

**TESTIMONY BEFORE THE HOUSE COMMITTEE ON VETERANS' AFFAIRS**  
**Subcommittee on Economic Opportunity**

Hearing on Executive Order #13607 May 16, 2012  
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On behalf of the  
National Association of College and University Business Officers

Executive Summary

The National Association of College and University Business Officers, representing over 2,100 public and nonprofit colleges and universities, shares the President's goals as outlined in his April 27<sup>th</sup> Executive Order (EO) establishing principles of excellence for educational institutions serving veterans, members of the armed services, and their families. These students deserve high quality academic and support services to enable them to make informed decisions. We strongly support safeguards against abusive or deceptive recruiting practices.

Most, but not all, of the President's principles align with existing U.S. Department of Education (ED) requirements for institutions that participate in Title IV federal student aid programs. Those principles will not inflict additional cost or burden on our member institutions. But we do have serious concerns about some of the provisions and potential implications of the EO, including the following:

1. Section 2(a) requires institutions to provide prospective students with a broad range of information on an individualized standard form. Prospective students do not routinely identify themselves by federal aid eligibility, making it difficult for institutions to know who should receive the form, nor are institutions able to accurately estimate veterans' benefits. While there is broad support for the use of standard terms and definitions and the development of model formats, the imposition of specific formats will not serve the needs of students given the enormous variation in educational programs.
2. Section 2(f) would mandate institutional refund policies in a manner similar to the ED's policy used for returning unearned Title IV funds. The ED policy permits colleges and universities to set their own refund policies. If a student drops out, the institution cannot go out and find another student to fill that slot, so the committed resources are lost.
3. We support the requirement in section 2(h) for a designated point of contact for academic and financial advising, but our ability to provide adequate financial counseling is severely impeded by the VA's tightly held control over most veteran information, including their eligibility for VA education benefits and indebtedness to the agency.
4. In section 3, we are concerned that student outcomes may be difficult to measure and may be misleading to the public. Veterans and service members are often nontraditional students with educational goals that may differ from traditional students. They often attend multiple institutions and each contributes to their success. Progress should not be measured solely on graduation rates.

We hope that the agencies tasked with carrying out the EO will actively consult with key constituencies as they develop the necessary rules. Lack of consultation between DoD, VA, and educational institutions has created obstacles due to a simple lack of understanding of each party's policies, procedures, and language.

In conclusion, I reiterate the commitment of NACUBO's membership to ensuring that our service members receive the education they deserve in a streamlined and efficient process. We understand the need to protect our returning soldiers from unscrupulous practices but we have significant concerns with the implementation of the requirements in the President's recent Executive Order. We believe that further clarification and discussions are necessary so that all parties can gain understanding and move toward consensus on developing an efficient, sensible policy.