



TESTIMONY OF
STUDENT VETERANS OF AMERICA

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

JOINT HEARING ON THE TOPIC OF:
MODERNIZING VETERAN EDUCATION IN THE SHADOW OF
COVID-19

July 20, 2022



Chairmen Levin and Mrvan, Ranking Members Moore and Rosendale, and Members of the Subcommittees:
Thank you for inviting Student Veterans of America (SVA) to submit testimony on modernizing veteran education in the shadow of COVID-19.

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

As we look to the future of veterans' education benefits following the pandemic, it is critically important that we consider our recent past and apply lessons learned in common-sense, proactive ways. This requires a dispassionate review of current and historical processes with the goal of ensuring the future state of veterans' education benefits is reflective of today's student veteran – a diverse, multifaceted, post-traditional student that excels in higher education when given the appropriate support.

To achieve this end, SVA considers the following priorities to be of the utmost importance. We look forward to being a resource to these subcommittees, and the whole of the House Veterans Affairs Committee, as they begin the next phase in bringing the Post-9/11 GI Bill into the digital age.

Make permanent the temporary protections established during the COVID-19 pandemic

As we testified to in recent months, SVA's top priority this year is legislation that would establish permanent safeguards that VA could invoke during future emergencies to protect student veterans and their families. We applaud Chairman Levin and Representative Mace for their leadership in introducing H.R. 7939, the *Student Veteran Emergency Relief Act of 2022*. This legislation codifies the many temporary protections Congress and the broader veteran-serving community worked so hard to establish over the course of the pandemic and is a standout example of the kind of proactive, common-sense reform student veterans and their families deserve.

The pandemic exposed numerous gaps in VA's authority that prevented the agency from protecting students and their benefits in emergencies. In response, Congress moved quickly to patch these newly exposed holes in the veterans' education benefits support structure to protect student veterans and their families from a sudden, unnecessary loss of benefits. We cannot thank you all enough for the robust safety net you and your staff worked so hard to create.

That safety net was necessary to preserve the basic integrity of the VA education benefits system. However, these protections expired, and, now without permanent safeguards, our Nation's veterans are in the same precarious position they were in before the pandemic, armed only with the hope that if another emergency occurs, Congress will do the right thing again without delay.

We all hope to put the pandemic behind us, but that does not mean we should ignore what it has taught us. A future emergency is not a matter of if; it is merely a matter of when. Yet, thanks to our recent shared history and the template Congress established with the temporary protections, we are better positioned than ever to protect student veterans and their education benefits during emergencies. We urge the members of the Subcommittees to seize the moment and embrace the proactive solution; make the temporary protections a permanent authority.

SVA again thanks Chairman Levin and Representative Mace for the *Student Veteran Emergency Relief Act* and strongly urges members to support this legislation so VA may proactively enable critical, stabilizing authorities that will protect student veterans and their families in future emergencies.

Digital GI Bill oversight

SVA has long been a vocal supporter of full-scale IT modernization at VA.¹ The underlying cause of many historical problems at VA has been the agency's reliance on remarkably old information technology (IT) systems. To properly serve our veterans, VA Education Service platforms must become a system that can adapt and change with the evolving landscape of higher education.

Fortunately, Congress took steps to provide VA with the funds necessary to start this modernization effort, so the multi-year effort is now underway.² We applaud VA's prompt efforts to begin implementing these changes and for being communicative about the process and improvements thus far. We have heard positive feedback on the recent platform updates for School Certifying Officials (SCOs) and, in general, are greatly appreciative of the efforts VA has undertaken to this point.

Still, to avoid late-stage stumbles like that of the Forever GI Bill (FGIB) implementation, SVA encourages the subcommittees to consider legislation that establishes a consistent reporting schedule from VA to Congress. To be clear, our suggestion is simply driven by our hope that it will help VA avoid the pitfalls that plagued previous implementation efforts and not concern over their work thus far.

Lastly, SVA recommends taking full advantage of the ongoing modernization effort at VA and establishing preemptive, automatic qualification to transferring service members and electronic Certificate of Eligibility (COE) disbursement. This is one of the most obvious and impactful ways to turn the modernization effort into a reality for our veterans.

SVA looks forward to working with committee members and officials at VA to ensure this modernization effort is successful. The educational experiences of current and future generations of student veterans depend on it.

Conduct a comprehensive review of the Monthly Housing Allowance (MHA) benefit

Even before the pandemic, SVA regularly heard from students that current MHA rates do not reflect the reality of their living situation. Whether it be inequities in distance learners' MHA relative to in-person, the lack of payment for periods between academic terms, the flat rate for overseas learners, or lower subsistence rates for VR&E participants without Post-9/11 GI Bill eligibility, students have raised concerns about the efficacy of MHA and its disconnect from the needs of today's students.

In particular, we want to highlight the increasingly apparent inequities between distance learner MHA rates and in-person MHA rates, a recurring complaint from student veterans throughout the pandemic. While Congress responded quickly to preserve MHA rates for students who were attending classes in-person but forced online, students enrolled solely in distance learning courses continued to receive an MHA rate that is half the national

¹ See generally STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE SUBCOMMITTEE ON ECONOMIC OPPORTUNITY AND TECHNOLOGY MODERNIZATION OF THE H.COMM. ON VETERANS'AFFAIRS ON MOVING BEYOND PATCHWORK SYSTEMS: THE FUTURE OF EDUCATION SERVICES IT, 116th Cong. (Sept. 16, 2020), available at https://studentveterans.org/wp-content/uploads/2020/09/HVAC-EO_-IT_Testimony_Sept16_2020.pdf; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H.AND S. COMMS. ON VETERANS'AFFAIRS ON LEGISLATION PRIORITIES OF 2020, 116th Cong. 6 (March 3, 2020), available at <https://www.veterans.senate.gov/imo/media/doc/03.03.2020%20-%20SVA%20Testimony.pdf>; STUDENT VETERANS OF AMERICA, TESTIMONY BEFORE THE H.AND S.COMMS. ON VETERANS'AFFAIRS ON LEGISLATIVE PRIORITIES OF 2019, 116th Cong. 7 (March 7, 2019), available at <https://www.veterans.senate.gov/imo/media/doc/5%20-%20SVA%20Testimony%2003.07.19.pdf>.

² Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. J, Title V, § 515

average, a difference of potentially thousands of dollars a month. With essentially all students utilizing distance education during the pandemic, many student veterans experienced this difference firsthand and see it as unfair or a punishment for their school or education choices.

We would also like to highlight recent studies done by the Pew Charitable Trust on student veterans and their student debt burdens.³ Pew found that over a quarter of student veterans took out student loans, despite using their GI Bill benefits, with a median total of \$8,000.⁴ Nearly 60 percent of those that took out loans did so primarily to cover living expenses, such as housing costs, groceries and childcare.⁵ The remaining roughly 40 percent of borrowers did so to cover education costs, like tuition and fees, or books and supplies.⁶

We share Pew's excellent work here to help underscore the reality that student veterans are post-traditional students that do not fit the mold of traditional students. They tend to carry greater responsibilities for dependents and lack the flexibility and support structures available to traditional students. SVA believes it is time to review certain fundamental assumptions underlying MHA. We look forward to working with Congress to comprehensively review all aspects of the benefit and ensure MHA meets the needs of today's student veterans.

Explore ways to increase the number of SCOs on campuses and address broader VA staffing concerns

One of the most common pieces of feedback we receive is that there are not enough SCOs available to adequately address the needs of student veterans at many campuses, leading to delays in processing certifications and struggles in meeting compliance requirements. This is especially important now considering the many recent reforms to VA education benefits in recent years.

In addition, as SCOs seek guidance on compliance requirements from their Education Liaison Representative (ELR), we are hearing reports that they are receiving either incorrect or incomplete information, and sometimes no guidance at all as ELRs are experiencing a staffing shortage across the country.

We receive this feedback from students, schools, and SCOs, and this overlap is concerning because it suggests there are very real problems at VA, and it is being felt at all levels of the veterans' education benefits system.

As suggestions for review, SVA encourages the committees to consider investigating:

- Whether VA's currently recommended ratio of one SCO to every 200 GI Bill students is adequate, should be reduced, or should be made required,
- Whether the staffing shortage for ELRs is negatively impacting communications and guidance from VA on new compliance requirements,
- If there are ways to relax any potential barriers preventing VA from addressing these issues in a timely fashion, and
- If VA Education Services has appropriate accountability throughout the Department without a permanent Executive Director.

We know VA is putting forth a good-faith effort to meet the tremendous number of new requirements handed to them in recent years. We also know that many of these requirements are handed down to students, schools, and SCOs in turn. SVA hopes to work with Congress to find ways to better position VA to provide the support needed to everyone in the veterans' education benefit system.

³ Pew Charitable Trusts. Veteran Student Loan Debt Draws New Attention. <<https://www.pewtrusts.org/en/research-and-analysis/articles/2021/09/13/veteran-student-loan-debt-draws-new-attention>>

⁴ Id.

⁵ Pew Charitable Trusts. Why Veterans With GI Bill Benefits Still Take Out Student Loans. <<https://www.pewtrusts.org/en/trust/archive/spring-2022/why-veterans-with-gi-bill-benefits-still-take-out-student-loans>>

⁶ Id.

Explore options to better integrate and support VA healthcare on campuses, particularly through the VA VITAL program

VA's Veterans Integration to Academic Leadership, or VITAL program, is an oft-overlooked program, but one that quietly excels. VITAL is a joint effort between the Veterans Benefits Administration (VBA) and the Veterans Health Administration (VHA) that provides on-campus mental healthcare and support services to student veterans and, when needed, coordinates with VHA, VBA, and community care providers. In addition, VITAL provides education and training on student veteran-specific needs for campus faculty and staff to further aid schools in creating a more welcoming community for transitioning student veterans.

When viewed in the light of VA's "Whole Health" treatment objective, VITAL's broad portfolio of services stands out as well-designed, flexible, and responsive to the day-to-day needs of student veterans. We know how important programs like this are to student veterans because, based on SVA's public opinion surveys, healthcare and mental healthcare services have been identified as the top two issue areas on which veteran service organizations should focus their advocacy efforts.

SVA encourages the committees to review ways to expand the VITAL program to more campuses across the country by increases in annual funding and making on-campus access to VA Healthcare, including the use of telehealth technology and coordination with community care providers, a top agency priority.

SVA thanks Representative Ellzey for his leadership on H.R. 5516, the *VITAL Assessment Act*, as well as Chairman Takano for his inclusion of this text in H.R. 6411, the *STRONG Veterans Act*. These bills would produce a report on VITAL, providing Congress with key information to better understand and support the program. These reports are the first step to improving and expanding this program on campuses across the country.

Updating the VA Work-Study program

SVA often hears feedback from student veterans that the VA work-study (VAWS) program should be modernized and improved. The primary concern from students is the substantial disparity in job opportunities available to students participating in VAWS compared to those available through Federal Work Study (FWS). VA Work-Study students are largely required to work in roles directly related to VA, a limitation that greatly diminishes VAWS participants' ability to learn and develop the skill and experience they need to enter the workforce.

SVA continues to work with former VFW-SVA Fellow and PhD candidate John Randolph of Penn State University to recommend important changes to the VAWS system. Specifically, he proposes broadening the pool of qualifying work-study jobs and improving the payment rate and structure.

At a minimum, SVA believes that veterans' demonstrated propensity for service should be rewarded by expanding the jobs available through VAWS to at least include public interest, non-profit, and government agency positions. Specifically, these Committees might consider including veteran liaison jobs at public agencies and non-profit organizations that fulfill duties like those performed by participants who can now work for members of Congress.⁷ We hope to work with these committees to examine ways to further expand opportunities available to VAWS students so they can benefit from the greater variety of experiences available to their FWS peers.

Fund an expansion of the popular and impactful VetSuccess on Campus (VSOC) program

⁷ Id. (authorizing duties including "[t]he distribution of information to members of the Armed Forces, veterans, and their dependents about benefits and services under laws administered..." by VA.)

The VSOC program is one of the few SVA hears about that is uniformly positive. Despite this, over its lifetime, the program has only expanded to approximately twenty schools beyond the approximately ninety original schools. This program is popular and provides tremendous help and guidance to student veterans and schools. We encourage Congress to provide adequate funding to ensure it can expand to meet the growing needs of student veterans everywhere.

Improve oversight and accountability of trends in higher education such as institutional conversions and online program management companies

Today, student veterans have more learning options than ever, with many, quite literally, right at their fingertips. These new, often innovative ways of learning are compelling options for student veterans, especially as the cost of higher education and student loan debt continue to rise. As higher education changes, it is important that policy makers weigh the risks and benefits posed to students by new learning options and investigate ways to establish reasonable guardrails that protect students while not discouraging innovative practices.

As online programs have grown in popularity, so too have partnerships between established institutions and online program management companies (OPMs). OPMs are for-profit companies that offer an easy way for traditional institutions to quickly stand-up online platforms to deliver courses to students seeking fully online instruction. While not a universal concern, institutions' partnerships with OPMs can lack transparency, and this can negatively impact students who enroll in the programs managed by these companies. Further, tuition-share agreements between institutions and OPMs can result in non-profit and public schools ceding significant responsibilities to these companies, that raise potential questions about instructional quality and the use of inappropriate recruiting tactics.⁸

It is currently unclear how VA and SAAs review institutional partnerships with OPMs. There is reason for concern, though, as the GAO recently found that the Education Department (ED) was not doing enough to monitor these arrangements.⁹ With the agency that is arguably best positioned to oversee these partnerships failing to do enough, it is imperative that we know more about how VA reviews them.

Recent developments with OPMs remind us that we must commit to fully understanding new trends in higher education and establish appropriate guardrails to protect students from potentially problematic scenarios while also not stifling innovation. We encourage Congress to continue monitoring institutional partnerships with OPMs and to consider legislating additional safeguards where appropriate to protect students.

Collect better data on student veteran basic needs insecurity, such as those related to food, housing, and childcare.

There is a lack of research at the federal level on basic needs insecurity amongst students, let alone post-traditional students such as veterans. Robust data on student veteran insecurities around food, housing, and childcare are difficult to find, and often cover only broad subsets of the population.

Though not specific to student veterans, the topic of food insecurity seems to be gaining attention as an underserved area for research. Recent reports, such as those from the Government Accountability office (GAO),

⁸ *TCF Analysis of 70+ University-OPM Contracts Reveals Increasing Risks to Students, Public Education*, The Century Foundation (Sept. 12, 2019), <https://tcf.org/content/about-tcf/tcf-analysis-70-university-opm-contracts-reveals-increasing-risks-students-public-education>.

⁹ See *generally* U.S. Gov't Accountability Office, GAO-22-104463, Higher Education: Education Needs to Strengthen Its Approach to Monitoring Colleges' Arrangements with Online Program Managers (2022).

the Department of Defense (DoD), and the Military Family Advisory Network (MFAN) all indicate that veterans and service members experience high rates of food insecurity.^{10, 11, 12}

Childcare is one of the greatest pressure points for post-traditional students, including many student veterans. Increasing access to childcare is a near-universal conversation among SVA Chapters. This is no surprise given that more than fifty percent of student veterans are parents.¹³ Childcare challenges create added pressures for student veterans and complicate their academic journeys.

With childcare costs comprising about 10 percent of an average family's income, and presumably more for single parents, financial pressures can compound more quickly for student parents.¹⁴ These pressures have predictable outcomes: twenty-four percent of students pursuing bachelor's degrees reported that they have considered stopping taking courses in the latter half of 2020 due to childcare or caregiver responsibilities.¹⁵ This number rises to thirty-two percent for those students pursuing associate degrees.¹⁶

As a potential way to alleviate some of these burdens, we recommend that the members of these committees consider draft legislation first proposed by VFW-SVA Legislative Fellow El'ona Kearney of The Evergreen State College. El'ona's work highlighted the lack of assistance for non-traditional childcare options, such as care from relatives and neighbors who are more likely to be available and willing to assist with childcare during off-peak times like evenings and weekends. This stipend proposal would provide at least some flexibility and assistance to student veterans, many of whom need alternative childcare options.¹⁷

○

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

We thank the Chairmen, Ranking Members, and Subcommittee Members for your time, attention, and devotion to the cause of veterans in higher education.

¹⁰ Government Accountability Office, NUTRITION ASSISTANCE PROGRAMS Federal Agencies Should Improve Oversight and Better Collaborate on Efforts to Support Veterans with Food Insecurity. <<https://www.gao.gov/assets/gao-22-104740.pdf>>

¹¹ Office of the Under Secretary of Defense for Personnel and Readiness, Strengthening Food Security in the Force: Strategy and Roadmap. <<https://media.defense.gov/2022/Jul/14/2003035423/-1/-1/1/STRENGTHENING-FOOD-SECURITY-IN-THE-FORCE-STRATEGY-AND-ROADMAP.PDF>>

¹² Military Family Advisory Network, 2021 MILITARY FAMILY SUPPORT PROGRAMMING SURVEY. <<https://www.mfan.org/wp-content/uploads/2022/07/Executive-Summary-MFAN-Programming-Survey-Results-2021.pdf>>

¹³ The 2020 SVA Census Survey: Student Veteran General Breakdowns, STUDENT VETERANS OF AMERICA (Jan. 2021), <https://studentveterans.org/wp-content/uploads/2021/04/SVA-Census-2020-Report.pdf>

¹⁴ Rasheed Malik, Working Families Are Spending Big Money on Child Care, CENTER FOR AMERICAN PROGRESS (June 20, 2019), <https://cdn.americanprogress.org/content/uploads/2019/06/19074131/Working-Families-SpendingBRIEF.pdf> (citing U.S. CENSUS BUREAU 2014 SURVEY OF INCOME AND PROGRAM PARTICIPATION, WAVE 3 (2019)), <<https://www.census.gov/programssurveys/sipp/data/datasets/2014-panel/wave-3.html> (last visited Feb. 24, 2021).>

¹⁵ Gallup. Gallup State of the Student Experience: Fall 2020 Report. <https://www.gallup.com/education/327485/state-of-the-student-experience-fall-2020.aspx>.

¹⁶ Id.

¹⁷ Discussion Draft, To amend title 38, United States Code, to direct the Secretary of Veterans Affairs to pay to certain veterans, who receive certain educational assistance furnished by the Secretary, a weekly stipend for child care services (2021), available at <https://docs.house.gov/meetings/VR/VR10/20210921/114046/BILLS-1172ih-U1.pdf>.