

The Enlisted Association of the National Guard of the United States (EANGUS) represent the interests of more than 452,000 men and women of the Army and Air National Guard. Our organizations deeply care about protecting the G.I. Bill. and we firmly believe that every student veteran has earned the right to utilize his or her benefits at a reputable, affordable, high-quality institution of higher education. Good schools help our veterans pursue their life's aspirations and career goals. When institutions fall short, student veterans are hurt. Period. As a country, we are better than this and it is our duty to fulfill our commitment to those who have served.

We believe the upcoming negotiated rulemaking sessions on Gainful Employment and Borrower Defense to Repayment present opportunities to work collaboratively to achieve meaningful, lasting protections for all student veterans.

There is no doubt, the Department of Education and those who will be at the negotiating table face a tough challenge. Reaching consensus will be difficult. The mere words Gainful Employment and Borrower Defense to Repayment illicit strong reactions from various stakeholders. Unfortunately, the process has become intensely political, and that must change. Surely, had negotiators reached consensus around the table the last time around, we would not be going through the process again.

Even though it will be difficult, reaching a consensus and establishing a strong set of protections to ensure all student veterans are well served by any institution they choose is the best way to achieve meaningful, lasting improvements to our higher education system. All legitimate, quality, high-performing institutions should welcome this outcome, and those that show excellence should be highlighted. At the same time, predatory, low-quality institutions at any level, must be identified, and eliminated regardless of sector. Period.

If there is no consensus this time, the process will continue to be politicized, needlessly delayed, and, most importantly, students will continue to be victims of predatory practices.

When we work together, we can achieve powerful results. I would like to point to one recent accountability tool that came as the result of such collaboration. H.R. 4057, the Improving Transparency of Education Opportunities for Veterans Act was approved unanimously by Congress and signed into law by President Obama. It was a focused piece of legislation that required the Department of Veterans Affairs to implement a national complaint tracking system so student veterans could file complaints about cost, attendance, marketing, graduation rates, program quality, employment prospects, and any other unfair or unlawful activity.

Simultaneous to this bipartisan legislation, President Obama issued Executive Order 13607 -- Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members.

Executive Order 13607, along with H.R. 4057, led to the establishment of a comprehensive complaint tracking system, aimed to gather real-time, direct input from veterans, service

members and their families. The Department of Veterans Affairs, the Federal Trade Commission, the Department of Justice, the Department of Defense, the Department of Education and the Consumer Financial Protection Bureau all came together to implement an integrated system that is available to more than 2,000 law enforcement agencies nationwide. The system has already led to sanctions on institutions for fraudulent and deceptive practices targeted toward service members and veterans. This law had its early beginnings in a coalition that reached consensus against insurmountable odds. In front of me this morning is a letter signed by multiple stakeholders across higher education and the veteran service organizations community. Just to name a few, the letter include the American Association of Collegiate Registrars and Admissions Officers, The American Council on Education, The National Association for College Admission Counseling, The University of Phoenix, The Association of Private Sector Colleges and Universities, The Veterans of Foreign Wars, The American Legion, and Student Veterans of America. Isn't it amazing what can be accomplished when stakeholders work together collaboratively?

Nobody is talking about re-evaluating or starting over on the complaint tracking system because our outcome was accomplished in a collaborative way. Is it perfect? No. Is it all that is needed? No. Is it a sound, meaningful tool that is having a positive impact? Yes, and that's what matters.

We believe now is the time to improve accountability across the board. Negotiated rulemaking on Gainful Employment and Borrower Defense to Repayment are opportunities to build a strong framework of protections based on collaboration and consensus. I strongly believe consensus can be reached and the goal should be to protect all students, all veterans and all service members at all institutions.

If the goal for the hearing today is to truly make recommendations to the agency regarding the repeal, replacement, or modification of over burdensome regulations. I want to reiterate the importance of applying regulations to all sectors of higher education to protect all student veterans, at every institution. Doing so must be a collaborative effort that includes all stakeholders. Protecting the G.I. Bill and ensuring it works for those who have served our country must be a top priority. Together, we can achieve meaningful, lasting protections for all students if we work earnestly to select negotiators who will work collaboratively to reach consensus, select negotiators who are committed to protecting all students, and use the process to examine legitimate ways to protect veterans at every intuition.