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**NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS**

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STATEMENT OF  
DR. JAN DEL SIGNORE, PRESIDENT  
NATIONAL ASSOCIATION OF VETERANS' PROGRAM ADMINISTRATORS  
BEFORE THE  
UNITED STATES HOUSE COMMITTEE ON VETERANS' AFFAIRS  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY  
JUNE 12, 2024

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

Thank you for inviting me to speak at this hearing on pending legislation. My name is Dr. Jan Del Signore, President of the National Association of Veterans Program Administrators (NAVPA). NAVPAs membership includes over 400 public and private colleges and universities across the nation 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. I appreciate the opportunity to speak on 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:

- Student Veteran Debt Relief Act of 2024
- Reforming Education for Veterans Act

One of our main concerns is how P.L. 116-315, Section 1019 has been implemented by the VA causing undue hardship on student veterans and schools alike. When the VA determines a GI Bill® recipient was paid Chapter 33 benefits incorrectly, those overpayment letters are sent to the institution. NAVPA members are reporting these overpayment letters include tuition payments as far back as 2010, or when the student last attended. Per the SCO Handbook, *“The institution is required to retain student records for 3-years per 38 CFR 21.4209(f) unless a written request to keep the records longer is received from the Department of Veterans Affairs or the General Accounting Office 30 or more days before the end of the 3-year period.”* The institution then has difficulty understanding the reason for this 14-year-old debt since SCOs no longer have access to the VA Once sunset technology, or possibly even the students record per federal guidelines, or why it has taken the VA over 14-years to determine a debt.

Oftentimes the student and/or graduate is unaware the VA has rescinded their GI Bill® approval. NAVPA membership is reporting these students have either graduated years ago or stopped attending the institution making it impossible for the school to contact the student regarding this new debt. These students are placed into collections causing unforeseen consequences such as negatively impacting their credit rating and personal financial portfolios. These actions are unknown to the student veteran as the school can no longer contact them.

Not all student debt has been from years past when the VA has rescinded a student veterans GI Bill® approval. NAVPA had one member report that both the school and student received overpayment letters prior to the student’s final semester. This created a huge debt for the student where he had to return thousands of dollars of his housing allowance back to the VA due to a VA clerical error but was then facing no housing support to complete his final semester in school and graduate. In addition, he now owed his school thousands of dollars in tuition for the monies the VA took back that were previously approved under his benefit. This action was not only unfair to that student veteran but placed him into extreme financial hardship and dire straits as he searched

to find alternative funding to stay and complete school, pay his tuition, and locate living expenses.

Since the inception of 1019, there are no longer recourses for the VA to work with a student and waive these overpayments caused by administrative errors by the VA or other unforeseen circumstances. NAVPA thanks the Subcommittee for addressing this issue with the *Student Veteran Debt Relief Act of 2024* and giving the VA tools to better serve our student veteran population when it comes to student debt. We do ask that the VA adhere to the 3-year requirement under § 21.4209 when collecting old debt.

Our next topic concerns the *Reforming Education for Veterans Act* addressing 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.

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 often be long lasting of 6-months to one year depending upon the mission. NAVPA recommends an amendment to this law 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.

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 extending the time limitations that were placed on the VA Compliance Survey 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.

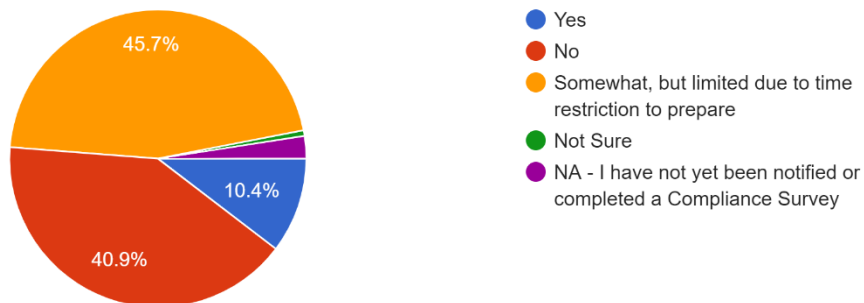
The Compliance Survey change currently limits institutions to less than 10-business days to prepare for a review once notification is received. For large accredited IHL schools with large quantities of information to organize and gather, this is not enough time. NAVPA members are reporting they must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

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 less than the full 10-business days to prepare for a VA Compliance Survey. Over 80% of participants responded they had limited or no time to serve their student veteran population during the preparation.

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.

These centralized schools are categorized as one institution under the ED, their accreditors, has one governing body, and one catalog and/or bulletin, and one team of SCOs performing all GI Bill® certification functions, but these surveys often overlap creating triple duty or more for the SCO at times. Having a multitude of Compliance Surveys on-going for the same school but at different 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 on the day 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.

NAVPA supports *The Warriors to Workforce Act* in helping our veteran’s transition back to the civilian sector through their apprenticeship or OJT program. And we are interested in seeing an increase of the book stipend to ensure student veterans have the necessary academic requirements to be successful in the classroom.

In conclusion, NAVPA is committed to serving our student veterans and providing quality services to our nation’s heroes and we thank the Committee in giving us this opportunity to share the insights of 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 testify today and I look forward to your questions regarding these topics.