March 27, 2018

The Honorable Paul Ryan  
Speaker  
U.S. House of Representatives  
H-232, The Capitol  
Washington, DC 20515

The Honorable Nancy Pelosi  
Minority Leader  
U.S. House of Representatives  
H-204, The Capitol  
Washington, DC 20515

The Honorable Kevin McCarthy  
Majority Leader  
U.S. House of Representatives  
H-107, The Capitol  
Washington, DC 20515

The Honorable Steny Hoyer  
Minority Whip  
U.S. House of Representatives  
H-148, The Capitol  
Washington, DC 20515

The Honorable Virginia Foxx  
Chairwoman  
Committee on Education and the Workforce  
U.S. House of Representatives  
2181 Rayburn House Office Building  
Washington, DC 20515

The Honorable Robert C. “Bobby” Scott  
Ranking Member  
Committee on Education and the Workforce  
U.S. House of Representatives  
2101 Rayburn House Office Building  
Washington, DC 20515

Dear Speaker Ryan, Majority Leader McCarthy, Minority Leader Pelosi, Minority Whip Hoyer, Chairwoman Foxx, and Ranking Member Scott:

On behalf of the 35 undersigned organizations representing the interests of more than 1.1 million service-affiliated students in higher education, we write to ensure that reauthorization of the Higher Education Act increases college access and improves college completion for our nation’s veterans.

While we appreciate the efforts of the majority to move reauthorization forward, H.R. 4508, the Promoting Real Opportunity, Success, and Prosperity through Higher Education Reform (PROSPER) Act, contains numerous provisions that would be detrimental to veterans and their families. Parts of the bill are a step in the right direction, though productive provisions in the legislation are not enough to overcome the significant concerns we have about the bill as a whole. If the bill were brought to the House Floor for a vote in its current form, we would be forced to oppose the legislation in the interest of those we represent.

The proposed legislation fails to protect service-affiliated students harmed by predatory and fraudulent practices most commonly employed by proprietary institutions. H.R. 4508 would enable these institutions to use deceptive recruitment practices that emphasize enrollment numbers rather than positive student outcomes. In addition, the bill proposes repealing the gainful employment rule—a critical provision that protects students from poor quality educational programs that are overpriced and lead to low-paying jobs. It would eliminate the existing borrower defense to repayment regulation and put in place new rules that make it more difficult for students defrauded by their educational institution to have their loans discharged.

The 90/10 rule stems from protections built into the GI Bill to help assure the financial soundness of colleges and universities. Throughout the decades, this rule in the veterans’ assistance programs has been retained because it curbs abuse within these programs. Instead of strengthening the 90/10 rule and closing an existing loophole that schools use to count military benefits in the 10 percent of the formula, H.R. 4508 would eliminate this protection altogether.

Not only does H.R. 4508 fail to curtail targeted recruitment of service-affiliated students (and the federal funds earned by these students), it would also eliminate safeguards intended to protect them and their families from long-term financial distress. H.R. 4508 proposes repealing the gainful employment rule—a critical provision that protects students from poor quality educational programs that are overpriced and lead to low-paying jobs. It would eliminate the existing borrower defense to repayment regulation and put in place new rules that make it more difficult for students defrauded by their educational institution to have their loans discharged.
The bill would also remove the requirement for state-by-state approval of institutions and repeal the definition of credit hour—both of which provide quality checks to make sure students are actually learning and being evaluated. Service-affiliated students deserve protections to ensure they get an education that is valuable throughout their lives, and one that does not place them on a trajectory to financial ruin.

Most concerning is the fact that the bill proposes reducing access to education by increasing the cost of college for service-affiliated students and discouraging them from continued service when they enter the workforce. H.R. 4508 would eliminate the subsidized Stafford Loan, which does not accumulate interest while a borrower is in school. Its elimination negatively affects 6 million students and costs them $27 billion over the next decade. Repayment also becomes more difficult under H.R. 4508 as borrowers and their families are placed on a more stringent income-driven repayment plan, and for low-income borrowers with average debt loads, makes loan repayment a lifelong burden.

H.R. 4508 would also eliminate Public Service Loan Forgiveness, which incentivizes borrowers to enter public service careers and give back to communities, and ultimately benefits our nation with their commitment to working in areas of high need. The US Naval Institute (USNI) News reports that almost 6,800 active duty military personnel are enrolled in the PSLF program, and the program’s elimination will likely have a substantial impact on efforts to recruit veterans into advanced degree programs and continued service in military jobs.

The investments our country makes in educating veterans have a substantial impact on our country. Service-affiliated students are among the most successful students in higher education today, and they are also some of our most deserving. Any reauthorization of the Higher Education Act should continue to protect students, while investing in the future of our country’s education future.

Sincerely,

Amy Fairweather
Director of Policy
Swords to Plowshares

Anthony P. Carnevale
Founder and Director
Georgetown University Center on Education and the Workforce

Bethany Keirans
Director
VetsFirst, a Program of United Spinal Association

Bonnie Carroll
President and Founder
Tragedy Assistance Program for Survivors

Carrie Wofford
President
Veterans Education Success

Rear Admiral Christopher W. Cole, USN, Retired
National Executive Director
Association of the United States Navy

Deirdre Parke Holleman, Esq.
Washington Executive Director
The Retired Enlisted Association

Frederic G. Sanford M.D., RADM, Medical Corps, USN(Ret.)
Acting Representative
Association of Military Surgeons of the United States

Jared Lyon
President & CEO
Student Veterans of America

John Rowan
National President and CEO
Vietnam Veterans of America

Joseph Chenelly
National Executive Director
AMVETS
Jon Ostrowski  
Executive Director  
Non Commissioned Officers Association

Joyce Wessel Raezer  
Executive Director  
National Military Family Association

Juliana Mercer  
Managing Director  
MVPvets

Kathy Roth-Douquet  
CEO  
Blue Star Families

Kevin Cochie  
The Military Coalition Representative  
Army Aviation Association of America

Kristina Kaufmann  
Executive Director  
Code of Support Foundation

Kristofer Goldsmith  
President  
High Ground Veterans Advocacy

Laura L’Esperance  
Senior Vice President, External Affairs  
The Mission Continues

Luke Opyd  
President  
Ivy League Veterans Council

Lydia C. Watts, Esq.  
CEO  
Service Women's Action Network (SWAN)

Lyman M. Smith  
Director of Communications  
Military Chaplains Association

Mary M. Keller, Ed.D.  
President & Chief Executive Officer  
Military Child Education Coalition

Matthew Boulay  
Executive Director  
Veterans Student Loan Relief Fund

Michael V. Reilly  
Executive Director  
American Association of Collegiate Registrars and Admissions Officers

Neil Van Ess  
National Commander  
Military Order of the Purple Heart

Nichole King-Campbell  
Air Force Women Officers Associated  
AFWOA Representative

Paul Rieckhoff  
Founder & CEO  
Iraq & Afghanistan Veterans of America

Paul D. Warner, Ph.D.  
National Commander  
Jewish War Veterans of the U.S.A.

Randy Reid, USCG (Ret.)  
Executive Director  
U.S. Coast Guard Chief Petty Officers Association

René C. Bardorf  
Senior Vice President, Government & Community Relations  
Wounded Warrior Project

Robert F. Muth  
Managing Attorney  
University of San Diego Veterans Legal Clinic

Ryan Manion  
President  
Travis Manion Foundation

Thomas E. Bandzul  
Legislative Counsel  
Veterans and Military Families for Progress