



**National Advisory Committee on
Institutional Quality and Integrity**

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Statement by William Hubbard

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My name is Will Hubbard and I am Vice President for Veterans & Military Policy with Veterans Education Success, a nonprofit research, policy, and student veteran advocacy organization. We work on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill® and other federal postsecondary education programs.

Veterans Education Success is committed to the educational advancement of America's veterans, service members, and their families. In addition to our policy expertise on Title IV, the GI Bill®, and the Department of Defense Tuition Assistance program, we provide consumer advocacy services to individual veterans and military-connected students by assisting them in navigating serious problems with the federal student aid system; this system all too often points to gaps and shortcomings in Title IV regulations.

The constituency we represent and the federal programs administered by the Departments of Defense and Veterans Affairs are significantly affected by the quality assurance and program integrity safeguards that fall chiefly under the Department of Education's jurisdiction. Of these, none is more consequential than accreditation. Accreditation alone within the accountability triad is squarely focused on substantive educational adequacy of academic programs institutions offer.

Despite the best efforts of this committee, the widespread cases of continued waste, fraud, and abuse amply demonstrate that the accreditors recognized by the Department are proving inadequate to the basic task of ensuring that no student is victimized by institutions enjoying accredited status. And no subpopulation of prospective and enrolled students faces a greater threat in this regard than veterans and military-connected students. The availability of non-Title IV funding for military-connected students has created distinctive and at times problematic institutional incentives for their recruitment by providers.

To-date, we have helped thousands of veterans who were directly hurt by inadequate accountability measures and gatekeeping for participation in federal educational assistance programs administered by the DoD, the VA, and the Department of Education. Students rely on program integrity measures set forth by this Department. In addition, VA and DoD -- and therefore all veterans and servicemembers -- rely on the Department's "stamp of approval" that a postsecondary program is worthy of veterans' hard-earned benefits.

In our view, accreditation currently suffers multiple shortcomings, most notably inadequate focus on the legitimacy of every program offered by accredited institutions. The present system essentially trusts institutions, once accredited, to offer quality programs on the honor system, with basically no further mandatory supervision by any academic oversight authority. This has, in turn, resulted in accreditation being treated as the ticket to maximize revenues by unscrupulous providers. These providers often oversell, overcharge, and under-deliver shoddy programs, while simultaneously touting their institutional accreditation as a de facto seal of federal approval and academic quality.

In one example, there exist law schools with no classrooms, few or no full-time faculty, and no significant curriculum other than BARBRI private bar prep review. They carry websites like "lawdegree.com," and have no recognition by the American Bar Association (ABA). This lack of

ABA accreditation leaves their graduates ineligible for the bar exam in all but a couple of States like California; some of these state-accredited law schools hold bar passage rates as low as 9%. And yet, many of these schools are shockingly eligible for Title IV funds by claiming institutional accreditation of their larger institution.

It is no exaggeration to say that too many shoddy institutions are in violation of most of the statutory accreditation criteria--student achievement, curricula, faculty, facilities, fiscal and administrative capacity, student support services, recruitment and admissions practices, measures of program length, student complaints--while in full compliance with the mechanical mandates of the other two legs of the Title IV triad. Accreditors represent the only component of oversight with the responsibility and the authority to address the substantive elements of quality assurance.

In connection with the criteria that accrediting bodies are required to address, we specifically request that this committee examine the extent to which admissions and student support policies of accreditors are responsive to the specific needs and circumstances of veterans and military-connected students. We have seen numerous examples of outright fraud in recruitment practices by unscrupulous schools targeting our constituency in specific and methodical ways.

Institutional practices targeting veterans and military students should be separately and more thoroughly examined by accrediting bodies, particularly at institutions that enroll a disproportionate number of such students. While such disproportionate representation is -- and may well be -- a sign of "military/veteran friendliness," it is often motivated by the availability of non-Title IV funds and the desire to skirt the existing 90/10 rule. Even beyond the persistent problem of fraud, many otherwise legitimate institutions actively recruit veterans for both their funding package and for the bragging rights.

Unfortunately, many of these same programs later fail to provide the necessary student services appropriate to their specific needs. In this case, as with admissions and recruitment practices, it is critical for all accreditors to be required to examine the quality and nature of support services delivered for veterans. In both cases, it is easy to miss dynamics that affect veterans in a disparate manner if accrediting bodies don't specifically focus on the practices and services that affect veterans differently than the general student population.

I appreciate this opportunity to share our views. Veterans Education Success and the broader community of veteran and military service organizations are anxious to work with the Committee as it develops its recommendations to strengthen and improve accreditation.