



# **NATIONAL ASSOCIATION OF VETERANS' PROGRAM ADMINISTRATORS**

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## **Veterans' Education Programs**

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### **2019**

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# **The National Association of Veterans' Program Administrators**

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## ***STATEMENT OF PURPOSE***

The National Association of Veterans' Program Administrators (NAVPA) is an organization of institutions and individuals who are involved or interested in the operation of veterans' affairs programs and/or the delivery of services to veterans as Veterans' Education Program Administrators across the country. A Board of Directors elected at our annual conference governs NAVPA. The purpose of NAVPA is to promote professional competency and efficiency through an association of members and others allied with, and involved in, veterans' educational programs and to promote the development, improvement and extension of opportunities to any service member, veteran or dependent of a veteran, for his or her personal growth and development to its fullest potential. This is achieved through assisting with the assessment and attainment of individual needs, communicating and cooperating with communities, schools, agencies and organizations at the local, state, regional and federal levels; developing productive relations with the Department of Veterans Affairs, Department of Education, Department of Defense, and other federal or national Veterans Service Organization or agency serving veterans; participating in efforts to facilitate the education and/or training of educationally or otherwise disadvantaged veterans and to promote cooperative studies, research, evaluation, workshops, seminars, conferences, and other activities as may be desired or required to fulfill the purpose of NAVPA.

## ***MEMBERSHIP***

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. NAVPA's membership now includes 344 Institutions of Higher Learning across 47 states that represent 431,032 veterans.

## ***TOP LEGISLATIVE AND REGULATORY ISSUES***

### **PRIORITY ISSUE #1**

#### **Public Law 115-48; section 308; 3699A (b)**

**Issue:** Allowing GI Bill® beneficiaries the opportunity to “opt out” of providing educational institutions entitlement information can potentially become a barrier to school certifying officials, counselors and veteran program administrators. Such barriers are counterproductive to advising student veterans in the optimal use of VA education benefits. Additionally, schools not having this information at the time of enrollment creates a potential financial risk to the student and the institution.

**Discussion:** NAVPA has long advocated that entitlement information, including percentage rate and remaining entitlement (chapter 33 benefit users specifically) be available for School Certifying Officials (SCO’s) in real time via a secure information technology system accessible for SCO’s. PL 115-48 Sec 308, 3699A (a) has addressed this situation where schools should no longer rely on, often times, outdated information from the beneficiary when certifying benefits to the VA. By having accurate information regarding remaining entitlement, SCO’s have the ability to advise benefit-using students on accurate out of pocket expenses before they are incurred, thus preventing burdensome financial situations for benefit users. Sub-paragraph b of the above referenced section of 308 states: *A veteran or other individual pursuing a course of education described in subsection (a) may elect not to provide the information described in such subsection to an educational institution in a manner prescribed by the Secretary.*

**Recommendation:** NAVPA recommends that PL 115-48 Sec 308, 3699A be amended and subparagraph (b) that allows beneficiaries to “opt out” of having their entitlement information not available via the secure technology stricken.

## **PRIORITY ISSUE #2**

### **GI Bill Comparison Tool – Complaint System**

**Issue:** Many institutions of higher learning receive unvetted complaints against them as part of the Department of Veterans Affairs (VA) GI Bill® feedback system, which is then posted on the VA GI Bill® Comparison Tool indefinitely. Schools have no recourse to remove or refute the complaints from their public-facing profile regardless of when the complaint was filed or the nature of the complaint. This results in higher education institutions having a permanent “black mark” on their public record that directly impacts a veteran or other VA education beneficiary’s choice in selecting a reputable school and program of study.

**Discussion:** The VA GI Bill® feedback system, allows recipients of VA educational benefits to submit complaints against educational institutions or employers they believe have failed to follow Principles of Excellence (POE) established under Executive Order, 13607. While complaints are supposed to be reviewed by the VA and addressed by the institution/employer, not all complaints filed have been true violations of EO 13607 yet are still posted on an institutions profile for public viewing with no option of removal or refutation by the institution. Complaints posted on the public site are not vetted, have no delimitating date, and are posted after student issues have been resolved.

Currently, there is no method to notify the institution/employer when the complaint response submitted to the student is considered satisfactory and the issue closed. There is no opportunity for institutions to refute the complaint. Nor are there any delimiting dates for complaints as they are posted on the GI Bill® Comparison Tool indefinitely.

**Recommendation:** VA partner with NAVPA in addressing the inequities which result from inaccurate and often erroneous information created and displayed by the feedback system in the GI Bill® Comparison Tool with an end date for the complaint to be removed. A viable and

accurate GI Bill® Comparison Tool is essential for veterans and GI Bill® recipients to select the best education institution that meets their individual needs.

### **PRIORITY ISSUE #3**

#### **GI Bill® Comparison Tool – Two Year Colleges**

**Issue:** The GI Bill® Comparison Tool often displays data that is not a true representation of the performance of students at two-year colleges. Veterans and other military-affiliated GI Bill® users attending two-year institutions, often focus primarily on obtaining the pre-requisites to transfer into a four-year college or university. Many of the two-year institutions offer pathways that support the student transfer without completing their program or graduating from the two-year school in question. As a result, the GI Bill® Comparison Tool displays inaccurate information regarding student success at these higher education institutions.

**Discussion:** The GI Bill® Comparison Tool is a well-used resource for veterans and other GI Bill® beneficiaries to assess the success rates and outcomes of higher education institutions prior to committing their Department of Veterans Affairs education benefits. Executive Order 13607: Establishing Principles of Excellence and Public Law 112-249: Improving Transparency of Education Opportunities for Veterans, the Department of Education, Department of Veterans Affairs, and Department of Defense identified outcome measures to be used by veterans and beneficiaries for educational choices. While there was some input from institutions during the time these outcomes were being established, it was very limited.

**Recommendation:** VA partner with NAVPA in addressing the inequities and inaccurate outcome measures displayed on the GI Bill® Comparison Tool regarding students who transfer from two-year institutions to four-year colleges and universities prior to completing or graduating from their program of study. NAVPA membership consists of thousands of highly experienced higher education professionals who work with the military and veteran student

population regularly and, as such, are positioned to assist VA with the development, implementation, and operation of a valid system to identify “transfer rates” in order to truly reflect the success of VA education beneficiaries at two-year institutions. These outcome measures require additional analysis to ensure accurate successes are reported regardless of degree completion.

#### **PRIORITY ISSUE #4**

##### **Public Law 115-48; section 306**

**Issue:** NAVPA recognizes that the previously announced advisory committee on education does not have representation from the practitioner level (SCO or Veteran Administrator) from the higher education community.

**Discussion:** Section 306 of the Harry W. Colmery Veterans Educational Assistance Act. Provides the extension of authority for the Advisory Committee on Education. NAVPA recognizes the positive impact of this subsection. However, there is concern among the professional community of school certifying officials that the makeup of the current committee does not have representation from the practitioner level. The only school representation on the current committee is from the executive level of leadership on campuses and is not involved in the day to day operations of their veteran programming, inclusive of the benefits.

**Recommendation:** NAVPA requests that a seat on the committee be established from the practitioner level or that a subcommittee of campus delegates working directly with student veterans be established to work with the committee.

**Additional NAVPA Discussion Topics:**

### **90-10 “Loophole”**

**Issue:** Veteran advocates, including NAVPA member schools are concerned that the current discussions around the 90-10 rule are misunderstood as a simple narrative of for-profit schools vs. non-profit/public schools. NAVPA has long held the belief that predatory or “bad actors” exists in all sectors of higher education.

**Discussion:** NAVPA believes that the 90-10 debate should remain centered on ensuring and enhancing protections for veterans as consumers. NAVPA recognizes that not counting Title 38 funding as federal funding in the 90% calculation has the potential to lead unscrupulous institutions to aggressively and deceptively recruit veterans, service members and their families to enroll in high-priced, low-quality programs.

NAVPA recognizes that there are private sector schools that offer flexibility in programming, flexibility in degree and or skill attainment and convenience that some students seek. NAVPA is concerned when all schools of any sector of higher education is painted with a broad brush.

NAVPA strives to support student veterans and military connected students in making sound decisions in their choices related to where they study based on their unique situations, educational goals, and not the fiscal needs of the IHL.

### **Study Abroad**

**Issue:** Allowing students using GI Bill® veterans education benefits to easily utilize their benefits with approved study abroad programs at their home institutions that will further their educational pursuits in alignment with current federal initiatives that promote international education and professional exchanges. In the past, there has been little guidance in this area. Recent interpretation of how students may use their benefits while studying abroad will severely limit available programs and will hinder students from participating in these educational value enhancing programs.

**Discussion:** In recent practice student's participating in study abroad programs have been certified through the parent school. The student must attend a WEAMS approved program at the host school and receive the maximum rate allowed by the parent school for tuition and fees and MHA. Recent interpretation of how the VA will permit certification for these programs will essentially limit the student to participation in faculty-led programs only, and eliminate almost all other Education Abroad programs from Institutes of Higher Learning. This will create a restricted and inequitable structure, hindering the cultural and meaningful experience expressly promoted by the U.S. State Department. New practices will require schools to certify students in the same method as they currently utilize in the domestic parent/school certification process. In the current study abroad landscape, third parties play a pivotal role in the relationship between the parent school and the foreign host (guest) school. These third parties are a crucial component as they facilitate financial ease, curricular articulation, and cultural integration. We believe Congress needs to look seriously at the relationship of GI Bill® benefits within study abroad and move toward a strategy that is in alignment with the current study abroad landscape.

**Recommendation:** The SAA approves study abroad programs of the parent school allowing the certification process to proceed under the same guidelines as the faculty-led programs.

### **STEM Scholarship**

**Issue:** Public Law 115-48, section 111 – The Colmery Act, allows an additional nine months of Post 9/11 GI Bill® benefits for certain eligible individuals pursuing credentials in STEM programs. The implementation of this enhanced benefit carries an August 1, 2019 effective date. NAVPA is concerned with the VA's previous struggles to implement other provisions of the Colmery Act, most notably section 107, and that these challenges will push the date back for section 111.

**Discussion:** Most colleges and universities will begin enrolling students for the Fall 2019 term in late March and April, well before the August 1 effective date of this section. NAVPA is

concerned that schools have not received guidance from VA on the proposed process of this section, including the application and subsequent selection processes that eligible students will have to follow to receive this scholarship. NAVPA believes that, as registration opens, SCO's and school veteran program administrators will not have the necessary information to advise students on benefits for which they may be eligible. We firmly believe that this will have a significant impact on students academically and financially, and could become a barrier to student success.

**Recommendation:** NAVPA requests that VACO provide immediate guidance and information on the implementation of section 111.

#### **NAVPA 2019 Summary**

NAVPA recognizes the significant challenges placed on the Department of Veteran Affairs Education Division in support of student veterans and benefit users across the country. As an organization, we seek to continue to work with the VA in the delivery of education benefits to our veterans pursuing higher education. NAVPA has a unique role as a broker of services with a 360 degree view.