

April 20, 2021



The Honorable Denis R. McDonough
Secretary
U.S. Department of Veterans Affairs
Washington, D.C. 20420

VIA EMAIL: Denis.McDonough@va.gov

Dear Secretary McDonough,

On behalf of the undersigned organizations, we write today to congratulate you on your confirmation as Secretary and applaud your commitment to public service. We also write to express strong concerns over a recently revised interpretation of the use of Post-9/11 GI Bill benefits by student veterans toward a study abroad experience. We urge the Department to reconsider the updated guidance, as it needlessly creates barriers that make it far more difficult for student veterans to pursue study abroad and gain crucial skills for success in today's global economy.

The Veterans Benefits Administration's (VBA) revised guidance on the use of GI Bill benefits for study abroad, which took effect in August 2020, severely limits the types of allowable programs in which student veterans can study abroad. The narrow interpretation restricts access to some of the most common types of study abroad programs offered today: semester exchange programs with overseas universities and programs facilitated by third-party organizations through which accredited U.S. colleges and universities award academic credit.¹ Conversely, the same interpretation allows student veterans to enroll directly at approved foreign universities to earn degrees, which data show that U.S. higher education students rarely do.² The current guidance would seem to favor enrollment at foreign institutions over U.S. institutions.

Veterans are a unique subset of the U.S. higher education student population, yet they should have all the same opportunities to study abroad as do other American students. Ninety-six percent of U.S. higher education institutions enroll veterans,³ and research shows that students who have studied abroad have higher grade point averages and higher completion, retention, and attainment rates than students who have not studied abroad.^{4,5}

A research study released last year by NAFSA analyzed hundreds of millions of U.S. job postings and found that more than 31 million job descriptions sought employees with skills that are gained through study abroad, such as adaptability, intercultural skills, and language skills.⁶ Unfortunately, even before

¹ Institute of International Education (IIE), "Duration of Study Abroad," *Open Doors Report 2020* (New York: IIE, 2020), <https://opendoorsdata.org/data/us-study-abroad/duration-of-study-abroad>.

² IIE, "Duration of Study Abroad."

³ Bureau of Labor Statistics, *Current Population Survey–2017 Annual Averages* (Washington, D.C.: U.S. Department of Labor, 2017).

⁴ Richard C. Sutton and Donald L. Rubin, "The GLOSSARI Project: Initial Findings from a System-Wide Research Initiative on Study Abroad Learning Outcomes," *Frontiers: The Interdisciplinary Journal of Study Abroad* 10, no. 1 (2004): 65–82. <https://doi.org/10.36366/frontiers.v10i1.133>.

⁵ Center for Global Education, "California Community College Student Outcomes Abroad Research Project" (Carson, CA: Center for Global Education, 2021), <http://globaled.us/cccoar/index.asp#top>.

⁶ NAFSA: Association of International Educators, *Developing A Globally Competitive Workforce Through Study Abroad* (Washington, D.C.: NAFSA, 2020), <https://www.nafsa.org/policy-and-advocacy/policy-resources/developing-globally-competitive-workforce-through-study-abroad>.

the COVID-19 pandemic, far too few students participated in study abroad. Only 10 percent of students study abroad before they graduate,⁷ meaning that 90 percent of graduates are entering the workforce without the global skills, knowledge, and experiences that would position them for success in the global economy.

In contrast, the U.S. Department of Education encourages study abroad for American students, as it allows the use of Title IV Federal Student Aid for study abroad programs that award academic credit. It stands to reason that federal dollars should be viewed in the same way across agencies and as applicable to U.S. higher education. Furthermore, the Department of Education's [*Federal Student Aid Handbook*](#) states:

A participating institution may establish study-abroad programs for which students are eligible to receive FSA [Federal Student Aid] funds. The study-abroad program does not have to be a *required* part of the eligible program at the home school for the student to be eligible to receive FSA funds, but the credits earned through the study-abroad or exchange program must apply toward graduation in the student's program at the home school. In addition, students in the study-abroad program must remain concurrently enrolled at their home school. Moreover, the school must mention the availability of FSA funds in the information it provides to students about the study-abroad program.⁸

Just as the *Handbook* encourages and facilitates study abroad for U.S. students, student veterans should be allowed to use their Post-9/11 GI Bill benefits to experience study abroad in the same manner as their classmates.

It is vital to ensure all students have access to a quality education that will prepare them for the global workforce into which they will graduate. Therefore, we urge the Department to work with relevant stakeholders in higher education and study abroad to review the current VBA guidance on the use of Post-9/11 GI Bill benefits for study abroad and to consider following a similar approach to that of the U.S. Department of Education's Title IV Federal Student Aid program, which allows the use of these funds for study abroad programs that award academic credit.

Thank you for your consideration.

Sincerely,

[Signature Redacted]
Esther D. Brimmer, DPhil
Executive Director & CEO
NAFSA: Association of International
Educators

[Signature Redacted]
Jared Lyon, MPA
National President and CEO
Student Veterans of America

cc: Thomas Murphy, Acting Under Secretary for Benefits, Veterans Benefits Administration
Charmain Bogue, Executive Director, Education Service, Veterans Benefits Administration

⁷ IIE, "Fast Facts 2020," *Open Doors Report 2020* (New York: IIE, 2020), https://opendoorsdata.org/fast_facts/fast-facts-2020.

⁸ U.S. Department of Education, *Federal Student Aid Handbook with Active Index, 2019–2020* (Washington, D.C.: U.S. Department of Education, 2020), 2–32. <https://ifap.ed.gov/sites/default/files/attachments/2020-05/1920FSAHbkActiveIndex.pdf>.