



July 1, 2020

The Honorable Jerry Moran
Chair
Senate Veterans' Affairs Committee
Senate Russell Office Building
Room 412
Washington, DC 20510

The Honorable John Tester
Ranking Member
Senate Veterans' Affairs Committee
Senate Russell Office Building,
Room 412
Washington, DC 20510

Dear Chair Moran and Ranking Member Tester,

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO) and our membership of 11,000 individuals and 2,400 institutions of higher education (IHE), I write to provide feedback to the Protect the GI Bill Act, H.R. 4625, which the Senate Veterans' Affairs Committee is expected to mark-up this Congress. Specifically, I wanted to provide the following feedback and recommendations:

Section 3

Section 3 of the legislation would require institutions to report on a monthly basis veteran enrollment status to U.S. Department of Veterans Affairs (VA). Asking institutions to submit monthly verification will be a very burdensome process considering that the VA-Once system does not accept batch data. As you may know, reporting to the VA-ONCE system must be done manually.

While the section suggests the enrollment shall be submitted electronically, we can only presume the submission will be one student at a time under the current system. This provision will take time and energy away from institution staff completing the complicated task of certification. The provision also asks the student to submit monthly confirmation of enrollment, which is redundant if the institution has to submit the same information. We are also not confident VA could handle this increase with current information technology (IT) systems.

The manual entry related to the compliance elements of the certification process/reporting, as currently imposed by the VA, already presents challenges for institutions. During manual entry, data can be mis-keyed, undermining accuracy. Additionally, institutions offer non-standard enrollment terms, multiple student levels (undergraduate, graduate, professional, etc.), and a large array of scholarships and grants adding layers of complexity to reporting. As a result, veteran reporting has become an administratively burdensome process that compromises student service, in part due to the lack of automation from the student information system (SIS) to the VA.

Finally, federal law already requires schools to notify the VA within 30 days when a student changes enrollment. This additional monthly reporting requirement would add 3-4 extra



certifications for each student each term, which normally take 10-15 minutes each. This would be a huge new burden to institutions and we would recommend its removal from the legislation.

Investment in Technology Infrastructure

We believe that the Protect the GI Bill provides Congress the opportunity to direct the VA to make veteran reporting a priority and ensure that the agency invests in upgrading their technology infrastructure. We truly believe that the best option for veteran verification is for the VA to upgrade technologies and implement an enrollment verification process similar to that of the Department of Education for Title IV compliance.

Currently, IHEs are required to report student enrollment information to the Department of Education at minimum every 60 days for individuals that receive Title IV funds. However, institutions are able to ‘batch’ report this information. The ability to report this information in this manner increases accuracy and speed of reporting by reducing/eliminating manual data entry and ensures that the Department of Education receives more accurate and complete information. This allows institutions to focus more on the students, instead of administrative requirements. The VA should look to duplicate this model.

This is not the first time the need to modernize the veteran reporting system has been raised. Ranking Member Tester, you, along with Senator Baldwin, sent a letter in February 2017 to Curtis Coy, then Deputy Under-Secretary for Economic Opportunity at the Veterans Benefit Administration (VBA), asking him to streamline the data submission process to the VA. In addition, Senators Cornyn and Cruz wrote a letter in April 2017 to then Major General Robert Worley, Director Education Systems at the VBA, with a similar request.

AACRAO, and its members, have had an interest in exploring ways to improve services for student-veterans through improvements in the veteran data reporting process for several years. The association created a formal work group comprised of School Certifying Officials (SCOs) from high veteran-serving institutions that was charged with evaluating issues, requirements, and student information system (SIS) functionality to facilitate veteran reporting improvement. The work group also sought to develop protocols for data collection and reporting using existing tools while anticipating the future state of the reporting process. A copy of the November 2019 report can be found [HERE](#).

Report recommendations are supported by NASPA-Student Affairs Administrators in Higher Education, Student Veterans of America (SVA), Veterans Education Success, along with many SCOs across the country.



AACRAO

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Recommendation

As such, we would also like to propose that the legislation include language about the need to provide updates and upgrades to the VA-ONCE reporting system that will facilitate institutions being able to report electronically through batch reporting. Moreover, we would suggest a deadline for the VA to complete this upgrade. By placing a deadline for this project, this would ensure that this project becomes a priority for the VA.

We hope that these comments are well received and we thank you for the opportunity to provide recommendations to the Protect the GI Bill Act and ensure that the VA and IHE are equipped to better serve our student veterans.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael V. Reilly'.

Michael V. Reilly
Executive Director