fiscal Year 2019, (P.L. 115-232), <https://www.congress.gov/115/statute/STATUTE-132/STATUTE-132-Pg1636.pdf>.

¹⁷ Defense Visual Information Distribution Service. "TAP CURRICULUM," (Oct. 2023), <https://www.dvidshub.net/publication/1235/dod-tap-curriculum>.

¹⁸ Aside from the topic of benefits, the "Pres-Separation Counseling Guide" addresses employment as 75% of the topics covered. <https://www.dvidshub.net/publication/issues/67710>.

¹⁹ Defense Visual Information Distribution Service. "2023 TAP Curriculum: Managing Your (MY) Education," (Oct. 2023), <https://www.dvidshub.net/publication/issues/65989>.

²⁰ *Id.*, pgs 58-59.

We also recommend adding the consideration of net cost, as there are some colleges that load up veterans with student loan debt in addition to taking their GI Bill, and many veterans complain to us that they were saddled with student loan debt they did not want or authorize.²¹

As the Subcommittee knows, the GI Bill covers the full cost of public universities and colleges, but not at some private colleges, especially for-profit programs. Sadly, too many veterans are not informed of this significant difference, which would likely change their college selection.

2. Share and Enhance Existing Resources to Help Transitioning Service Members Make Informed Decisions

Unfortunately, the stark reality is that service members and veterans are often targeted by predatory institutions for their lucrative education benefits. Other service members and veterans end up with loans for an education that was more expensive than they had understood and more costly than their GI Bill would cover.

To help service members make better informed decisions related to the use of their hard-earned GI Bill benefits, vital information, including the typical earnings of graduates from specific schools – and the accompanying potential risks of wasting their GI Bill benefits at subpar schools – and the realities of net prices of private colleges, must be shared. The current TAP education track curriculum contains some information about warning signs service members and veterans should pay attention to when choosing a college or university, but they are not enough.

One example is the “Know Before You Go” campaign by VA.²² While this video is shared during VA’s portion of TAP, we believe this resource should be shared sooner and more regularly throughout the military lifecycle to educate service members on what to look for when choosing a school.

Additionally, the USAA Educational Foundation created an unbranded video, available for use by any government agency, and could be included in the TAP curriculum.²³ The video explains how veterans can avoid known efforts to defraud students and is an example of a resource that is already available from a reliable source.²⁴

The Subcommittee should also prioritize educating service members and veterans about student loan debt and should also introduce legislation to rename the “Master Promissory Note” as “Student Loan Agreement.” Too many military-connected students

²¹ Veterans Education Success, “Veterans With Student Loans They Never Wanted or Authorized,” (Oct. 2022), https://vetsedsuccess.org/wp-content/uploads/2022/03/VES-REPORT-Veterans-with-Student-Loans-They-Never-Authorized-or-Wanted_03-3.pdf.

²² U.S. Department of Veterans Affairs, “Know Before You Go,” (Nov. 2, 2015), <https://www.youtube.com/watch?v=Z1ttkv9oR14>.

²³ Awareness Video, (2020), <https://vimeo.com/370920512>.

²⁴ The Department of Defense Office of Financial Readiness has used other USAA Educational Foundation resources on its site <https://finred.usalearning.gov/>.

wind up with student loans they didn't understand or need.²⁵ Additional loan debt education should incorporate awareness of the Consumer Financial Protection Bureau's "Paying for College" tool.²⁶

It is imperative that the trainers and instructors leading TAP classes provide transitioning veterans with neutral, objective information, and with no vested interest in where the service members choose to pursue higher education. For example, some non-profit organizations sponsored by or representing for-profit colleges are reportedly trying to secure roles leading TAP classes with the goal of pushing veterans to use their benefits at these schools.

Having neutral advisors ensures the advice is focused on what is in the best interest of the student. Only government representatives or veterans service organizations taking no funding from colleges should lead these classes.

Furthermore, much-needed improvements to the GI Bill Comparison Tool would provide valuable information for transitioning service members and improve their ability to make informed decisions related to their education. The following recommendations would provide significant improvements to the GI Bill Comparison Tool, and make it a more effective tool for service members as they transition:

- Enable searches by major or degree sought by geographic area. The Comparison Tool is decidedly not user-friendly or modern.
- Provide student outcome metrics from ED, especially graduates' earnings (as reported by the IRS to ED) and the comparison of an institution's tuition and graduation rates to the national medians for that type of school (e.g., 2-year vs. 4-year), as well as student loan debt levels and default rates. This information is readily available at ED and could be accomplished simply by pulling data from ED's College Navigator and College Scorecard.^{27, 28, 29}
- Establish a "Risk Index" to enable veterans to be aware of the riskiest schools.

²⁵ U.S. Department of Education Office of Federal Student Aid. "Master Promissory Note (MPN)," <https://studentaid.gov/mpn/>.

²⁶ Consumer Financial Protection Bureau. "Paying for College," <https://www.consumerfinance.gov/paying-for-college/>.

²⁷ 38 U.S.C. 3698 requires VA to maintain various metrics on the GI Bill Comparison tool, such as (i) its public, private nonprofit, or proprietary for-profit status; (ii) the accrediting agency's name and contact details for student complaints; (iii) details on the State approving agency and its complaint contact information; (iv) participation in title IV programs under the Higher Education Act; (v) tuition and fees; (vi) median federal student loan debt upon program completion; (vii) cohort default rate; (viii) total enrollment, graduation rate, and retention rate; (ix) provision of technical, academic, and other support services; (x) policies on credit transfer from other institutions; (xi) administration of priority enrollment for student veterans; (xii) requirements for covered individuals under section 3679(e)(4); (xiii) affiliation with a religion and its denomination; (xiv) designation as a minority serving institution by the Secretary of Education or federal agency; and (xv) whether the institution is gender-specific.

²⁸ U.S. Department of Education, College Navigator, <https://nces.ed.gov/collegenavigator/>.

²⁹ U.S. Department of Education, College Scorecard, <https://collegescorecard.ed.gov/>.

- Improve “Caution Flags” by posting these warnings in a timely manner so that prospective students have the information as soon as possible. Currently, VA fails to update and accurately maintain Caution Flags.
- Display student veteran complaints in a timely manner, as it can sometimes take several months, even after the complaint is closed, for complaint information to show up in the Comparison Tool.
- Show all student complaints received about a school on the Comparison Tool. In 2019, reportedly at the behest of for-profit college lobbyists, VBA adopted a policy to show only the complaints received in the most recent 24 months. This is not a veteran-centric policy and clearly benefits schools with a history of complaints. This is especially true in comparison to how the Federal Trade Commission (FTC) and Consumer Financial Protection Bureau (CFPB) operate, with the goal of not limiting consumer information available to individuals. The Comparison Tool should show the full history of complaints. The history, volume, and nature of complaints is relevant information, and veterans should be allowed to decide for themselves whether a school’s history of complaints matters in their decision making. SAAs, accreditors, other federal agencies, and academic researchers also would benefit from knowing a school’s history of student complaints.
- Include whether the school responded to a complaint and whether the complaint was resolved to the satisfaction of the veteran, as is the practice of the Better Business Bureau and the CFPB.^{30, 31} It is important for student veterans to know whether a school failed to respond to other student veterans’ complaints received through the Feedback Tool. Disclosing information about school response rates and student satisfaction with the schools’ responses adds context to complaints and helps students make informed choices.
- Maintain information about schools that close and/or lose GI Bill approval on the historical data section (“data download”) of the Comparison Tool for reference and research. For instance, student veterans who may be entitled to restoration of their GI Bill when a school closes or a program loses approval have difficulty locating information about their school when it disappears from WEAMS and the historical data section (“data download”) of the Comparison Tool.
- Allow student veterans who submit a complaint in the Feedback Tool to upload attachments and have the option to make the narrative portion of their complaint public on the Comparison Tool.
- Automate the ED/VA data-crosswalk as it is labor intensive for VA employees to update it manually and they fail to do so. This is a simple process of aligning VA’s facility codes with ED’s OPEID numbers for each school, but it is an essential alignment.

³⁰ Better Business Bureau, “Complaints,” (accessed Mar. 14, 2024), <https://www.bbb.org/process-of-complaints-and-reviews/complaints>.

³¹ Consumer Financial Protection Bureau, “Consumer Complaint Database,” (accessed Mar. 14, 2024), <https://www.consumerfinance.gov/data-research/consumer-complaints/>.

The GI Bill Comparison Tool is an important resource that is already included in TAP, and making it reliable and comprehensive is vital to veterans' long-term success. We also note that military-connected students are understandably angry when they learn that a school that cheated them is one the government already knew about.

Schools under law enforcement action have no place on military bases or receiving the government's stamp of approval for the GI Bill. This is something the nation's leading veterans and military service organizations called for in 2016 and 2019, as did VA's Inspector General.^{32, 33, 34}

- **Provide service members with high quality counseling.** Many of the Armed Services are not hiring qualified counselors. Without the appropriate guidance, service members will continue to elect easier, low-quality programs at unacceptable rates and pseudo-counselors are subject to the bias of industry and the entity that trains them/hires them. DOD should require all counselors to meet OMB standards for grade GS-1740-09, Guidance Counselors.
- **Restrict base access for colleges that pose a significant risk** to service members, especially after the recent loss of the 20-student rule for base access. DOD's MOU with schools has proved insufficient; the Navy eliminated all base education offices; and the Army has insufficient resources to monitor bases. It is also a security risk. Job fairs and education fairs are dominated by predatory colleges with outsized military marketing efforts and poor educational outcomes. Whistleblowers tell us that representatives from these schools are on base, giving presentations to entire units during *mandatory* duty hours. DOD has significant leeway in statute to oversee bases and voluntary education programs. DOD should immediately ban from military installations any college that has been the subject of federal, state, or local law enforcement action or punitive regulatory action within the past 5 years.

3. Implement a Way for Stakeholders to Provide Timely Feedback

Many changes have been made to TAP over the past few years and veteran groups such as Veterans Education Success have received useful feedback from participants. Efforts to share this feedback and make recommendations about improving the program, however, have been stifled by the absence of an efficient and timely way to do so.

³² Veterans Education Success. "Twenty Three Veterans and Military Organizations Ask VA for Better Oversight of the GI Bill," (May 16, 2016), <https://vetsedsuccess.org/twenty-three-veterans-and-military-organizations-ask-va-for-better-oversight-of-the-gi-bill/>.

³³ Veterans Education Success. "36 Veteran and Military Organizations Ask VA for Better Oversight of GI Bill Colleges," (Feb. 14, 2019), <https://vetsedsuccess.org/36-veteran-and-military-organizations-ask-va-for-better-oversight-of-gi-bill-colleges/>.

³⁴ U.S. Department of Veterans' Affairs Office of Inspector General. "VA's Oversight of State Approving Agency Program Monitoring for Post-9/11 GI Bill Students," (Dec. 3, 2018), <https://www.oversight.gov/sites/default/files/oig-reports/VAOIG-16-00862-179.pdf>.

DOD's Transition to Veterans Program Office Curriculum Program Manager directs stakeholders to provide their feedback and recommendations for improvement to the DoL Advisory Committee on Veterans Employment, Training, and Employer Outreach (ACVETEO). ACVETEO publishes recommendations only once a year in their annual report. The annual report is addressed to the Secretary of Labor who then would be required to share salient points with DOD.

By the time feedback and recommendations reach the relevant staff member within DOD who can make improvements, over a year of time will have passed and a great deal of relevant information likely will have been lost along the way. Stakeholders have been told by DOD that because the GI Bill program is managed by VA, VA has input into what is included in the TAP curriculum. Similarly, however, there is no efficient way for stakeholders to make recommendations and ensure they will be considered by the TAP curriculum program managers. This is not an efficient or timely means to address needed improvements.

Veterans, service members and stakeholders should have a more efficient way to keep the TAP program as current, relevant and useful as possible through timely feedback and recommendations.

Conclusion

Veterans Education Success sincerely appreciates the opportunity to express our views before this Committee. As the higher education industry continues to evolve in these very dynamic times, we emphasize the importance of maintaining high standards of quality. Student veterans, taxpayers, and Congress must expect the best outcomes from the use of hard-earned GI Bill benefits. We look forward to the discussion and review of these proposals, and we are grateful for the continued opportunities to collaborate on these topics.

Information Required by Rule XI2(g)(4) of the House of Representatives

Pursuant to Rule XI2(g)(4) of the House of Representatives, Veterans Education Success has not received any federal grants in Fiscal Year 2023, nor has it received any federal grants in the two previous Fiscal Years.