



STATEMENT OF
STUDENT VETERANS OF AMERICA

BEFORE THE
COMMITTEE ON VETERANS' AFFAIRS
U.S. HOUSE OF REPRESENTATIVES

HEARING ON THE TOPIC OF:
BUILDING AN ACCOUNTABLE VA: APPLYING LESSONS LEARNED
TO DRIVE FUTURE SUCCESS

February 28, 2023

Chairman Bost, Ranking Member Takano, and Members of the Committee: Thank you for inviting Student Veterans of America (SVA) to submit a statement on the topic of Building an Accountable Department of Veterans Affairs (VA).

Through a dedicated network of campus-based chapters worldwide, SVA aims to inspire yesterday's warriors by connecting today's military-connected students, student veterans, family members, and survivors with a community of dedicated SVA chapter leaders. Every day these passionate leaders advocate for the necessary resources anywhere. This population is pursuing their education while working to provide support through networking and fostering a sense of comradery post-military service to ensure student veterans can effectively connect, expand their skills, and ultimately achieve their greatest potential.

Transparency and Accountability

SVA firmly believes that transparency and accountability go hand in hand. We encourage the Committee to focus on the following topics when considering how to build a more transparent and accountable VA so it can better serve student veterans and other military connected students.

1. Increase oversight of VA communications with institutions and training providers.

SVA heard growing concerns from School Certifying Officials (SCOs), institutions, and training providers recently concerning a lack of timely and accurate communications on policy changes and guidance.

Over the last three years, many important and necessary changes have been made to laws governing VA education benefits. For instance, the landmark *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*—appropriately dubbed by VA as “transformative”—required the Department to implement more than 30 new provisions.¹ SVA supported this bill and will be forever grateful for this Committee's work. However, based on our conversations with SCOs and other institutional representatives, VA has had challenges implementing certain aspects of the legislation. This has been particularly true when it comes to the Department disseminating clear, consistent, and timely guidance to institutions.

Communications issues at VA have also impacted certain aspects of its Digital G.I. Bill modernization project. This long-overdue project is making significant changes to GI Bill IT systems.² Of course, these changes have implications for institutions as well. For instance, the Department is about to release its new Enrollment Manager—an updated system for SCOs to use when certifying enrollment for students using VA education benefits.³ SVA believes this is an important update and supports the overall effort. Yet, we have been perplexed by some of the decisions made by VA and the seeming lack of consideration the Department has shown for input from institutions.

Last year, for instance, VA announced plans to transition from the current VA-ONCE system to the new Enrollment Manager during arguably the busiest enrollment period of the spring semester. This decision came

¹ *Isakson and Roe Veterans Health Care and Benefits Improvement Act of 2020*, U.S. DEP'T OF VETERANS AFFAIRS, <https://benefits.va.gov/gibill/isaksonroe.asp> (last updated July 18, 2022).

² *Transforming the GI Bill Experience*, U.S. DEP'T OF VETEARNs AFFAIRS, <https://digital.va.gov/delightful-end-user-experience/transforming-the-gi-bill-experience/> (last updated Feb. 22, 2023).

³ Bulletin from Veterans Benefits Administration to School Certifying Officials (Dec. 13, 2022), *available at* <https://content.govdelivery.com/accounts/USVAVBA/bulletins/33ced9d>.

despite feedback from SCOs that doing so would have potentially disastrous consequences for student veterans and military-connected students due to delayed certifications resulting in late benefit payments, among other issues. We commend VA for ultimately heeding these concerns and delaying the rollout, but we still have reservations as to why the original decision was made in the first place and why input from SCOs was seemingly not considered earlier in the process.⁴ At the time of this hearing, VA-ONCE sunset a few days ago, and VA's new Enrollment Manager will kick in March 6. SVA stands by to hear those using the new system.

SVA often hears from SCOs that they are not receiving the guidance they need from their VA Education Liaison Representatives (ELRs). The problem has sometimes been attributed to a shortage of ELRs. Though based on comments we have heard from VA representatives, it appears the Department simply views their ELR structure as in transition. Whatever the true nature of the issue, SVA believes ELRs are critical for VA to disseminate timely and accurate guidance to institutions. Considering what we have heard from SCOs about the current state of VA communications and guidance, SVA urges the Committee to explore whether ELRs are truly fulfilling their essential duties. If necessary, we ask that the Committee intervene to correct deficiencies.

As a general matter, SVA encourages the Committee to ramp up its oversight of VA's communications at all levels with institutions and training providers. We ask that the Committee more closely monitor VA's communications for timeliness and consult with institutions and training providers regularly regarding the clarity, consistency, and workability of VA communications, including on policy guidance.

2. Address concerns with VR&E processes and personnel.

SVA believes the Committee should focus a brighter oversight spotlight on the Veteran Readiness and Employment (VR&E) program.

In 2021, VA announced a self-identified change in how it assesses eligibility for VR&E as it relates to other veterans' education benefits. In short, a veteran may use their VR&E eligibility up to a 36-month cap and then, separately, use another education benefit, such as the Post-9/11 GI Bill, up to its own 36-month cap, with a total cap of 48 months. SVA would like to commend VA for identifying and changing its interpretation. This change provides a greater benefit to eligible veterans and complies with the underlying statute.

To continue this positive trend, SVA encourages the Committee to place a focus on ongoing areas of concern with the program that we hear about from student veterans, such as the lack of counselors, difficulty in contacting VA to determine eligibility, long timelines in the assessment process, inconsistent counselor guidance and determinations, among many other issues.

VR&E is one of the most flexible and important programs in VA's portfolio. Indeed, in certain scenarios, it provides a vastly greater benefit than even the generous Post-9/11 GI Bill. Particularly considering the recent change to entitlement charges by VA. It is more important than ever to thoroughly review this program for obstacles, barriers, and shortfalls that prevent it from fulfilling its true potential as a benefit. We look forward to working with the Committees on the best path forward for the program.

3. Support and monitor ongoing improvements to the GI Bill Comparison and Feedback Tools.

The GI Bill Comparison and Feedback Tools are important transparency mechanisms that give students critical information to make informed choices about where to use their VA education benefits. Students can get cost

⁴ See *generally* Letter from American Council on Education et. al to the Hon. Denis R. McDonough, Secretary, U.S. Department of Veterans Affairs (Dec. 8, 2022), *available at* <https://www.acenet.edu/Documents/Letter-VA-Enrollment-Manager-120822.pdf> (explaining institutional concerns); see Bulletin, *supra* note 3 (explaining VA chose to delay the rollout to "optimize functionality.").

estimates, see if a school has key veteran support programs and services, and view complaints against institutions, among other things. Yet, the tools also remain a source of great untapped potential. We urge the Committee, as we have in the past, to consider the following options to improve the GI Bill Comparison and Feedback Tools.

As it stands, the lack of coordination between the Department of Education (ED) and VA on College Navigator, College Scorecard, and GI Comparison Tool reduces the overall delivery of powerful data to veterans.⁵ The Comparison Tool has unique data, justifying itself as a separate tool from ED's options, but the underlying data is not being shared effectively between these tools, leaving prospective students an incomplete view of their options. We encourage members to explore ways to better share and integrate the data across ED and VA resources.

SVA also believes student outcome measures should be displayed in the GI Bill Comparison Tool. Establishing the appropriate data feeds and displaying the information in the tool would require IT upgrades that fit neatly alongside those currently happening at VA. In one of our most common-sense recommendations, each institution should be required to disclose how effective it is at delivering on its promise to students. By informing military-connected students, student veterans, family members, and survivors about the effectiveness of GI Bill-eligible programs, we allow them to make informed decisions about how to spend their education benefits.

Additionally, we ask that the Committee encourage VA to note whether an institution participates in the VA VITAL Program. VITAL can provide critical mental health support for student veterans, assistance with academic accommodations, and foster a more veteran-inclusive campus culture. The GI Bill Comparison Tool currently includes a section on "Veteran Programs and Support" where VA could easily note whether the institution participates in VITAL and link to more information about the program's benefits.

The GI Bill Comparison Tool also suffers from a lack of detailed information about student complaints. For any given school, the tool simply shows a tally of complaints across broad categories. The tool also only publishes complaints from the prior 24 months. SVA provided specific recommendations to address these issues in a public comment on VA's continued collection of information through the GI Bill Feedback Tool:

VA should publish and maintain a comprehensive database of all school-specific complaints submitted through the Feedback Tool. Students should be given the option to disclose their narrative comments publicly, and those comments should be included in the database. The feedback database should be presented in a familiar interface, preferably one that mirrors other popular review websites. This means it should include helpful user features like search, filters, and sorting. We further recommend the Department include a link on each school's profile page in the GI Bill Comparison Tool that directs students to a full, detailed list of complaints submitted about that institution. This will help students identify and better understand the true nature of complaints submitted about each school. It will also improve the ability of advocates and researchers to monitor and analyze past and present institutional compliance with the Principles of Excellence and other laws.⁶

To address concerns about fake or inaccurate reports, we believe VA should verify that reports come from current

⁵ See generally *College Navigator*, NATIONAL CENTER FOR EDUCATION STATISTICS, US DEPARTMENT OF EDUCATION, <https://nces.ed.gov/collegenavigator> (last visited March 1, 2020); *College Scorecard*, US DEPARTMENT OF EDUCATION, <https://collegescorecard.ed.gov> (last visited March 1, 2020); *GI Bill Comparison Tool*, US DEPARTMENT OF VETERANS AFFAIRS, <https://www.va.gov/gi-bill-comparison-tool/> (last visited Feb. 24, 2021).

⁶ *SVA Comment on OMB Control No. 2900-0797 Agency Information Collection Activity: Principles of Excellence Complaint System Intake*, STUDENT VETERANS OF AMERICA 3 (2020), available at <https://www.regulations.gov/comment/VA-2020-VACO-0001-0084>.

or former students of the institution for which feedback is being provided and that schools be given the opportunity to issue public responses to complaints.

VA should also place caution flags on schools in the GI Bill Comparison Tool that receives an inordinate number of student complaints. VA currently only places caution flags on schools with a program of education subject to “increased regulatory or legal scrutiny” by VA or other federal agencies.⁷ SVA supports this use of caution flags, but student veterans also deserve to be alerted when a school has received a troubling number of student complaints.

SVA also asks that VA develop a mechanism to maintain closed schools within the GI Bill Comparison Tool versus having them simply disappear. This removal of schools from the tool means associated data also disappears, leaving significant gaps in the overall picture of how those schools served students. We look forward to working with Congress and VA to update this valuable resource so it can better serve student veterans, service members, and their families.

SVA applauds Senators Schatz, Rounds, Portman, and Coon’s leadership on this issue with their championing of the *Student Veterans Transparency and Protection Act* last congress. The bill would make numerous improvements to the GI Bill Comparison and Feedback tools, while also providing entitlement restoration for beneficiaries that are the victims of misconduct perpetrated by bad-actor institutions. We look forward to that bill being reintroduced this Congress and encourage the Committees’ members to support it as well as the other improvements we have outlined here.

Finally, SVA acknowledges and applauds VA’s ongoing efforts to improve the GI Bill Comparison Tool. The Department has made great strides in recent years, by adding new information like context about accreditation and details on institutional ownership as well as important new features like side-by-side comparison and map functionality. We look forward to collaborating closely with Congress and VA to further refine these important tools.

4. *Establish a Veteran Economic Opportunity and Transition Administration with Undersecretary representation for all economic opportunity and transition programs.*

For years, SVA and others have called for the creation of a fourth administration at VA—a Veteran Economic Opportunity and Transition Administration. This new administration would provide VA’s economic opportunity programs with the dedicated, senior-level leadership they deserve. As DAV, PVA, and VFW pointed out in the 2016 Independent Budget, a “new undersecretary for EO would refocus resources, provide a champion for these programs, and create a central point of contact for veterans service organizations and Congress.”⁸ If we want to “build a more accountable VA”—especially with regards to economic opportunity programs—a fourth administration would do just that.

As SVA has noted, we believe the greater focus must be placed on economic opportunity for veterans, including through higher education. This would be best achieved by building on the early success of the new office at VA dedicated to transition and economic opportunity and elevating it, and Education Service, to its own administration at VA. Presently, economic opportunity programs such as the GI Bill, home loan guaranty, and many other empowering programs for veterans are buried within the bureaucracy of Veterans Benefits Administration and functionally in competition against disability compensation policy for internal resources.

⁷ *GI Bill® Comparison Tool: About This Tool*, U.S. DEPARTMENT OF VETERANS AFFAIRS (June 11, 2020), https://www.benefits.va.gov/gibill/comparison_tool/about_this_tool.asp#sourcedata.

⁸ *Id.* at 121.

Over the past century, VA has focused on compensating veterans for loss, but the reality of the 21st century and beyond demands the additional goal of empowering veterans to excel post-service and improving a veteran's social determinant of health. Critically, this will further advance our nation's goals of enhancing economic competitiveness and increasing protective factors against suicide. A focus on veteran contributions to business and industry, to governments, to non-profit organizations, and to communities through the best education programs in our country will result in impressive returns on the taxpayers' investments and save lives.

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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 Chairman, Ranking Member, and Members of the Committee for your time, attention, and devotion to the cause of veterans in higher education.