



November 26, 2024

The Honorable Chuck Schumer
Majority Leader
United States Senate
Room S-221, The Capitol
Washington, D.C. 20510

The Honorable Mitch McConnell
Minority Leader
United States Senate
Room S-230, The Capitol
Washington, D.C. 20510

The Honorable Jon Tester
United States Senate
Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Jerry Moran
United States Senate
Committee on Veterans' Affairs
412 Russell Senate Office Building
Washington, D.C. 20510

Dear Majority Leader Schumer, Minority Leader McConnell, Chairman Tester, and Ranking Member Moran:

On behalf of the undersigned associations, representing the full spectrum of American higher education, I write to express our support for the Elizabeth Dole 21st Century Veterans Healthcare and Benefits Improvement Act (H.R. 8371). While we support the overall package, we would like to raise specific technical concerns to ensure that the bill's language best meets the needs of veterans and their families. These concerns primarily pertain to the VA GI Bill Comparison Tool found in Section 215.

Our members are committed to providing the most accurate data available to assist veterans and the public in making informed choices as to their educational options. Section 215 includes language addressing published completion rates for veterans at institutions of higher education, specifically identifying "the number of veterans or members who completed education at the institution." It is certainly reasonable to offer veterans insight into their likely educational outcomes. However, the underlying Enrollment Manager (EM) for GI Bill data only counts those veterans or beneficiaries as "complete" at the institution where they finish their degree or credential if they are using GI Bill at the time of completion. Unfortunately, this definition of completion does not account for the realities of today's student veterans and beneficiaries, as many will transfer institutions at least once before earning their degree.

The definition also excludes veterans and beneficiaries who successfully earn their degree after exhausting their GI Bill benefits. As a result, the data tool will show incomplete and inaccurate information that misrepresents the likelihood of success for veteran students within a program or institution. We recommend revising the bill language to instead use the “number of veterans or members who completed who have **ever** used covered education benefits at the institution [emphasis added].”

Further, the legislation includes language such as “average annual cost” and “total cost,” neither of which are data points currently collected by or reported to the Department of Education (ED) or defined by law. Our members are concerned that maintaining these broad, undefined terms in the legislation will lead to inconsistent and misleading data for veterans and beneficiaries.

We respectfully suggest two changes to these definitions to reflect data that is already collected by ED. First, we suggest that “average annual cost” and “total cost” be shifted to “average net price” and “average cost of attendance,” respectively. Both “average net price” and “average cost of attendance” are data points already defined by law and reported by institutions to ED, ensuring that clear and accurate information reaches veterans and their families. What’s more, these measures account for the availability of aid, which can significantly affect the costs that veterans will pay. By including these measures, veterans will have a clearer and more accurate view of the likely costs they will actually pay.

In addition, the bill requests “average time for completion of each program,” a term that is undefined in this or any other legislation and is not currently reported. As an alternative, we suggest the bill use the existing term “published program length,” which is already federally defined and reported by institutions.

Finally, the bill requires data on GI Bill beneficiaries earning a certificate or professional license. However, this data varies widely by state and would not provide a meaningful comparison. We instead recommend deleting this requirement or adding “to the institution’s knowledge.”

Without clear definitions in statute, it is reasonable to expect that the Department of Veterans Affairs will distribute inconsistent or misinterpreted data. Given the importance of the actual cost and likelihood of success in deciding where to enroll, it is important to make these simple clarifications. Doing so will better equip veterans and their families to make truly informed choices about their educational options. We appreciate your attention to this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell", with a stylized flourish at the end.

Ted Mitchell
President

On behalf of:

American Association of Collegiate Registrars and Admissions Officers
American Association of Community Colleges
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Catholic Colleges and Universities
Association of Governing Boards of Colleges and Universities
Association of Jesuit Colleges and Universities
Association of Public and Land-Grant Universities
Council for Higher Education Accreditation
NASPA – Student Affairs Administrators in Higher Education
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of Student Financial Aid Administrators
State Higher Education Executive Officers Association