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**NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS**

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STATEMENT FOR THE RECORD  
DR. JAN DEL SIGNORE, LEGISLATIVE DIRECTOR  
NATIONAL ASSOCIATION OF VETERANS' PROGRAM ADMINISTRATORS  
TO THE  
UNITED STATES HOUSE COMMITTEE ON VETERANS' AFFAIR  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY  
LEGISLATIVE HEARING  
MARCH 11, 2025

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

Thank you for the opportunity to provide a statement for the record on matters that affect student veterans using their GI Bill® at this hearing on pending legislation. Consequences of previous legislation and VA interpretation have caused negative impact on student veterans. The National Association of Veterans Program Administrators (NAVPA) very much appreciates the opportunity to share our members' real live boots on the ground experiences of these issues.

NAVPA is a 501(c)(3) not-for-profit corporation who supports military connected education nationwide. NAVPA's membership includes over 400 public and private colleges and universities across the country that represent over 530,000 student veterans. Most of our membership is comprised of School Certifying Officials (SCOs) and school administrators who administer or oversee GI Bill® benefits for our student veterans. NAVPA has served as the voice of advocacy for veterans in higher education

since its founding in 1975. Our research, training, and policy initiatives have developed programs and support services to ensure veterans achieve their academic and professional goals. We appreciate the opportunity to share insight into the pending legislation topics that pertain to the Institutions of Higher Learning (IHLs) and how previous outcomes have affected our military connected students and veterans.

NAVPA would like to address the following topics:

- *H.R. 1527 Reforming Education for Veterans Act*
- *Veterans Readiness and Employment Transparency Act of 2025*
- *H.R. 1423 GI Bill® Parity Act*

The *H.R. 1527 Reforming Education for Veterans Act* identifies three separate issues. Section 2, *Absence From Certain Education Due To Certain Service*, addresses *P.L. 117-328 Consolidated Appropriations Act 2023, Section 216*. This law does not reinstate the student veterans' GI Bill® benefits if they are activated while in school. Mandating the institution to return all funds for services already rendered is a disservice to the institutional operations and students. Schools that serve active duty students must have a signed Department of Defense Memorandum of Understanding (DODMOU) where schools are required to follow the DOD directive of returning funds. Schools are required to return any unearned Federal Tuition Assistance (FTA) funds on a proportional basis through at least the 60 percent portion of the period for which the funds were provided.

Currently, schools are required to follow guidance from the Department of Education (ED) and the DOD in how to administer to students when or if they are activated while attending the institution. The ED currently has an outline under *section 484C of the Higher Education Act of 1965* for Institutional Readmission Requirements of Servicemembers and the Department of Defense Instruction, DODi1322.25 provides guidance that schools must adhere to. Additional information can be found in CFR 34, § 668.18 *Readmission requirements for servicemembers* which was codified under [20 United States Code \(U.S.C.\) Section 1091c](#).

Mandating that students receive an "Incomplete" grade removes the academic freedom of the faculty and the servicemember as the student may decide an "Incomplete" grade

is not in their best interest while they serve their country. Oftentimes, students that withdraw for military duty are focused on their mission and will retake the class upon their return to school as these deployments can be long lasting of 6-months to one year depending upon the mission. While NAVPA appreciates the language in H.R. 1527 to correct this disservice for students who are activated, we recommend a change in language to this Bill to reflect current procedures followed by the ED and the DOD for when servicemembers must withdraw or take a leave of absence to perform military duty in what is in the best academic interest of the military member.

NAVPA recognizes and understands the important role that Congress and the VA play in the oversight of veterans' educational benefits and thanks the Subcommittee on hearing real world outcomes from P.L. 117-333, *Veterans Auto and Education Improvement Act of 2022*, which added a time restraint upon the SCO to prepare for a VA Compliance Survey within a 10-business day notice period. Schools administering GI Bill® benefits want to do so correctly and efficiently while serving our student veterans.

The Compliance Survey change currently limits institutions to less than 10 business days to prepare for a review once notification is received. For large accredited IHL schools with massive quantities of information to organize and gather, this is not enough time. NAVPA members are reporting they must work with different departments across the campus to obtain the requested information that normally takes longer than the allotted time given by the VA.

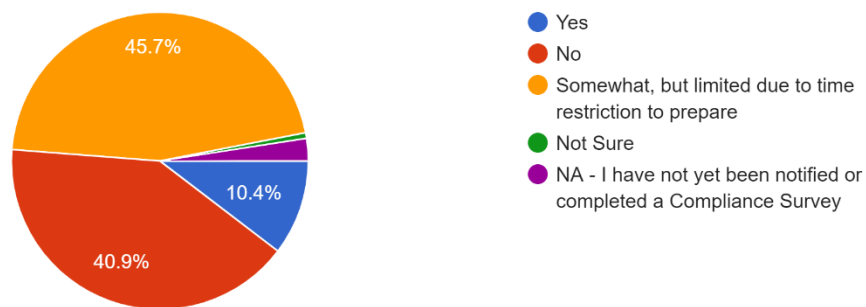
For smaller schools, the SCO is wearing a multitude of hats in addition to the many SCO responsibilities and struggles to provide this information accurately within the deadline. With this new limited time allotment, SCOs have reported working nonstop and overtime throughout the weekends to prepare for these site visits. Student veterans have limited to no access to their SCOs or administrative offices during the time SCOs are preparing for the compliance surveys.

NAVPA recently conducted a survey of our members and over 40% of the schools surveyed reported they had received fewer than the full 10 business days to prepare for

a VA Compliance Survey. Over 85% of participants responded they had limited or no time to serve their student veteran population during the preparation and survey.

5. Did you have sufficient time to prepare for the VA Compliance Survey and still meet your daily operational requirements as a School Certifying Official (SCO)?

164 responses



NAVPA members are reporting that there is not enough time to prepare for a VA Compliance Survey. Many schools are not receiving a reasonable amount of notification (current legislation is maximum of 10-business days) to prepare, organize, and upload the amount of documentation required. SCOs are working from the time they receive notification until the day of the site visit to gather the substantial amount of required documentation for the VA Compliance Survey, regardless of federal holidays, weekends, school mandated events, or personal life events. Recently, one school reported they were notified on the Thursday prior to Memorial Day for a Compliance Survey at their institution for the following Wednesday. That was a 3-business day notification over a federal holiday when the school was closed.

Centralized schools are reporting that they are being notified for different Compliance Survey locations on the same day. And once schools are notified, there is no flexibility in changing the deadline once the notification has been sent. Centralized schools usually have one SCO or perhaps more than one administering the GI Bill® benefit on behalf of their student veterans.

These centralized schools are categorized as one institution under the ED, their accreditors, has one governing body, one catalog and/or bulletin, and one team of SCOs performing all GI Bill® certification functions, but these surveys often overlap with

creating triple duty or more for the SCO at times. Having a multitude of Compliance Surveys on-going for the same school but at various locations places undue hardship on the institution and their student veterans taking the SCO away from serving their student veteran population.

Many SCOs are veterans themselves and are reporting they receive notification for a VA Compliance Survey during the same timeframe they have an appointment at the VA hospital. When the VA reviewer is told that there is a conflict, the reviewer cannot change the date as it is written in law that the institution cannot have more than a 10 day notice. There is no flexibility for extenuating life circumstances. This lack of flexibility is impacting veterans mental, physical, and social well-being. Other members have reported receiving their VA Compliance Survey notice during graduation, spring semester start week, over the Christmas holidays when the campus is closed, while on FMLA, and during freshman orientation and drop/add week taking the SCO away from their daily operations or a personal life event to host a visit from a VA representative. Per the SCO Handbook, student veterans receive consideration for what is known as *“Mitigating Circumstances” where there are circumstances beyond the student’s control that prevent the student from continuing in school or that cause the student to reduce credits.* However, the SCO receives no consideration for being a human being nor has any flexibility even with valid reasons as to why a site visit should be rescheduled or given an extension to a later date. Flexibility should be granted and considered for valid extensions such as: federal holidays, school closures, FMLA, or even natural disasters. A NAVPA member reported having a VA Compliance Survey conducted the day prior to Hurricane Helene hitting their school limiting their time to prepare for this natural disaster.

NAVPA is very appreciative of Section 3 in H.R. 1527, *Department Of Veterans Affairs Compliance Surveys*, as it shows Congress is listening to the struggles placed upon their constituents by this time limitation. NAVPA recommends adding the language of **“NO LESS THAN”** be adopted to the current language, recommend 15 business days, and to have VA recognize institutions as a singular school as does ED and not have duplicity. In addition, NAVPA recommends adding flexibility to accommodate real world

FMLA events, federal holidays, school closures and/or events, and a natural disaster stipulation.

NAVPA recognizes that there are organizations who have never worked in higher education and do not understand what or how a VA Compliance Survey is conducted but do have extraordinarily strong opinions and assumptions about how and why these reviews *should* be conducted. These organizations have never experienced the pleasure of participating in or the amount of work that is involved in preparing for these visits so have no real concept or data to provide the negative impact of this time limitation. These organizations do not fully understand the safety protocols that were put in place by Congress with P.L. 116-315, Sections 1010, 1012, & 1013 and P.L 115-48, Section 310, to safeguard student veterans from predatory practices. These laws require both students and schools to confirm and certify students are attending courses while sections 1012, 1013 and 310 reinforced oversights of institutions to ensure quality education is being delivered by implementing the Risk-Based reviews by the State Approving Agency (SAA).

NAVPA supports Section 4 of H.R. 1527, *Notification Of School Certifying Officials Of Handbook Updates*, as SCOs need to be aware of changes implemented by the VA to stay in compliance with all federal regulations and guidance. Schools want to serve their students in the most effective way and need to have stronger communication and support from the VA. NAVPA supports *H.R. 1527 Reforming Education for Veterans Act* with the recommended modifications.

NAVPA recently testified in December 2024 on the *Effectiveness of the Veterans Readiness and Employment (VR&E) Program* with real world examples and experiences. NAVPA supports the *Veterans Readiness and Employment Transparency Act of 2025* to better serve our disabled student veteran population. Having a dedicated phone line for VR&E questions would greatly help our student veterans and SCOs when dealing with an absent/non-responsive VR&E counselor.

NAVPA supports *H.R. 1423 GI Bill® Parity Act* as we oftentimes see our National Guard and Reserve students being called up to support state and national emergencies. Our students' service should count towards their overall service to the country as it requires

sacrifice to help others. As recently as wildfires, several hurricane recoveries, or deployments have kept our students busy wearing the uniform and completing their mission to serve. A day activated in service full-time either under Title 32 or Title 10 should count towards eligibility for Chapter 33, Post 9/11 GI Bill® benefits.

In conclusion, NAVPA is committed to serving our student veterans and providing quality services to our nation's heroes and we thank the Committee for giving us this opportunity to share the insights into how previous laws have had unintended consequences on the student veteran and those institutions who serve them. We hope that by sharing the impact of this prior legislation, there can be productive discussion on how to best move forward in supporting the student veteran population considering these undue hardships. NAVPA is willing to assist in finding a solution.

Thank you for the opportunity to provide this statement for the record.