



December 12, 2017

The Honorable Virginia Foxx  
Chairwoman  
Committee on Education and the Workforce  
U.S. House of Representatives  
Washington, D.C. 20202

The Honorable Robert "Bobby" Scott  
Ranking Member  
Committee on Education and the Workforce  
U.S. House of Representatives  
Washington, D.C. 20202

Dear Chairwomen Foxx and Ranking Member Scott:

On behalf of the Enlisted Association of the National Guard of the U.S. (EANGUS) and the National Guard Association of the U.S. (NGAUS) which represent the interests of over 452,000 men and women of the Army and Air National Guard, and as one of the largest cohorts to utilize the Post-9/11 G.I. Bill, we write to address key components of H.R. 4508, the Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act.

According to the U.S. Department of Veterans' Affairs, 730,000 veterans used the Post-9/11 GI Bill in Fiscal Year 2016. These student Veterans are an essential part of the country's higher education system. Through sacrifice, each one of them earned the right to attend an accredited college or recognized program that effectively prepares them to achieve their goals in a chosen career. Too often student veterans are not provided the right information and become targets of low-performing institutions. This systemic problem must be addressed by taking a comprehensive and fresh look at the accountability structure across higher education. The core features of today's accountability structure, including institutional student loan cohort default rates as currently calculated and the 90-10 rule do not adequately measure academic quality and should be replaced with more meaningful accountability measures.

We welcome the PROSPER Act as a catalysts to prompt wholesale change. We are particularly supportive of the bill's movement to a new, enhanced accountability structure which features an institutional risk-sharing component that will force institutions to focus on student completion and require them to share in the financial risk of non-completion on both students and taxpayers by shifting the burden of repaying a meaningful amount of federal loans when a student withdraws before graduation. The bill would also move to a more meaningful program-level loan repayment rate that replaces the institutional-level cohort default rate, which is designed to target federal aid to only those programs where graduates have the ability to repay their federal student loans.

Furthermore, the bill attempts to focus accreditors on academic quality and student outcomes. Strengthening the accountability of higher education institutions through improvements to the accreditation process and requiring accreditors to annually identify institutions or programs that are experiencing poor outcomes could be a game-changer in higher education. Many of the problems student Veterans face in higher education are the result of shortcomings at the accreditation level.

Most student Veterans take a non-traditional path to higher education. Due to this non-traditional path, Veterans are not appropriately accounted for in the statutory definition of full-time or first-time students. We welcome provisions in the PROSPER Act to increase transparency and improve the accessibility of information on all students, including Veterans. The requirement for the Secretary of Education to create a consumer-tested College Dashboard that will display information about colleges and universities, including cost, enrollment, completion, average debt and average salary after graduation appears to be similar to Department of Veterans' Affairs GI Bill Comparison Tool. The GI Bill Comparison Tool, implemented in response to Executive Order 13607 Establishing Principles of Excellence for Education Institutions Serving Service Members, Veterans, Spouses, and Other Family Members, has been an effective tool in ensuring Veteran students make informed decisions about higher education.

As the PROSPER Act moves forward, we plan to engage in the debate over how best to protect and serve students Veteran in higher education. The PROSPER Act is a critical first step in accomplishing this goal, while preserving student veterans choice in the marketplace. Thank you for taking the lead on this initiative and for your continued support of our Armed Forces, Veterans, and all students at all institutions across higher education. We look forward to working with you.

Sincerely,



Sgt Maj (Ret) Frank Yoakum  
Executive Director, EANGUS



BG J. Roy Robinson, U.S. Army (Ret)  
President, NGAUS