

**STATEMENT OF
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(NAVPA)
BEFORE THE HOUSE OF REPRESENTATIVES
VETERANS AFFAIRS COMMITTEE
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY (EO)**

**Hearing on:
“A REVIEW OF HIGHER EDUCATION OPPORTUNITIES FOR THE NEWEST
GENERATION OF VETERANS”**

March 17, 2015

Introduction

Chairman Wenstrup, Ranking Member Takano, and members of the Subcommittee on Economic Opportunity, the National Association of Veterans Program Administrators (NAVPA) is pleased to be invited to provide comments for this “*review of higher education opportunities for the newest generation of veterans.*” NAVPA is a nationally recognized nonprofit organization founded in 1975 by school certifying officials. Our organization represents close to 400 educational institutions nationwide. We voluntarily serve NAVPA in an effort to better serve the veterans on our campuses.

NAVPA recognizes the significant higher education opportunities that are afforded this generation of veterans. We are committed, in partnership with the Department of Veterans’ Affairs, to ensure the success of the programs funded to provide educational opportunities for our veterans and their family members.

GI Bill Comparison Tool

A year ago, in March of 2014, Student Veterans of America published the Million Records Project. One of the clear observations that emerged from the data in this study was the unique non-traditional education pathways that veterans take. Student veterans are more likely to transfer or change institutions, and take longer than traditional college students to complete their education credentials. This makes defining success and measuring outcomes for veterans challenging.

The GI Bill Comparison Tool is an important breakthrough in providing information to potential student veterans. However, it has significant limitations. The graduation rate used in the tool, is the Department of Education's metric, based on the Integrated Postsecondary Education Data System (iPEDS). The iPEDS graduation cohort is limited to "first-time, full-time students" (first-time degree or certificate seeking students). In the denominator, the rate includes only those students who have no previous higher education experience, and who enroll full-time in a degree granting program. In the numerator, the rate only includes those from the denominator who earn a degree at the initial institution. Therefore, students who arrive on campus with transfer credits or start at one institution but graduate from another are unrepresented in the graduation rate. This differentially impacts the reporting of veteran students.

Based on the American Council on Education (ACE) analysis and recommendations, service members and veteran's military transcripts are evaluated for transfer credit. If credit is awarded, the student will never be represented in the graduation cohort rate. Because the veteran is excluded from the cohort, his/her successful completion of a higher education credential is also not captured.

Being mindful of the SVA's Million Records Project, the metric used in the GI Bill Comparison Tool does not account for the unique experience and enrollment patterns of student veterans, specifically, the arrival on campus with credits from the military transcript and the high transfer rate between institutions – thus making the iPEDS graduation data not truly reflective of the efforts of the student veterans or the institutions providing their education.

One set of outcome measures that is currently proposed is to capture the course completion rates within institutions of higher education. Rather than the current graduation metric used in the comparison tool, course completion rates would be a better indicator of veteran students' success. While graduation rates are an important indicator, NAVPA believes that veterans deserve a more valid comparison tool, which utilizes relevant data/metrics, and urges congress to ensure that the VA has adequate funding, resources and time to develop such a tool to accurately depict the successes of our institutions and students.

Feedback System

NAVPA endorses the GI Bill Feedback system which allows educational institutions to work with the VA, state and federal agencies to mitigate veteran students' complaints. We support the increased scrutiny by the VA for validated serious or flagrant complaints, including risk-based program reviews.

As an organization, we ask that the notification, follow-up and resolution process continually be improved. For example, our membership reports that once they have provided feedback for a complaint lodged against their school, resolution information is not currently being provided by the VA.

Not all of the complaints received by our membership have been in violation of the Principles of Excellence (PoE); instead these are complaints from students who do not understand processes within higher education. The Principles of Excellence were established to strengthen oversight, enforcement, and accountability for students who receive funding from federal veteran and military educational benefit programs, yet it would appear from our membership, that all complaints are treated as PoE violations. It would be helpful if the VA could identify true PoE violations to be reported. The VA serves primarily as the facilitator between the student and school for complaint resolution and should take a more active facilitator role with improved communication to the institution.

It is also worth noting that there is significant concern that all complaints, whether valid or invalid against institutions, with no qualifying information, is available in the School Summary section of the comparison tool. It is the position of NAVPA that only validated complaints be listed, along with a summary of corrective actions taken.

Choice Act 2014, Section 702

The "*Veterans Access, Choice and Accountability Act of 2014*" being signed into law by the President is viewed by NAVPA as a significant commitment from our country to ensure the quality of care and services afforded to our most deserving population. Section 702 of the act, requiring that all public institutions of higher learning participating in VA-approved programs charge in-state tuition and fees to covered individuals as described in the act, is supported by the NAVPA membership.

NAVPA is concerned that the implementation date of July 1, 2015 may not allow all state governments to pass legislation that will bring their states into compliance with section 702. We understand that VA is in the process of developing waiver criteria for states that are actively pursuing changes to become compliant. It is our position that waivers may create a situation of inequity between state institutions. We respectfully request that this committee strongly consider passing House Resolution 475, which includes moving the implementation date for section 702 to July 1, 2016.

Choice Act 2014 Section 701

NAVPA and our membership would like to commend the Department of Veterans' Affairs Education for their work in successfully implementing section 701 of the Choice Act. Our member schools have reported that the implementation of section 701, including transferring covered individuals from other VA education benefits to the Fry Scholarship has been handled very well by the VA.

Closing

In closing, on behalf of the membership institutions of NAVPA, I thank you for the opportunity to discuss these important issues with the committee today. We look forward to working with you on veteran education issues in the future.

