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**NATIONAL ASSOCIATION OF VETERANS PROGRAM ADMINISTRATORS**

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STATEMENT OF  
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NATIONAL ASSOCIATION OF VETERANS' PROGRAM ADMINISTRATORS  
BEFORE THE  
UNITED STATES HOUSE COMMITTEE ON VETERANS' AFFAIRS  
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY  
DECEMBER 11, 2024

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

Thank you for inviting me to speak at this hearing on *Examining the Effectiveness of the Veterans Readiness and Employment (VR&E) Program*. My name is Mr. Keith Glindemann, President of the National Association of Veterans Program Administrators (NAVPA). NAVPA's membership includes over 400 public and private colleges and universities across the nation that represent over 530,000 student veterans. Our membership is comprised of School Certifying Officials (SCOs) and school administrators who administer or oversee GI Bill® benefits for our student veterans. NAVPA has served as the voice of advocacy for veterans in higher education since its founding in 1975. Our research, training, and policy initiatives have developed programs and support services to ensure veterans achieve their academic and professional goals. I appreciate the

opportunity to speak on the VR&E topic that pertains to the Institutions of Higher Learning (IHLs) and how outcomes have affected our military connected students and veterans.

The VR&E program is an employment benefit for disabled veterans authorized under CFR38, Chapter 31. Oftentimes, these national heroes will require additional skillsets to become gainfully employed and maintain a suitable lifestyle. Each veteran is assigned a Veteran Readiness Counselor (VRC) that will work one-on-one with the veteran to evaluate and ensure their talent, interest, and capabilities are met. Many disabled veterans find a pathway to employment by attending a learning institution and preparing for a career change to accommodate their disability. When a career is selected, the veteran may need to choose an institution that can provide the education needed to successfully transition into that career field with the help of Department of Veteran Affairs (VA) resources. Once a school is decided upon, the Chapter 31 benefit will cover the cost of the veteran's education to include school fees and supplies. Chapter 31 will also pay the student veteran a cost of living allowance (COLA) or if eligible, the student can choose to receive the BAH rate if they are approved for the Chapter 33 GI Bill®. At this point, the VRC will notify the institution that the student veteran has been granted the use of their Chapter 31 benefit at their school by using an electronic means called Tungsten.

Tungsten was first implemented by VR&E at the end of 2019 and went into full effect early 2020 with little to no notification or training to School Certifying Officials (SCOs). The transition from a paper process to an electronic platform while meant to be an improvement, was instead a huge disservice to our disabled veterans. NAVPA voiced concern over the implementation and negative impact on the student veteran. NAVPA met with the VR&E Executive Director at the time, Mr. Will Streitberger, who listened to SCO concerns on administering the Chapter 31 benefit. Mr. Streitberger did his best to address the concerns brought forth by the NAVPA membership. The new Tungsten system does not include identifying student information and SCOs cannot search for their student veterans in the system by the last four of their social security numbers. Oftentimes, schools could not obtain the VR&E information for any Chapter 31 student. There was no training, no standardization, and no resources for the SCO to ask for assistance in serving our student veterans using Chapter 31 benefits.

Schools were discovering the VRCs were also experiencing issues with the Tungsten system, while being overworked and overburdened with too many cases to effectively serve the disabled veteran. During the tumultuous time of the COVID pandemic, students frequently had to stop attending school due to unavoidable events caused by the pandemic. When the institution attempted to return the funds back to the VA, there was no set standard or contact person to send funds.

Recently, NAVPA conducted a short survey of our membership and their experiences with VR&E. We found that nothing has changed since the transition occurred in 2019-2020. Tungsten is still a nightmare to navigate, schools still experience barriers in returning VA funding, VRC counselors are still overworked with heavy caseloads, and worst of all, the student veteran has suffered due to these inconsistencies and lack of organization and support.

We want to discuss the following:

- Staffing and Management
- Effectiveness and Outcomes
- Needs

NAVPA member schools work hard every day to support our veteran and military-connected students as they pursue their educational journeys. However, we feel the same pressure our students feel by a lack of VR&E communication, shortage of VRCs and a system that has not grown when the population using it has. For example, the recent passage of the PACT Act allowed many veterans suffering from toxic exposures to receive a VA disability rating and in turn qualify for Chapter 31 benefits if eligible, under the VR&E program. While NAVPA applauds the passage of this long overdue legislation we also wanted to report on what is being observed and experienced in the field. With this newly eligible group of veterans able to apply for Chapter 31 benefits, Institutions of Higher Learning (IHLs) are seeing the Chapter 31 program that was already stretched thin on resources pulled even further to the detriment of the many who utilize this benefit. VRCs have shared with some of our NAVPA member schools that they are overburdened, have extremely high and difficult to manage caseloads and feel burned out. At the same

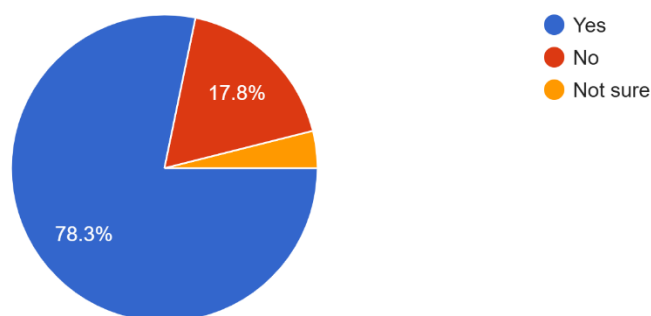
time Chapter 31 disabled student veterans are reporting a lack of communication with their VRC, delayed payments, and increased stress both mentally and financially as they navigate the VR&E program.

The Tungsten system uses Purchase Order Authorization numbers (PO's) from the VRC so student veterans can attend the institution of their choice. SCOs are reporting that they do not receive the correct PO's to process the veterans benefit. Under Title 38 USC 3679(e), schools are required to have an approved policy that affords Chapter 31 students' admission to attend and participate in class once the student provides the institution with a certificate of eligibility of entitlement or a VA Form 28-1905 no later than the first day of the course. Without a correct electronic authorization from the VRC, Chapter 31 students have no VA approval to attend classes.

Student veterans are usually very proactive and will attempt to contact their VRC counselor prior to the next semester to obtain approval of classes. However, there has been a significant turnover of VRCs nationwide and when this occurs, there is no notification to the student or the SCO. When counselors leave their job, this creates a ripple effect of events that prevent the veteran from receiving the services they need. SCOs are reporting nationwide that they have difficulty contacting the VRCs and obtaining timely authorizations. During the NAVPA survey, over 78% of SCOs responded they had experienced this issue.

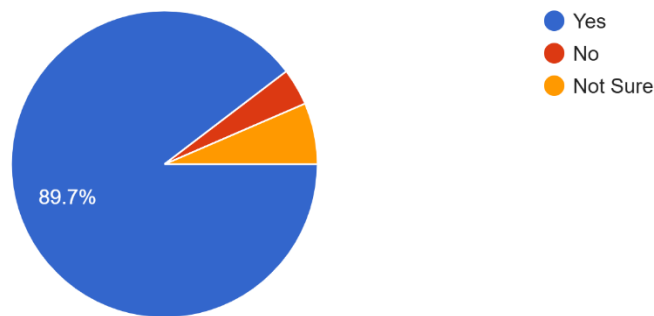
Have you had any issues communicating with a VRC?

230 responses



Not only do schools have this communication barrier, but Chapter 31 student veterans do as well as there is never notification that a VRC has changed or left. When this occurs, the veteran will contact their SCO for help as they do not know where else to turn for assistance. When asked this question during the NAVPA survey, over 89% of participants reported that their students had difficulty in contacting their VRC.

Have your Chapter 31 students had difficulty in making contact with their VRC?  
232 responses



VRC communications have shown a trend in providing less and less contact information. This started with emails and PO's omitting phone numbers on communications which denigrated the ability for when the SCO or college Business Office needs to contact the VRC for assistance. Later it was seen that direct emails were no longer included and instead the generic email ([eva@va.gov](mailto:eva@va.gov)) replaced it. This contact information is vital for a multitude of reasons to include discussing a specific student's academic needs, payment issues, or trying to be proactive and get a new PO number issued when the current one is expiring. By not sharing this information there can be a delay in processing entitlements and ultimately delaying a student receiving their benefits.

Lack of communication and constant change only adds unnecessary stress and delay of benefit to these disabled veterans who are working towards obtaining employment. Student veterans have shared that their emails and phone calls go unanswered. When schools cannot obtain the necessary authorization, this delays the certification of benefits which in turn will delay the students COLA or housing benefit creating a financial hardship on the veteran. NAVPA members are reporting that the student will go for months before

receiving any communication from the VRC. SCOs have had to contact VRC supervisors (if known) or had to reach out to Congressional Representatives for assistance to help the veteran receive their benefit.

There is no standardized training provided for the SCO or the VRC. NAVPA members have reported that the VRC will give the student veteran incorrect information or the VRC does not understand how Chapter 31 works. Some Counselors have told students that they cannot apply for VR&E if they have any Chapter 33 benefits. This goes against what is published in the VR&E SCO Handbook that clearly states a veteran should use their Chapter 31 benefits prior to Chapter 33 due to the 48-Month Rule Change. Members are also reporting that there are conflicting processes between the VRCs which creates confusion and slows down approval for the student veteran.

The Tungsten technology has been cumbersome and not user-friendly for the SCO. Schools have difficulty finding students in the system because of limited identifying information. When first implemented, there were issues concerning schools who had one tax ID with multiple campuses and/or bank accounts creating a complicated process. Refunds are still an issue when the school is trying to return funds back to the VR&E location where the student is receiving approval of benefit only to have the VR&E return those funds back to the school for unknown reasons. NAVPA members have reported they will then receive a letter from the VA threatening to refer them to the Treasury Offset Program (TOP) to recover the monies. There is no centralized location to return government funding to be processed.

VR&E staff authorizes payments for the Chapter 31 participants' tuition and fees using the Invoice Payment Processing System (IPPS). PO authorizations are sent to schools via email by the VRC and do not contain any information in the email to identify which student the PO numbers are for. The only way to do this is to login to Tungsten and try and retrieve the authorization by entering the PO number itself and date range of when it was created. Once this is done SCOs can see the complete authorization in Tungsten and download the information needed to certify the student and bill for their classes.

Tungsten is not user friendly in the fact that as a school we are unable to search for a student using any personal identifying information (PII). By not being able to search the

Tungsten system with any PII, the processing of benefits grinds to a halt until SCOs can locate a PO authorization number to search Tungsten for the actual authorization and details. This can result in a delay in certification, delayed housing payments for students, delayed school payments from the VA, and frustrated VRCs who are trying to assist their Chapter 31 students. Ultimately, this puts tremendous stress and anxiety on the disabled student veteran who is focusing on academics, worrying about financial matters, and not receiving their housing payment in time to pay their rent or buy groceries.

SCOs are obviously sensitive to the interest of protecting student privacy, and it might seem like eliminating PII is a “best practice”. However, the more important principle at work in student privacy is the need-to-know basis. Our student veterans are individuals, each with different situations and needs. As important as it is to protect their privacy to the utmost extent possible, we cannot do so to the exclusion of meeting their needs. Some amount of PII is necessary for schools to administer the VR&E program to these veterans.

While the VR&E can be a great resource for our disabled veterans, NAVPA recommends an increase in VRC employees to better serve our student veterans. NAVPA would like to see a reorganization of VR&E processes where there is direct and secure communication between the school and the VR&E with protected veteran PII information. Improved communication will help eliminate many of the issues already addressed. There needs to be standardized procedures in place on a national level with training to both the VRC and SCOs who administer this benefit. VR&E should update their SCO Handbook with standardized procedures and support information.

It is NAVPA’s recommendation that an updated field directory of all VRCs and their supervisors is created and published on the VA.gov website. This information should include where SCOs and student veterans can find assistance when a VRC has stopped communicating with a student or school.

And lastly, VA should update their technology to accommodate the specific details of VR&E students to make it more user-friendly so school administrators can effectively serve our student veterans using the Chapter 31 benefit. It is NAVPA’s recommendation that the VA work with Tungsten to develop better search criteria for PO authorizations to

help school officials locate information for Chapter 31 students to expediate the certification and billing process. NAVPA is open to a Roundtable discussion to provide real time recommendations.

In conclusion, NAVPA is committed to serving our student veterans and providing quality services to our nation's heroes and we thank the Committee for giving us this opportunity to share the insights of how the VA has served our disabled veterans using Chapter 31 benefits. We hope that by sharing the impact of these issues, there can be productive discussion on how to best move forward in supporting the student veteran considering these undue hardships. NAVPA is willing to assist in finding a solution.

Thank you for the opportunity to testify today and I look forward to your questions regarding these topics.