

December 8, 2022

The Honorable Denis R. McDonough
Secretary
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

Dear Secretary McDonough:

On behalf of the organizations and associations listed below, representing two- and four-year public and private colleges and universities, I write regarding the Department of Veterans Affairs' (VA) plans to transition to a new enrollment management system for certifying GI bill benefits in January 2023.

Colleges and universities are deeply concerned that this system migration will disrupt and delay critical veteran education benefits including veterans' monthly housing allowances, particularly for new veterans transitioning into higher education for the first time. We strongly urge the VA to delay this transition until the summer of 2023, so as to avoid the peak certification period that occurs in January. We also urge the VA to use this additional time to provide high-quality training resources and opportunities for school certifying officials (SCOs) to help minimize any disruptions and ensure a smooth transition.

Last week, the Education Service announced that its current enrollment management system, VA-ONCE, will sunset on January 13, 2023, and VA will transition to a new system, Enrollment Manager, by the end of January. In the interim, there will be a period of at least two weeks when institutions will be unable to submit any certifications to the VA.

VA has chosen to schedule this system migration during the peak certification period for the spring semester, which occurs in January. Moreover, the announcement provides campuses with less than three weeks to prepare for the changeover before they close for the holidays. Many colleges and universities will not reopen until the week of January 16 or 23, at which point they will be unable submit certifications until the new system comes online. This is likely to result in a delay of critical housing allowance and other payments typically sent to veterans on February 1. Already, January and February housing payments tend to be lower due to reduced class schedules during December and January; a delay in payment will only increase these hardships.

Veterans newly transitioning into higher education are also likely to be affected by this migration – including veterans transitioning off of active-duty who plan to enroll during the new student orientation period. Not only will SCOs be delayed in submitting these certifications, but they will require additional processing time at VA, further adding to the delay. Although VA has encouraged campuses to submit certifications before VA-ONCE sunsets on January 13, in many cases, campuses will be unaware of student actions, such as enrollment changes as course sections open and close, and therefore be unable to certify these

students prior to that date. The VA-ONCE shutdown will cause an inability to certify students in January and will cause hardships, overpayments, and student debt.

Campuses have alerted us to a lack of adequate, hands-on training opportunities and resources to train SCOs on the new system. While VA offered a workshop on November 18, there were significant audio problems complicating participation for the roughly 9,000 on-line attendees (although we appreciate VA's ongoing efforts to provide subsequent online access to a recording of that training that will address these audio issues). Other campuses have raised concerns regarding the functionality of the new Enrollment Manager system, including that it does not appear to capture all of the information that VA requires SCOs to report. We urge the VA to ensure, prior to its rollout, that it has provided ample training opportunities and resources for SCOs, and prepared contingency plans should the go-live date be delayed. We also urge the VA to address the functional shortcomings of Enrollment Manager, as it appears some GI Bill reporting cannot currently be completed in the new system. Short training videos and training documents on specific topics would be particularly appreciated, as would the opportunity for more SCOs to test-drive the new system before it goes live.

Finally, there are questions whether the system migration could undermine campuses ability to meet their obligations under VA regulations, and lead to negative audit findings. As one example, because VA requires certifications to be submitted within 30 days of the start of the term, the system outage could prevent SCOs from submitting within the required timeframe. There are also concerns that, due to the sunset of VA-ONCE, campuses will no longer be able to access historical data about certifications they may be required to provide as part of an audit. We strongly encourage the VA to describe the steps it is taking to ensure that no institution receives negative audit findings as a result of the Enrollment Manager transition. We also recommend that VA maintain "view-only" access to VA-ONCE after the transition so campuses may access these records as needed.

We understand that VA believes that Enrollment Manager will be a significant improvement over the current system and will provide a more intuitive and user-friendly experience for certifying officials. We are hopeful this will be the case and appreciate VA's efforts to bring about improvements to the current system. At the same time, we respectfully urge VA to delay the roll out of the new system to ensure that veterans' benefits are not delayed or otherwise impacted. If it would be helpful, we would be happy to discuss our request further at your earliest convenience. Thank you for considering our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Mitchell".

Ted Mitchell
President

Cc: The Honorable Mark Takano, Chair, U.S. House Committee on Veterans' Affairs

The Honorable Mike Bost, Ranking Member, U.S. House Committee on Veterans' Affairs

The Honorable Jon Tester, Chair, U.S. Senate Committee on Veterans' Affairs

The Honorable Jerry Moran, Ranking Member, U.S. Senate Committee on Veterans' Affairs

Joseph Garcia, Executive Director, Education Service Veteran Benefits Administration, Department of Veterans Affairs

On behalf of:

ACPA- College Student Educators International

Achieving the Dream

American Association of Colleges and Universities

American Association of Colleges of Nursing

American Association of Collegiate Registrars and Admissions Officers

American Association of Community Colleges

American Association of State Colleges and Universities

American Association of Veterinary Medical Colleges

American College Health Association

American Council on Education

American Indian Higher Education Consortium

Association of American Universities

Association of Catholic Colleges and Universities

Association of Community College Trustees

Association of Governing Boards of Universities and Colleges

Association of Independent California Colleges and Universities

Association of Independent Colleges & Universities of Rhode Island

Association of Jesuit Colleges and Universities

Association of Public and Land-grant Universities

CCCU- Council for Christian Colleges & Universities

Career Education Colleges and Universities

Connecticut Conference of Independent Colleges

Council for Higher Education Accreditation

Hispanic Association of Colleges and Universities

Higher Education Consultants Association

NASPA- Student Affairs Administrators in Higher Education

New Hampshire College and University Council

National Association of College and University Business Officers

National Association of College Stores

National Association of Colleges and Employers

National Association of Independent Colleges and Universities

National Association of Student Financial Aid Administrators

National Association of Veterans' Program Administrators

New England Commission of Higher Education

North Carolina Independent Colleges and Universities

Northwest Commission on Colleges and Universities

Tennessee Independent Colleges and Universities Association

UPCEA

Wisconsin Association of Independent Colleges and Universities