

BETTER FOR VETERANS:

A clear trajectory for improving outcomes
for students from the military community

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About Victory Media

Based in Pittsburgh, Victory Media, a service-disabled veteran-owned business, connects classrooms to careers for the nation's next generation of professionals. Our data-driven ratings are published in G.I. Jobs®, Military Spouse, Vetpreneur® and STEM JobsSM media, and featured in national media including USA Today, Wall Street Journal, FORTUNE, Bloomberg, NBC, ABC, CBS, CNN, CNBC, Fox News and others. Learn more at victorymedia.com.

About Military Friendly®

Military Friendly® is the leading time-tested, trademarked program that benchmarks and rates colleges and companies, helping veterans and military families make well-informed decisions about education and career opportunities in the civilian world. Military Friendly® is part of the ratings division of Victory Media, a service-disabled, veteran-owned business. Military Friendly® is a federally trademarked term, created in 2003 by Victory Media.

The Military Friendly® assessment process includes extensive research and required completion of a proprietary, data-driven survey. All Military Friendly® surveys, methodology, criteria and weightings were developed with the assistance of an independent Advisory Council comprised of higher education and recruitment professionals from across the country. The survey is administered for free. Criteria for consideration and more information can be found at militaryfriendly.com.

About The Author

Daniel's pursuit of his own calling to bridge the gap between education and employment began nearly two decades ago working with medical students on the Haiti-Dominican border, and has stretched through his experiences as a Navy Reserve Chaplain in combat operations in Iraq to serving as Chief of Staff for the Veterans' Employment & Training Service at the U.S. Department of Labor. His entrepreneurial leadership has resulted in the launch of post-secondary vocational and employment programs in healthcare, energy, and advanced manufacturing along with numerous national programs supporting the job training and employment of wounded and injured servicemembers and military spouses.

An accomplished speaker, writer and business leader, Daniel's passion for individual transformation as Victory Media's Chief Product Officer has led to the creation and launch of STEM JobsSM along with the resurgence of military programs and initiatives across Victory Media; which itself is a passionately entrepreneurial service disabled veteran owned company at the forefront of military education and employment and the force behind the powerful and meaningful work of GI Jobs®, Military Spouse, Vetpreneur® and Military Friendly®. Daniel currently leads the most comprehensive evolution of the Military Friendly® performance benchmarking program since its inception nearly a decade ago, of which this paper is a small part.

Daniel holds an MBA from the University of Maryland, Robert H. Smith School of Business; an M.A., Counseling, and M. Div, Theology, from Asbury Theological Seminary; and a B.A., Religion / Spanish from Grove City College.

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Take a tour of nearly any college campus and you'll undoubtedly be introduced at some point to one of the newer facilities on campus ... a space dedicated to student veterans. With more than one million veterans currently enrolled in degree programs and more than 200,000 exiting the service each year with new and more generous "Post 9/11 GI Bill" benefits, the importance of assuring a return on these investments cannot be overstated. Potential military students receive little evaluative information regarding available education options, leading in some cases to poor decisions that result in unnecessary debt or investing education benefits in training they have already received during their military career.

The recent release of federal data sets and digital tools, while a useful first step in addressing gaps in the decision support process, is necessarily limited by the regulatory and compliance-driven nature of federal governance. Private industry plays an increasingly important role in partnering with compliance efforts to generate positive change in corporate behavior that exceed compliance efforts in both scope and depth. Yet, unlike the federal approach to addressing veteran employment gaps through the establishment of public-private partnership initiatives such as the Employer Support of the Guard & Reserve (ESGR) or Joining Forces, there is no equivalent effort in support of military and veteran education outcomes. Furthermore, these efforts are currently being managed almost entirely through regulatory and compliance-driven methods, which lack the voice and participation of a robust network of supportive private organizations and individuals, as well as the veteran community itself.

More veteran students than ever

More than one million of the nation's 21 million veterans have accessed education benefits administered by the Department of Veterans' Affairs (VA) in each of the past three years, amounting to over \$12 billion in total annual payments.¹ While the VA's education benefits support veterans currently in the workforce, a second benefit program, run by the Department of Defense's (DoD) helps active duty service members pursue an education as an enhancement to their existing military career. The DoD Tuition Assistance program mimics many

corporate tuition benefits programs and represents an additional investment in military student education of over \$500 million each year with an average participation of nearly 280,000 active duty service members annually.²

One of the primary struggles of both federal bodies is their inability to adequately evaluate, and coordinate criteria for participating institutions to assure the best outcomes for military and veteran students. From an institutional perspective, according to the July 11, 2016 data set available on vets.gov, there are 16,933 institutions approved for GI Bill funding, and 17,543 approved on-the-job-training (OJT) programs.³ Of these, only 34% of schools participate in the "Principles of Excellence" program, which was established April 27, 2012 by Executive Order 13607⁴ as a voluntary outline of acceptable practices for educational institutions serving students receiving funding from VA and DoD education benefits programs. By comparison, there are only 2,279 institutions currently listed as approved on the DoD's website for the provision of eligible Tuition Assistance programs.⁵

On March 1, 2011, the Government Accountability Office (GAO) released a report of findings following a review of DoD Education benefits. One of the findings highlighted in the report states, "With regard to accountability, the DOD's review process provided recommendations that could improve educational programming, but there is no DOD-wide process to ensure that these recommendations have been addressed. Furthermore, DOD lacks a system to track complaints about schools and their outcomes."⁶ A similar review released by the GAO in 2014 highlighted the DoD's ongoing challenge to measure program quality.⁷ Going a step further, a more recent study published in 2015 by the RAND Corporation identified the lack of a tracking mechanism for federal agencies to identify program and resource utilization across these various programs.⁸ And to date, there is no common set of qualifying standards shared between federal agencies to differentiate between high-performing institutions, qualifying institutions, and "bad actors."

¹ <http://benefits.va.gov/REPORTS/abr/ABR-Education-FY15-02032016.pdf>

² <http://www.gao.gov/assets/670/665580.pdf>

³ http://www.benefits.va.gov/GIBILL/docs/job_aids/ComparisonToolData.xlsx

⁴ <https://www.whitehouse.gov/the-press-office/2012/04/27/executive-order-establishing-principles-excellence-educational-instituti>

⁵ <https://www.dodmou.com/Home/InstitutionList> - this list has not been updated since July 7, 2014.

⁶ <http://www.gao.gov/products/GAO-11-300>

⁷ <http://www.gao.gov/assets/670/665580.pdf>

⁸ http://www.rand.org/content/dam/rand/pubs/research_reports/RR600/RR664/RAND_RR664.pdf

Defining “Bad Actors”

In recent years, the concept of “bad actor” has taken center stage in the debate surrounding military and veteran student education outcomes, becoming synonymous with “for-profit college” along the way. Yet, in all of the discussion, regulations and executive branch actions to curb the behavior of “predatory bad-actors” no single definition exists of what that means. The result has been considerable confusion for service members, veterans and their families, as well as for higher education institutions.

Postsecondary schools that participate in Department of Education, VA, and DOD education benefits programs include (1) public schools, which are operated and funded by tax dollars derived from state or local governments; (2) nonprofit schools, which are owned and operated by nonprofit organizations whose net earnings do not benefit any shareholder or individual; and (3) for-profit schools, which are privately owned and whose net earnings can benefit individuals or shareholders. Nearly all of these institutions are in part or whole funded through tax-based programs, either through grants, loan subsidies or, in the case of public schools, direct federal, state and local tax dollars. For-profit schools in particular are under immense scrutiny and regulatory pressure, stemming from the “Harkin Report” produced by the Senate Health, Education, Labor and Pensions Committee in 2012. Yet, aside from their fundamental tax status, there is little consensus around the precise measures that determine a good-versus-bad actor school. Any educational institution whose federal funding is pulled would likely fail rapidly, especially a public institution, and ultimately a binary measure based on tax status alone provides insufficient guidance for the million plus military students seeking post-secondary degrees.

A comprehensive report published by the Congressional Research Service in January, 2016 states, “Over the decades since 1944 during which the GI Bill programs have been in existence, two themes have been emphasized. The benefits promote development of work-related skills to facilitate entry or re-entry into the workforce, and the base benefit is equitable regardless of rank or military occupation specialty.”⁹ This fundamental purpose to promote the development of work-related skills, appears to be largely lost in the conversation against the backdrop of the more salacious news-grabbing fight against the “for-profits.” Indeed, rather than focusing on the establishment of outcome standards and measures, regulatory and executive actions have focused primarily on advertising and accreditation.

Better for Veterans: A Look at Current Strategies and A Way Forward to Protect Student Veterans and Position Them for Success.

The intent of this paper is twofold: first, to offer insight into the limitations of disparate current strategies being implemented to protect military students; and, second, to present a simpler, cleaner and more collaborative approach to assisting military students in evaluating educational institutions. Finally, this paper intends to recommend the importance of a collaborative approach. The issue of military student success is larger than any one entity or agency, it is an as-yet unsolved issue that is decades-old and in need of a fresh approach: one based upon clear outcome measures and the simple notion that the first standard for every educational institution should be that they are “better for veterans”—that all students from the extended military community find greater success than non-military students at the institution.

This paper also proposes the implementation of a 50/20 rule for outcome measures, along with an institution’s commitment to be “better for veterans” in meaningful outcome measures: graduation rate, retention rate, loan default rate, and job placement rate. These simpler measures, coupled together with public-private advocacy, would provide military students with a clear and concise picture of institutional performance relevant to their needs and aspirations.

⁹ <https://www.fas.org/sgp/crs/misc/R42785.pdf>

Education Benefits for Veterans have Evolved since WWII.

The importance of the federal provision of education benefits for military personnel, both in their decision to join and to extend their commitment to military service, has been abundantly clear since the advent of education benefits with the Servicemen's Readjustment Act of 1944, typically known as the GI Bill of Rights.¹⁰ While education benefits for veterans under the Act would initially end in 1956 with 7.8 million veterans participating in education and training programs, the ongoing provision of education benefits linked to military service would continue to become a standard benefit of service through the establishment of the Servicemembers Opportunity College network in 1972, and later the Montgomery GI Bill in 1984. In 2008, the GI Bill received a major update for post-9/11 service members, which roughly corresponded to the rapid advancement of online education programs.

In large part due to significant investment of taxpayer dollars, a number of provisions were added to the Post-9/11 GI Bill to establish criteria for institutions to participate in these federal programs. Following the trajectory of these requirements and regulations provides meaningful insight into the legislative and regulatory intent behind policing a burgeoning and important benefit to service members.

1970s-2008: More Education Choices Introduces Need for Better Quality Controls.

Institutional qualifications and standards were defined initially in 1972 with the institution of the Servicemembers Opportunity College designation. These early provisions established three primary qualifications for participation in military student benefits programs: equal access, accreditation, and flexibility in programs and policies to meet the needs of active duty service members and to permit their participation in education without negatively impacting their duties. As utilization rates and institutional participation rates increased, a string of additional provisions were added as a means of narrowing the field of institutions able to participate, while providing some form of quality control.

Prior to 2008, the definition of eligible institution extended well beyond traditional post-secondary degree-granting institutions:

- public or private elementary or secondary schools;
- vocational, correspondence, business, normal, or professional schools;
- colleges or universities;
- scientific or technical institutions;
- other institutions offering education for adults;
- state-approved alternative teacher certification program providers;
- private entities that offer courses toward the attainment of a license or certificate generally recognized as necessary for a profession or vocation in a high technology occupation; and qualified providers of entrepreneurship courses.¹¹

In addition to the above list, apprenticeships and various forms of On-the-Job-Training programs were also included, which made sense in light of the underlying employment goal of the program. The one caveat for these institutions was approval by a state approving agency (SAA), the VA itself, or agencies of the federal government authorized to supervise vocational training.

¹⁰ Per the 2015 RAND Study "Federal Education Assistance Programs Available to Service Members, "in the 1999 Active-Duty Survey, 62 percent of respondents selected education benefits as the primary reason for enlisting in the military (Buddin and Kapur, 2002). See Eighmey, 2006, for further discussion of the motivations behind military enlistment, including education benefits. See Kleykamp, 2006, for an analysis of the propensity to enlist in response to military education benefits. See Simon, Negrusa, and Warner, 2010, for an analysis of military recruit responsiveness to education benefit generosity."

¹¹ Pg4 <https://www.fas.org/sgp/crs/misc/R42785.pdf>

The table below illustrates the current eligibility criteria for education funding by institution type.

Table: Federal Program Eligibility by Institution Type

Institution Type ¹²	Post-9/11 GI Bill	MGIB-AD	DEA	MGIB-SR	REAP	VEAP	DoD MOU
College or University	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible
High School	NOT Eligible	NOT Eligible	Eligible	NOT Eligible	NOT Eligible	Eligible	NOT Eligible
Apprentice / OJT	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	NOT Eligible
Entrepreneurship Training	Eligible	Eligible	NOT Eligible	Eligible	Eligible	Eligible	NOT Eligible
Co-op Training	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	NOT Eligible

By supplementing institutional approval with program approval, the use of benefits was extended to cover the cost of courses at non-accredited educational institutions, courses administered by federal agencies, and various test and exam preparation courses such as those for Advanced Placement, the Scholastic Aptitude Test (SAT), refresher courses and other cooperative programs. This broad range of program inclusion was largely untouched until the rapid advancement of online degree programs and as advanced business models outpaced traditional approaches to accreditation and quality assurance.

Perhaps the true impetus behind the escalation of regulatory controls was the rapid growth in program participation resulting both from the introduction of new benefits and the increase in the number of eligible participants from combat operations in Iraq and Afghanistan. As the Chart below indicates, participation nearly doubled between 2010 and 2014. Concurrently, the average benefit rose from \$6,611 per participant with the MGIB-AD program to \$13,606 for the Post-9/11 GI Bill.

KEY:

MGIB-AD - Montgomery GI Bill - Active Duty

DEA - Dependents Education Assistance

MGIB-SR - Montgomery GI Bill - Selected Reserve

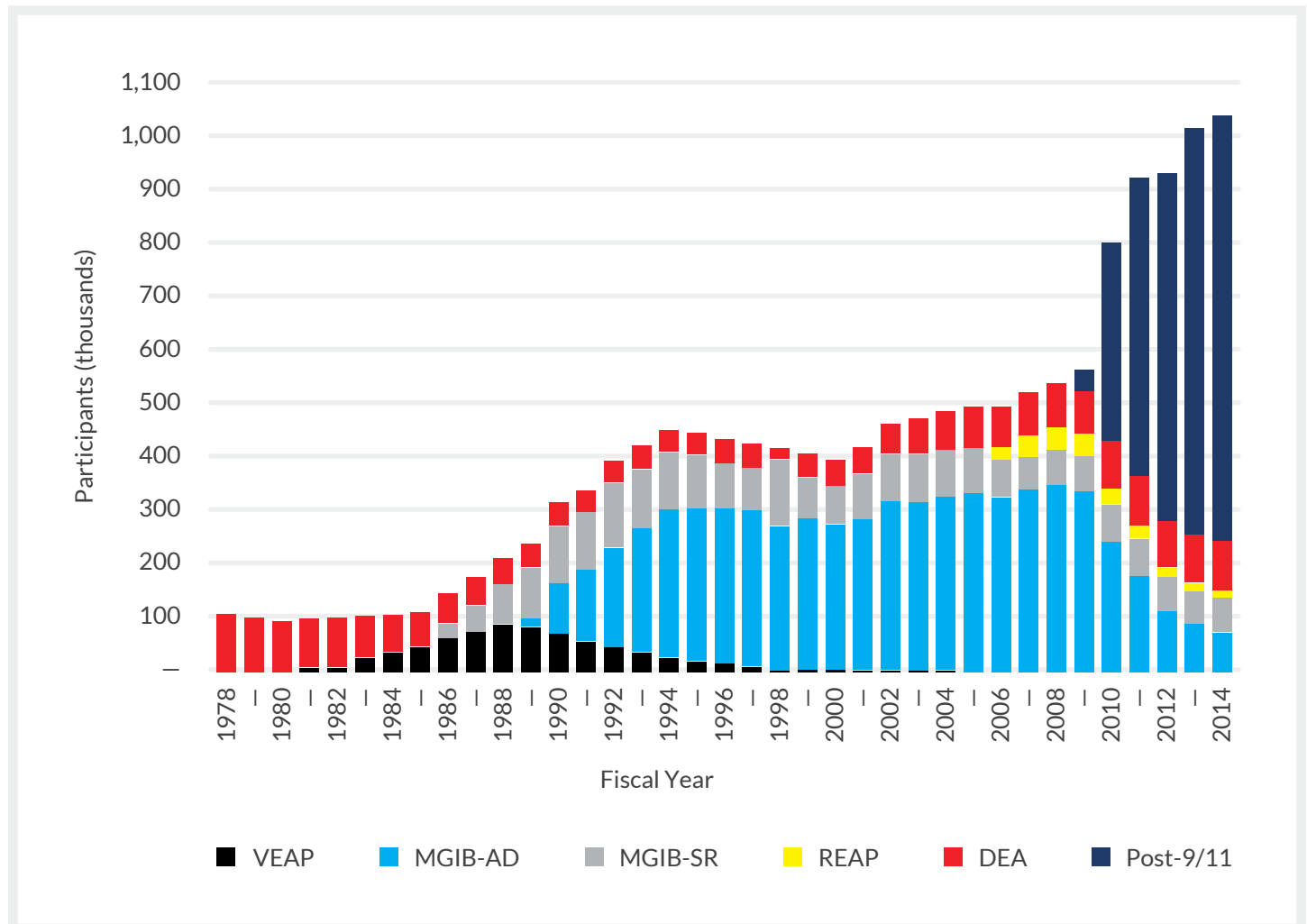
REAP - Reserve Educational Assistance Program

VEAP - Veterans Educational Assistance Program

DoD MOU - Department of Defense Memorandum of Understanding

¹² <https://www.fas.org/sgp/crs/misc/R42785.pdf>

Figure I. Total Veterans, Active-Duty Servicemembers, Reservists, and Dependents Receiving VEAP, MGIB-AD, MGIB-SR, REAP, DEA, and Post-9/11 GI Bill Education Benefits each Year (1978-2014)



Source: Department of Veterans Affairs' Annual Reports 1978-1977; data provided to CRS by the Department of Veterans Affairs, 1998-2008; Department of Veterans Affairs' Veterans Benefits Administration Annual Benefits Report FY2010; and the President's Annual Budget Request, FY2013-FY2016.

With benefits and participation at an all-time high, and with the rapid expansion of postsecondary training institutions, the need for greater clarity and control over quality became apparent.

2012 to Today: New Measures Add Protections, but Shift Focus Away from Employment Outcomes

As a rapid response was needed, the Principles of Excellence were published on April 27, 2012 by executive order 13607.¹³ These principles, while not able to supercede legislation, added cost transparency, educational planning, military points of contact on campus, and additional policies surrounding recruiting and financial disclosure to the list of criteria and measures postsecondary institutions must follow in order to receive VA-funding approval. What quickly became (and still is today) evident in this approach was the ideological shift away from employment as a positive outcome of education to cost control and institutional stability as a priority. Furthermore, accreditation, by in large, proved to be an inadequate barrier for entry as cash-flush institutions were able to gain accreditation through institutional acquisition.

Regulations for institutions participating in the DoD's Tuition Assistance program (active duty and reserve tuition benefit during service), were also included in the scope of Executive Order 13607 and were finalized on May 15, 2014 via the DoD Memorandum of Understanding (MOU), which includes specificity around the type of accreditation required for institutions to be approved by the DoD, along with a program assessment, the banning of student-recruiting bonuses, and support for the translation of military experience.

What is most telling is the difference in intent between federal regulatory efforts and legislative initiatives. For instance, the H.R. 2360 Career-Ready Student Veterans Act of 2015, was by-in-large an attempt to move back toward the historic employment focus of the benefit. Yet this legislation was sidelined by more recent efforts focused on "advertisement and accreditation" and closing the perceived 90/10 loophole. A study published in 2013 reveals the stark reality of the discussion when the concept of tax-supported education is applied more broadly. "Overall, almost two-thirds of institutional revenue across all types of colleges comes from federal student aid. The figures are 42% for private nonprofit colleges, 70% for private for-profit colleges and 82% for public colleges (98% at community colleges and 77% at public 4-year colleges)."¹⁴ The study concludes that, "the 90/10 rule is ineffective at measuring educational quality. Instead, it depends heavily on the demographics of each college's student population, measuring ability to pay more than willingness to pay."¹⁵

In other words, employment creates the "ability" for students to repay loans and this measure should outweigh other measures as a primary indication of the impact of education and institutional supports has on student veterans. Employment as an outcome is the historical driving force behind veteran benefits (and arguably military tuition benefits). Therefore employment outcomes (measured against debt) should outweigh "box-checking" standards preferred in recent regulatory initiatives, which appear to be more "surgical" applications of the law.

The end result is a veritable gauntlet of federal programs, approvals, policies, agreements, instructions and more, few of which offer real guidance to military students, and fewer providing actual protections. There are approximately 8 major programs or agreements an education institution can participate in, only two of which establish eligibility for providing training to active military personnel, reservists or veterans: Post-9/11 GI Bill approval, 8 Keys to Veterans' Success, VA's Principles of Excellence, Federal Financial Aid Shopping Sheet, Armed Forces Tuition Assistance funding approval, DoD Mou, the ServiceMembers Opportunity College Network, and the VetSuccess on Campus program. Many of these programs are duplicative, and rely largely on various levels of state licensure and national, regional or programmatic accreditation.

Correlation Between Compliance and Outcomes is Not What You May Think

Interestingly, an examination of military student outcome data reveals a more subtle factor at work: there is actually a NEGATIVE correlation between the institutions that check off all the compliance boxes and their veteran graduation and placement outcomes as demonstrated in the chart below (.01 significance). This suggests that eager participation in all possible federal programs appears to identify bad-actor schools—schools with lower veteran and military graduation rates, lower military placement rates and higher loan default rates than the overall student population. While this may seem at odds with common sense, some of the schools that tend to be slower in response to signing on to new federal initiatives, or simply not participating, are those that already have strong support for the military community and leaders in higher education, but whose programs are not best suited to active duty schedules, including Vanderbilt University, Tuskegee University, Purdue University, Marquette University, University of Southern California, St. Andrews University, Worcester Polytechnic Institute, Harvard Business School, Pepperdine University ... the list goes on.

¹³ <https://www.whitehouse.gov/the-press-office/2012/04/27/executive-order-establishing-principles-excellence-educational-instituti>

¹⁴ <https://www.edvisors.com/media/files/student-aid-policy/20130819-90-10-rule.pdf>

¹⁵ <https://www.edvisors.com/media/files/student-aid-policy/20130819-90-10-rule.pdf>

Table: Correlations between student outcomes and institutional programs and policies

		Adoption of Government Programs	Tuition Assistance Policies	Policies to Support Military Spouses
[CO3.0.2] Metrics: Retention rate for military and/or veteran students after one year Percentage Rate	Pearson Correlation	.024	.125	.173
	Sig. (2-tailed)	.792	.162	.052
	N	127	127	127
[CO3.0.3] Metrics: Retention rate for military and/or veteran students after two years Percentage Rate	Pearson Correlation	.199	.352**	.259*
	Sig. (2-tailed)	.059	.001	.013
	N	91	91	91
[CO4.0.1] Metrics: Graduation rate for military and/or veteran students Percentage Rate	Pearson Correlation	-.349**	-.141	-.128
	Sig. (2-tailed)	.000	.131	.169
	N	116	116	116
[CO5.0.1] Metrics: Job placement rate for military and/or veteran students Percentage Rate	Pearson Correlation	-.146	-.144	.069
	Sig. (2-tailed)	.338	.347	.652
	N	45	45	45
[CO6.0.1] Metrics: Default rate for military and/or veteran students Percentage Rate	Pearson Correlation	.000	-.270	.013
	Sig. (2-tailed)	.998	.088	.935
	N	41	41	41
[CO7.0.1] Metrics: Median loan debt for military and/or veteran students Loan amount	Pearson Correlation	-.050	-.219	-.242
	Sig. (2-tailed)	.734	.130	.095
	N	49	49	49

The fundamental limitations with regulatory driven efforts to incentivize good behavior and police bad behavior is common to other federal programs: once an institution is able to move past the regulatory “gate guard,” they are generally free to operate without any closer inspection. Additionally, policing efforts led by the federal government tend to be reactive in nature. To this end, public-private partnership is essential to not only establish clear standards, but create incentives that draw more institutions more meaningfully into program development.

A quick read of required institutional qualifications for DoD and VA education program participation highlights the central role accreditation plays in establishing eligibility for various programs. Admittedly, the evaluation of educational quality is not a defined mission, nor area of expertise for either the Departments of Defense or Veterans Affairs. Yet, the need for establishing institutional quality controls is obvious given the size of annual investment, especially in the case of VA administered benefits. There is, however, a misnomer about the role of accrediting bodies and the accreditation process itself.

While many individuals would rightly assume that institutional accreditation assumes the validation of academic outcomes, in reality, accreditation is far more about the verification of the existence of processes, personnel and resources than it is about outcomes. While accreditation has an undisputed role in assuring academic institutional quality, its connection to the indirect academic outcome of employment readiness (outside of specific career-focused programs) positions accreditation as one piece of the quality assurance partnership and not the central player. That is to say, that accreditation is often looked upon as a binary tool for selection or deselection in federal program eligibility, where in realistically it is an inadequate binary measure given that many of the identified “bad actors” in fact hold or held (Corinthian Colleges for instance) regional accreditation which is generally considered the most rigorous. To understand how accreditation has failed as a lone safeguard, it is useful to investigate the history and function of accreditation.

Types of accreditation, their history and governance

The U.S. Department of Education does not accredit educational institutions or programs, but rather, “publishes a list of nationally recognized accrediting agencies that the Secretary determines to be reliable authorities as to the quality of education or training provided.”¹⁶ Accreditation emerged in the 19th century largely in response to student mobility as a means of

establishing the exchange of credits by establishing a standard process by which higher education institutions and programs could be reviewed and improved over time. The result is arguably the best higher-education system in the world, yet not a system that is without flaws. The process of accreditation is carried out by non-governmental organizations created and sustained by academic institutions, generally with an external review and “recognition” by the Department of Education.

Broadly, there are two primary types of accrediting bodies: institutional accreditors and programmatic accreditors. Institutional accreditors review the entire institution and include regional accreditors, national career-related and national faith-related accreditors. Every three months, the Department of Education publishes its list¹⁷ of institutions along with the institution's accrediting bodies and those organization's recognition status; differentiating between institutional, specialized, and internship/residency. Regardless of accreditor, the fundamentals of accreditation are the same: self-regulation and peer/professional review.¹⁸ While there are fluctuations with each list publication, there are approximately 85 accrediting bodies in the U.S., with 18 focusing on institutional level accreditation. It is important to note that accreditation is separate from the license to operate, which is controlled by each State independently.

The connection between veteran student protections and the expanding role of the federal government in regulating educational institutions cannot be overstated as a brief legislative review reveals the foundation of this relationship being established in 1944 with the Servicemen's Readjustment Act, followed by the Veterans Readjustment Assistance Act of 1952 which not only expanded federal education benefits but also established the role of nongovernmental accreditors as reliable authorities in verifying the quality of educational offerings.¹⁹ What is interesting to note is the apparent disconnect between the goal of veteran education benefits - employment, and the predominant mission of the academic institution - academic quality.

¹⁶ <https://www.whitehouse.gov/the-press-office/2012/04/27/executive-order-establishing-principles-excellence-educational-instituti>

¹⁷ <http://ope.ed.gov/accreditation/GetDownloadFile.aspx>

¹⁸ http://www.chea.org/pdf/EHE5-1_U%20S%20Accreditation_Meeting_the_Challenges_of_Accountability_and_Student_Achievement-Judith_5%20_Eaton.pdf

¹⁹ http://www.chea.org/pdf/EHE5-1_U%20S%20Accreditation_Meeting_the_Challenges_of_Accountability_and_Student_Achievement-Judith_5%20_Eaton.pdf

A view of accreditation from the inside

Judith Eaton, President for the Council for Higher Education Accreditation (CHEA)²⁰ published a guide for new board members in May of 2016 that provides unique insight into the range of experiences and perceptions of the accreditation process.

"Accreditation is complex and at times controversial – both academically and politically. It is both welcomed and not welcomed on college campuses. It is welcomed when the visiting team is viewed as a group of valued academic colleagues and when primary attention is given to providing advice leading to quality improvement of a program or service. Accreditation is then treated as a form of external consulting from respected members of the academic community, as peer review that results in sound judgment that helps to move an institution forward.

*Accreditation may not be as welcome if it is perceived as a compliance or checklist activity that is less focused on enhancing the academic efforts of an institution. Accreditation is not appreciated by some when, rightly or wrongly, it is viewed as a means of forcing an institution to comply with law or regulation that is not seen as connected in any meaningful way to educational development, or when accreditation is viewed as a set of bureaucratic standards and policies having little to do with furthering quality teaching, learning or research."*²¹

In summation, the accreditor attempts to balance the requirements and expectations of federal guidelines and peer-defined standards against an institution's mission and purpose. The issue of employment outcomes in higher education rests at the very center of this discussion as the predominant and historic mission of the vast majority of post-secondary institutions is academic quality. From a historical perspective, academic quality is tethered to institutional autonomy, academic freedom, commitment to institutional mission.²²

Demystifying accreditation and its role in protecting student veterans

The broader role of accreditation according to Eaton is fourfold, "it assures quality, provides access to federal funds, engenders public confidence in higher education and eases transfer of credit."²³ Government recognition, both at the state and federal level primarily focuses on assuring the soundness of institutions and programs to receive federal funds. The result is apparent in reviewing a typical checklist for regional accreditation using the New England Association of Schools and Colleges standards for accreditation, which are reproduced below.²⁴

New England Association of Schools and Colleges standards for accreditation

"To be affiliated with the Commission on Institutions of Higher Education of the New England Association of Schools and Colleges, as a candidate institution, an institution of higher education must meet the following requirements. Accredited institutions fulfill these requirements through meeting the Standards for Accreditation.

The institution:

- 1. has formally adopted a statement of mission, which demonstrates that the fundamental purposes of the institution are educational, and which is also appropriate to a degree-granting institution, and appropriate to those needs of society it seeks to serve;*
- 2. offers one or more collegiate-level education programs, consistent with its mission, that leads to degrees in recognized fields of study and that require at least one year to complete;*
- 3. awards the bachelor's, master's, or doctor's degree or, if it grants only the associate's degree, includes programs leading to degrees in liberal arts or general studies or another area of study widely available at the baccalaureate level of regionally accredited colleges and universities;*

²⁰ CHEA is an association of 3,000 institutions in providing oversight over 60 institutional and programmatic accrediting organizations.

²¹ <http://www.chea.org/pdf/board-guide-accreditation.pdf>

²² http://www.chea.org/pdf/EHE5-1_U%20S%20Accreditation_Meeting_the_Challenges_of_Accountability_and_Student_Achievement-Judith_S%20Eaton.pdf

²³ http://www.chea.org/pdf/EHE5-1_U%20S%20Accreditation_Meeting_the_Challenges_of_Accountability_and_Student_Achievement-Judith_S%20Eaton.pdf

²⁴ https://cihe.neasc.org/downloads/PUBLICATIONS/NE-Becoming_Accredited_NE_Candidacy_Guide-.pdf

4. has, for each of its educational programs, clearly defined and published objectives appropriate to higher education in level, standards, and quality, as well as the means for achieving them, including a designated course of studies acceptable for meeting degree requirements, adequate guidance to degree candidates in the satisfaction of requirements, and adequate grading or evaluating procedures;

5. awards only degrees appropriate to each graduate's level of attainment;

6. in addition to study of the areas of specialization proper to its principal educational programs, requires a coherent and substantive program of liberal studies at the postsecondary level, as either a prerequisite to or a clearly defined element in those programs;

7. has adopted a statement specifying the potential students it wishes to serve, and admits qualified students to its programs under admission policies consistent with this statement and appropriate to those programs;

8. has students enrolled in and pursuing its principal educational programs at the time of the Commission's evaluation;

9. has available to students and the public a current and accurate website and catalog or comparable official publication setting forth purposes and objectives, entrance requirements and procedures, rules and regulations for student conduct, programs and courses, degree completion requirements, full-time and part-time faculty and degrees held, costs, refunds, and other items related to attending or withdrawing from the institution;

10. has a charter and/or other formal authority from the appropriate governmental agency authorizing it to grant all degrees it awards, has the necessary operating authority for each jurisdiction in which it conducts its activities, and is operating within its authority;

11. has sufficient organizational and operational independence to be held accountable for meeting the Commission's standards;

12. has a governing board that includes representation reflecting the public interest that oversees the institution; assures that fewer than one-half of the board members have any financial interest in the institution, including as employee, stock-holder, or corporate director;

13. has a chief executive officer, appointed by and responsible to the governing board, whose full-time or major responsibility is to the institution and who possesses the requisite authority;

14. has faculty sufficient in number, qualifications, and experience to support the academic programs offered, including an adequate number of faculty whose time commitment to the institution is sufficient to assure the accomplishment of class and out-of-class responsibilities essential to the fulfillment of institutional mission and purposes;

15. has sufficient staff, with appropriate preparation and experience, to provide the administrative services necessary to support its mission and purposes;

16. devotes all, or substantially all, of its gross income to the support of its educational purposes and programs;

17. documents a funding base, financial resources, and plans for financial development adequate to carry out its stated purposes;

18. has financial records that relate clearly to the institution's educational activities and has these records audited annually by an external auditor in accord with the generally accepted auditing standards for colleges and universities as adopted by the American Institute of Certified Public Accountants;

19. has graduated at least one class in its principal educational programs before the Commission's evaluation for accredited status. If the institution has graduated its first class not more than one year before the Commission's evaluation, the effective date of accreditation will be the date of graduation of that first class."

Generally lacking from this list is a set of standard outcome measures and goals. There is no expectation regarding the graduation, employment, retention, knowledge attainment, or other specific types of measures that are more generally assumed to be part of the accreditation process. For a certainty this process assures that the conditions are right to achieve improved outcomes, but philosophically places the responsibility for those outcomes in the hands of the students. Regardless, the question of the purpose of accreditation in relation to employment outcomes (or outcomes in general) remains, and it is suggest here as evidence for a broader partnership model, one that extends beyond the traditional relationships between federal, state and accrediting entity to include additional private sector partnerships with the capacity to incentivize the adoption of programs, policies and services that serve beyond the academic mission of the institution.

The lack of commonly agreed upon definitions is one of the key challenges in influencing the implementation of responsible business practices on a large scale. An article published by the John F. Kennedy School of Government at Harvard University outlines three trends driving public-private partnership: Philanthropy, Public Relations, and Compliance.¹⁶ These broad categories are useful for illustrating and summarizing existing practices, and provide a framework for future strategy and policy. A key takeaway from the research, however, is that these are not future states, they are baseline expectations of corporate governance. It is widely accepted that any given corporation or education institution should have some level of philanthropy, a public voice of advocacy, and be in compliance with requisite laws. Doing only this, however, is what is expected; it is not true corporate social responsibility. Nelson notes that leading organizations are moving beyond traditional philanthropy to focus on the totality of the impact of company's operations. Leading corporations are expanding accountability and transparency efforts from highly controlled press releases to the free release of performance data. Finally, organizations are moving beyond a compliance-based mindset; "they recognize that it is not only about 'box-ticking', but also about the public statement of corporate purpose, principle and values, underpinned by internal policies and systems of management and accountability."¹⁷ These are the actions and behaviors that federal agencies, non-profit organizations and marketplace businesses are all trying to encourage, albeit in very different ways.

Roles for Public-Private Partnerships

There are distinct roles that public, private and government entities play, with each having strengths and limitations:

- Government's primary domain and tool of influence is that of compliance, but ultimately compliance is meant to establish a floor, not a ceiling.
- Service organizations and other nonprofits and foundations seek partnership in philanthropic efforts, but generally are not well-equipped to facilitate the development of critical insourcing of philanthropic know-how and capacity that assure sustainability.
- Private business partners provide avenues to achieve

the direct effects sought by other businesses such as greater market awareness and consumer response, but often do not go far enough in facilitating the development of transparency required to drive transparency that reveals corporate intention.

Each of these partner groups is required not only to participate, but to evolve their efforts, capacities, strategies, and mindset if any initiative is to move from mere advocacy to practice. It is also important to keep in mind that when it applies to consumer services, especially education, desired behaviors should be embraced and sustained within all institutions. A quick review of the current state of affairs, in light of this model, suggests that the majority of players in the space are operating independently and within old stereotypes. Federal regulatory and compliance activities (unlike employment initiative models like Joining Forces or ESGR) are not only punitive in nature, but are generally not equally applied, and not being processed in executive-legislative partnerships, which is essential. Veteran advocacy groups are sidestepped through unpublished regulatory measures. The result is a jumble of memos, memoranda, and other informal programs that lack inter-departmental coordination and collaboration outside of data sharing for the purpose of identifying compliance and investigative targets. The lack of supportive legislation suggests that these efforts will likely not sustain beyond a given administration.

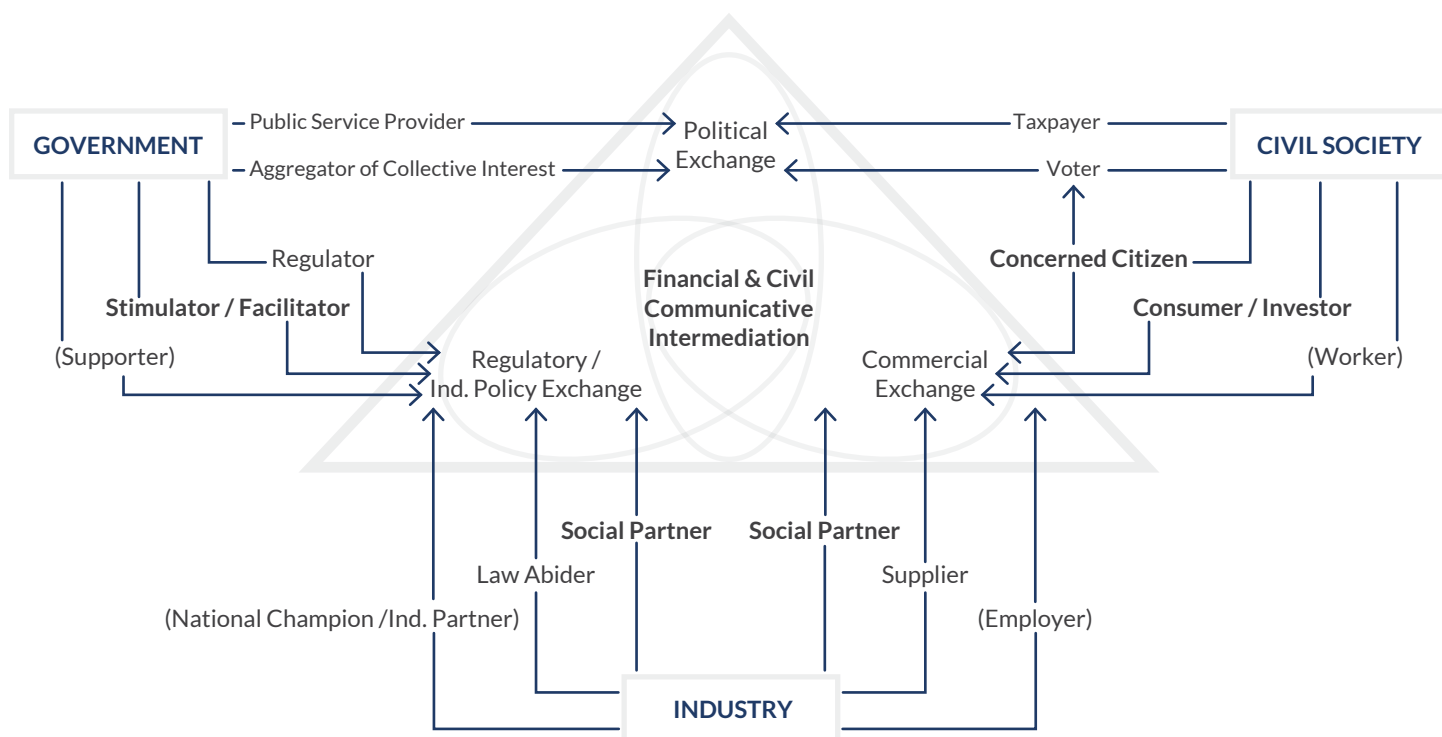
Current compliance and regulatory efforts such as the DoD MOU instruction to exclude various forms of advertisement to limit base access of non-participant schools¹⁸ is designed to facilitate the retention and cost control initiatives of a single federal branch, rather than jointly establish goals and strategies that have long-term impact and benefit for the whole military and veteran community. Veterans in transition from active duty can no longer utilize DoD Tuition Assistance and require education on GI Bill benefits, eligibility and program participation which includes the application of benefits toward test preparation, non-accredited courses and OJT given that the goal of that legislation is employment as a primary outcome. Regulatory-driven strategies have the additional effect of leaving traditional Veteran Service Organizations and their connection to veterans on the sidelines in favor of partnerships with legal action organizations.

²⁵ Nelson, Jane. 2004. "The Public Role of Private Enterprise: Risks, Opportunities, and New Models of Engagement." *Corporate Social Responsibility Initiative Working Paper No. 1*. Cambridge, MA: John F. Kennedy School of Government, Harvard University, p.6 https://www.hks.harvard.edu/m-rcbg/CSRI/publications/workingpaper_1_nelson.pdf

²⁶ *ibid*.

²⁷ <https://www.dodmou.com/Home/Faq>

Figure 2: The embedded relational model



Source: Midttun (2005).

Military Students Should Have a Seat at the Table

What do military students think? What do military students need? Our own focus groups reveal a very different picture of what service members value: a culture that understands them, a community that supports them and amenities that ease their transition to civilian life and experiences. These assertions are backed by numerous research studies, one of which summarizes studies from 2006-2009²⁰ by first pointing out the lack of a national-level systematic effort to assist student veterans in higher education, and identifying student veteran preference for campuses that partner with the VA, that offer orientation programs for veterans along with resource centers and student groups. These studies point out the critical link between veteran student integration and retention supported by faculty, support staff, and peer connections.²¹

²⁸ https://www.researchgate.net/profile/Marta_Elliott/publication/274215740_US_Military_Veterans_Transition_to_College_Combat_PTSD_and_Alienation_on_Campus/links/572178f008aea92aff8b2e07.pdf

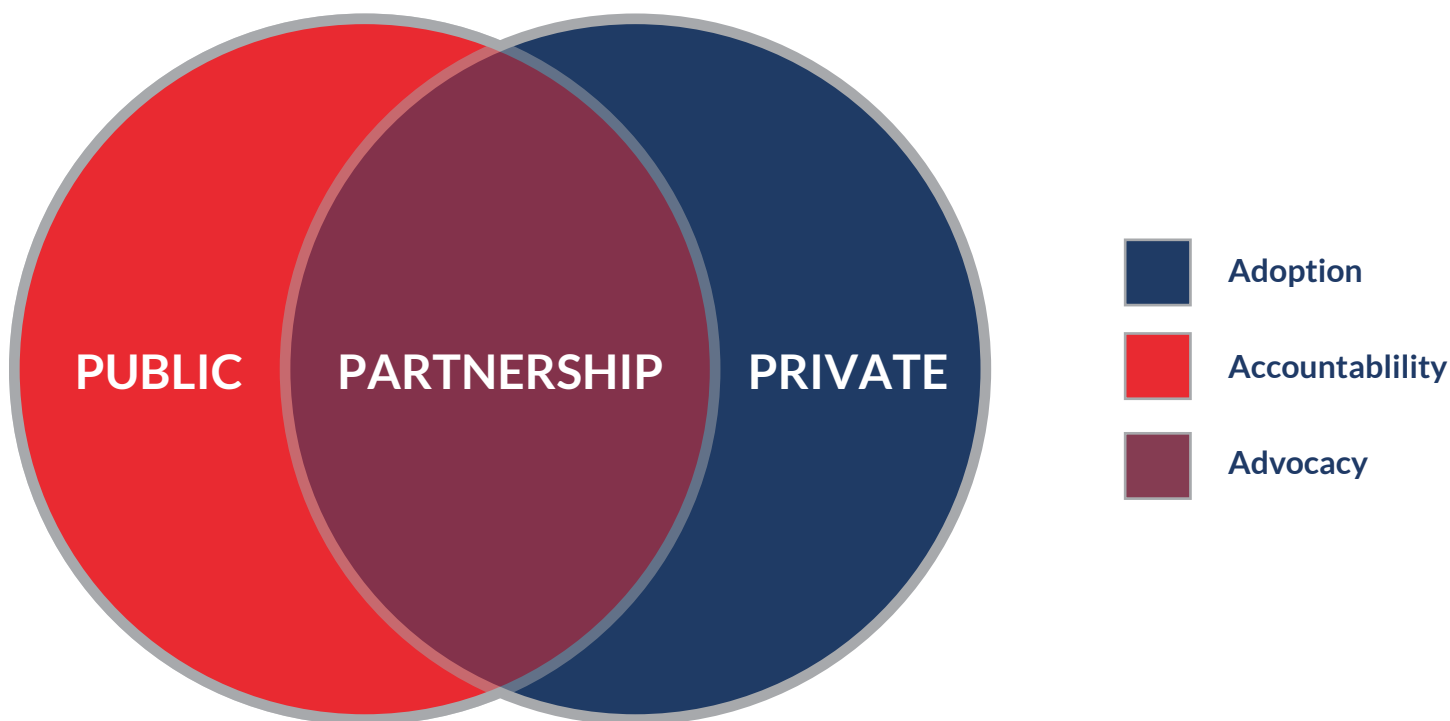
²⁹ *ibid.*

Defining roles within the partnership model

Following the three-part model suggested above, it is imperative that discussion take place across a diverse group of organizations surrounding the requisite roles, capacities and limitations and membership of each functional category: Philanthropy (organizational performance), Public Relations, and Compliance. Federal agencies have a clearly defined role in assuring compliance with the law. Public and private entities can work in partnership to develop and promulgate standards, provide training and disseminate best practices, while both can establish public recognition and rewards that incentivize institutions to move beyond compliance. In the Harvard research, we are introduced to a relational model for analysis of public policies on corporate social responsibility, which illuminates the public-private relationship as a set of exchanges between government, business and society. The

three models of exchange are identified as Policy, Political and Commercial. By arranging organizations within this model, a clearer picture emerges of how a public-private partnership could work along the lines of “Adoption, Accountability, and Advocacy.”

Private industry partners have the greatest capacity to collaborate, collect and disseminate best practices, as well as to encourage greater adoption of standards that exceed mere compliance. Public sector partners are most capable of holding entities accountable while reviewing data and adjusting standards to address gaps or emerging needs and challenges. Together, each partner possesses the ability to advocate, both on behalf of military students as well as the organizations that are exhibiting best practices. This positive and intentional model provides a clearer framework for roles and relationships.



In order to move from concept to implementation and to better understand the necessity of a new approach to addressing military student education challenges, it is useful to review current resources and efforts underway, along with their purpose and limitations. Additionally, it is important to arrive at a common understanding of not only the intent of the law, but more importantly the purpose for taking action on behalf of military students.

Federal Tools for Decision-Making

Federal agencies make available a number of online tools for potential students and veterans to review available data. A key limitation of these tools is the lack of ability for the government to recommend one institution over another. As a result, these tools tend to be searchable lists, often with information limited to basic statistics for which little insight or analysis is provided. The College Navigator³⁰ provides basic information for around 7,700 institutions with search options including: name, type, region, degree level and degree type. While generally useful for the average student there is little to no specific information provided regarding military or veteran students. Additionally, the data and metrics supplied do not match the demographics of the typical military student and thus are generally skewed.

The U.S. Education Department released a tool with a fresh and more modern look in 2015 called the College Scorecard.³¹ In terms of data, the information provided differs only slightly from the College Navigator, providing projected future earnings of graduates. Like the prior set of data, this federal tool relies on its own data set - federal student loans. Veterans generally utilize their separate GI Bill benefit, and therefore are not included or segmented in these results. The Department of Veterans Affairs offers a GI Bill Comparison Tool³² which adds new and more veteran relevant but still limited information, such as the existence of a student veterans group, sign-on with various initiatives and participation in several VA campus programs. Unfortunately, reporting is not compulsory as veteran specific data is frequently missing, especially in the case of 4-year institutions. Finally, the Department of Defense provides its own tool - relevant only for active duty military students eligible for Tuition Assistance benefits. TA Decide³³ offers unique data such as course completion rates and even number of complaints. While these data points appear valuable, there is little to know analysis or explanation, such as whether a complaint was valid, or is resolved, or whether a course taken had value or was merely easy to pass. As a whole, federal data tools for students are limited - as

data alone can be interpreted in many different ways. As federal agencies cannot advocate for specific institutions, there is ultimately a binary feel to their lists, along with a lack of relevance that leave potential students more vulnerable and less informed rather than more prepared. In contrast, the Military Friendly Schools list provides deeper levels of information about actual programs, culture and on-campus supports specific to student veterans and military students as well as their dependents. While the lists have not provided any ranking information (in this sense it is binary), the combination of published data and digital information organizes information in ways responsive to user requests and interests. Additionally, this list incorporates nearly 180 data points or easily 10 times the data points available from any single federal tool. As a positive marketing tool, organizations are encouraged to provide deeper levels of information, and unlike federal data collection programs, the list has adopted and evolved year over year with increasingly more challenging benchmarks.

Herein lies an important distinction between efforts focused on adoption versus accountability. Private data sets are transformed into performance benchmarking tools available to institutions, providing feedback and peer-to-peer analysis of trends and performance. It is tools like these that have led to the hiring of single-points of contact for veteran students, veteran centers on campus, peer mentoring, alumni groups, orientation programs and many more campus-wide improvements that benefit veteran and military students - as well as their dependents.

Identifying Meaningful Outcome Measures:

Post-Graduation Outcomes

A report published in 2000 by the University of Central England in Birmingham aptly summarizes the decades-long debate over the academic-employability connection, "to address the relationship between the academy and employment is to risk, at least in some quarters of academia, being seen as an apologist for anti-intellectualism, for the erosion of academic freedom and as proposing that higher education should be about training graduates for jobs rather than improving their minds."³⁴ For a certainty, the purpose of vocational training is employment, and from a practical perspective, the next logical step of anyone pursuing a degree program is to either gain employment or improve employment prospects. As the White House paper on the "gainful employment rule" notes, "Institutions that participate in the federal student aid programs must

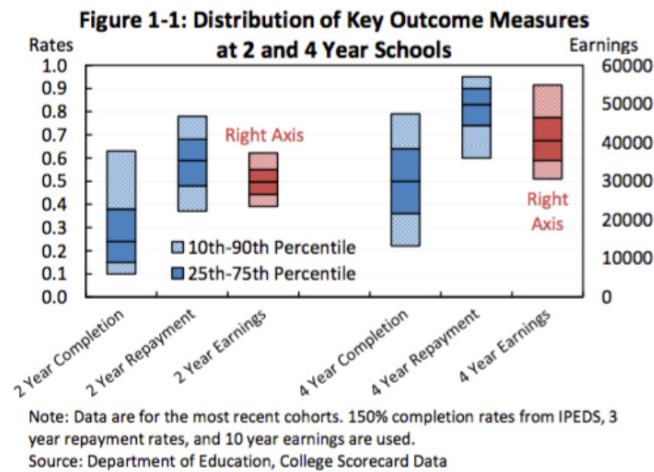
³⁰ <http://nces.ed.gov/collegenavigator/>

³¹ <https://collegescorecard.ed.gov/>

³² <https://www.vets.gov/gi-bill-comparison-tool>

³³ <https://www.dodmou.com/TADECIDE/>

³⁴ <http://www.qualityresearchinternational.com/esectools/relatedpubs/New%20Realities.pdf>



demonstrate that their students are able to repay their student loans under the cohort default rate and gainful employment provisions. These requirements intentionally focus on only one outcome of higher education – successful student loan repayment – and do not attempt to define or measure the broader purposes of higher education.”³⁵ As the rule was applied only to a single category of institutions – those offering vocational programs – the rule does not apply equally to the vast majority of institutions. The intent, however, is clear and even stated, “Efforts in the field are directed towards developing more comprehensive and summative measures of institutional quality. There is still value, however, in creating separate measures of various dimensions of college performance so that individuals and stakeholders can use actionable information to assess institutions according to their own priorities.”³⁶ It is, however, important to note that the “gainful employment” rules are the first time a direct attempt to measure the value of an academic program has been written into federal policy.

As a counterpoint, if it is the intent of these regulations to meet the needs and priorities of students, the question must be asked: how are those needs being assessed, incorporated, and applied? The same paper, however, makes a keen observation that is useful here in light of a framework for public-private partnership, “any source of college information will be an incomplete guide for some students

who will need to use outside sources to find information on their particular interests.”³⁷

The optimal role of the public side of the equation is the collaboration and dissemination of data along with the analysis of that data to establish fundamental performance thresholds. Private sources of data, so long as they incorporate these basic thresholds, have the flexibility and positive advocacy to expand upon these data sets with more qualitative and functional or socially relevant sets of data. Acting together, a more complete and informative picture may begin to emerge. For instance, a small cosmetics and beauty school has limited capacity to bring on more than a handful of students, but the results in terms of student experience, exposure, preparation and ultimately employment may be an ideal match for a veteran student who would otherwise have no way of discovering the existence and personal relevance of such an institution. Likewise, veteran students in particular access bridge-education programs and partnerships between community colleges and four-year institutions to gain entry into science and engineering fields at which they may technically excel but for which they are not readily academically prepared.

Defining a Bad Actor

While there is no limit to the number of articles published in recent years linking for-profit education with the term, “bad actor,” yet concomitantly, there is a dearth of definitions for what this pejorative phrase actually means. This situation is effective for smearing and ultimately shutting down specifically targeted institutions without impacting other institutional groups. But from the perspective of ethics, policy and good practice, it is of little to no practical use to institutions or prospective military students. Is it the proper goal of an academic institution to be concerned primarily with the ability of their graduates to repay their student loans? Or are there higher echelon goals of greater importance like building resilience, critical thinking, the capacity to learn, and independence. If so ... how are these to be measured?

Robert Zemsky, in his book “Checklist for Change: Making American Higher Education a Sustainable Enterprise,”³⁸ provides a fascinatingly detailed look into transformations affecting the entire industry and how new technology-

³⁵ “Using Federal Data to Measure and Improve the Performance of U.S. Institutions of Higher Education.” September 2015. Executive Office of the President of the United States.

³⁶ Ibid. <https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf>

³⁷ Ibid. <https://collegescorecard.ed.gov/assets/UsingFederalDataToMeasureAndImprovePerformance.pdf> pg. 10

³⁸ https://books.google.com/books?id=zAsDAAQBAJ&pg=PT65&lpg=PT65&dq=education+bad+actors+definition&source=bl&ots=nli7QX1EwT&sig=v5isizkuMjHJpP86LY7ko4ZZBzw&hl=en&sa=X&ved=0OahUKEwiOi-2bq_PNAhVMmx4KHxFtA78Q6AEIUTA#v=onepage&q=education%20bad%20actors%20definition&f=false

enabled educational approaches pioneered largely by for-profit institutions, are being readily adopted across the industry. As this becomes increasingly the case, it hampers the ability for regulators to establish uniform standards without affecting groups of institutions unintentionally - requiring yet more detailed levels of regulation or instruction on how these rules are to be applied. What is clear, is that federal intervention is becoming more prevalent - often superseding or breaking historical public-private partnerships and ultimately leading to what Zemsky suggests, "the reality that the Department of Education is now seeking to federalize accreditation."³⁹

In terms of its application to military students, the concept of bad-actor has become synonymous with for-profit. According to activist blogs and lobbying organizations, a bad actor is defined by institutional financial performance and the amount of federal dollars the institution has taken in compared to non-profit schools. As noted above, the suspension of federal dollars would likely shut down any institution, especially public institutions. The idea that it feels wrong to mix for-profit and education, while understandable, is not sufficient, and it is certainly not protection for students that may wind up selecting one of many public institutions whose outcomes, resources, and quality are worse than the for-profits demonized in internet blogs and media.

Why do "Bad Actors" Remain on Approved Government Lists?

The government itself has no prevailing definition for what this term actually means. Currently, the most reliable method of identifying institutions the government has identified as a bad actor is to track first "suspension" actions related to program approvals, and then to track legal actions taken against organizations. Given that federal lists like the Department of Defense list of participating institutions is updated infrequently (in this case there has been no update for two years—see screenshot above taken July 14, 2016)⁴⁰ this method is at best unreliable and in practice an impossible task for anyone seeking to rule out institutions as part of their search process.

In fact, the use of the term, while viscerally and politically appealing, comes into question entirely in the practice of applying nearly any set of standards. For instance, let us use a basic set of criteria for defining bad-actor versus non-bad actor (assuming that not being a bad actor does not automatically assume an organization to be a good actor). In the case of the Military Friendly® Schools algorithm, institutions are deemed immediately ineligible for any of the following: Accreditation has been suspended, VA / DoD authorizations have been suspended or revoked, college scorecard data indicates one of several flags such



Department of Defense (DoD)
Voluntary Education Partnership Memorandum of Understanding (MOU)

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(Change 3, DODI 1322.25 dated July 07, 2014)
Total Main Institutions: 2,729
Total Additional Locations: 12,303

To determine if an Institution is currently participating in the DoD MOU program,
please search the below Participating Institutions list.
See FAQs for institution status definitions.

³⁹ *ibid*

⁴⁰ <https://www.dodmou.com/Home/InstitutionList>

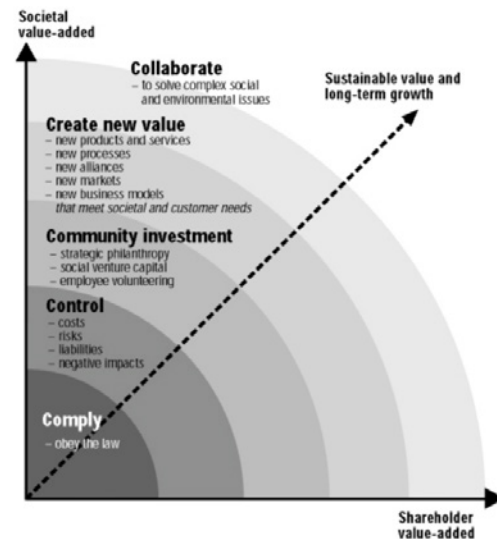
as heightened financial monitoring, OR veteran complaints exceed 5% of their reported military student enrollment. Neither federal agency utilizes such strict methodology. The resulting list when applied across the board to all institutions flags 29% of for-profits, and 7% each of private and public institutions. Interestingly, the majority of for-profit institutions trip the list due to being under heightened financial monitoring. If you broaden the net further, as the Military Friendly® Schools methodology does, to include instances where outcomes for veterans are worse than the average student body in graduation rates, placement rates, retention rates, or loan default rates, the resulting list flags 37% of for-profits, 69% of private institutions and 52% of public institutions.⁴¹ Digging into this list of names is at times surprising, as is having actual conversations with these institutions on an annual basis.

Is it appropriate to characterize the institutions that fall below these marks as bad-actors? In many cases it is not. Is it important to establish a baseline expectation of outcome performance? Yes, and it is equally important to create such an expectation that can be uniformly applied. A significant limiting factor to this solution was identified in the 2015 RAND study, “We recommend development of a mechanism for tracking an individual’s use of education benefits programs across departments. Currently, we are not aware of such a tool.”⁴² One of the goals of any public-private partnership should be the development of an agreed-upon definition of what a “bad-actor” is, both to establish a joint understanding to drive program improvement from an advocacy perspective, but also to develop communication resources that will help inform best use of not only federal benefits but additional personal loans military students may incur in pursuit of their personal and professional goals.

Federal Limits in Regulating & Promoting Good Practices

For a certainty, advocates will agree that some policing mechanism is needed to assure the best interests and outcomes of military students. As noted in the referenced Harvard study by Jane Nelson⁴³, any successful chance at meaningful change requires partnerships that move beyond simple compliance, where sustainable value, societal value, and shareholder value are not merely balanced but grow as noted in the image provided. As Nelson suggests, this cannot be accomplished by rules and regulation alone.

Limiting bad behavior and encouraging best practices are two entirely different goals/tasks. It is a fallacy to assume that the



imposition of regulatory measures is in any way sufficient to encourage positive behavior that is beneficial to veterans. As an example, the Department of Defense efforts were reviewed in a 2014 GOA audit with the following findings highlighted in the report:

“DOD used a contractor to conduct evaluations of schools participating in the Tuition Assistance Program, however, according to DOD, the evaluations did not provide the agency the information it needed to assess schools. This is because DOD lacked a specific plan to frame the evaluations, which according to federal standards, should clearly define the evaluation questions and methodology and address the collective knowledge, skills, and experience needed by the entity conducting the evaluations. According to DOD’s contract, evaluations were to assess school quality, but the 15 areas DOD provided the contractor for evaluation were often not clearly defined and it was not clear what the contractor was to evaluate.”⁴⁴

Nelson brings the need for collaboration into perspective, “The voluntary versus regulatory debate is unlikely to go away - and nor should it. What is needed is an ongoing dialogue between business, government and other stakeholders to explore the most effective balance between market mechanisms, private voluntary initiatives and regulatory approaches; and between different types of regulation, from prescriptive requirements to management and performance-based regulatory regimes.”⁴⁵ Arguably in the case of military students, bad actors, and education outcomes, this dialogue is not happening. In its place is a less useful barrage of legal battles and accusations between rival stakeholders with the veterans themselves left without clear information or assistance.

⁴¹ <https://collegescorecard.ed.gov/data/>

⁴² http://www.rand.org/content/dam/rand/pubs/research_reports/RR600/RR664/RAND_RR664.pdf

⁴³ https://www.hks.harvard.edu/m-rcbg/CSRI/publications/workingpaper_1_nelson.pdf

⁴⁴ <http://www.gao.gov/assets/670/665580.pdf>

⁴⁵ P.13 https://www.hks.harvard.edu/m-rcbg/CSRI/publications/workingpaper_1_nelson.pdf

Better for Veterans: A Movement for Military Student Outcomes

If the goal is to improve outcomes for military and veteran students, we must move beyond the current tandem of rhetorical tough love and punitive regulatory action. What is needed is real change driven by the momentum generated from concerted and meaningful public-private partnership. To this end, we propose a starting point for discussion as outlined below to include an acceptable and consistent standard for measured outcomes, along with a fundamental principle that can be embraced and adopted: “Better for Veterans”. Knowing that institutional outcomes differ by type, geography and availability of resources, and accepting that student priorities are multivariate in nature, we propose that institutions adopt a basic commitment to be better for veterans across all measurable outcome areas, and that where there are deficiencies, that these organizations commit to instituting a plan, and where there are strengths, to commit to sharing best practices.

A 50/20 Rule as Measured Outcomes

There are two basic performance thresholds that have appeared across various research papers and regulatory proposals. The study of 800,000 student veteran records in 2014 revealed that veterans trailed their non-veteran peers with a 51.7% completion rate compared to a non-veteran 59% four year graduation rate.⁴⁶ The study did not review a single year, but considered outcomes of records across a span of years from 2002 to 2013, and is one of, if not the most, comprehensive longitudinal record study available on military and veteran students. This study, coupled with the 20% threshold established by the “gainful employment” rules as the ceiling for acceptable student loan default rates offers a three-part outcome-based assessment model for college performance standards in regard to veterans: That is to say that schools commit to exceeding 50% in graduation rates, retention rates, job placement rates, along with a commitment to provide the services and resources that keep loan repayment rates below 20%.

One limitation of adopting a 50/20 rule, however, is the static nature of the number, rather than a formulaic and annually adjusted benchmark that is more reflective of economic trends and realities. As such, this recommendation is suggested only as a baseline, and not a target threshold of best practice performance.

“Better for Veterans” Commitment

While institutions are unable to achieve these measures they will join all institutions in committing to achieving better results for all military and veteran students than their all-student average. That veteran education outcomes fall behind non-veteran peers on a national average is unacceptable, and it will

not be addressed by regulatory initiatives nor by litigation. This is a simple problem around which a nation can come together, just as it has around veteran unemployment rates for the last decade. While a 50/20 threshold will lead to undoubted debate, the simple commitment to achieve better results for veterans should not be.

For some, this is not an aggressive goal, for others it may seem insurmountable. For students from the military community, it provides a very simple and understandable measure to expect of any institution they select that can be assessed with a single question: are you better for veterans? Over the past several years, the Military Friendly® Schools benchmark program has annually reviewed proprietary data from nearly 2,000 participating institutions, comparing this data to publicly available data to establish benchmarks, award a designation, and, most importantly, to provide institutions with access to otherwise unavailable peer benchmark data to assess and improve performance in critical outcomes like job placement and veteran student persistence.

Additional topics for consideration

Anecdotal data from the past several years of the Military Friendly® Schools survey, supported by recent research findings indicate that selection of major is an important element of consideration for veteran student success upon graduation. According to an LA Times research report published October 30, 2015,⁴⁷ 26% of undergraduates receiving GI Bill benefits also took out personal loans averaging \$7,400 per year. This does not account for the number of veterans who exhaust their benefits eligibility prior to completing a degree program. The VA itself recommends that veterans, “weigh your different degree options and make your decision before taking major-centric courses. Doing so will minimize the risk of exhausting benefits and paying out of pocket for the rest of your classes.”⁴⁸ One significant area for future study and consideration is the correlation between a veteran’s education and experience attained during military service and the potential for utilizing education benefits to re-train in order to achieve civilian equivalency rather than investing in additional degree attainment that may provide long-term career potential. The level of guidance provided to veterans during the admission and area of study selection process has been a key measurement for the Military Friendly® Schools benchmarking program and continues to provide insight into meaningful measures of institutional performance in support of veteran students.

⁴⁶ <http://www.usatoday.com/story/news/nation/2014/03/24/veterans-students-graduation-college-completion-rates-va/6735003/>

⁴⁷ <http://www.latimes.com/nation/la-na-veteran-debt-20151031-story.html>

⁴⁸ <http://www.blogs.va.gov/VAntage/1420/six-ways-to-maximize-your-education-benefits/>

Military Friendly® Provides a Framework for the Effectiveness of Benchmarking

In the 2015-16 Military Friendly® Schools cycle, the average military job placement rate among institutions earning the designation was 78%, the graduation rate was 57%, the one-year retention rate for military students was 70%, and the average loan default rate was 2.92%; in each of these cases the average rate for veterans in the designation cohort exceeded that of the all student average. From a data collection standpoint, this proprietary survey exceeds that of any existing federal data program, both in depth and completeness. The reason for this is at least partial evidence of the motivation that a positive, performance benchmarking and advocacy approach has; institutions will achieve higher outcomes when presented with meaningful direction on what to measure and public recognition when they achieve positive results. Year-over-year trend data shows increases in outcome measures and participation rates in data collection, as it has throughout the evolution of this program.

The Military Friendly® Schools program is one data point of evidence for the need to establish a stronger connection between public and private initiatives. As a private entity, data can be shared and benchmarked in a non-punitive way, and institutions can be encouraged and rewarded as they make progress towards goals set by peer performance. Having a benchmark that adjusts annual also provides for economic swings, and becomes more responsive and self-governing than legislated data points that largely reflect only the year in which they were established.

The publishing and circulation of this paper will be accompanied by the release of a digital statement of commitment. Rather than setting out to formulate a new entity, it makes greater sense to start a movement, one that is not owned by any single stakeholder, but that can be embraced by many and once embraced improved upon through ongoing dialogue. To this end, www.betterforveterans.org will launch as an initial step to identify individuals and organizations that are willing to take up the banner, either as an institution ready to adopt these basic principles, or advocates willing to facilitate the next logical steps of this nascent effort.

On behalf of our nation's military and veteran students, we invite you to join us in rallying with a unified voice, in cutting through the divisive dialogue, in joining forces to address the needs of more than a million men and women who have served and now prepare for their next phase in our nation's classrooms. Join us in assuring that every institution of higher education not only commits to, but is able to achieve, results that are better for veterans.

A draft Statement of Commitment

For more than a decade, our nation's Veterans have trailed non-veterans in education outcomes. It is time for all higher education institutions to commit to being "**Better for Veterans**" in their policies, programs and practices.

I/We _(organization name)_ commit to being "Better for Veterans" by _____
The specific outcomes I/we are committed to supporting:

Schools

- Graduation
- Retention
- Job Placement
- Loan Repayment
- Other

Option for supporting agencies and individuals:

I/We _(organization name)__ commit to being "Better for Veterans" by _____
The specific outcomes I/we are committed to supporting:

Schools

- Graduation
- Retention
- Job Placement
- Loan Repayment
- Other



BetterForVeterans.org