

Veterans Education Benefits Changes

IASFAA

November 10, 2021

INTRODUCTION (3 minutes)

Good morning.

My name is Mark Munson, and I have been the Student Financial Planner for the University of Dubuque for the past 7 years. In addition to being the University's Certified Financial Planner, I am also one of the University's School Certifying Officials assisting with VA education benefits for approximately 130 students.

I would like to thank my co-worker Sara Sroka for recommending me for this discussion today as well as Zachary Gries, Gisella Baker and Shelly Brimeyer for coordinating this IASFA training opportunity.

In the spirit of full disclosure, I am not a Veteran, nor do I pretend to have the military knowledge that only comes from serving. And, on the eve of Veterans Day, I wish to extend my heartfelt appreciation to all of our military veterans. Thank you for your sacrifice and your service. Though not a Veteran myself, my position requires that I have some basic knowledge of the various Education Benefit Programs utilized by our students, which can include everything from ROTC to Post 9/11 GI Bill, as well as all the regulatory compliances required of the University to receive military education benefits. Our Registrar is also a School Certifying Official responsible for certification of enrollment, and Rick Ernst is our full time Veterans Admission & Assistance Coordinator responsible for knowing pretty much everything military. Rick is our retired Veteran and also the Director of the Sgt. Jeffrey B. Dodge Veterans Center on the University of Dubuque campus.

I plan to follow a format for each of the (3) Isakson-Roe sections we will cover that will:

- Allows 3 – 5 minutes for me to complete a synopsis of the section's law and how our University has responded to comply with the law, and then
- allow us 10-15 minutes between each Section for Q & A, comments and suggestions. (not set in stone/may need more time for 1 section over another). Gisella and Zachary are managing the Chat room so please feel free to submit your questions as they enter your mind.
- Following this format, we should easily finish within the allotted time.

Just as we're all subjected to online ads before the video runs the topic we really want to see, here is my short ad for the University of Dubuque' Veterans Admissions and Assistance services. You can mute me but you cannot skip the ad ☺.

I am proud to say that the University of Dubuque offers unparalleled support to our student veterans ranging from our vibrant Army ROTC Eagle Detachment, to our veteran support groups. The University is home to one of the largest Veteran Centers in the region, staffed with a full time retired Veteran and equipped with study rooms, computers, WIFI, media hub, gaming systems, lounge and kitchen. For the sake of our time today, I will simply recommend you go to our Veterans link at www.dbq.edu/Veterans and see for yourself just how broad our offerings are to Veterans, and just how numerous your opportunities are to serve your Veteran students.

As mentioned in the advance release of this presentation, we all are constantly juggling the delivery of services to our diverse student body in a constantly changing regulatory environment. Case in point, before I could finish preparing for this Isakson-Roe presentation, two bills have been introduced in Congress to amend the statutory code impacting today's topics and could provide some relief to the issues I planned to discuss. And while this does steal a bit of my thunder, those bills are still pending and I think we still have a lot to gain sharing our experience with each other.

Isakson-Roe was signed into law on January 5th of this year, and some provisions went into effect August 1st bringing significant changes to Veteran's education benefits. And with no disrespect intended, the communication, translation and implementation of the 32 Sections the law embodies has been challenging. For today, I would like us to share how each of us are navigating (3) of those Sections – and they are Sections 1010, 1018 & 1019. To assist us in this discussion, I've sent out a bullet summary of Isakson-Roe, as well as the article in the November 1, 2021 issue of NAFSA Today News explaining the “two bills seeking to amend the Isakson-Roe Veterans Bill measures to improve consumer information requirements”.

SECTION 1010 (3 minutes)

Section 1010. Impacts the **Verification of enrollment to receive Post 9/11 Educational Assistance benefits:** *“Creates a dual certification for the receipt of Post-9/11 GI Bill benefits. The school will certify the student’s enrollment after the add-drop date, and then each month thereafter, the student would be required to electronically verify with VA their continued enrollment in that school. If a student fails to certify for two consecutive months, VA will withhold monthly housing allowance payments until the student certifies. Effective December 17, 2021.” (IHL’s) – August 1, 2021 (NCD’s)*

More specifically, under Section 1010, the institution first certifies enrollment with tuition and fees reported as \$0.00 dollars, in order to start the student's housing payments, and then amends the certification with the correct tuition and fees amount after the add-drop period ends. In some ways this was probably one of the easiest of the changes for us to comply with because our Registrar/SCO already certifies enrollment the start of the term as \$0.00 dollars, and I then certify enrollment and after add/drop when I submit tuition and fees for payment.

For institutions with flat tuition and fee structures, however, the requirement for dual certification can do more harm than good where charges are **unlikely** to change as a result of the add/drop period. Dual certification to those institutions increases time needed to certify students and could delay disbursement of additional institutional or

state financial aid funding to veterans. This is one component of the bill that NASFA has requested be reconsidered and that the pending legislation seeks to amend.

The other component to dual certification is the student is requirement for monthly electronic verification of their enrollment to VA. Potential problems I see with this is whether this could also result in any issues for students entered into any payment plans with the University.

Q & A Section 1010 (10 minutes)

Does dual-certification do more harm than good at your IHL?

Does dual-certification dramatically increase the amount of time needed to certify students for VA benefits?

Does dual-certification delay the disbursement of additional institutional or state financial aid funding to veterans? If so, how?

Do you anticipate any issues impacting your IHL over the requirement for students to monthly electronically verify with VA their continued enrollment?

SECTION 1018 (6 minutes)

Section 1018. Requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs. *This section essentially codifies in statute the requirements of the Principles of Excellence Program. It also makes compliance with those requirements mandatory for approval of a course of education. Effective August 1, 2021.*

Section 1018 – According to our ELR, requirements for educational institutions participating in the educational assistance programs of the Department of Veterans Affairs, should no more than “codify” what we were already doing under our Principals of Excellence Program or College Financing Plan, formally the Financial Aid Shopping Sheet. Under Section 1018 a school must provide a covered individual (meaning a

student using benefits under chapter 30, 31, 32, 33, or 35, or chapter 1606) with a personalized shopping sheet that contains

- Estimated total cost of the course that includes tuition, fees, books, supplies and any other additional costs as well as the estimated cost of living expenses.
- Amount of costs above that are covered by VA Education benefits.
- Other types of Federal financial aid, not administered by VA that is offered by the institution, that the individual may be qualified to receive.
- Estimated amount of student loan debt the individual would have upon graduation.
- Information regarding graduation rates, job-placement rates and acceptance of transfer credits
- Any additional requirements including training, experience, or examinations that are required to obtain a license, certification or approval for which the course of education prepares the individual.
- Personalized shopping sheets must be provided within 15 days after tuition and fees are determined for the academic year if there is a change.

In addition to the personalized shopping sheet, schools must maintain policies that:

- Inform an enrolled covered individual of the availability of federal financial aid, not administered by VA that is offered by the institution.
- Alert the individual of the potential eligibility of other federal financial aid before packaging or arranging student loans or alternative financing.
- Prohibit automatic renewal of a covered individual in a course and/or programs.
- Ensure each covered individual approves of the enrollment in a course.
- Allow enrolled members of the Armed Forces, including reserve components and National Guard to be readmitted if such members are temporarily unavailable or must suspend enrollment by reason of serving in the Armed Forces, and accommodate short absences for such services in the Armed Forces.

Lastly, schools must:

- Provide covered individuals the requirements for graduation and a graduation timeline.
- Obtain approval of the respective accrediting agency for each new course or program for accredited educational institutions.
- Designate an employee of the educational institution to serve as a point of contact for covered individuals and family members seeking assistance with academic counseling, financial counseling, disability counseling and other information regarding completing a course of education.

While our University already maintains much of the required changes under our Principals of Excellence Program, Isakson-Roe requires more than just what's already covered. As stated in the letter from the American Council on Education to the House Committee on Veteran's Affairs, "we strongly support ensuring that student veterans have the information they need to make informed decisions about how best to use their GI Bill benefits, but we believe that the bill's requirement to provide estimates of costs and aid for the duration of the student's program, while well-intentioned, is likely to result in information that is highly inaccurate, confusing, and misleading to veterans".

One of the most pressing issues in the bill are these consumer requirements which require aid offices to provide estimates of costs and aid for the duration of the student's program, and require institutions to have policies to inform students of federal aid eligibility prior to packaging loans, among others.

As I mentioned in my opening remarks, there are two bills seeking to amend Isakson-Roe to improve consumer information requirements by allowing institutions to use the College Financing Plan to fulfill the Isakson-Roe disclosure requirements.

Personally, with each new student there is a learning curve for the student and family as to how all these pieces come together and just exactly what the bottom line is going to be after we come up with the costs and deduct the grants, scholarships and awards and then apply the particular Veteran's benefits the individual is entitled to under the various chapters. Pretty consistently, I am asked to create a budget applying the

student's aid and particular VA benefits for each term so everyone can see just exactly how each term is going to evolve and just how much borrowing (if any) will be necessary to make up any shortfalls. I have created a rather robust template that I can merge into a letter or e-mail that gives parents and students a pretty accurate forecast of what they can expect.

Q & A Section 1018 (25 minutes)

What do you feel are the biggest differences between the Isakson-Roe Consumer Information Requirements and the current College Financing Plan in place for IHL's?

Do you feel the issues of estimating costs and aid for the duration of the student's program and policies to inform students of federal aid eligibility prior to packaging loans are resolved under the current College Financing Plan in place for IHL's?

How are you adapting to this consumer information requirement at your IHL?

SECTION 1019 (2 minutes)

Section 1019. Overpayments to eligible persons or Veterans. *This section adds a requirement that schools and training programs be financially responsible, instead of the student, for benefits paid directly to an educational institution pursuant to the Post-9/11 GI Bill for tuition and fees or the Yellow Ribbon program, and advance payments of initial education assistance, without consideration of whether the overpayment was the result of the willful or negligent failure of the school. Effective January 5, 2021.*

Section 1019 – Overpayments to eligible persons or Veterans changed in ways that clearly shifted the responsibility of collecting overpayments from Debt Management and Collections to the learning institutions, plain and simple. What was once a student's debt to DM&C became a debt the college needed to up front DM&C and then collect themselves from the student. So if a student incurs a housing debt, that debt is now the responsibility of the college to pay and then collect from the student. Good for VA, not so good for the college.

From my perspective, maybe this is where there is some merit in that provision in Section 1018 where the student must electronically verify their enrollment, thus reducing opportunity for debt letters.

One adjustment at our University has been to really tighten up on fluctuations in a student's rate of pursuit. Prior to Isakson Roe, we had already identified some weak links in our chain of enrollment communication, especially in our flight program. We've implemented a reporting protocol from the flight instructors, to the School Certifying Officials. With the unique challenge of flight training schedules extending 1 – 2 terms beyond the term of original enrollment, we tightened up our monitoring and reporting of students who's rate of pursuit changed without notification. Now when a student's enrollment status changes, we are able to timely identify and report the change to VA and minimize overpayments.

Q & A Section 1019 (10 minutes)

What strategies have you considered or have already implemented to address the increased responsibility placed on the IHL instead of the student for overpayments made directly to the student?

Do you feel the requirement for students to monthly electronically verify with VA their continued enrollment will impact the IHL positively, negatively, both under this increased debt collection responsibility placed on the IHL?

Closing Remarks

- NOVEMBER 1, 2022 NASFA TODAY “TWO BILLS SEEK TO AMEND ISAKSON-ROE VETERANS BILL, IMPROVE CONSUMER INFORMATION REQUIREMENTS”.
- H.R. 5545 “RESPONSIBLE EDUCATION MITIGATING OPTIONS AND TECHNICAL EXTENSIONS ACT” OR THE “REMOTE ACT”. REPS. DAVID TRONE (D-MD), SANDER LEVIN (D-MI) AND MARK TAKANO (D-CA)
- H.R. 5509 “STUDENT VETERAN COVID-19 PROTECTION ACT OF 2021”. REP MIKE BOST (R-ILL)
- AMERICAN COUNCIL ON EDUCATION SUPPORTS BOTH BILLS, BUT PREFERS THE LANGUAGE FOUND IN H.R. 5509.