



NATIONAL ASSOCIATION OF VETERANS' PROGRAM ADMINISTRATORS

**Veterans' Education Programs
Issues and Legislative Agenda**

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CONTENTS

NAVPA Statement of Purpose	1
<i>NAVPA 2010 Board of Directors</i>	2
NAVPA Legislative and Regulatory Issues for 2010	7
<i>Top Five Issues/Priorities – 2010 Legislative Action Center</i>	10
<i>VA Work-Study and Jobs for Veterans</i>	12
<i>Veterans Service, Education and Training (VSET) Program Grant</i>	13
<i>Equity in Benefit, Simplicity in rules, Payments, and the Administration of the Post-9/11 GI Bill</i>	16
<i>Elimination of the GI Bill Delimiting Dates</i>	17
<i>Increase Reporting Fees to IHL</i>	18
<i>Consolidation of Claims Processing</i>	19
<i>Development of a Web Portal</i>	20
<i>Measurement of Pursuit</i>	21
<i>Accelerated Payment</i>	22
<i>Need for Training for School Certifying Officials</i>	23
<i>Veterans’ Student Work-Study Program Enhancement</i>	24
<i>Congress Should Appropriate Money for Veterans’ Care and Benefits When They Appropriate Money for War</i>	25
<i>Tie Military Separation Physicals to VA Compensation Physicals</i>	27
<i>The GI Bill for Veterans Who Receive A “General (Under Honorable Conditions)” Discharge</i>	28
Technical Legislative Recommendations for Public Law 110-252 and Other Veterans Education Programs Summary	29
House Committee on Veterans’ Affairs, Subcommittee on Economic Opportunity Roundtable Discussion/Testimony	31



NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS

Suite 1975 • 2020 Pennsylvania Avenue N.W. • Washington, D.C. 20006-1846

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.

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NAVPA LEGISLATIVE AND REGULATORY ISSUES FOR 2010

VA Work Study

The student work-study program needs to be expanded to allow veteran students to work in academic or administrative departments at the institution in which they are pursuing their degree. This will enable students to work in a myriad of jobs within the college or university and gain valuable work experience. Work-study expansion would tie in to legislation enacted by the 107th Congress, PL 107-288 - The Jobs for Veterans Act. We recommend that Congress and DVA support this concept.

The Veterans Service, Education and, Training Program Grant (VSET)

We recommend a two or three-year pilot program in DVA to demonstrate whether a renewed Veterans Service, Education, and Training grant program proposed herein would be productive and enhance service and outreach. Funding on the order of five million dollars per year would be adequate to do this.

Elimination of the MGIB & Post-9/11GI Bill Delimiting Dates

Veterans under the Montgomery and Post-9/11GI Bill currently have a "Delimiting Date" of 10 and 15 years respectively, following separation from active military service. This means that the veteran must use or lose their entitlement by this delimiting date thereby impeding life-long-learning and professional development concepts. NAVPA opposes the elimination of entitlement based on an expiration date. We encourage Congress to eliminate this requirement to veterans' educational and training opportunities.

Increase Reporting Fees to Institutions of Higher Learning

Institutions are compensated at the rate of \$7 for each student enrolled in most VA educational benefits. If the educational institution delivers an advance payment check, compensation is increased to the rate of \$11 for that student. These fees have not changed since the inception over 30 years ago; however, several programs have been added on to the school VA veteran's program administrator's responsibility at the institution. It is time and appropriate for that fee, paid to the college or university, to be increased to \$50.00 per student. Fees should be designated for the office of veterans' affairs for services, outreach, and professional development. This issue was approved and is a matter of record as outlined in the Department of Veterans Affairs Education Business Processing Re-Engineering Community of Practice Report, April 25, 2002. No action has been taken as of this writing.

Equity in Benefit, Simplicity in rules, payments, and the Administration of the Post-9/11 GI Bill

Public Law 110-252 establishes the foundation for a 21st century all volunteer force GI Bill. Equity in all aspects of the delivery and simplicity of administration of the Post-9/11 GI Bill should be a goal of legislation. NAVPA encourages the Secretary and Congress to amend chapter 33 to expand educational and training opportunities and to seek simplicity in program and administrative rules.

Appropriate Money for the True Cost of War

Historically the US Governments' quick resolve to appropriate money for war has fallen short when considering setting aside some of that appropriation to fund the much-needed care of those soldiers who fight in those wars. Therefore, veterans' health care and benefits have not kept pace with the financial obligations needed to pay for them. To solve this problem our Government must factor into the cost of war, the continuing cost care for our veterans. We recommend that legislation be passed that requires the President and the Congress to appropriate money for veterans' care and benefits as a necessary part of their appropriation of money for war. If we cannot afford to keep our promise to care for those who serve our country, we cannot afford to go to war.

Authorize the GI Bill for Veterans Who Receive A "General (Under Honorable Conditions)" Discharge

We recommend that veterans who receive a "General (Under Honorable Conditions)" Discharge be allowed to use their VA education benefits under the MGIB. This change is the right thing to do for our veterans whose service has been satisfactory, honest and faithful, but not sufficiently meritorious to warrant an honorable discharge. This is an opportunity to help these individuals become better citizens, gain meaningful employment and contribute to society in a positive manner. Service members who receive a "General (Under Honorable Conditions)" Discharge are eligible to receive all other VA benefits. Veterans who served during WWII, Korea and Vietnam and received a "General (Under Honorable Conditions)" Discharge were entitled to their GI Bill Education Benefits. As these generations of veterans have proven; an educated society is more productive, much less likely to commit crime, will pay taxes, buy a home and contribute to their community.

DVA ISSUES

Efficiencies in Consolidation of Education Claims Processing

NAVPA is convinced that the policies, databases, etc., within DVA Education Services should be standardized. As technology enables better and faster communications DVA should concentrate on standardizing the procedures of and messages from the RPO's to its shareholders. A reduction in the number of processing points could be made possible as these efficiencies, such as a web portal and electronic certification process, both under development, reach their fullest potential. We believe that better customer service to the veteran as well as efficiencies gained by the DVA would be the end result. Resources from a consolidation could be distributed to other urgent needs within DVA to further reduce backlog in claims processing.

Development of a Web Portal

A web portal will provide an efficient mechanism for information exchange with, and access to, education systems by veterans and other stakeholders, such as schools, State Approving Agencies, etc. We highly recommend that funding for this important initiative be made available to the DVA Education Services Department to allow enhancements for the development of a web portal as initially recommended by NAVPA in 1999.

Measurement of Pursuit

Many students who access their Montgomery GI Bill (MGIB) benefit are placed at a financial disadvantage because of DVA policy to count class enrollment sessions versus term enrollment periods. This often results in a reduction of the veteran students' monthly entitlement and is contrary to the disbursement of Title IV funds. VA should change the method to computing all credit hours earned in a standard college term to maximize the GI Bill benefit to the veteran. Term enrollment should mirror the Federal Financial Aid formula to provide equity and continuity in these higher education processes.

Accelerated Payment

While the concept of accelerated payments has been recognized by enactment of law, its implementation has missed the mark. Our concern has been that veterans could not pay for short-term technical courses, some of which are not delivered by academic institutions and do not fit familiar models of traditional course delivery. We recommend that DVA take steps to correct the situation.

Need for Training for School Certifying Officials

High turnover among certifying officials makes training a priority. DVA needs to develop and implement an aggressive, well-organized training plan that takes advantage of opportunities to train certifying officials at various locations. All the contemporary modes of training should be integrated into this plan. NAVPA is ready to continue to provide field training to school certifying officials with the DVA. An increase in reporting fees paid to institutions of higher learning would help accomplish this need. Fees should be designated to the office of veterans' affairs and a portion earmarked for annual training. This was also a recommendation of the DVA Education Services Business Processing Reengineering Team (2002).

Veteran's Student Work-Study Enhancement

Many veterans have not graduated when their MGIB entitlement has expired after having reached its 36th month. These veterans are still in school; still have some time remaining relative to the delimiting date, yet have no VA educational benefit to help them through the remaining few months of school. We recommend that the VA Work-study program not be limited to 36 months, rather be made available to them as long as they have not reached their delimiting date.

Tie Military Separation Physicals to VA Compensation Physicals

Too many veterans eligible for increased benefits based on disability are denied or delayed higher education and or training leading to gainful employment because of delays in receiving proper compensatory physical examinations following separation from the military service. We recommend that Department of Defense (DOD) and VA cooperate on separation physicals for all members leaving active service.



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TOP FIVE PRIORITIES/ISSUES – 2010 LEGISLATIVE ACTION CENTER

PRIORITY ISSUE # 1

Equity in Benefit, Simplicity in Rules, Payments, and the Administration of the Post-9/11 GI Bill: Public Law 110-252 established the foundation for a 21st century all volunteer force GI Bill. This law makes it possible for Guard and Reserve members who fight alongside active duty members, to receive the same level of GI Bill benefit as their Active Duty counter-parts, equal benefit for equal service in support of deployments. It recognizes the need to make public education in higher education attainable. It responds in part, to the voice of service members nationwide as it relates to transferability. This was the first step toward achieving equity. Further, equity in all aspects of the delivery and simplicity of administration of the Post-9/11 GI Bill should be a goal of legislation; an example of inequity: Tuition reimbursement for private education in higher education in the United States is tied to the state's highest tuition while tuition reimbursement for enrollment in foreign schools is tied to the national average; the exclusions of other viable and previously approved training opportunities, OJT and apprenticeship; the exclusion of a living stipend for certain veterans pursuing a program of education offered through Distance learning.

Funding seems to be the barrier to a truly beneficial GI Bill program; NAVPA's position is that history of the GI Bill has proven that the **return on investment by America is 7 fold (7:1)** and that while a Pay-Go requirement exists it should not be applied to the GI Bills because we will realize a better educated, working, taxpaying, productive member of society who will return \$7 dollars for every dollar invested in the GI Bills. And, with the exception of a severely injured veteran, an educated and/or trained veteran is less likely to be dependent on other benefits and services, freeing up dollars intended for those who have no alternative.

PRIORITY ISSUE # 2

Compensation to schools and agencies (OJT-Apprenticeship) who certify veterans to the DVA for certification of enrollment in higher education or appropriate training and apprenticeship programs: Currently the DVA pays an annual reporting fee of \$7.00 per student for certification of enrollment, the same compensation paid over 30 years ago when schools were responsible for certifying two programs. Today schools and agencies are responsible for the accurate certification and proper administration of 13 programs, 11 in higher education and 2 for agencies (OJT and Apprenticeship) yet are paid the same \$7.00 per student. The lack of adequate funding for schools has been cause for many offices of veteran's affairs on campus to be realigned to other programs such as financial aid, counseling, admissions and the business office as an additional duty. Veterans have lost the direct support on campus needed in order to maintain their academic standing – that is, they have lost a caring and concerned program administrator who advocated on their behalf.

In addition, the program administrators are expected to adhere to the many state and federal laws governing these programs. The DVA funds the State Approving Agency (Association) to ensure that educational institutions adhere to federal laws and state rules governing these programs, but falls short of funding even one program administrator's training. Funding for veterans education benefits must include funding for the administration of these programs at all levels.

PRIORITY ISSUE # 3

Modernize the GI Bill to address 21st century work force requirements and societal changes by expanding opportunities for veterans and service members to maximize their earned benefit through elimination the MGIB and Post-9/11 GI Bill delimiting dates: Many veterans delay entering school or training because of family and or financial obligations. When veterans are finally in a position to pursue an education or advanced training they find that they either are up against their delimiting date with insufficient months remaining to complete their program or their delimiting date has expired. Some veterans who do complete a degree after service do not always use the entire 36 month benefit because of completing some college or training while in service. Later, when it comes time to upgrade or update their skills for career enhancement their unused remaining benefit has expired because of the delimiting date. NAVPA believes that **the delimiting date is a barrier to the concept of lifelong learning**, a concept that is prevalent in our society.

PRIORITY ISSUE # 4

Expand the student work-study program: Under current rules, veteran students enrolled at a minimum $\frac{3}{4}$ training time are only allowed to work in the office of veterans affairs on campus thereby limiting their exposure in the word-of-work. NAVPA has long argued for an expanded student work-study program that would allow veterans enrolled (at a minimum $\frac{1}{2}$ training time) in school to work in departments across campus and gain valuable work experience. Veterans who work in academic department would be able to work in laboratories within their discipline and earn valuable insight into their program as well build a creditable work experience resume. For many veterans the work-study program supplements their income and for others it is their only income. The veterans' work ethic would be invaluable to any campus office or department. Limiting employment to only one department on campus severely limits the veterans' opportunity for employment as well as the experience that is necessary to compete in the civilian work place.

PRIORITY ISSUE # 5

Develop an education benefits web portal: NAVPA has long held the belief that veterans should have easy access to their VA records via a web portal. All information relative to their VA educational benefit, applications, enrollment certifications and payments should be made available to them through this portal. A web portal will provide an efficient mechanism for information exchange with, and access to, education systems by veterans and other stakeholders, such as schools, State Approving Agencies, etc. This becomes more critical with the implementation of the Post-9/11 GI Bill. We highly recommend that funding for this important initiative be made available to the DVA Education Services Department to allow enhancements for the development of a web portal as initially recommended by NAVPA in 1999.

Finally, NAVPA feels very strong about a need for Congress and the DVA to place greater emphasis on the OJT/Apprenticeship portion of the GI Bill Programs: OJT and Apprenticeship is the most underutilized of the MGIB program. Much of this is caused by the lack of adequate information conveyed to veterans and users or agencies. Many agencies who might be trainers of the OJT/Apprenticeship eligible veteran are not aware that such a program exists. NAVPA recommends greater emphasis on the OJT/Apprenticeship program be developed to specifically seek out and counsel veterans, who do not intend on seeking a college degree, about these programs.

January 2010



VA WORK-STUDY AND JOBS FOR VETERANS: A MATTER OF READJUSTMENT

ISSUE: Title 38 U.S.C. § 3485(a)(1)(B) outlines the Department of Veterans Affairs veteran student work-study program; however, the restrictions imposed are too limiting by not allowing veteran students to work at colleges and universities outside of the office of veterans' affairs. These restrictions therefore do not conform to the concept of providing work experience or enhancing job opportunities for veterans and their dependents following graduation.

DISCUSSION: Current legislation authorizes a work-study program for veteran students enrolled at a minimum 3/4 time student status, but restricts school job placement to the college/university office of veterans' affairs. There is no opportunity for work experience under this program outside the veterans' affairs office, which in turn, limits the number of veteran students that can be employed. This restriction has a limiting effect on the scope of substantive and relevant student work experience.

The Jobs for Veterans Act, PL 107-288, provides for priority service to veterans and spouses of certain veterans for the receipt of employment training and job placement. Veterans who are accessing their GI Bill at accredited colleges and universities should be afforded better opportunities to expand their VA work-study experience at the institution of higher learning where they are pursuing their degree program. Expansion of the VA student work-study program would complement the Jobs For Veterans Act of 2002 (PL107-288) and enhance the veterans' opportunity for job placement following college and ensure that a veterans transition to the world of work is improved following separation from the military and education or training at the institution of their choice to complete the readjustment process, the overall objective of the GI Bill.

RECOMMENDATION: NAVPA fully supports a bill introduced in the 1st Session of the 111th Congress, H.R. 1336, to amend title 38, United States Code, to make certain improvements in the basic educational assistance program administered by the Secretary of Veterans Affairs, and for other purposes. Provide additional work-study opportunities for eligible veterans by allowing veterans the opportunity to work in the college/university office of veterans' affairs and/or administrative or academic departments at the degree granting institution of higher learning in which the student is pursuing their academic credentials. Additionally, veteran students should be allowed to take advantage of this program while enrolled at a minimum of ½ time student status.



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VETERANS SERVICE, EDUCATION AND TRAINING PROGRAM GRANT - VSET

ISSUE: Offices of Veterans Affairs at Post Secondary Educational Institutions (PSE) approved for the education and training of veterans have traditionally been at the forefront of supporting and championing for veterans rights at colleges and universities. However, these offices are provided few resources and support within the PSE with which to manage their function of administering VA Educational Programs and services for veterans, service persons, guard and reserve members and their dependents to the Department of Veterans Affairs (DVA). The technological advances under development by the DVA mandate that school administrators maintain currency on new applications; however, the lack of adequate resources has placed these offices at jeopardy within the PSE. Many program administrators do not have the appropriate tools to submit timely electronic enrollment certifications and many cannot afford to attend the needed professional training on the myriad of new programs employed and/or planned for implementation by DVA. There is also the requirement at the college and university office of veterans' affairs to maintain compliance with Federal and state laws governing the administration of these programs. Lack of compliance could expose the school to institutional liability.

DISCUSSION: In the past there was a program managed by the Department of Education that provided some funding in this regard. With tuition increasing every year, colleges and universities are looking for ways to reduce administrative costs. Unfortunately, the office of veterans' affairs is an easy target even though veterans comprise up to 10% of the student enrollment at many schools. As DVA develops more efficient methods for reporting enrollment status of veterans and their dependents that access VA educational entitlements, the support hardware and software must be upgraded at the grass roots level in order to be responsive to these new developments and to provide the needed services to the veterans' constituency in a timely manner. The high turnover rate at PSE institutions of program officials mandates a need for continual training at the grass roots level. Training remains a top priority for program officials, the DVA and NAVPA. Both Title 38, U.S.C. and 38 C.F.R. 21.4209 require that schools approved for veteran training must maintain certain records and to make these records available for examination by the Department of Veterans Affairs or an authorized representative of the government. Additionally, the institution is responsible for ensuring timely and accurate enrollment reports to the Department of Veterans Affairs. The Institution is liable for overpayments where willful, false or negligent reporting occurs. This issue demands that professional training of school certifying officials be a continual process to protect the school certifying official from liability and the student from overpayment of education benefits.

RECOMMENDATION: NAVPA recommends that Congress and the Secretary of Veterans Affairs pursue legislation to authorize a new grant program for school offices of veterans' affairs. We hereby introduce a title, the Veterans Service, Education and Training (VSET) Program Grant. VSET would become the program for college and university veterans certifying officials that would enable them to adequately support their veterans' constituency and to reach out to veterans in their communities. This funding would subsidize efforts by schools to upgrade and maintain currency with technological advancements as well as to provide quality services to veterans and their dependents. Additionally, we envision an enhanced partnership with the Education Services branch of DVA Benefits Services. A test program should be authorized for FY 10, 11 and 12 and funds allocated at the amount of not less than \$5,000,000. for each fiscal year.

The VETS Program would:

1. Authorize the Secretary of Veterans Affairs to provide funding for Offices of Veterans Affairs at institutions of higher learning.
2. Require that participating institutions, both PSE and training institutions, to have a minimum of 50 veterans, including dependents who are receiving VA education benefits under Chapters 30, 31, 32, 33, 34 or 35, Title 38, U.S.C., and Chapters 1606 and 1607, Title 10.
3. Require that eligible institutions submit applications for funding to the Secretary of Veterans Affairs.
4. Require that Offices of Veterans Affairs provide services in veterans' certification, special education programs, including counseling and training. Institutions may use funds to develop other support programs for veterans and their dependents.
5. Provide that to the degree that appropriations are made available, participating institutions be paid \$100 for each eligible veteran and other eligible individuals and that these funds be used solely to support eligible veterans, veterans' dependents and the Office of Veterans Affairs, to include staff development, at the PSE institution.
6. Require that the Secretary retain one percent or \$20,000, whichever is less, from available program funds for any fiscal year for the purpose of collecting information on exemplary veterans' education programs.
7. Authorize the Secretary to retain not more than five percent, or \$250,000, whichever is less, of amounts available for the purpose of administering this program.
8. Require that institutions not be permitted to capture more than 1% of the grant funds for internal administrative purposes.

Authorize not less than \$5,000,000 for each fiscal year 2011, 2012 and 2013 with reauthorizations to be at the discretion of Congress

Summary: The Veterans Service, Education and Training (VSET) program provides Federal financial assistance on a formula basis to all eligible institutions of higher education to provide certain services to veterans. (Authority 20 U.S.C. 1070e-1)

The Secretary, Veterans Affairs is responsible for administration of the VSET Federal Grant Program.

Availability of Awards:

Awards made under VSET are available for expenditure by the institution office of veterans' affairs over a period not to exceed two academic years.

Minimum Award. The minimum award an institution may receive is \$1,000.00 subject to the availability of appropriations.

Award Amounts:

In order to maintain an office of veterans' affairs, which has responsibility for veterans' counseling, enrollment certifications, outreach, recruitment, special education programs, tutorial assistance, vocational assistance and training; eligible institutions will receive \$100 for each veteran and dependent certified for enrollment under chapters 31, 30, 32, 33 and 34, Title 38, U.S.C., and Chapters 1606 and 1607, Title 10, U.S.C. Additionally, eligible institutions will receive a payment of \$50 for each undergraduate who has received an honorable discharge from military service but does not receive educational benefits under Chapters 31, 30, 32, 33 or 34, Title 38 U.S.C., and Chapters 1606 and 1607, Title 10, U.S.C. A total award to any one institution may not exceed \$50,000.00.

The parent institution is authorized to count veterans attending any branch thereof in the overall computation of eligible veterans and other eligible persons served for the purposes of this award.

Definitions:

1. Support activities: Except as provided elsewhere a grantee may use VSET funds only for the following activities:
2. Maintaining an office of Veterans' Affairs, responsible for veterans' counseling, enrollment certifications, outreach, recruitment, special educational programs, tutorial assistance, vocational assistance and training.
3. Carrying out programs designed to prepare educationally disadvantaged veterans for postsecondary education for which they are receiving benefits pursuant to Title 38 U.S.C. Chapters 31, 30, 32, 33 and 34.
4. Carrying out active training programs (with special emphasis on service-connected disabled veterans, other disabled or handicapped veterans, incarcerated veterans and educationally disadvantaged veterans), and counseling activities (with special emphasis on the veteran-student services programs under Title 38 U.S.C.)
5. Carrying out an active tutorial assistance program for veterans.
6. Assisting in the readjustment, rehabilitation, personal counseling and employment needs of veterans.
7. Coordinating activities carried out under this part with the Veterans Administration.
8. Carrying out the professional development of veterans certifying officials to the extent necessary to ensure officials maintain currency in VA Education Services program development and enhancements through participation in professional training sessions conducted by national associations or by the Department of Veterans Affairs.
9. After the institution has carried out the activities described in paragraphs (1) - (7) of this section, defraying instructional expenses in academically related programs such as office equipment support, outreach and recruitment.



Equity in Benefit, Simplicity in Rules, Payments, and the Administration of the Post-9/11 GI Bill.

Issue: Legislation is needed to amend Post-9/11 GI Bill under Title 38 to address inequities and unnecessary complexities. NAVPA's primary concern is to address the many issues with the administration of the Post 9/11 GI Bill.

Background: Public Law 110-252 established a firm foundation for a 21st century, all volunteer force GI Bill. This law makes it possible for Guard and Reserve members who fight alongside active duty members, to receive the same level of GI Bill benefit as their Active Duty counter-parts, equal benefit for equal service in support of deployments. It recognizes the need to make public education (at minimum) in higher education attainable. It responds in part, to the voice of service members nationwide as it relates to transferability. This was the first step toward achieving equity. Further, equity in all aspects of the delivery and simplicity of administration of the Post-9/11 GI Bill should be a goal of legislation; an example of inequity: Tuition reimbursement for private education in higher education in the United States is tied to the state's highest tuition, while tuition reimbursement for enrollment in foreign schools is tied to the national tuition average; the exclusions of other viable and previously approved vocational training opportunities, OJT and apprenticeships; the exclusion of a living stipend for certain veterans pursuing a program of education offered through Distance learning; the exclusion of a living stipend for veterans pursuing a program of education on a half time basis and working part-time, at reduced income in order to obtain that college degree. We do not believe that Congress envisioned the complexities and ultimately the administrative burden to both the DVA and cost of this program.

Limiting training opportunities (career options), consequently dilutes the readjustment element of the program. Such limitations will prove to be a disservice to our veterans when they find that numerous career goals cannot be realized; and to our nation when we realize the return on investment is not as great as it was with previous education programs. But the complexity of the Chapter 33 program, funding challenges for both the VA and educational institutions, and the difficulty of correlating it with both the original Reserve MGIB ("Chapter 1606") and the MGIB (Chapter 30) may depreciate the intentions of the sponsors of this bill.

Recommendation: NAVPA supports H.R. 950 – "To amend chapter 33 of title 38, United States Code, to increase educational assistance for certain veterans pursuing a program of education offered through distance learning". NAVPA encourages the Secretary and Congress to further amend chapter 33 to expand educational and training opportunities such as the OJT/Apprenticeship option; to simplify the administration; to provide a continuum between the MGIB and the Post-9/11 GI Bill; not to differentiate between in-residence and on-line enrollments as it relates to the amount payable under this program; and, to seek simplicity in program and administrative rules.



NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS

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ELIMINATION OF THE MONTGOMERY & Post -9/11 GI BILL DELIMITING DATES

ISSUE: Veterans under Chapter 30 (Active Duty) of the Montgomery GI Bill (MGIB) and Chapter 33 of the Post-9/11 GI Bill currently have a “Delimiting Date” of 10 & 15 years respectively, following separation from active military service. This means that the veteran must use or lose their entitlement by this delimiting date thereby impeding life-long-learning and professional development concepts.

DISCUSSION: Many veterans separate from military service unprepared to pursue a degree or training leading to employment at the time of separation. In the demands of the American society world-of-work today, education and training have become life-long learning issues. The GI Bill for many veterans is the only avenue they have to obtain a quality education or training program. The “delimiting or expiration date” is a barrier to their goals. Studies such as the Goodrich report, the VA Commissioned Klem report and Atwell paper substantiate this fact. Veterans, for a myriad of reasons from family needs to financial issues are not all equally prepared to pursue a college degree or training within the current 10 or 15-year allowable time. Many veterans who have families when they separate from military service must first find a secure and safe environment for their families. This is their primary need at the time of separation from active military service, they are not thinking of pursuing an educational goal at that time. The social implications are, to many, overwhelming and their immediate needs overcome the desire to pursue a college degree or upgraded employment credentials. Others who do earn a degree or obtain some training and who have limited entitlement remaining often find themselves with a need to upgrade their professional skills for advancement in their fields. They find themselves without entitlement because their remaining entitlement has expired under these “delimiting date” statutes. Delimiting dates bar many veterans from taking full advantage of their earned entitlement.

RECOMMENDATION: (1) That the MGIB Chapter 30 and the Post-9/11 Chapter 33 delimiting dates be eliminated. The demands of the world-of-work and other issues of life-long learning dictate that this earned entitlement should be provided to veterans without the limitation of an expiration date. (2) At a minimum, Congress should consider extending the delimiting date to the end of a term for those veteran students who, while enrolled in a standard college term, reach their delimiting date. GI Bill benefits should be extended to the end of the enrollment period (term) to allow veteran students to complete that term without requiring additional financial assistance.

January 2010



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INCREASE REPORTING FEES TO IHLS

ISSUE: Prior to 1976 the Department of Veterans Affairs (VA) employed and assigned staff at or near Institutions of Higher Learning (IHL) to report enrollments of veterans who accessed their VA educational entitlement (GI Bill). The VA was removed from the colleges and universities in 1976 as a cost reduction initiative and IHL's were compensated for certifying the enrollment status of veterans to the VA at the rate of \$7.00 per each student enrollment certified. Only one program, the Vietnam-era GI Bill existed at that time.

DISCUSSION: The \$7.00 per student enrollment certification fee has not kept pace the duties and responsibilities nor the work effort required to certify students; several programs have been added that require the IHL to monitor, certify and maintain. Now, a new veteran's education program has been added, Chapter 33, PL 110-252, by the 110th Congress in 2008 without regard to compensating IHL's or other certifying officials. The burden on the IHL is not business as usual. Chapter 33 has significantly increase the work by schools to insure the program is administered correctly, minimizing fraud and possible overpayment. Not only will school officials need to continue the certification process, but with payments going directly to the school, financial management becomes a priority. Financial management has become even more complex for schools who participate in the Yellow Ribbon Program.

Many VA education programs have been added since 1976, these programs include: Montgomery GI Bill – Active (Chapter 30), MGIB – Selected Reserve (Ch 1606), REAP (Chapter 1607), Veterans Education Assistance Program (Chapter 32), Survivors' and Dependents' Educational Assistance Program (Chapter 35). Additionally, no compensation is paid for Vocational Rehabilitation Program (Chapter 31), or the REPS compensation.

Additionally, the 2003 education program, the National Call to Service program, is beginning to take effect and the school veterans program administrator is required to certify enrollment of these students to the VA as well. This is a new program for schools and the added work effort has not been calculated; however, the addition of new programs without benefit of compensation to the certifying officials cannot continue.

The average cost of tuition in 1976 was \$68.00 per semester or \$136.00 per academic year. In relationship, schools were compensated at a rate of 9.5% of the cost of tuition per student. Today the average cost of tuition exceeds \$4,000 per academic year and the cost of maintaining a staff of program assistants to process VA enrollment certifications has increased proportionally. The IHL is severely under funded by the DVA to process the myriad of enrollment certifications on their behalf. Further, the IHL VA certifying official turnover is significant; an increase in reporting fees would allow schools to send their certifying officials to VA sanctioned new and advanced professional training and provide support for the office of veterans' affairs at the school.

RECOMMENDATION: NAVPA supports H.R. 3579 – To amend title 38, United States Code, to provide for an increase in the amount of the reporting fee payable to educational institutions that enroll veterans receiving educational assistance from the Department of Veterans affairs, and for other purposes. NAVPA has long supported legislation which would increase the annual reporting fee paid to IHL's to \$50.00 per student processed and that this amount be paid for all VA educational programs to include Vocational Rehabilitation, as well as any future VA programs that will require IHL certification. Also, the use of these fees should be designated to support the office of veterans' affairs and for professional development of the school VA certification officials.



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CONSOLIDATION OF EDUCATION CLAIMS PROCESSING

ISSUE: VA Education Services currently has 4 VA Regional Processing Offices (RPO) to receive and adjudicate VA educational claims from VA certifying officials responsible for the enrollment certification of veterans and their dependents who access their VA educational entitlements.

DISCUSSION: VA should consider returning to a one-center concept for all education claims processing. With the automated web based enrollment certification system in place there appears to be no need to have 4-RPOs. Prior to establishing the 4 RPOs, VA education claims for Chapter 30, Montgomery GI Bill (MGIB) were processed by one regional office, the then St. Louis Regional Processing Office. The reason for establishing a 4-RPO concept was to spread the tremendous workload of manually created paper files, caused by the volumes of enrollment certifications and changes thereto; however, that rationale has evaporated. VA education claims adjudication has advanced with technology to an electronic process.

Additionally, consolidation would (1) ensure standardization in the interpretation and application of laws and policy for all school certifying officials and (2) it would bring greater efficiency in electronic processing and (3) it would allow for the realignment of resources to more urgent needs within DVA. This bold move, if accepted by the VA would allow for efficiencies in services and resources for several VA programs, especially in processing the backlog in education, C&P and health related claims.

RECOMMENDATION: Recommend DVA seriously consider the consolidation of the VA Regional Processing Offices to an Electronic Education Claims Processing Center as an efficiency move. The location selected should be the most fiscally advantageous, for example, least turnover in staff and the most beneficial cost-of-living index to ensure staff longevity and consistency in policy. **As an alternative**, consolidating and specializing in like programs at the current VA RPOs could enhance processing and address the issue of one voice for each program. For example, Chapters 30, 32 and 33 could be processed at one site, Chapters 1606 and 1607 at another, Chapters 31 at another and Chapters 35 and the National Call To Service program at the remaining VARO.

January 2010



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DEVELOPMENT OF A WEB PORTAL

ISSUE: Veteran students do not now have an electronic means of accessing meaningful and useful information from the Department of Veterans Affairs on their education benefits, usage and remaining entitlement from their VA records. While the VA has made significant improvements in the telephone answering system, veterans, when attempting to gain this information via telephone, often become frustrated and concerned because of delays in that system. Educational institutions are becoming overwhelmed with the volume of calls and limited ability to assist students in determining the status of their claims.

DISCUSSION: NAVPA has long held the belief that veterans should have easy access to their VA records via a web portal. All information relative to their VA educational benefit, applications, eligibility, enrollment certifications and payments should be made available to them through this portal. Information should include at minimum information sent to the veteran via the US mails at the beginning of each academic year as contained in the “award letter”. This information is the award period, monthly benefit, delimiting date, any benefit increases and level of training for the enrollment period. School certifying officials should have secure access to the portal for veteran students so that they may provide counseling and assistance when necessary. VA ONCE and WAVE have partially covered these issues; however, all information is still not available. Veterans should be able to view all pending issues to include receipt of documentation and current status, reason(s) for any delays in processing should be addressed on this WEB portal.

RECOMMENDATION: That the VA continue to aggressively pursue the development and implementation of a secure web portal for veteran students accessing their VA educational entitlements. We believe that the implementation of a secure web portal will enhance service to veterans and bring efficiencies to the DVA with a corresponding reduction in telephone service personnel at the Regional Processing Offices. The efficiencies in personnel utilization realized would benefit processing time.

January 2010



MEASUREMENT OF PURSUIT

ISSUE: Department of Veterans Affairs 38 CFR 21.4135(s)(5) stipulates that an individual who enrolls in several subjects and reduces his or her rate of pursuit by completing one or more of them while continuing training in others, will have their educational assistance allowance reduced effective the date the subject or subjects were completed. Many institutions schedule mini sessions (4-7 weeks) within a standard semester (15-18 weeks) and require students to enroll full time, but the enrollment period is broken into two or more modules during the semester. This is often necessary to complete sequential courses, such as in nursing programs. Many students who access their Montgomery GI Bill (MGIB) entitlement are placed at a financial disadvantage because of this DVA policy. Not only are the veteran students monthly entitlement reduced, but financial aid is computed using all credits in which the student is enrolled for that term.

DISCUSSION: Students pursuing professional programs that require scheduling of non-standard terms/ modules during a regular semester/quarter are not able to select those terms that would allow full-time enrollment computation of their monthly entitlement; or, students who are required to enroll in such terms lose full time enrollment status and thereby full compensation of VA educational entitlement rates even though they complete the equivalent of full time enrollment over the course of the semester. This is in direct contrast to the computation of the Federal Financial Aid programs that combine all credits earned during a standard semester to determine the students' enrollment status and pay accordingly. Veteran students are disadvantaged in VA educational entitlement computation because of this inequitable VA process.

To illustrate this inequity, assume that a standard term is January 15 – May 15 and the student is enrolled at the college or university for 12 semester hours of credit in this term. Normally this enrollment would equate to full-time status for VA MGIB training purposes. However, when a student is enrolled in short duration or modular classes within that term the student's VA monthly compensation is diluted as follows: January 15 - March 15 the student is enrolled in 9 semester hours of credit. March 16 – May 15 the student is enrolled in 3 semester hours of credit. For FFA purposes the student is full time. For DVA rate computation the student is enrolled $\frac{3}{4}$ time from January 15 – March 15, and then on March 16 is reduced/adjusted to $\frac{1}{4}$ training time for the remainder of the term, even though the student will earn 12 semester hours of credit in the standard term. Normally, 12 semester hours is sufficient for full-time status/benefit.

RECOMMENDATION: That VA change the procedure to calculate training time based on the actual number of credit hours completed in a standard semester/quarter, regardless of the length of each class/module.



ACCELERATED PAYMENT Missed The Mark

ISSUE: Public Law 107-103 outlines the accelerated payment provisions for recipients of VA educational benefits under Chapter 30, (Montgomery GI Bill) and now Chapter 33 (Post-9/11 GI Bill). While the concept of accelerated payments has been recognized by enactment of this law, its implementation has missed the mark. Our concern has been that veterans could not pay for short-term, high cost programs, some of which are not delivered by academic institutions and do not fit familiar models of traditional course delivery.

DISCUSSION: For students wishing to seek training and employment in the high tech industry, as defined by the VA, a reimbursement of 60% of the tuition and fees will be paid when those costs exceed 200% of what would normally be paid under Chapter 30. Accelerated payment is only payable for approved courses offered by an institution that qualifies as an educational institution. Private business entities can apply to the State Approving Agency (SAA) for approval of a course, but they would have to meet the entire approval requirement of a Non-College Degree (NCD) course. Accelerated payment is a result of a NAVPA initiative to allow students to use their earned education benefit to pursue NCD, short term-high cost programs, such as technology programs; however, the implementation of the law missed its original intent.

RECOMMENDATION: We recommend that DVA take steps to correct the situation to allow veterans the opportunity to use their education benefit for certain "short term-high cost programs" and not limit payment only to high tech programs as currently defined by the VA. Additionally, this program should not apply to, nor was it intended for students enrolled in standard college programs where they could otherwise exhaust their entitlement (i.e. Benefit from the full 36 month entitlement or its equivalent in part-time training).

January 2010



NEED FOR TRAINING FOR SCHOOL CERTIFYING OFFICIALS

ISSUE: Training of school officials has been a concern of NAVPA for several years. The VA Education Business Process Reengineering Community of Practice Task Force reported in April 2002 that training of Veteran Program Administrators and/or school Certifying Officials requires special attention.

DISCUSSION: The high turnover among school certifying officials coupled with the shift of emphasis into the electronic processes and developments in technology demand that training of school certifying officials receives a high priority. Tools and technical assistance should be developed and implemented to ensure that a training program is developed to train the new school certifying official. The NAVPA “Basic Training Workshop” conducted at the annual conference provides hands on training for school certifying officials and has become one of NAVPA’s trademark services of the annual conference. NAVPA remains ready to continue this practice in partnership with DVA. The NAVPA *Handbook For School Certifying Officials*, updated annually, is presented to each training participant. While many school officials can attend the NAVPA conference or one of the four annual VA Regional Office meetings, there are many more that cannot because of budgetary considerations. In the past, annual training was conducted by VA Regional Office Education Liaison Representatives, often in cooperation with the State Approving Agencies. Since this practice is not consistent, a different approach to training should be addressed. Internet training already exists; however, many new school certifying officials either do not know about this training or need more individualized instruction on their new responsibilities.

RECOMMENDATION: That DVA develop and implement an aggressive, well-organized training plan that takes advantage of opportunities to train certifying officials at various locations in each state and throughout the United States. All the contemporary modes of training should be integrated into this plan. An increase in reporting fees paid to institutions of higher learning would help accomplish this need if fees are designated for the school office of veterans’ affairs and a percentage or minimum amount allocated for annual professional training.



VETERAN'S STUDENT WORK-STUDY ENHANCEMENT

ISSUE: Currently veterans, guard and reservists are eligible to receive educational benefits under Chapters 31, 30, 32, 33, Title 38 U.S.C., and Chapters 1606 and 1607, Title 10, U.S.C., often utilize their 36 months of educational benefit before they complete the college degree program which they are seeking; many have one or two terms remaining before completion of their degree program. Expiration of the educational benefit often causes a financial burden on many of those students in this category. Additionally, many of these same students are employed by the school under the VA work-study program and work-study eligibility is tied to the VA educational benefit.

DISCUSSION: Veterans have a 10 or 15 year delimiting date in which to use or lose their VA educational benefit; guard and reservists have 14 years. When the educational benefit is used-up, both the monthly GI Bill benefit and the work-study program expire even though many of these veterans still have time remaining on their 10,14 or 15 -year "use or lose" window, the delimiting date. Although the wages paid are established at Federal or State minimum wage, the financial income loss for most students is significant, especially at the end of their academic program.

RECOMMENDATION: NAVPA recommends that veterans, guard and reservists who accessed their VA and DOD educational benefits under Chapters 30, 31, 32, or 33, Title 38 U.S.C., and Chapters 1606 and 1607, Title 10, U.S.C., be entitled to VA veteran student work-study benefits until their have completed the degree program in which they were enrolled utilizing one of the above cited benefits, provided their delimiting date has not arrived.

January 2010



Congress Should Appropriate Money for Veterans' Care and Benefits when they Appropriate Money for War

ISSUE: Congress does not appropriate funds for veterans' care when appropriating funds for the cost of war. Veterans' care and benefits historically fall short of meeting their immediate and long-term needs after serving their country.

DISCUSSION: The Veterans Administration's ability to serve veterans is directly related to Congress' willingness to appropriate adequate funding. Throughout American history, even after "popular" wars, veterans have had to struggle against a Government that has mostly sought to limit its financial liability. After every one of our countries war's, beginning with the American Revolution, veterans have had to fight for benefits.

On January 25, 1787, Daniel Shays, a Massachusetts farmer turned war hero, led a group of veterans as they tried to seize the Springfield Federal Arsenal. Three veterans died in what became known as the Shays' Rebellion, a rebellion against our government's broken promises, farm foreclosures and veterans in debtor's prison.

After the Civil War, veterans came home to communities that offered them unemployment and a lack of acceptance. The Government expected the soldiers to take care of themselves. In 1866, less than a year after Appomattox, Dr. Benjamin Stephenson formed a national soldiers' mutual benefit society called the Grand Army of the Republic. It took until 1890 for Congress to pass the Dependent Pension Act that gave a pension to any veteran who had served 90 days and could not earn a living.

After WWI there was the Bonus March in Washington D.C. Approximately 30,000 unemployed veterans and their families tried to get the government to pay their bonus. They were tear gassed and their camp burned by a 200 mounted cavalry with more than 300 infantry soldiers armed with bayonet mounted rifles, five tanks and a special machine-gun unit. These federal troops were lead by Gen. Douglas McArthur, Majors' Dwight Eisenhower and George Patton. The American press supported this gross spectacle of the rousting of veterans and their families.

After WWII, President Roosevelt proposed the most comprehensive G.I. Bill in history. However, Congress tried to force Roosevelt to remove certain parts of the bill – actions that would have narrowed the scope of the educational component. It wasn't until 1977 that women who served in WWII were recognized as veterans, far too late to give them access to the G.I. Bill

Korean War veterans received a less generous G.I. Bill. Also, during the 1950's the military secretly gave powerful hallucinogens, such as LSD, to soldiers without telling them. Between 1945 and 1963, 250,000 soldiers were exposed to radiation from nuclear tests. Not until May of 1988 did the President sign legislation to begin compensation for the veterans suffering from cancer as a result of these tests.

After Vietnam, the GI Bill, VA Health Care and the Veterans Cost of Instruction Program (VCIP) were all under-funded. President Nixon vetoed a VA health care bill and cut vocational rehabilitation funds. It took the Government 15 years to recognize the Agent Orange issue and begin treatment and compensation.

Operation Desert Storm brought the VA Medical system 300,000 veterans (48.4% of those who served) and a whole new host of issues to the table including how we will deal with, budget for, and more importantly, treat those with "Gulf War Syndrome".

As US servicemen and women continue to be deployed to the Global War on Terror (GWOT), the numbers of wounded, including, but not limited to amputees, traumatic brain injured, and those in need of Vocational Rehabilitation continues to grow. VA Medical Centers, Veterans' Outreach Centers, Offices for Workforce Development, etc., are strained to capacity because of shortage of staff and the continuing increase in war veterans.

Veterans in search of higher education benefits find themselves fighting yet another battle. The Post 9/11 GI Bill that began 1 August, 2009 has an estimated 240,000 applicants to date and an anticipated growth of approximately 30% by 2011. Veterans face Lengthy delays due to the deployment delays of an automated system for calculating/processing and paying VA education benefits. Colleges and Universities with limited budgets are faced with helping the ever increasing veteran population through the complexities of the processes as well as the regulations governing this program, with extremely limited access to the information or VA staff necessary to do so.

CONCLUSION: Our Government always finds the funding to engage in war. However, history indicates that the Government's unstated mission is to limit the liability for the wages of war - The bottom line is money. To solve this problem our Government must factor into the cost of war, the continuing cost of war, which is the care of our veterans.

RECOMMENDATION: Legislation must be passed that requires the President and Congress to appropriate money for veterans' care and benefits as part of their appropriation of money for war. ***If we cannot afford to keep our promise to care for those who serve our country, we cannot afford to go to war.***

January 2010



TIE MILITARY SEPARATION PHYSICALS TO VA COMPENSATION PHYSICALS

ISSUE: Many veterans who have service connected disabilities must apply for VA compensation after separation from the military service thereby delaying their ability to apply for VA vocational rehabilitation education benefits by 6 – 9 months or more; some have waited up to 3 years to start their vocational a rehabilitation program. Although the service member may receive a separation physical from the military service, the physical is not mandatory. Separated service members must also complete a VA compensation physical in order to qualify for post service compensation based on service-connected disabilities.

DISCUSSION: While many veterans are eligible for vocational rehabilitation educational benefits, delayed scheduling of the DVA required compensation physical causes a delayed eligibility for receipt of VA Chapter 31, vocational rehabilitation benefits, and a subsequent delay in achieving educational goals; in some cases, veterans shy away from pursuing their educational goals altogether because of becoming frustrated by this seemingly bureaucratic process. While many of these veterans are eligible for Chapter 30 MGIB and/or Chapter 33 Post-9/11 benefits, their special needs and accommodations are not addressed in the Chapter 30 and 33 provisions, nor are they given the battery of interest, aptitude and abilities tests required by the Chapter 31 program. The eligible disabled veterans are not afforded proper counseling in employment assistance essential to placement following education/training under this chapter. This delay of receipt of benefits can be overcome in many cases by tying separation physicals to the VA compensation physicals. This procedure has been successfully tested both at Tacoma VAMC in Tacoma, Washington and in New Jersey. Although the test was successful, the DOD does not require all separating members to undergo a physical. Therefore, those separating service members who opted for an expedited separation (no physical) but who later decide to apply for compensation based on a service connected disability are draining both the DOD and VA resources in records recovery and the necessary VA compensation physical.

RECOMMENDATION: Recommend that (1) DOD require all separating members to undergo a separation physical; (2) that DOD and DVA seek a partnership with a view toward making separation/compensation physical an efficient one-stop process. Dollars saved could be reassigned to more needy programs within the DVA and DOD and, veterans' education and employment needs would be much better served.



THE GI BILL FOR VETERANS WHO RECEIVE A “GENERAL (UNDER HONORABLE CONDITIONS)” DISCHARGE

ISSUE: Veterans who receive a “General (Under Honorable Conditions)” Discharge are not eligible for Chapter 30 (Active Duty) Montgomery GI Bill (MGIB) or the Post-9/11 GI Bill. Ironically, they are eligible for all of their other VA benefits.

DISCUSSION: Prior to the MGIB veterans who served during WWII, Korea and Vietnam and received a “General (Under Honorable Conditions)” Discharge were entitled to their GI Bill Education Benefits. With the implementation of the MGIB, service people have to not only contribute \$100 a month for 12 months but also receive an Honorable Discharge to be eligible to utilize their GI Bill. If they receive a “General (Under Honorable Conditions)” Discharge, veterans lose their Montgomery and/or Post-9/11 GI Bill entitlement but are eligible to receive all of their other VA benefits.

A general discharge, under honorable conditions is issued to personnel whose military record is satisfactory but not sufficiently meritorious to warrant an honorable discharge. It is an administrative discharge issued to many members' whose service has been honest and faithful

An educated society is a more productive society, much less likely to commit crime, will pay taxes, buy a home and contribute to their community. If generally discharged veterans (under honorable conditions) were allowed to receive education and training under the MGIB most would become better citizens, gain meaningful employment and contribute to society in a positive manner. This is an opportunity to help these individuals turn their lives around by obtaining an education that will lead to gainful employment.

RECOMMENDATION: In support of H.R. 1336 SEC. 7 - That veterans who receive a General Discharge, *Under Honorable Conditions*, be allowed to use their VA education benefits under all GI Bills. This change is right for our veterans, America and is the right thing to do.

January 2010



NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS

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Executive Summary

Technical Legislative Recommendations for Public Law 110-252 and other Veterans

Education Programs

Proposed by

Faith DesLauriers

Embry-Riddle Aeronautical University

On behalf of the National Association of Veterans' Program Administrators

December 3, 2009

Included in the mission of educational institutions is to serve veterans, service members and their dependents. It is our experience that the men and women who serve our country are disciplined, goal oriented, and adult learners. They are smart consumers and most have made both personal and financial sacrifices to attend our institutions. What's more, we are ever conscious of the greater sacrifices they made to protect our freedoms.

Veterans' Program Administrators on college and university campuses reach out to this population and let them know that as an institution they understand the unique issues facing service members, veterans and their families. Veterans Program Administrators are the "face" of the GI Bill.

Efforts to streamline provide equity and simplicity, to improve and augment current veterans entitlements are imperative to the success of the programs and its beneficiaries.

- **Allow Housing Allowance/Stipends for students enrolled in courses and programs defined as Distance Learning.** In this 21st Century, the era of electronic communication, there is a large shift toward non-traditional modes of course delivery. We should not inhibit the ability of our veterans to participate in the pursuit of their educational plans by restricting the method by which they can receive their course of study.
- **Expand VA Work Study opportunities and relax training time requirements.** Allow for continued work when course loads are reduced, for summer and other non-standard length terms. Limiting employment to only one department on campus severely limits the veterans' opportunity for employment as well as the experience that is necessary to compete in the civilian work place. For many veterans the work study program supplements their income and for others it is their only income.
- **Clarify the amounts payable for tuition and fees under the Post-9/11 GI Bill.** We do not believe it was the intent of the law to separate tuition and fees, but to combine the cost to establish the maximum amount payable for enrollment in a private school, graduate program or terminal degree. The maximum amount of established charges in each state should consist of the highest tuition and the highest fees combined – A matter of equity in benefit.
- **Modify the amount of Housing Allowance/Stipend under the Vocational Rehabilitation and Employment Program (Chapter 31).** This population should not be faced with sacrificing the benefits of Chapter 31 for the much needed living stipend increase under Chapter 33.
- **Allow Title 32, National Guard members to qualify for the Post-9/11 GI Bill.** This class of service member, the oldest component of the United States Armed Forces may have been inadvertently excluded under the definition of eligible individuals, under PL 110-252.

- **Transfer of Entitlement under the Post-9/11 GI Bill.** Allow members of the Armed Forces who have served 20 years and met the minimum service requirements of 90 days following September 10, 2001 to transfer their entitlement under the Post-9/11 GI Bill to their dependents. This entitlement should consist of 36 months under Chapter 33.
- **Eliminate Overpayments – Charge Entitlement.** To establish an overpayment puts unnecessary burden on the student and the DVA in an effort to repay and recover, respectively. Overpayments should be recovered from entitlement.
- **Increase the amount of Reporting Fee payable to educational institutions.** School reporting fees have not changes since the inception over 30 years ago. Vocational Rehabilitation, Chapter 31 was never included. The reporting, reconciliation and overall cost of administering all programs has increased substantially.
- **Allow for the use of entitlement under the Post 9/11 GI Bill for Apprenticeships, On the Job Training, business courses and seminars and for courses taken to prepare for licensing and certification test.** This is consistent with the concept of lifelong learning and provides the same flexibility currently in the Montgomery GI Bill chapters.
- **Make all educational assistance benefits available for veterans discharged from active duty with a General Discharge, under honorable conditions.** A General discharge, Under Honorable Conditions, is issued to personnel whose military record is satisfactory; but, not sufficiently meritorious to warrant an Honorable discharge. Such discharges are issued to many members whose service has been honest and faithful. These veterans are eligible for all VA benefits, except education.
- **Do not tie the certification of tuition and fees to the housing allowance/stipend.** It will be necessary for the VA to develop another certification of “anticipated enrollment” in order that the housing allowance/stipend will be paid without interruption.
- **Develop an Education Web Portal.** The implementation of a secure web portal will enhance service to veterans; bring efficiencies to the DVA with a corresponding reduction in telephone service personnel. The efficiencies in personnel utilization realized would benefit processing time. This concept is need now more than ever with the extreme delays in processing claims and the complexities of the Post-9/11 GI Bill.

I have been intimately involved with veterans’ educational issues as a veteran program administrator with ERAU for over 28 years. I am proud of our nation’s commitment to ensuring that the veteran receives the best VA educational benefits and is willing to update the delivery of those benefits as needs evolve. I trust that Congress will again do the right thing and upgrade veterans’ educational benefits to meet the demands of the next decade as presented herein. Our veterans deserve nothing less.



House Committee on Veterans' Affairs, Subcommittee on Economic Opportunity Roundtable Discussion

December 3, 2009.

Technical Legislative Recommendation for Public Law 110-252 and other Veterans' Education Programs:

Distance Learning - Housing Allowance/Stipend

To amend chapter 33 of title 38, United States Code, to increase educational assistance for certain veterans pursuing a program of education offered through distance learning. (In support of H.R. 950)

Section 3313(c)(1)(B)(i) of title 38, United States Code, is amended by striking the following: '(other than, in the case of assistance under this section only, a program of education offered through distance learning)'.

In General- Section 3313(c)(1)(B)(i) of title 38, United States Code, is amended--
(1) by striking the following: '(other than, in the case of assistance under this section only, a program of education offered through distance learning)'

Rational: Student would be paid based on the location of school as are other eligible individuals attending the same school.

Expand VA Work Study

To amend chapter 33 of title 38, United States Code, to make certain improvements in the basic educational assistance programs. (In support of H.R. 1336, Sec. 9)

(a) In General – Subsection (a) (4) of section 3485 of title 38, United State Code, is amended by adding at the end of the following new paragraph:

(G) The provision of placement services described in section 3104(a) 95) of this tile at an educational institution carried out under the supervision of a Department employee.

(b) Work study for Students enrolled on half-time Basis – Subsection (b) of such section is amended –

(1) in the first sentence, by striking 'three-quarters' and inserting 'half'; and
(2) in the third sentence, by striking 'three-quarters-time' and inserting 'half-time.'

Rational: Students would be permitted to take advantage of this program while enrolled at a minimum of half-time student status. This will not only allow for continued work when a course load is reduced, but for work opportunity in summer terms and accelerated enrollment periods when a student's choice of courses may be limited to half-time enrollment. This conforms to the concept of providing work experience and enhancing job opportunities for veterans and their dependents; as would expanding the opportunity to work in other academic and administrative office at the institution in which the student is pursuing their academic credentials.

Amounts Payable under Post-9/11 GI Bill

To amend title 38, United States Code, to provide clarification that in the case of an individual entitled to education assistance under the Post-9/11 Educational Assistance program which is enrolled at an institution of higher learning, the Secretary shall allow the individual to use all or any portion of the maximum amount of established charges regularly charged in state students for full time pursuit of approved programs of education for undergraduates by the public institution of higher education in the state in which the individual is enrolled, to pay any amount of the individuals tuition and fees for that program of education. (In support, *with edits*, of H.R. 2928)

In General – Subsection (c) (1) (A) of section 3313 of title 38, United State Code, is amended by adding at the end of the following paragraph: The Secretary shall allow the individual to use all or any portion of the amount payable under subsection (c)(1)(A) to pay any amount of the individual's tuition and fees for that program of education.

Rational: This is a matter of equity in benefit. We do not believe the intent of this law was to separate tuition and fees, but to pay the “maximum” amount of established charges” which would consist of all charges, tuition and fees, charged for the program. If this is the case, the amount payable should be the established charges, not to exceed the maximum amount of all established charges (i.e., combined tuition and allowable fees) regularly charged in-State undergraduate students for full time pursuit of approved program of education, by the public institution of higher education in the state in which the individual is enrolled that has the highest rate of regularly charged established charges for such programs of education, among all public IHL's in the state offering such programs of education.

Typically public institutions charge minimal, low, or no tuition and higher fees and private institutions charge higher tuition and minimal, low, or no fees. To maintain equity and provide choice in academic institutions, whether private or public, the maximum established charges payable must be defined as tuition and fees combined. As currently regulated the Post-9/11 GI Bill provides veterans and dependents attending private schools, as well as those attending public graduate programs, a lesser benefit.

Vocational Rehabilitation Housing Allowance/Stipend

To amend title 38 united States Code to enhance vocational rehabilitation benefits for veterans, and for other purposes (In support of S. 514)

In General – Modification of amount of subsistence allowance – Subsection (b) of section 3108 of title 38 United States Code, is amended to read as follows:

- (b) Except as otherwise provided in this section, the amount of the subsistence allowance to be paid to a veteran under this chapter for a month during which the veteran participates in rehabilitation program under this chapter shall be the amount equal to the national average of the amount for basic allowance for housing payable under section 403 of title 37 for that month for a member of the uniformed services in pay grade E-5 without dependents as applicable.

Rational: The Vocational Rehabilitation (Chapter 31) program is proven to be a much deserved and necessary program to serve the men and women who have service-connected disabilities. The modification of the amount of subsistence allowance consistent with this recommended legislation would update this program while maintaining its invaluable benefit to our wounded warriors. This population should not be faced with sacrificing the benefits of Chapter 31 for the much needed living stipend increase under Chapter 33.

Add National Guard to the Post-9/11 GI Bill

To amend title 38, United States Code, to provide for the inclusion of certain active duty service in the reserve components as qualifying service for purposes of Post-9/11 Educational Assistance Program, and for other purposes. (In support of H.R. 3554 and S. 1668)

In General- Section 3301(1) of title 38, United States Code, is amended by adding at the end the following new subparagraph:

(C) In the case of members of the Army National Guard or Air National Guard of any State, full-time duty under section 502(f) of title 32, including duty in support of any homeland security operation, natural disaster related operation, counter-narcotic operation, or border security operation and duty in the Active Guard Reserve.

Discharge from service in the Reserve components for service-connected disability.

Subparagraph (B) of section 3311(b)(2) of title 38 United States Code, is amended to read as follows:

“(B) after completion of service described in subparagraph (A), is discharged or released from –

- (i) active duty in the Armed Forces for a service-connected disability; or
- (ii) a reserve component for a service-connected disability.

Rational: Allow Title 32, National Guard members to qualify for the Post-9/11 GI Bill. This class of service member, the oldest component of the United States Armed Forces may have been inadvertently excluded under the definition of eligible individuals, under Public Law 110-252. National Guard in State status under title 32 United States Code have served the United States before and since September 11, 2001 – “Always Ready and Always There” to protect and defend in times of crisis, both foreign and domestic. National Guard members served and continue to serve the United States in many critical capacities, but do not qualify for a GI Bill intended to serve those who serve our country. Further, any member of the Armed Forces who is discharged from service for a service connected disability should be considered eligible and qualify for the Post-9/11 GI Bill.

Transfer of Entitlement under the Post-9/11 GI Bill

To amend title 38, United State Code, to provide authority for certain members of the Armed Forces who have served 20 years on active duty to transfer entitlement to Post-9/11 Educational Assistance to their dependents. (In support of H.R. 3577)

AUTHORITY OF CERTAIN MEMBERS OF THE ARMED FORCES WHO HAVE SERVED 20 YEARS ON ACTIVE DUTY TO TRANSFER ENTITLEMENT TO POST-9/11 EDUCATIONAL ASSISTANCE TO THEIR DEPENDENTS.

- (a) Transfer Authorized- Section 3319(b) of title 38, United States Code, is amended--
- (1) in paragraph (1), by striking “or”;
 - (2) in paragraph (2), by striking the period and inserting “; or”; and
 - (3) by adding at the end the following new paragraph:
 - (4) 20 years of active duty service in the Armed Forces, as of any date between September 11, 2001, and July 31, 2009, including at least 90 days of such service after September 10, 2001, and is honorably discharged.'

(b) Effective Date- The amendments made by this Act shall take effect as if included in the enactment of the Post-9/11 Veterans Educational Assistance Act of 2008 (title V of Public Law 110-252).

Rational: Allow members of the Armed Forces who have served 20 years and met the minimum service requirements of 90 days following September 10, 2001 to transfer their entitlement under the Post-9/11GI Bill to their dependents. This population should not be penalized for having completed a career in the Armed Forces before or immediately following the September 11, 1001 attack on America.

General Recommendations for Equity, to Streamline, Improve and Augment Current Veterans' Education Entitlements

Eliminate Overpayments – Charge Entitlement

Overpayments are established in many different ways. To establish an overpayment puts unnecessary burden on the student and the Department of Veterans' Affairs in the effort to recover the overpayment. Basically, we are suggesting that an individual has 36 months of entitlement under a single program and that an overpayment should not exist until the eligible individual has used 36 months of the benefit. If the individual uses their entitlement responsibly, education and/or training will still be accomplished. This puts the burden of managing an “earned benefit”, choice, and planning on the eligible beneficiary of this benefit; and lessens the administrative burden on the Department of Veterans Affairs, the United States Treasury, veterans' benefits administrators and educational/training institutions. Overpayments recovered from entitlement should still be tracked and reported to the eligible individual as such. Educational/Training institutions would still be responsible for reporting eligible enrollments and for refunding the VA that portion of the benefit which is paid for established charges, for which the individual is not otherwise eligible, as currently defined.

Increase the Amount of Reporting Fee Payable to Educational Institutions Enrolling Veterans Receiving Education Assistance

In support of H.R. 3579, amend title 38, United States Code, to provide an increase in the amount of reporting fees payable to educational institutions that enroll veterans receiving education assistance from the Department of Veterans' Affairs, and for other purposes. Increase the amount of the fee from \$7 and \$11 to \$50 per student certified each calendar year.

Rational: School reporting fees have not changed since the inception over 30 years ago; however, several programs have been added on to the school Veterans' Program Administrators' responsibility at the institution and some, such as Vocational Rehabilitation, Chapter 31, have never been included. Now, a new and even more complex education program has been added, Chapter 33, PL 110-252. While the reporting, reconciliation and overall cost of administering all programs has increased and the burden on the educational institution is not business as usual; the added work effort has not been calculated. Also, the use of these fees should be designated to support the Office of Veterans' Affairs/Services and for professional development of the school VA Certification Officials and other Veterans' Program Administrators.

OJT, Apprenticeship, Non College Degree Institutions, Business Courses and Seminars, Preparatory Courses for Licensing or Certification Tests under Title 38 United States Code.

In support of H.R. 1336 - To amend title 38, United States Code, to make certain improvements in the basic educational assistance program administered by the Secretary of Veterans Affairs, and for other purposes. Specifically:

SEC. 2. Use of educational assistance for business courses and seminars

SEC. 3. Use of educational assistance for courses taken to prepare for licensing or certification tests

SEC. 6. Extension of increase in benefit for certain individuals pursuing Apprenticeships or On-Job Training

Rational: Allow benefits for certain skill attainment, trades and continuing education. Consistent with the concept of life-long learning and to provide the same flexibility currently in the Montgomery GI Bill chapters

Use of Entitlement under Post-9/11 GI Bill for Apprenticeships and On-The-Job Training

To amend title 38, United States Code, to provide for the use of entitlement under Post-9/11 Veterans Educational Assistance Program for the pursuit of apprenticeships and on-job training. (In support of H.R. 3337)

Rational: Consistent with the concept of life-long learning and to provide the same flexibility currently in the Montgomery GI Bill chapters

Make all Educational Assistance Benefits available for veterans discharged from active duty with a General Discharge, under Honorable Conditions

In support of H.R. 1336 - To amend title 38, United States Code, to make certain improvements in the basic educational assistance program administered by the Secretary of Veterans Affairs, and for other purposes. Specifically:

SEC. 7. Provision of basic educational assistance benefits for veterans discharged from active duty with general discharge.

Rational: Veterans who receive a general discharge are not eligible for education benefits. Ironically, they are eligible for all of other VA benefits. Prior to the MGIB veterans who served during WWII, Korea and Vietnam and received a General discharge were entitled to their GI Bill education benefits. A General Discharge, Under Honorable Conditions is issued to personnel whose military record is satisfactory but not sufficiently meritorious to warrant an Honorable discharge. It is an administrative discharge issued to many members whose service has been honest and faithful. An educated society is a more productive society, much less like to commit crime, will pay taxes, buy a home and contribute to their community. If generally discharged veterans (under honorable conditions) were allowed to receive education and training under the veterans education programs for which they are otherwise eligible, most would become better citizens, gain meaningful employment and contribute to society in a positive manner.

Do not tie the Certification of Tuition and Fees to the Living Stipend/Housing Allowance.

The living stipend/housing allowance under the Post 9/11 GI Bill should not be tied to the certification of tuition and fees. The Post-9/11 GI Bill requires that schools certify one term/semester at a time in order that actual tuition and fees be reported, rather than estimated. Understanding this requirement, it will be necessary for the VA to develop another certification of "Anticipated Enrollment" in order that the living stipend/housing allowance will be paid without interruptions. Allow schools and training institutions to certify students "intent" to enroll for the full academic year to establish eligibility for the living stipend. Allow the VA to pay and continue paying the living stipend until a report (VA Form 22-1999b) is submitted by the education/training institution which would stop or otherwise adjust this monthly payment. Further, the payment of tuition and fees must be made to the school in a timely manner. The VA defines timely as 30 days from the occurrence. Education institutions will work with the men and women who serve our country and appreciate the VBA's position, but there should not be an expectation that they will carry account balances indefinitely or that they will continue to defer payments without verification of entitlement (Certificate of Eligibility).

Rational: The majority of educational institutions are deferring tuition and fees (in the amount due from the VA) for students who are, or appear to be eligible for the Post-9/11 GI Bill. However, these students came to college campuses with the understanding, a promise if you will that they would receive a monthly living allowance to supplement or in some cases cover living expenses. For most eligible students, this did not happen and many students were forced to take out loans or to withdraw from school for financial reasons. Not only did this delay their educational objective and cause them extreme financial hardships; many are facing substantial overpayments for tuition and fees paid to the school. The current system of certification (one term at a time) will delay monthly payments further if there is not a means to separate the certification of "Anticipated Enrollment Status" from the certification of tuition and fees.

Develop an Education Web Portal for easy and accurate access to VA Records pertaining to Veterans' Education Benefits.

Veteran students do not have an electronic means of accessing meaningful and useful information from the Department of Veterans' Affairs on their education benefits, usage and remaining entitlement from their VA records. Educational institutions are becoming overwhelmed with the volume of calls, misinformation from the VA Call Center and limited ability to assist students in determining the status of their claims or even eligibility. Above all, eligible individuals/students should have access to their VA records. All information relative to their VA education benefits, eligibility, applications, enrollment certifications and payments should be made available to them through this portal.

Information should include at minimum information sent to the veteran via the US mails at the beginning and throughout each academic year as contained the Award Letter and now the Certificate of Eligibility under the Post-9/11 GI Bill.

Designated school officials would have secure access to the portal for veteran students so they may provide counseling and assistance when necessary. VA-ONCE and WAVE have partially covered these issues; however, all information is still not available. Veterans should be able to view all pending issues to include receipt of documentation and current status, reasons for any delays in processing should also be addressed on this WEB portal.

The VA should aggressively pursue the development and implementation of a secure web portal for veterans and educational institutions. We believe the implementation of a secure web portal will enhance service to veterans, bring efficiencies to the DVA with a corresponding reduction in telephone service personnel. The efficiencies in personnel utilizations realized would benefit processing time. This concept is needed now more than ever with the extreme delays in processing claims and the complexities of the Post-9/11 GI Bill.

Respectfully Submitted,

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EMBRY-RIDDLE AERONAUTICAL UNIVERSITY

**ON BEHALF OF THE NATIONAL ASSOCIATION OF VETERANS' PROGRAM
ADMINISTRATORS**

**BEFORE THE
HOUSE COMMITTEE ON VETERANS' AFFAIRS
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY**

December 3, 2009

Good afternoon Chairwoman Herseth Sandlin, Ranking member Boozman, and Members of the Subcommittee. I appreciate the opportunity to appear before you today and to participate in a roundtable discussion on technical legislative recommendations for Public Law 110-252, the Post-9/11 GI Bill and other veteran's education programs.

For the past 15 years I have served in an executive position on the board of directors of the National Association of Veterans' Program Administrators (NAVPA). For the past 10 years we developed an annual Veterans' Education Programs and Legislative Agenda outlining the many program enhancements to Veterans' Education Programs that our membership, which is made up of educational and training intuitions nationwide, sees as necessary in order for veterans, service members and their dependents to keep pace with the ever increasing need for an educated and trained workforce.

As often stated by my predecessor, (David Guzman, Retired Air Force Officer); "Veteran's Program Administrators on college campuses are at the business end of VA Education Programs". I have included a copy of NAVPA's 2009 agenda with my recommendations for this meeting and will deliver the 2010 agenda to both the Senate and House Veterans' Affairs Committee members in late January. In keeping, we appreciate the fact that several Representatives have introduced legislation based in part on NAVPA's recommendations.

Public Law 110-252 establishes the foundation for a 21st Century all volunteer force GI Bill. This law makes it possible for Guard and Reserve members who fight alongside active duty members, to receive the same level of GI Bill benefits as their active duty counterparts, equal benefit for equal service in support of deployments. It recognizes the need to make public education in higher education attainable. It responds in part to the voice of service members' nationwide as it relates to transferability. This was the first step toward achieving equity. Further, equity in all aspects of the delivery and simplicity of administration of the Post-9/11 GI Bill should be a goal of legislation.

Modernize the GI Bill to address 21st century work force requirements and societal change by expanding opportunities for veterans and service members to maximize their earned benefit through elimination of the MGIB and Post-9/11GI Bill delimiting dates: Many veterans delay entering school or training because of family or financial obligations. When veterans are finally in a position to pursue an education or advanced training they find that they either are up against their delimiting date with insufficient months remaining to complete their program or their delimiting date has expired. Some veterans who do complete a degree after service do not always use the entire 36 month benefit because of completing some college or training while in service. Later when it comes time to update their skills for career enhancement, their unused remaining benefit has expired because of the delimiting date. We believe that the delimiting date is a barrier to the concept of lifelong learning, a concept that is prevalent in our society. General examples of inequity include but are not limited to: **Tuition and fee reimbursement for private education** in higher education in the United States is tied to the state's highest tuition while tuition reimbursement for enrollment in foreign schools is tied to the national average; **The separation**

of tuition and fees as it relates to payment for private education – We do not believe the intent of this law was to separate tuition and fees, but to pay the maximum amount of established charges which would consist of all charges, tuition and fees, not to exceed the highest amount of all established charges (i.e., combined tuition and allowable fees) regularly charged in-state undergraduate students; **The exclusions of other viable and previously approved training opportunities** - OJT and apprenticeship, and the exclusion of a living stipend for certain veterans pursuing a program of education offered through courses classified by the VA as distance learning; and **the exclusion of title 32 National Guard members in the definition of eligible individuals under the Post -9/11 GI Bill.**

The intention of the Post-9/11 GI bill is to pay the basic housing allowance for veterans while pursuing a program of study at an institution of higher learning and many veterans are not able to travel to an IHL for various reasons choosing to continue their education via distance learning. Many students take classes online or at branch campuses of a school while serving on active duty. Once released, they find gainful employment and continue their education to be competitive in the civilian workforce. Also, in many cases active duty members are released due to a disability. In these cases, the students' only choice may be to complete their program of study through distance learning.

All modalities are approved by the State Approving Agencies for Veteran Training and recognized by accrediting bodies. This group of veterans should not be penalized for being responsible, disciplined adult learners, for putting their family first or whatever reason for choosing this credible 21st century mode of study. Embry-Riddle certifies the enrollment of over 4,000 veterans and active duty students annually who are enrolled in courses defined by law and approved as distance learning – a mode of study that is approved for veterans training for all other GI Bill programs, and that has become a trend in both private and public education today – distance learning, blended, hybrid, etc. We should not inhibit the ability of our veterans to participate in their educational plans by restricting the method by which they receive their course of study.

We are disappointed that PL 110-252 limits training opportunities, excluding On the Job Training, Apprenticeships and other training opportunities. Such limitations will prove to be a disservice to our veterans when they find that numerous career goals cannot be realized; and to our nation when we realize that the return on investment is not as great as it was with previous education programs. Many veterans are not interested in attending college, but have the skills necessary to master a trade. Our country certainly needs tradesmen and women like electricians, plumbers, carpenters and truck drivers to bring goods and services to the communities across this nation.

We advocate administrative like changes to Veterans' Education Programs that would: **Expand the student work study program** - This program needs to be expanded to allow students to work in academic or administrative departments at the institution in which they are pursuing a degree. This will enable students to work in a number of jobs within the college or university and gain valuable civilian work experience. **Provide education benefits for the veterans who receive general discharges under honorable conditions** - Perhaps if this small group of veterans were able to receive education or training, they would become productive citizens, gain meaningful employment and contribute to society in a positive manner. **Development of an Education Benefits Web Portal** - A web portal will provide an efficient mechanism for information exchange with, and access to, education systems by veterans and other stakeholder, such as schools, state approving agencies, etc. We highly recommend that funding for this important initiative be made available to the DVA Education Services Department to allow enhancements for the development of a web portal as initially recommended by NAVPA in 1999. **Eliminate overpayments –Charge entitlement** - To establish an overpayment puts unnecessary burden on the student and the Department of Veterans' Affairs in the effort to recover the overpayment. We are suggesting that an individual has 36 months of entitlement under a single program and that an overpayment should not exist until the eligible individual has used 36 months. Overpayments should be recovered from entitlement. **Do not tie the certification of tuition and fees to the living stipend/housing allowance** – The VA should develop another method for schools to certifying "Anticipated Enrollment" for the academic year, in order that the living stipend/housing allowance will be

paid without interruption. The majority of educational institutions are deferring tuition and fees (in the amount due from the VA) for students who are, or appear to be eligible for the Post-9/11 GI Bill. However, these students came to college campuses with the understanding, a promise if you will that they would receive a monthly living allowance to supplement or in some cases cover living expenses. For most eligible students this did not happen and many students were forced to take out loans or to withdraw from school for financial reasons. Not only did this delay their educational objective and cause them extreme financial hardship, many are facing substantial VA overpayments for tuition and fees paid to the school. The current system of certification (one term at a time) will delay monthly payments further if there is not a means to separate the certification of "anticipated" enrollment status from the certification of tuition and fees.

We would also like to see an increase in the Reporting Fee for schools and businesses that administer the Veterans' Education Programs. These fees have not changed since the inception over 30 years ago. While the reporting, reconciliation and overall cost of administering all programs has increased and the burden on the educational institutions is not business as usual; the added work effort has not been calculated. Also, we would recommend the use of these fees be designated to support the office of Veterans Affairs/Services and for professional development of school VA Certifying Officials and other Veterans' Program Administrators.

Again, thank you for this opportunity to participate in this discussion and make recommendations for GI Bill improvements and enhancements on behalf of our nation's veterans, service members and their dependents, Embry-Riddle Aeronautical University and the National Association of Veterans' Program Administrators.

Madam Chairwoman, this concludes my statement. I would be pleased to answer any questions you or other members of Subcommittee may have.