



VETERANS EDUCATION SUCCESS

STATEMENT FOR THE RECORD

LEGISLATIVE HEARING ON THE
CAREER-READY STUDENT VETERANS ACT (H.R. 2360)

BEFORE THE

SUBCOMMITTEE ON ECONOMIC OPPORTUNITY

COMMITTEE ON VETERANS AFFAIRS

U.S. HOUSE OF REPRESENTATIVES

JUNE 2, 2015

Chairman Wenstrup, Ranking Member Takano, and Members of the Subcommittee:

Veterans Education Success (VES) appreciates the opportunity to share its perspective on the Career-Ready Student Veterans Act (H.R. 2360). VES is a non-profit organization focused on protecting the integrity and promise of the GI Bill and other federal educational programs for veterans and servicemembers.

Career-Ready Student Veterans Act (H.R. 2360)

H.R. 2360 adopts the same commonsense, bipartisan protections for GI Bill educational benefits that Congress put in place, through the bipartisan 2014 National Defense Authorization Act, for servicemembers who use DOD's Tuition Assistance Program.¹ We believe that it is critical for Congress to extend these same bipartisan protections to veterans using GI Bill benefits.

The goal of this important legislation is simple—to protect the integrity of GI Bill educational benefits and taxpayer expenditures. Earning a certificate or degree does not automatically lead to a job in a veteran's field of study. Some professions, including law, nursing, teaching, and certain healthcare professions, must also meet state licensure and certification requirements as well as employer expectations.

The Department of Veterans Affairs (VA) and its partner, State Approving Agencies (SAAs) approve programs for veterans to attend using their GI Bill benefits. Unfortunately, the Department of Veterans Affairs allows veterans to use their GI Bill

¹P.L 113-66.

benefits for degrees that do not lead to the necessary licensure or certification. Frankly, this is a waste of both veterans' hard-earned educational benefits and taxpayer dollars.

Appropriate Accreditation Is Often the Pathway to a Job

In approving degree programs, VA and SAAs generally rely on standards established by the Department of Education. The Education Department recognizes two types of accrediting agencies—both institutional and programmatic. According to the Education Department, accreditation is the recognition that an institution maintains standards requisite for its graduates to gain admission to other reputable institutions of higher learning or to achieve credentials for professional practice.

In general, institutional accreditation, not programmatic accreditation, is a prerequisite for a school to participate in the federal student aid program.²

- *Institutional accrediting organizations* are either regionally based (accrediting schools in their geographic region) or national in scope (accrediting schools that have multiple campuses across the country).³ In some cases, the type of institutional accreditation can limit the ability of schools' graduates to find a job in their field of study. For example, all states require teachers to graduate from a regionally accredited school and some police agencies do as well.
- *Specialized accrediting agencies* focus on specific degrees offered by schools or by a department or college within a larger university.⁴ Some of these specialized agencies accredit distance education programs and accreditation by one of these agencies allows schools to participate in federal student aid.⁵ For some careers, however, institutional accreditation is not sufficient: Proper accreditation at the programmatic level by a specialized accrediting organization is necessary. For example, lawyers must graduate from a law school accredited by the American Bar Association to sit for Bar Exam, which is required in all but a few states to practice law. Similarly, you simply cannot become a licensed clinical psychologist unless the PhD program you attend is accredited by the American Psychological Association.

State Boards and Employers Also Play a Role in Determining Who Gets Hired

At the state level, various boards and entities determine licensing and certification requirements, including Boards of Nursing and Dentistry, state bar admission associations, and state Departments of Education. For law enforcement officers, state

²Although the Department's College Navigator website provides information on institutional accreditation, it has very spotty data on schools' programmatic accreditation.

³http://www2.ed.gov/admins/finaid/accr/accr_pg6.html

⁴See <http://ope.ed.gov/accr/FAQAccr.aspx>. See this link for a list of some the specialized accrediting agencies: http://www2.ed.gov/admins/finaid/accr/accr_pg7.html. Other approved agencies can be found at the Council for Higher Education Accreditation, <http://www.chea.org/>.

⁵http://www2.ed.gov/admins/finaid/accr/accr_pg10.html

legislatures may set minimum standards but state and local police agencies may adopt more stringent requirements.

While some professions do not require licensure, states and employers may strongly prefer schools to be programmatically accredited. For example, state nursing boards may take programmatic accreditation into consideration when determining which schools' nursing programs are approved for graduates to become licensed RNs. And, some employers insist that graduates pass a national certification exam offered by a recognized organization. Particularly in the healthcare field, employers view such certification as a protection against lawsuits alleging that they employ unqualified health personnel.

GI Bill Approval of a School Program Doesn't Mean the Degree Leads to a Job

Numerous GI Bill approved degrees in programs such as law, psychology, teaching, criminal justice, and numerous healthcare fields, including nursing, medical assistant, and dental assistant do not lead to jobs because they lack the appropriate accreditation or fail to meet state-specific criteria required for certification or license. Moreover, veterans graduating from some programs are unable to obtain the professional certifications that employers strongly prefer.

From our pool of veterans complaints and law enforcement actions, we identified at least 8 fields of study offered by 15 different schools that failed to meet state or employer requirements for graduates to find a job in their field of study (see table below). Yet, the Department of Veterans Affairs authorizes GI Bill benefits for these programs at about 60 campuses across the country. Overall, GI Bill approved programs at about 20 percent of the 300 campuses that we examined did not qualify graduates for state licensure or certification. An attachment to this statement contains a detailed description of these findings.

These programs—offered both online and at brick and mortar campuses—represent the tip of the iceberg of unaccredited programs because this analysis focused only on some of the degree programs that were the subject of veteran complaints or state Attorneys General lawsuits. Certainly, degree programs in other fields pose similar accreditation problems for graduates. For example, on May 26, 2015, the U.S. Federal Trade Commission announced an action against Ashworth College for misleading students about programs that "failed to meet the basic educational requirements set by state licensing boards for careers or jobs" in numerous states. The action noted that Ashworth's programs were eligible for GI Bill dollars, but not for federal student loans, and that Ashworth targeted veterans and service members for recruiting, including through recruiters posing as "military advisors."⁶

⁶<https://www.ftc.gov/system/files/documents/cases/150526ashworthcollegecmpt.pdf>

Sample of Degree Programs Approved for GI Bill Benefits that Don't Lead to Jobs in Those Fields

Degree	Sample of GI Bill-approved campuses identified through veteran complaints or lawsuits with degree programs that don't satisfy job requirements	Why degree doesn't lead to a job	Related Lawsuit
Law	7 (online (3), CA (4)) ^a	not ABA accredited ^b	
Clinical Psychology (PhD)	2 (WA, FL)	not APA accredited ^c	CO AG
	MN	not APA accredited	CT
Teaching (early childhood)	IA, online	not state board of education approved	IA AG
Nursing	4 (AL, FL (2), NC)	not state board of nursing approved	NM AG
Criminal Justice	Boise	police dept. requires regional accreditation	
	4 (Tampa, St. Petersburg, IL (2))	police dept. requires regional accreditation	
	4 (IL)	police dept. requires regional accreditation	IL AG
Dental Assisting	18 (TX (9), CA (9))	not state dentistry board approved ^d	
Medical Assisting	3 (CA)	lacks the program accreditation required to attain the certification employers prefer	
	4 (NE, OH (2), WI)	lacks the program accreditation required to attain the certification employers prefer	MN AG
	8 (CO, MO, NE, OK, TX (4))	lacks the program accreditation required to attain the certification employers prefer	
Surgical Technology	KS, MO	lacks the program accreditation/approval required to attain the certification employers prefer ^e	NY AG

Source: Research by Veterans Education Success.

Note: This table has been revised to reflect the fact that the Phoenix BA nursing program offered at 19 campuses in various states does not require state Board of Nursing approval because the Phoenix program only enrolls RNs who are seeking a Bachelor's degree in nursing and already have a state license to practice. The VA database of GI Bill approved programs does not distinguish between such "post-licensure" programs and the 3 "pre-licensure" programs we examined that Phoenix offers in California, Colorado, and Hawaii. Those 3 programs are approved programs in those states and qualify graduates to become licensed RNs.

^aThere are a total of 6 law schools but 7 online/campus-based programs because one law school offers both online and campus-based degrees.

^bAmerican Bar Association. ABA accreditation is not required to sit for the bar in California and several other states. However, graduates are required to undergo several years of mentoring by a licensed lawyer in order to take the bar exam.

^cAmerican Psychological Association.

^dTexas requires dental assistants who perform x-rays to be state registered but none of Kaplan's 9 Texas campuses are approved by the state dentistry board. California's dentistry board requires dental assistants to

attend a state approved school to perform four different procedures but Kaplan is only approved for one of the four procedures.

⁶Two organizations offer a certification exam for surgical technology—the National Board of Surgical Technology and Surgical Assisting and the National Center for Certification Testing. The former requires schools to have programmatic accreditation to sit for the exam while the latter requires graduation from an “authorized” school.

Accreditation and licensure requirements bring harsh, real-life implications for the young men and women who learn, too late, that their degree lacked the proper accreditation and they are not eligible to even sit for a licensing exam in their field of study. Once their GI Bill benefits are wasted on an unaccredited program, there is no recourse for them. Many such veterans understandably express anger that VA did not properly protect their hard-earned benefit.

Veterans justifiably expect that if VA has approved a program for GI Bill benefits, then that program is a good use of those hard-earned benefits. Veterans believe that VA approval means the program is worthy of their sacrifice. Veterans should not be expected to navigate different state-specific licensing requirements and employer preferences to try to uncover that a program is, in fact, unlikely to leave them eligible for work. Nor should they be expected to rely on school disclosures, which may not be forthcoming or helpful.⁷ In short, determining whether a school’s program meets career requirements is not a task that veterans should be burdened with.

Already operating under a similar provision, the Defense Department reports that it requires schools to self-certify that they are in compliance in order to relieve the administrative burden of enforcing the requirement

Conclusion

H.R. 2360, the Career-Ready Student Veterans Act would extend to veterans the same commonsense, bipartisan protections that Congress already put in place in 2013 for servicemembers who use DOD’s Tuition Assistance Program.

The examples cited in this testimony underscore the need to protect veterans’ hard-earned educational benefits by ensuring that only degree programs leading to the jobs they actually studied for are approved to receive GI Bill funds. These degree programs at both brick and mortar campuses and online are only the tip of the iceberg. Because this analysis only examined some of the programs that were the subject of veteran complaints or state Attorneys General lawsuits, additional programs may also leave veterans ineligible to work in their field of study.

It would be a disservice both to veterans’ military service and to taxpayers’ investment in the post-military careers of our nation’s veterans not to extend these basic protections.

⁷Inadequate disclosures about programs’ lack of proper accreditation has been the subject of many law enforcement law suits against certain programs.

Thank you for considering the views of Veterans Education Success on this important topic.

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