



Student Veterans of America
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TESTIMONY OF
MR. WILLIAM HUBBARD
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STUDENT VETERANS OF AMERICA

BEFORE THE

OFFICE OF POSTSECONDARY EDUCATION
U.S. DEPARTMENT OF EDUCATION

PUBLIC HEARING ON THE TOPIC OF:
“ENFORCING THE REGULATORY REFORM AGENDA”

OCTOBER 4, 2017



On behalf of Student Veterans of America, a higher education non-profit representing over 1.1 million veterans in post-secondary education, I stand before you strongly urging this body to stand with students. The intent of Executive Order 13777 is to “alleviate unnecessary regulatory burdens placed on the American people”. We fully support this intent. We do not, however, interpret this intent to mean the decimation of student protections and I appreciate this opportunity to explain our position.

My name is Will Hubbard. I am a former chapter leader of the Student Veterans of America chapter at American University, and now serve on the national headquarters staff as the Vice President of Government Affairs. I also served as a non-federal negotiator in the original borrower’s defense rulemaking in 2015, representing the perspective of our military-connected students, and have been nominated by nearly 30 military and veteran organizations for the upcoming rulemaking negotiations.

With rumors of hard-won victories to protect students being at risk, we delivered a letter this spring on behalf of dozens of military, veteran, and family organizations to the Chairmen of the Senate Health, Education, Labor and Pensions Committee, and the House Education and Workforce Committee. We also testified before this body in July on these same issues, to demonstrate the importance of each. Nobody likes the idea of streamlining government more than me. Indeed, decision-making processes that are slow and overburdened with regulatory red tape are a significant hindrance to protecting student veterans from predatory schools.

As a member of the military, I learned to understand the concept of Commander’s Intent. A leadership philosophy which dictates that decision-making should occur at the most local level possible, with individuals being empowered to execute the mission. All too often, unfortunately, the Commander’s Intent is obfuscated like a game of telephone—the purpose of an order being lost in translation.

Interpreting the intent to alleviate unnecessary regulatory burdens does not mean rolling back crucial protections for students. The Executive Order specifically cites that these burdens should be reduced on behalf of “the American People”. Are not students “the American People”. Therefore, we highlight several critical protections which should be considered for modification through strengthening:

- First, **the Gainful Employment Rule**. This rule enforces the Higher Education Act’s requirement that career education programs receiving federal student aid must “prepare students for gainful employment in a recognized occupation.” This common-sense requirement applies to career education programs at all types of



colleges (public, nonprofit, and proprietary) and protects both students and taxpayers from waste, fraud, and abuse. Additional resources ought to be committed to ensure this regulation is fully implemented, to prevent schools with poor outcomes from continuing to deceive student veterans.

- **Second, new regulations on federal student loan relief.** These regulations for defrauded borrowers and college accountability, which make it harder for schools to hide fraud and clarify avenues for students to receive the loan relief they are entitled to under the Higher Education Act. America’s heroes are targeted for such fraud because of the 90/10 loophole, and deserve the relief they are entitled to under the law. These regulations should be modified to be as inclusive as possible, with the benefit of the doubt being given to students who attended programs that consistently demonstrate a pattern of intentional deception of their enrollees.
- **Third, the ban on incentive compensation.** This ban was enacted in the Higher Education Act more than 20 years ago with broad bipartisan support to reduce high-pressure, deceptive sales tactics. Sales commissions incentivize college recruiters to “do anything and say anything” to get veterans to enroll. Veterans, who are frequently encouraged to enroll on the spot, are most frequently exposed to high-pressure recruiting: over 60 percent are the first in their family to attend college. As a rule of thumb, any school that encourages student to “enroll today” should be of concern. School is a major life decision, not a trip to the supermarket—let’s take it seriously.
- **Fourth, the Enforcement Unit** at the Department. This unit has been taking steps to protect all students – and explicitly embraced a goal of prioritizing veterans and servicemembers – from any illegal conduct by any college.

We maintain that schools that achieve strong outcomes ought to openly embrace the of these student protections. These protections only negatively affect schools who appear committed to defrauding taxpayers, students, and the broader American public. The lack of leadership on behalf of students within higher education continues to baffle.

On behalf of national organizations representing our nation’s military servicemembers, veterans, survivors, and military families, we vehemently urge the Department to ensure important laws and regulations protecting students are not watered down or eliminated. We hope that agreement is possible in order to protect America’s military heroes and their families.



William Hubbard, Vice President of Government Affairs



Will Hubbard joined the professional staff of Student Veterans of America in February 2014. Mr. Hubbard is frequently called to testify to Congress on a variety of topics related to higher education and veterans. He also regularly advises the White House and senior executives of the Administration on the interests of student veterans and higher education policy.

Mr. Hubbard received his Bachelors in International Studies from American University. After graduating, he spent several years serving government agencies to include the Department of the Navy, Department of State, and the State of Indiana Department of Revenue in his role as a Federal Strategy and Operations Consultant.

As a National Executive Committee Member of Deloitte's Armed Forces Business Resource Group, Mr. Hubbard was dedicated to the achievement of veterans, and led the successful proposal of two veteran-focused pro bono projects. Prior to his career in consulting, he co-founded a successful startup business in the snack food industry, which expanded placement into 14 local stores.

Mr. Hubbard joined the Marine Corps Reserve in 2006 and initially served with 2nd Battalion, 24th Marines. Today, he continues to serve at Quantico, VA, and most recently deployed to Central America with a Special Purpose Marine Air-Ground Task Force. He has served SVA at both the chapter and national levels, and has been passionate about veterans' issues since entering the armed services.