



**OFFICIAL STATEMENT OF  
MATTHEW L. SCHWARTZMAN**

**FOR THE  
U.S. HOUSE COMMITTEE ON VETERANS' AFFAIRS  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY**

**ON  
PENDING LEGISLATION**

**JUNE 11, 2025**

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The Reserve Officers Association of the United States, now doing business as the Reserve Organization of America, is a military service organization incorporated under Internal Revenue Service Code section 501(c)(19), and comprising all ranks of servicemembers, veterans, and family members of our nation's eight uniformed services separated under honorable conditions. ROA is the only national military service organization that solely and exclusively supports the reserve components.

ROA was founded in 1922 by General of the Armies John "Black Jack" Pershing, during the drastic reductions of the Army after World War I. It was formed to support a strong national defense and focused on the establishment of a corps of reserve officers who would be the heart of a military expansion in the event of war. Under ROA's 1950 congressional charter, our purpose is unchanged: To promote the development and execution of policies that will provide adequate national defense. We do so by developing and offering expertise on the use and resourcing of America's reserve components.

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## **DISCLOSURE OF FEDERAL GRANTS OR CONTRACTS**

The Reserve Officers Association of the United States, now doing business as the Reserve Organization of America, has not received any grants, contracts, or subcontracts from the federal government in the past three years.

## **CURRICULUM VITAE**

Matthew Schwartzman serves as the Director, Legislation and Military Policy, for ROA. Responsible for ROA's government relations program, Matthew has more than seven years of experience in government affairs. In his more than five years working in the military and veterans' policy sector, Matthew has testified before Congress, analyzed more than 300 public policy proposals, cultivated relationships with mission partners in a non-partisan manner, planned events with more than 100 attendees, and presented briefings before crowds exceeding 500 people.

Matthew is also the Secretary, Board of Directors, for The Military Coalition, representing, on select issues, including Guard and Reserve GI Bill parity, a consortium of more than 30 military and veterans service organizations with approximately 5.5 million members collectively.

# SHORTENED STATEMENT

## INTRODUCTION

Chairman Van Orden, Ranking Member Pappas, and distinguished members of the House Veterans' Affairs Subcommittee on Economic Opportunity, on behalf of the Reserve Organization of America, the only national military organization that solely and exclusively supports the Reserve and National Guard, *thank you* for the invitation to testify on pending legislation, particularly H.R.3887, the *Enhancing the Transitioning Servicemember's Experience (ETS) Act*.

## H.R. 3387, ENHANCING THE TRANSITIONING SERVICEMEMBER'S EXPERIENCE ACT

ROA commends Chairman Van Orden for championing H.R. 3387 and making critical improvements to TAP reform efforts.

ROA supports the bill's overarching goals and most provisions as written, while offering several recommendations to strengthen its impact—particularly for members of the reserve components.





### Sec. 2(a) – Special Operations Forces (SOF) Inclusion

ROA supports the aim of explicitly including SOF in TAP but questions the necessity, as GAO findings show SOF outperforming non-SOF in TAP participation. ROA recommends adding Warrior Care Program information to the preseparation counseling checklist.

### Sec. 2(b) – Preseparation Counseling Requirements

ROA supports flexible counseling based on servicemembers' circumstances. Current language may unintentionally subject reservists with ongoing civilian careers to five-day counseling. ROA recommends amending the language to also apply the three-day requirement to members already in full-time civilian employment.

ROA further urges inclusion of reservist-relevant content:

-  Retired recall authorities
-  Use of service records for benefit access
-  Documenting health/duty status
-  Reserve retirement point systems

### Sec. 2(c) – Prohibition on Retention Officials as Counselors

ROA recommends clarifying “individual responsible for retention” to ensure counselors can still provide guidance on reserve affiliation.

#### Sec. 2(d) – Start TAP at 540 Days Pre-Separation

ROA supports this expansion but emphasizes that mission tempo, deployments, and limited commander support remain barriers to timely TAP initiation.

#### SEC. 2(e) – RESERVE WAIVERS FOR RECENT TAP ATTENDANCE

ROA supports allowing Guard and Reserve members to waive TAP if taken in the last three years without content changes.

#### SEC. 2(f–h, k) – PARTICIPATION FLEXIBILITY, SPOUSE INCLUSION, AND DOCUMENTATION

ROA supports:

- ✚ Allowing TAP access for reenlisting members (Sec. 2(f))
- ✚ Repeat counseling on a space-available basis (Sec. 2(g))
- ✚ Spouse integration (Sec. 2(h))
- ✚ Documentation of pathway assignments (Sec. 2(k))

#### SEC. 2(i) – FINANCIAL COUNSELING

ROA supports one-on-one counseling but cautions that the term “significant experience” lacks clarity and that overly rigid requirements could strain limited counseling resources. Use flexible definitions similar to Sec. 2(l)’s “at risk” language.

#### SEC. 2(j) – STANDARDIZED PATHWAYS, INCLUDING RESERVE COMPONENT PATHWAY

ROA supports standardization but seeks clarity on potential centralization under OSD. While disparities across services exist, including in waiver rates for TAP tracks, a fully centralized authority may be premature. ROA supports the VFW’s proposed Under Secretary of Defense for Transition as a concept worth further exploration.

#### SEC. 2(l) – INTERAGENCY COORDINATION AND AT-RISK OUTREACH

ROA supports targeted outreach but recommends clarifying goals of engagement. Programs like VA’s Solid Start could serve as a model.

#### SEC. 2(m–n) – CONTRACTING AND AUDITS

ROA supports standardized contracting but recommends a pilot program and minimum provider qualifications. ROA also supports unannounced audits and proposes clear audit metrics such as quality of content and counselor qualifications.

#### SEC. 2(o) – STATE AGENCY INFORMATION SHARING

ROA supports. Food insecurity remains a serious concern for reserve families, with up to 41% of junior-enlisted spouses experiencing it. SNAP eligibility information is a practical inclusion.

#### SEC. 2(p) – SPOUSE TAP PILOT PROGRAM

ROA believes spouses benefit more from integrated TAP participation (Sec. 2(h)) rather than separate programs.

#### SEC. 2(q) – REPORTING AND TRACKING

ROA supports improved TAP transparency and curriculum updates. However, ROA strongly urges development of a reserve-specific TAP curriculum, consistent with prior RAND recommendations. ROA proposes detailed legislative language to mandate a tailored curriculum addressing reserve component employment, benefits, and retirement.

#### SEC. 3 – EXTENDED TRANSITIONAL HEALTH CARE (270 DAYS)

ROA supports.

#### SEC. 4 – SKILLBRIDGE GAO STUDY

ROA supports further review but cautions against redundancy with recent GAO findings under FY24 NDAA. Standardization should be balanced with service-level flexibility.

#### SEC. 5 – VA TRANSITION PROGRAM WEBSITE

ROA supports but seeks clarity on inclusion of community-based or non-accredited programs.

#### SEC. 6 – JOB COUNSELING ELIGIBILITY EXPANSION

ROA supports expanding eligibility for VA job services to TAP-eligible servicemembers.

#### SEC. 7 – SOLID START PROGRAM INTEGRATION

ROA supports the provision to link TAP and Solid Start, consistent with H.R. 3386. ROA urges secure implementation to prevent fraud, as military-related scams accounted for over \$350 million in losses in 2023.

#### Additional recommendation: expand TAP eligibility

ROA urges Congress to fix the 180-day continuous active-duty threshold that disqualifies many reservists from TAP. ROA recommends amending eligibility to include 180 cumulative days of active service, including training and drill periods. This modest reform would recognize the totality of reservists' service.

## **H.R. 3386, STREAMLINING THE SOLID START COMMUNICATIONS ACT**

This bill modernizes VA communication by authorizing outreach through text messaging, online chat, and other digital means—aligning with how most veterans, especially younger ones, prefer to receive information.

ROA thanks Chairman Van Orden for this commonsense legislation and urges swift passage. However, expanded outreach must include strong safeguards against fraud. Imposter scams now account for up to 40% of fraud reports from military personnel, with veterans losing an estimated \$350 million in 2023 alone.

Without proper verification protocols, digital outreach could unintentionally expose veterans to predatory scams, weakening trust in legitimate VA communications. This is especially risky for newly separated servicemembers in the vulnerable transition period.

ROA urges the VA to adopt robust authentication procedures for all veteran-facing communications to maintain trust and protect against fraud.

## **H.R. 1965, VETERANS EDUCATIONAL ASSISTANCE ADJUSTMENT ACT**

This bill increases the annual Post-9/11 GI Bill stipend for books and supplies from \$1,000 to \$1,400 and ties future increases to the Consumer Price Index (CPI).

The stipend has not changed since 2009, despite textbook prices rising more than 1,000% since the late 1970s. Students consistently report that textbook costs contribute to course failure.

Reserve component students are often older, supporting families, and attending school part-time while balancing military and civilian jobs. For these citizen-warriors, every dollar counts. Updating and indexing the stipend will ease financial strain and improve educational outcomes.

ROA strongly supports this update and thanks Rep. Gabe Vasquez for sponsoring the bill.

## **H.R. 2720, GOLD STAR FAMILIES EDUCATIONAL PARITY ACT**

This bill sunsets the Chapter 35 DEA program by August 2029 and transfers eligible survivors and dependents to the more robust Post-9/11 GI Bill (Chapter 33), regardless of prior election.

ROA supports this move toward parity. However, we stress that full GI Bill parity for Reserve and National Guard members remains ROA's top education priority. As such, we reaffirm support for H.R. 1423/S.649, the Guard and Reserve GI Bill Parity Act of 2025.

## **H.R. 3619, PATRIOTS OVER POLITICS ACT**

ROA, the only national military association to advocate for full reinstatement and back pay for affected servicemembers, would support this bill if narrowed to apply only to those who are reinstated. Benefit eligibility should follow reinstatement, not separation alone.

## **CONCLUSION**

ROA strongly supports H.R. 3387 and commends Chairman Van Orden for advancing meaningful, long-overdue reforms to TAP. This bill makes critical progress toward ensuring that all servicemembers, particularly those in the reserve components, receive timely, relevant, and accessible transition support. We appreciate the bill's emphasis on flexibility, interagency coordination, expanded eligibility, and spouse inclusion.

ROA urges the Subcommittee to adopt the recommendations outlined in this statement to further strengthen the bill's effectiveness.

ROA also supports H.R. 3386, H.R. 1965, and H.R. 2720, each of which complements the goals of H.R. 3387 by improving communication with transitioning veterans, updating outdated GI Bill benefits to reflect rising education costs, and consolidating educational assistance programs for survivors and dependents.

At the same time, we reaffirm that securing full GI Bill parity for Reserve and National Guard servicemembers remains ROA's top legislative priority in the education space. We continue to advocate for swift passage of H.R. 1423 and S. 649 to achieve this goal.

Finally, ROA appreciates the intent of H.R. 3619 but recommends limiting eligibility to servicemembers who are reinstated after being separated solely for noncompliance with the COVID-19 vaccine mandate. Restoring benefits should go hand in hand with restoring status.

Together, these legislative proposals represent a comprehensive and thoughtful effort to improve the transition experience for all who serve. ROA stands ready to support you in enacting these reforms and ensuring their successful implementation.



# **Full Statement**

## INTRODUCTION

Chairman Van Orden, Ranking Member Pappas, and distinguished members of the House Veterans' Affairs Subcommittee on Economic Opportunity, on behalf of the Reserve Organization of America, the only national military organization that solely and exclusively supports the Reserve and National Guard, *thank you* for the invitation to testify on pending legislation, particularly H.R.3887, the *Enhancing the Transitioning Servicemember's Experience (ETS) Act*.

ROA stands ready to provide technical assistance and subject-matter expertise on most of the bills under consideration for this hearing.

In fact, many of ROA's positions are detailed in a complementary Statement for the Record (SFR), authored by ROA policy fellows Jake Fales and Hannah Miller.

This SFR, however, is *laser-focused* on the issues to which ROA is devoting its highest level of engagement. These issues are supported by a formal ROA resolution or are directly aligned with our congressional charter, which will mark its seventy-fifth anniversary on June 30.

## H.R. 3387, ENHANCING THE TRANSITIONING SERVICEMEMBER'S EXPERIENCE ACT

**Supported by Resolution No. 23-15**

ROA thanks Chairman Van Orden for sponsoring this important legislation, which stands as the flagship effort to reform the Transition Assistance Program (TAP). We also commend the Chairman for making critical improvements to this version of the bill compared to the one introduced in the previous Congress.

ROA continues to support the overall goals of the bill and, as currently written, endorses many of its provisions. Additionally, ROA offers proposed amendments and suggested legislative language to strengthen the bill.

What follows is a section-by-section summary and assessment of the bill.

### SEC. 2(a) SPECIAL OPERATIONS FORCES

This section explicitly codifies the inclusion of Special Operations Forces (SOF) in TAP.

ROA supports efforts to ensure SOF servicemembers are not overlooked during the transition process, particularly given the substantial growth in SOF end strength over the past two decades.

While ROA does not oppose this provision, we question its necessity.

According to a May 2024 report by the U.S. Government Accountability Office, three of the four SOF service component commands met the Department of Defense's (DoD) TAP completion goal of 85 percent.

GAO also found:

- ✚ Across all services, SOF servicemembers demonstrated a higher TAP completion rate than their non-SOF counterparts.
- ✚ SOF servicemembers were more likely to begin TAP earlier than non-SOF servicemembers, at a rate of 39 percent compared to 34 percent.
- ✚ SOF servicemembers were assigned to Tier 1 nearly twice as often as non-SOF servicemembers during individualized initial counseling.
- ✚ Far fewer SOF servicemembers were assigned to Tier 3 than non-SOF servicemembers.

It is important to note that these findings relate directly to a SOF servicemember's likelihood of receiving a waiver to otherwise mandatory TAP requirements. For example, GAO found that 13 percent of SOF servicemembers *did not* attend a mandatory 2-day track in Fiscal Year (FY) 2023. Another troubling finding was that SOF servicemembers in Tier 1 were more likely to start TAP on time, despite Tier 2 and 3 members needing more assistance.<sup>1</sup>

If the aim of this provision is to ensure that SOF servicemembers are not overlooked in TAP, ROA would further recommend amending the bill to include a section that would add information on the Warrior Care Program, sometimes referred to as the Care Coalition, to the preseparation counseling checklist (DD Form 2468).

## SEC. 2(b) REQUIREMENT OF PRESEPARATION COUNSELING

This section requires a minimum of three days of individualized preseparation counseling for transitioning servicemembers who have confirmed employment, educational enrollment, or vocational training plans, and at least five days for those without such plans.

ROA has received feedback indicating that the volume of information presented during individualized preseparation counseling can be overwhelming and poorly tailored to the reserve components.

To quote Ranking Member Pappas at the Subcommittee's March 25 TAP oversight hearing, it can be like "drinking from a firehose."<sup>2</sup>

While ROA supports the intent behind this requirement, we recommend greater flexibility in its implementation.

Specifically, ROA recommends amending the provision for clarity and to allow for the early conclusion of counseling when both the servicemember and the counselor agree that a shortened session sufficiently meets the servicemember's needs.

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<sup>1</sup> <https://www.gao.gov/assets/gao-24-106587.pdf>

<sup>2</sup> <https://www.youtube.com/watch?v=EPJ4ILROvj0&t=6165s>

This recommendation is particularly important for members of the reserve components, as many elements of individualized preseparation counseling, and TAP more broadly, do not reflect the unique circumstances of their service.

In the context of SEC. 2(b), ROA is concerned that reserve component members who already hold civilian employment would be subject to a minimum of five days of preseparation counseling. As currently written, the bill reduces the requirement to three days only for those members who have “accepted an offer of full-time employment...that shall commence after the member separates, retires, or is discharged.”

As written, ROA questions whether the language accounts for reserve component members who maintain ongoing civilian careers concurrent with their military service.

For clarity, ROA recommends the following legislative language:





*“(i) In the case of a member who—*

*(I) has accepted an offer of full-time employment that shall commence after the member separates, retires, or is discharged; or*

*(II) is engaged in ongoing full-time civilian employment at the time of preseparation counseling;*

*not fewer than three days.”*

Additionally, ROA urges the inclusion of the following topics in the content delivered by TAP preseparation counselors:

-  An explanation of the circumstances under which a member may be subject to a retired recall to active duty.
-  Guidance on how to obtain, use, and safeguard military service records to access earned benefits.
-  Information and counseling on how to report and document health conditions and duty status, both during military service and after separation.
-  An overview of the retirement points accounting system, including how to verify retirement point calculations and understand retirement benefits the member may be entitled to receive.

Including these matters in preseparation counseling would enhance its relevance for reserve component members and, in turn, encourage greater engagement and fulfillment.

#### SEC. 2(c) PROVISION OF PRESEPARATION COUNSELING: THIRD PARTY COUNSELORS; IN-PERSON TO THE EXTENT PRACTICABLE

This section prohibits individuals responsible for retention from administering preseparation counseling and permits remote counseling when in-person attendance is not feasible for the transitioning servicemember.

ROA views this provision as well-intentioned. However, one of the requirements of TAP counseling is “an explanation of the procedures for and advantages of affiliating with the Selected Reserve.”

If implemented without clarification, ROA is concerned this provision could unintentionally disqualify all preseparation counselors.

ROA therefore urges further clarification of the term “individual responsible for retention” and recommends defining it in a manner that does not conflict with the statutory requirement to provide information on reserve affiliation benefits.

#### SEC. 2(d) PERIOD OF ELIGIBILITY: EXPANSION

This section extends the required start of preseparation counseling for non-retirement separations from 365 to 540 days prior to the anticipated separation date.

ROA supports this provision and views it as a positive step toward ensuring servicemembers have sufficient time to complete TAP.

However, ROA cautions that this extension does not resolve the core challenges associated with starting TAP on time, particularly unit mission requirements, deployments, and a lack of awareness or support for TAP among commanders.

#### SEC. 2(e) WAIVER FOR CERTAIN MEMBERS OF THE RESERVE COMPONENTS

This section allows members of the Reserve and National Guard to waive TAP preseparation counseling if they received it within the past three years and the program content has not changed since.

ROA supports this provision and thanks Chairman Van Orden for recognizing the unique challenges faced by reserve component members, who are often required to participate in TAP at inconvenient times, in unsuitable locations, or when the information is not relevant to their circumstances (if they even qualify at all).

#### SEC. 2(f) ELIGIBILITY OF A MEMBER WHO REENLISTS TO RECEIVE PRESEPARATION COUNSELING

This section authorizes a transitioning servicemember’s commanding officer to approve their request for preseparation counseling, regardless of whether the servicemember reenlists or commits to a new period of obligated service.

Unfortunately, servicemembers who reenlist or extend their service commitment are often no longer classified as “transitioning” and may be excluded from participating in TAP. This discourages proactive transition planning and fails to accommodate the dynamic and often unpredictable nature of military careers.

This provision provides the flexibility needed to address such situations. It also reinforces the commander’s role in supporting a servicemember’s preparation for post-military life.

Additionally, it promotes greater commander engagement and compliance with TAP, which is a necessary element of reform.

ROA supports.

#### SEC. 2(g) REPEAT ATTENDANCE

This section permits transitioning servicemembers to receive preseparation counseling a second time, on a space-available basis, prior to separation, retirement, or discharge.

ROA supports.

#### SEC. 2(h) ELECTIVE INCLUSION OF THE SPOUSE OF A MEMBER

This section enhances the integration of military spouses into their service spouse's TAP.

ROA supports.

#### SEC. 2(i) MINIMUM AMOUNT OF COUNSELING REGARDING FINANCIAL PLANNING

This section mandates that transitioning servicemembers receive at least one hour of personalized financial counseling from “an individual who has significant experience in financial planning.” While ROA supports the intent of this provision, we offer two considerations regarding its implementation and clarity.

First, the term “significant experience” is not defined and may be interpreted inconsistently across the services. Clarifying the qualifications or credentials, such as certification as a financial counselor, experience advising servicemembers on military-specific financial matters, or a minimum number of years in professional practice, would help ensure consistent, high-quality delivery of counseling.

Second, we caution against overly proscriptive language, as it may limit the pool of qualified personnel available to meet the requirement. Manpower availability is precisely our concern.

Language like that used in the definition of “at risk for a difficult transition to civilian life” in Section 2(l) of this bill could serve as a model to promote clarity without being unduly restrictive.

Mandating individualized financial counseling for all transitioning servicemembers would significantly increase demand on an already limited pool of professionals, particularly at or near smaller installations. Without appropriate resourcing and personnel support, implementation may prove challenging.

#### SEC. 2(j) PATHWAYS: STANDARDIZATION; ESTABLISHMENT OF PATHWAY FOR MEMBERS OF THE RESERVE COMPONENTS

This section standardizes TAP “pathways” across all service branches and reaffirms the establishment of a dedicated pathway for Reserve and National Guard members, made

possible through Chairman Van Orden’s leadership in securing the codification of SEC. 571 in the FY 2025 National Defense Authorization Act (NDAA).<sup>3</sup>

ROA appreciates the intent to improve consistency and accountability within TAP. However, we seek additional clarity.

As currently written, the language appears to transfer the authority for designing and assigning servicemembers to specific TAP pathways from the military services to the Secretaries of Defense and Homeland Security.

While ROA recognizes TAPs shortcomings, we are not yet convinced that the conditions are sufficient to transition this authority. Oversight and execution of TAP within DoD involves a complex network of responsibilities shared among nearly a dozen Pentagon principals within the Office of the Secretary of Defense (not to mention support staff), along with the military department secretaries and commanders.

The Veterans of Foreign Wars (VFW) has proposed establishing an Under Secretary of Defense for Transition (USD-T).

According to their recommendation, “This office would oversee and coordinate all transition programs, ensuring comprehensive and standardized support for service members as they prepare for life after military service. The USD-T would enforce compliance with TAP requirements, hold commanders accountable for participation, and address cultural stigmas around transition assistance, reinforcing that it is a key part of career development. The office would also implement targeted interventions for service members at high risk for post-transition challenges such as suicide, substance use disorders, and mental health issues.”<sup>4</sup>

ROA finds this proposal worth further exploration. If established, it could help facilitate the conditions necessary to support a more centralized TAP authority as envisioned in the proposed language.

At the same time, ROA recognizes that the existing structure has resulted in disparities across the services, particularly related to the military services’ waiver authority for 2-day TAP track requirements. GAO recently documented significant differences in how often the services waived the two-day TAP class attendance requirement: the Air Force and Navy waived it in 92 percent and 86 percent of cases, respectively, while the Army and Marine Corps did so in just 38 percent and 16 percent of cases.

These inconsistencies point to uneven implementation of TAP across the services and raise important concerns regarding parity.

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<sup>3</sup> [https://docs.house.gov/billsthisweek/20241209/RCP\\_HR5009\\_xml%5b89%5d.pdf](https://docs.house.gov/billsthisweek/20241209/RCP_HR5009_xml%5b89%5d.pdf)

<sup>4</sup> <https://www.vfw.org/advocacy/national-legislative-service/congressional-testimony/2025/3/mission-incomplete-strengthening-the-tap-program>

In the spirit of addressing disparities within TAP, ROA thanks Chairman Van Orden for his steadfast support in establishing a dedicated reserve component pathway for individualized preseparation counseling.

ROA fully supports this subsection and offers additional recommendations on how the language can be further complemented on pages 19 and 20.

#### SEC. 2(k) PATHWAYS: RECORD OF PATHWAY ASSIGNMENT

This section requires that a servicemember's assigned TAP pathway, along with the rationale for the placement, be documented in their service record. ROA supports.

#### SEC. 2(l) COORDINATION BETWEEN DEPARTMENTS OF DEFENSE, VETERANS AFFAIRS, AND LABOR

This section requires the Department of Veterans Affairs (VA) to receive contact information and DD 2648 forms for transitioning servicemembers, mandates proactive outreach by the VA and Department of Labor (DoL) to those deemed "at risk for a difficult transition" within 60 days of separation and directs standardized regulations and reporting to Congress on compliance and failures.

ROA supports the intent to ensure timely and targeted follow-up for those servicemembers who may face the greatest challenges in reintegrating into civilian life.

Research consistently shows that the initial transition period is when many veterans face elevated risks related to unemployment, mental health, homelessness, difficulty navigating benefits, and other challenges.

At the same time, ROA respectfully notes that the provision, as drafted, does not clearly define the intended purpose of this outreach. While the mandate specifies who should be contacted and when, the goals of these engagements remain unclear.

Clarifying this would help ensure the effort is as effective and impactful as possible.

To this end, ROA believes there is value in looking at existing models, such as the VA's Solid Start program, which provides structured outreach to all newly separated veterans during their first year.

#### SEC. 2(m) CONTRACTING: STANDARDIZATION

This section authorizes the Secretary to contract with an external entity to provide preseparation counseling and encourages coordination among Secretaries to use the same provider where practicable.

ROA supports this provision but recommends that it first be implemented as a pilot program.

ROA further recommends that certain mandatory minimum provider qualifications be codified to establish a statutory baseline. These qualifications would then serve as a



reference point for evaluating the Secretary's criteria in the audit process proposed under SEC. 2(n).

To this end, ROA proposes the following legislative language:

*Provider Qualifications. — The Secretary concerned shall ensure that any individual providing counseling under the Transition Assistance Program pursuant to a contract entered into under this section:*

*(1) Possesses appropriate credentials, training, and experience in career development, transition assistance, or a related field, as determined by the Secretary; and*

*(2) Has relevant professional experience or credentials in delivering specialized transition services, including but not limited to employment and reemployment law, veterans' benefits, financial literacy, and other subject areas required under section 1142 of title 10, United States Code, as determined by the Secretary.*

## SEC. 2(n) YEARLY SURPRISE AUDITS

This section authorizes VA and DoL employees or contractors to conduct unannounced visits to preseparation counseling sessions for auditing purposes and requires them to report their findings.

ROA supports this provision but recommends codifying additional evaluation criteria, given the current statutory silence regarding performance-based metrics for preseparation counseling.

ROA proposes the following legislative language:

*Audit Authority and Scope. — The Secretaries concerned shall be authorized to direct an employee or contractor of the Department of Veterans Affairs or the Department of Labor to conduct unannounced audits or site visits to evaluate—*

*(1) the qualifications and conduct of personnel providing preseparation counseling services;*

*(2) adherence to applicable law;*

*(3) the accuracy and quality of information provided to transitioning servicemembers;*

*(4) compliance with contract terms and performance benchmarks; and*

*(5) such other matters as the Secretary deems appropriate.*

## SEC. 2(o) INFORMATION PROVIDED TO STATE VETERANS AGENCIES REGARDING MEMBERS SEPARATING FROM THE ARMED FORCES

This section expands the scope of information sharing between the Secretaries of Defense and Veterans Affairs, as well as with state veterans' agencies, to include benefits for low-income households, such as the Supplemental Nutrition Assistance Program (SNAP).

ROA supports.

The *2023 Survey of Reserve Component Spouses* revealed troubling data regarding food insecurity among reserve families. Notably, 22 percent of all reserve spouses reported experiencing either low or very low food security. This includes reduced quality, variety, or desirability of diet, along with multiple indicators of disrupted eating patterns and reduced food intake.

Alarming, food insecurity rates rose as high as 41 percent among junior-enlisted spouses.<sup>5</sup>

Food insecurity among servicemembers and their families is a readiness issue that Congress and DoD have increasingly sought to address.

Although reserve component members are eligible to use the commissary system, which aims to provide cost savings not available to the civilian consumer, many live far from military installations, making the benefit impractical or inaccessible.

This is one example of reserve component members having limited or no access to support mechanisms intended to reduce food insecurity. Another is the recently created Basic Needs Allowance, which is not available to drilling reservists who are not on active-duty, even when they face equal or more severe financial hardship and food insecurity.

## SEC. 2(p) PILOT PROGRAM FOR MILITARY SPOUSES

This section establishes a voluntary TAP pilot program for military spouses, tailored to their needs and offered quarterly, including evenings and weekends, at no fewer than five installations, with at least one overseas. The program includes counseling on benefits for military families and veterans, and requires a report with recommendations on permanence after two years, with the pilot terminating after three years.

ROA believes military spouses and dependents would benefit more from being integrated in the servicemember's TAP experience, rather than receiving separate counseling.

SEC. 2(h) is sufficient to achieve this, in ROA's view.

## SEC. 2(q) REPORTS; TRACKING SYSTEM

This section requires the Secretary of Defense to submit annual reports on TAP at installations with at least 250 participants, detailing metrics such as counseling duration, time to separation, reenlistments, deployments, pathway assignments, referrals to federal agencies (including missed referrals), unemployment claims and compensation paid, and commander briefing frequency.

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<sup>5</sup> <https://www.militaryonesource.mil/data-research-and-statistics/survey-findings/spouse-survey/>

It also mandates annual updates to the TAP curriculum, including reporting on such updates, and requires the implementation of a system to track whether servicemembers begin TAP within the required timeframes.

While ROA supports the reporting and updating requirements in SEC 2(q), we believe these provisions should be strengthened by codifying a tailored curriculum for the reserve components.

TAP's current core curriculum is designed for active component servicemembers and is not well suited to the distinct transition needs of citizen-warriors and their families.

This was recently affirmed in a RAND Corporation study conducted pursuant to Senate Report 114-255, which directed DoD to examine the transition experiences of reserve component members. The study recommended several improvements to TAP and proposed the development of a curriculum specifically designed for the reserve components.

Will H., a Marine Corps Reservist, shared with ROA his own experience with the inadequacy of TAP:

“The last time I took TAP was when I got back from Afghanistan in 2019. My instructors had zero understanding of the reserve components. When I asked my instructor if there was any literature focused on the RC, I was given a blank stare.”

To address this, ROA recommends the development and implementation of a tailored TAP curriculum that reflects the unique service, employment, and benefit realities of reserve component members.

ROA proposes the following legislative language for inclusion, either within Section 2(q) or as a standalone provision:

*SECTION [X]. TAILORED TRANSITION ASSISTANCE PROGRAM  
CURRICULUM FOR RESERVE COMPONENT MEMBERS.*

*(a) Amendment to Title 10.— Section 1144(f) of title 10, United States Code, is redesignated as paragraph (1), and the following new paragraph is added:*

*“(2)(A) The Secretary of Defense, in coordination with the Secretary of Veterans Affairs and the Secretary of Labor, shall develop and implement a tailored curriculum within the Transition Assistance Program (TAP) specifically for members of the reserve components.*

*(B) The curriculum required under subparagraph (A) shall address the unique service, employment, and benefit conditions applicable to members of the reserve components and shall include, at a minimum:*

- (i) guidance on accessing Department of Veterans Affairs and Department of Defense benefits available to reserve component members;*
- (ii) information on civilian employment protections, reemployment rights under*

*the Uniformed Services Employment and Reemployment Rights Act (USERRA), and managing concurrent military and civilian careers;*

*(iii) retirement planning for non-regular (Reserve Component) retirement systems, including eligibility criteria and timelines;*

*(iv) health care coverage options such as TRICARE Reserve Select, TRICARE Retired Reserve, transitional coverage post-activation, and benefit considerations for gray-area retirees;*

*(v) reintegration and family readiness resources specific to reserve component service.*

*(C) The curriculum shall be reviewed not less frequently than once every two years and updated as necessary in accordance with subsection (c).*

*(D) In this paragraph, the term ‘reserve components’ has the meaning given in section 101(c) of this title.*





*(E) Not later than 30 days after each update to the curriculum under subparagraph (C), the Secretary of Defense, in coordination with the Secretary of Veterans Affairs and the Secretary of Labor, shall—*

- (i) provide a briefing on the changes to the Committees on Armed Services and the Committees on Veterans' Affairs of the House of Representatives and the Senate;*
- (ii) provide a briefing to representatives of recognized veteran service organizations and military service organizations;*
- (iii) submit a copy of the revised curriculum to the Committees on Armed Services and the Committees on Veterans' Affairs of the House of Representatives and the Senate; and*
- (iv) publish the updated curriculum in a publicly available location accessible online.”*

*(b) Clerical Amendment. — The heading for subsection (f) of such section is amended by inserting “; tailored curriculum for reserve component members” after “Department of Labor”.*

Even if the curriculum detailed in the proposed language is not adopted, ROA recommends that the reporting and transparency framework it contains be incorporated into Section 2(q).

Specifically, subsection (2)(A) of the current draft could include:

-  A defined timeframe for briefings;
-  Requirements to notify *and* brief the congressional committees of jurisdiction;
-  Consultation with military and veterans service organizations; *and*
-  Public availability of curriculum updates.

ROA believes these enhancements would improve oversight and help ensure that TAP remains accountable, up to date, and responsive to the needs of all who serve.

### SEC. 3 TRANSITIONAL HEALTH CARE FOR MEMBERS BEING SEPARATED OR RECENTLY SEPARATED: EXTENSION OF ELIGIBILITY

This section extends the duration of transitional health care for separating service members from 180 days to 270 days. ROA supports.

### SEC. 4. SKILLBRIDGE: GAO STUDY

This section directs a study on differences in SkillBridge program services and participation across the Armed Forces, including best practices related to employer selection, contract development, and the feasibility of standardizing the program.

ROA supports the intent of this provision. However, ROA encourages careful consideration of whether subsections (1) through (3) are necessary, given recent congressional oversight efforts and publicly available information.

The FY 2024 NDAA, for example, tasked GAO with reviewing the SkillBridge program, including how eligibility is determined, the characteristics of participating service members, and the application of relevant federal ethics rules concerning internships.<sup>6</sup>

The resulting GAO report, released in August 2024, addressed many of the issues raised in this section, particularly the variation in eligibility requirements across the services.<sup>7</sup>

Additionally, from ROA's view, employer expectations and standards are outlined as part of the SkillBridge Memorandum of Understanding (MOU), which serves as a framework for best practices.

Nonetheless, ROA supports continued exploration of the feasibility of standardizing SkillBridge across the Armed Forces to promote consistency and equitable access for all transitioning service members.

### SEC. 5. WEBSITE OF THE DEPARTMENT OF VETERANS AFFAIRS REGARDING PROGRAMS FOR NEW VETERANS

This section directs the Secretary of Veterans Affairs to maintain a publicly accessible website that allows veterans and their dependents to search, by ZIP code, for programs serving those recently separated from active duty.

ROA supports the creation of a centralized access point but seeks clarification on whether the database will include community-based or unaccredited programs.

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<sup>6</sup> <https://www.congress.gov/118/plaws/publ31/PLAW-118publ31.pdf>

<sup>7</sup> <https://www.gao.gov/assets/gao-24-107352.pdf>

## SEC. 6. EXPANSION OF ELIGIBILITY FOR A CERTAIN PROGRAM OF JOB COUNSELING, TRAINING, AND PLACEMENT SERVICES FOR VETERANS

This section expands eligibility for VA's job counseling and placement programs to include TAP-eligible servicemembers. ROA supports.

## SEC. 7. SOLID START PROGRAM: INTERACTION WITH TRANSITION ASSISTANCE PROGRAM

This section enhances the Solid Start Program by requiring that TAP materials be included as part of its outreach efforts. ROA supports this provision in the context of H.R. 3386, the *Solid Start Communications Act*, which expands the methods available to the VA for communicating with veterans, especially those in younger cohorts.

## ADDITIONAL MATTER FOR CONSIDERATION

While this legislation includes significant reforms desired by citizen-warriors and their families, additional steps can be taken.

One example is that current law and policy require servicemembers to spend 180 continuous days on active-duty to qualify for TAP, a threshold that excludes many reserve component members.

Some of these citizen-warriors have served honorably for decades but are deemed ineligible simply because their active-duty orders are capped at 179 days (a practice often used as a cost-saving measure).

ROA spoke with a retired Air Force Master Sergeant who shared their experience navigating separation and retirement without TAP:

“At the beginning of my out processing, I was given a bunch of literature and told to ask questions if confused. If done right, retirement is something you do only once. So, going in, I didn't know exactly what questions to ask. Frankly, I only really learned those questions when going through the motions. I've been out for a little over a year now and I'm still learning. It would have been nice to sit down in an auditorium or seminar just to make sure I was doing everything I had to do and to learn more about my benefits.”

To ensure equitable access to TAP, ROA urges Congress to amend existing law to allow servicemembers who have served *180 cumulative days of active service* to participate.

Active service, in this case, should include every day served in uniform, including inactive duty training (such as drill weekends) and annual training.

To this end, ROA proposes the following legislative language:

*SECTION [X]. EXPANSION OF TRANSITION ASSISTANCE PROGRAM ELIGIBILITY TO RESERVE COMPONENT MEMBERS WITH CUMULATIVE SERVICE.*

*(a) Amendment to Eligibility Criteria. — Section 1142(a)(4)(A) of title 10, United States Code, is amended—*

*(1) by striking “first 180 continuous days of active duty” and inserting “a cumulative total of 180 days of active service, including active duty, active duty for training, and inactive duty training”; and*

*(2) by striking clause “(i) the member performed full-time training duty or annual training; and”.*

*(b) Definition. —For purposes of subsection (a), the term “active service” has the meaning given in section 101(d)(3) of title 10, United States Code, and includes periods of duty performed under section 10147 of such title and other applicable authorities, including inactive duty training.*

## **H.R.3386, STREAMLINING THE SOLID START COMMUNICATIONS ACT**

This bill authorizes the VA to expand its communication efforts beyond traditional postal mail by incorporating modern channels such as text messaging and online chat.

This commonsense modernization reflects how most Americans (especially younger veterans) communicate and receive information today.

ROA thanks Chairman Van Orden for sponsoring this bill and urges its swift codification into law. In voicing our support, we also urge careful implementation from VA, and effective oversight from Congress.

Expanding communication platforms must go hand in hand with safeguards that protect veterans from fraud and ensure trust in VA. This is not a hypothetical concern. Imposter scams account for up to 40 percent of all fraud reports filed by military personnel.

It is easy to imagine a bad actor sending a fake “VA” text to a new veteran, asking them to “verify” bank information or pay a fee to access benefits. Without proper verification protocols, a well-intentioned effort to connect with veterans could unintentionally open the door to predatory practices and scams.

The scale of this problem is growing. In 2022 alone, veterans and military families reported \$292 million in fraud losses, according to the Federal Trade Commission. That number rose to an estimated \$350 million in 2023.

What makes this threat especially dangerous is its potential to undermine trust in legitimate VA communications. A veteran who receives one or two fraudulent messages may become understandably wary of future outreach, even when it’s real.

For the Solid Start program, which depends on building trust with newly transitioned servicemembers, this erosion of confidence could severely weaken the program's effectiveness.

Transitioning veterans are in a particularly vulnerable phase. Tragically, scammers know this and exploit it.

This is why ROA urges the VA to adopt strong authentication and verification procedures for all Solid Start communications, and for all veteran-facing outreach more broadly.

## **H.R.1965, VETERANS EDUCATIONAL ASSISTANCE ADJUSTMENT ACT**

Many benefits and programs (especially for the reserve components) fail to keep pace with changing conditions, whether economic or otherwise.

One such program is the Post-9/11 GI Bill's stipend for books, supplies, equipment, and other educational costs. The current law, first codified in 2009 by the Post-9/11 Veterans Educational Assistance Act, sets the stipend for all GI Bill enrollees at up to \$1,000 annually. This amount has not been updated since its inception.

As any student in recent decades can attest, the cost of attending school has significantly increased. This includes the costs of books and supplies, despite the growth of electronic alternatives, which have also seen price hikes. According to the Education Data Initiative:

- ✚ Between 1977 and 2015, the cost of textbooks increased by 1,041%.
- ✚ Consumer prices for textbooks have surged by up to 88%.
- ✚ 20% of students who fail college courses cite the cost of textbooks and class materials as a contributing factor.
- ✚ The average annual cost of textbooks at both four-year and two-year institutions has exceeded the Post-9/11 GI Bill stipend for at least the past decade.

To address this issue, this bill proposes increasing the stipend from its current \$1,000 to \$1,400 annually, with future increases tied to the Consumer Price Index (CPI).

By implementing CPI indexing, Congress can prevent the need for large, irregular increases in the future, allowing for more predictable and stable budgeting.

The typical student veteran in the reserve components is older than the average college student and more likely to have family responsibilities. In fact, most student veterans are between the ages of 24 and 40, and nearly half are married or have children.

Many reserve component members hold full-time civilian jobs to support their families, pursuing education part-time. When deployments or training disrupt their civilian income or incur additional costs, finances become strained. Put differently, every dollar counts.



If the GI Bill stipend falls short, a reservist-student may need to divert funds from their family budget to cover the cost of textbooks.

ROA fully supports this bill as written and thanks Reps. Gabe Vasquez and David Valadao for sponsoring this important legislation.

### **H.R. 2720, GOLD STAR FAMILIES EDUCATIONAL PARITY ACT**

This legislation would terminate the Survivors' and Dependents' Educational Assistance (DEA) program under Chapter 35, effective August 1, 2029. It would also transfer eligible beneficiaries to the Post-9/11 GI Bill (Chapter 33) as if they had elected that benefit, regardless of whether they formally did so. In essence, the bill consolidates educational benefits for survivors and dependents under the more comprehensive Post-9/11 GI Bill framework.

ROA supports this bill on its merits. However, we must be clear: securing GI Bill parity for Reserve and National Guard servicemembers remains ROA's top education priority and demands immediate congressional action.

To this end, ROA submits its Senate Veterans Affairs Committee SFR in support of H.R.1423/S.649, the Guard and Reserve GI Bill Parity Act of 2025, as an addendum to this statement.

### **H.R.3619, PATRIOTS OVER POLITICS ACT**

This legislation authorizes certain veterans, specifically those separated for failing to comply with the now-rescinded COVID-19 vaccination mandate, to transfer their unused Post-9/11 GI Bill educational benefits to their dependents.

It applies to servicemembers who completed at least six years of service and were separated between August 24, 2021, and January 10, 2023.

ROA was the only national military association to advocate for the full reinstatement of all servicemembers discharged solely for declining the vaccine, along with the restoration of 100 percent back pay.

ROA would consider supporting this legislation if it were tailored to apply specifically to servicemembers who are reinstated.

In other words, if a servicemember was discharged solely for noncompliance with the vaccine mandate and is later reinstated, the education benefit proposed under H.R. 3619 should be extended to them.

## **CONCLUSION**

As global threats intensify and the reserve components are called upon with increasing frequency, ensuring fair and consistent access to earned benefits is essential to sustaining the force of today, and generating the force of tomorrow.

Thank you, Chairman Van Orden, Ranking Member Pappas, and the distinguished members of the Subcommittee, for your steadfast support of citizen-warriors and their families.

Too often, military and veterans' law are developed without sufficient appreciation for the distinctions between active and reserve service. Invariably, members of the Reserve and National Guard, and their families, are left behind.

When that happens, America's military readiness suffers. We cannot afford that loss.