

**STATEMENT OF
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THE AMERICAN LEGION
BEFORE THE
COMMITTEE ON VETERANS AFFAIRS
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
UNITED STATES HOUSE OF REPRESENTATIVES
ON
PENDING AND DRAFT LEGISLATION**

FEBRUARY 6, 2019

Chairman Levin, Ranking Member Bilirakis, and distinguished members of the committee, on behalf of National Commander James W. “Bill” Oxford and the nearly two million members of The American Legion, we thank you for inviting The American Legion to testify today.

The American Legion is directed by millions of active Legionnaires who dedicate their time and resources to the continued service of veterans and their families. As a resolution-based organization, our positions are guided by nearly 100 years of advocacy and resolutions that originate at the grassroots level of our organization. Every time The American Legion testifies, we offer a direct voice from the veteran community to Congress.

H.R. 5052 - Wage Adjustment for Veterans Enrolled in School Act or the “WAVES Act”

To amend title 38, United States Code, to include local government minimum wage requirements in determining the hourly minimum wage applicable for purposes of the work-study allowance under the educational assistance programs administered by the Secretary of Veterans Affairs.

The Department of Veterans Affairs (VA) work-study program provides often critical financial support for veterans utilizing their GI Bill in approved programs of education. The program provides payment (at the federally prescribed minimum wage) to veterans who are assisting veterans affairs officials on campus, school certifying officials (SCOs), VA Educational Liaison Representatives (ELRs) and even State Approving Agencies (SAAs). The program provides much needed income for student veterans who qualify throughout the country. Plus it provides them with exposure to and training in areas of GI Bill administration and oversight that often helps those interested in these fields in securing future employment.

The WAVES Act will provide that these veterans enrolled in programs in high cost of living areas will be paid the applicable state hourly minimum wage when it is higher than that mandated nationally. These veterans living and attending school in these areas will then be better able to complete their programs (some only readily available in such areas) as they will receive support

more in keeping with the actual cost of living where they live. By doing this, VA would increase access to programs and eventual veteran success.

The American Legion supports H.R. 5052 as currently written.

Draft Legislation

To amend title 38, United States Code, to make an individual eligible for educational assistance under chapter 33 of such title and who transfers such educational assistance to a dependent solely liable for any overpayment of such educational assistance

As a condition of its passage in 2008, the Post-9/11 GI Bill included a provision designed to increase servicemember retention: the opportunity to transfer GI Bill benefits to family members after ten years of service. The authority for configuring this transferability was delegated to each service branch, who are best equipped to leverage the benefit to meet respective retention demands.

Ultimately, this authority has courted controversy in recent years as the Department of Defense has placed additional restrictions on transferability¹, but a less reported concern has been the negative outcome of what happens to the children of servicemembers when the service branches do not properly implement the transfer.

The American Legion was recently made aware of the case of a servicemember who completed the transfer of GI Bill to his daughter with his chain of command's sanction prior to discharge. His daughter then used the GI Bill for her fall and spring freshman semesters. Unbeknownst to her, VA determined that her father did not meet the eligibility to transfer his benefits due to a technicality of service dates. As a result, VA revoked his daughter's GI Bill and sent her a debt collection notice for the previous Fall and Spring tuition. Before her 18th birthday, she owed tens of thousands of dollars to the Department of Veterans Affairs.

Problems with transfer of eligibility for the GI Bill will remain as long as DoD administers a program in which VA holds the purse strings. Unfortunately, some servicemembers will continue to be deprived of transferability that they have earned through service, due to technical misunderstandings between their chain of command and VA.

These are the problems we face today, but it is unacceptable that such burdens be borne by the children. This draft bill would establish that the veteran assume financial liabilities for GI Bill overpayments instead of their dependents. Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.²

The American Legion supports this draft legislation as currently written.

¹ <https://www.navytimes.com/veterans/2018/07/30/lawmakers-demand-pentagon-leaders-drop-plans-to-limit-gi-bill-transfers> "Lawmakers demand Pentagon drops GI Bill transfer limits", July 30, 2018

² American Legion Resolution No. 318 (2016): [Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education](#)

Draft Legislation - VET-TEC Improvement Act

To amend the Harry W. Colmery Veterans Educational Assistance Act of 2017 to expand eligibility for high technology programs of education and the class of providers who may enter into contracts with the Secretary of Veterans Affairs to provide such programs

The Veterans Employment Through Technology Education Courses (VET TEC) is an innovation of the *Colmery Act*, or Forever GI Bill, that matches veterans with leading training providers to develop high-technology skills. Unlike the traditional oversight requirements of accreditation that higher education mandates, VET TEC training providers meet a simple eligibility requirement to be listed as a “preferred” institution: they must refund all tuition and fees if the veteran does not find meaningful employment within 180 days of completing the program.

Despite this straightforward compliance metric, traditional oversight measures have limited industry engagement in the program. In order to apply for this program, providers must be in existence for two years and limit their training to full time coursework. This bill would expand provider eligibility by articulating part-time program requirements, and lowering eligibility to one year of program operability.

The American Legion supports these approaches to expand provider opportunities for veterans, and encourages VA to further develop a robust outreach plan to recruit industry providers.

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student’s Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.³

The American Legion supports this draft legislation as currently written.

Draft Legislation

To provide for the eligibility of members of the Armed Forces on terminal leave for the Department of Veterans Affairs high technology education program, and for other purposes

The Veterans Employment Through Technology Education Courses (VET TEC) is VA’s first program to help veterans acquire new skills to immediately enter the job market, but it is not the first program to do so in the federal government. That distinction was earned by the Department of Defense nearly six years ago when it established the now prolific SkillBridge program.

Under the SkillBridge program, separating servicemembers can be granted up to 180 days of permissive leave to focus solely on training full-time with approved industry partners after their Field Grade commander provides written authorization and approval. These industry partners offer

³ American Legion Resolution No. 318 (2016): [*Ensuring the Quality of Servicemember and Veteran Student’s Education at Institutions of Higher Education*](#)

real-world training and work experience in in-demand fields of work while having the opportunity to evaluate the servicemember's suitability for the work.

Like the VET TEC program, these industry partners must meet a simple but challenging employment requirement to maintain eligibility: achieve an 85% program graduation rate, and report 90% of program graduates receive job offers. Even with this high benchmark, SkillBridge participation has grown to over 2,000 servicemembers in FY 2017.⁴

With the shared outcome of civilian employment, VET TEC providers should be empowered to take advantage of the SkillBridge and offer servicemembers the same eligibility to apply as veterans. This draft bill amends the VET TEC program to do exactly that by establishing eligibility to members of the Armed Forces.

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves veteran student's education opportunities.⁵

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To provide for an extended time frame for certain students to find employment following completion of Department of Veterans Affairs high technology education program, and for other purposes

The Veterans Employment Through Technology Education Courses (VET TEC) is an innovation of the Forever GI Bill that matches veterans with leading training providers to develop high-technology skills. Unlike the traditional oversight requirements of accreditation that higher education mandates, VET TEC training providers meet a simple eligibility requirement to be listed as a "preferred" institution: they must refund all tuition and fees if the veteran does not find meaningful employment within 180 days of completing the program.

The American Legion believes it is important for VA to address new forms of non-traditional learning as the realm of higher education evolves and is encouraged by the progress VA has made in scaling this five-year pilot. As with any first-generation program, several modifications and improvements have been identified since it first went live in April 2019.

This bill would amend the 180-day employment requirement for training provider participation to account for two exceptions: student veterans who move on to apprenticeships, and student veteran National Guard or reserve servicemembers who are mobilized following the conclusion of VET TEC training. In both cases, resetting the 180-day window to the conclusion of a veterans service

⁴ "Department of Defense Report: Credentialing Program Utilization", as requested on Page 150 of the Senate Report Accompanying S.1519, the National Defense Authorization Act for Fiscal Year 2018, Senate Report 115-125

⁵ American Legion Resolution No. 318 (2016): [*Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*](#)

requirement is a practical adjustment to ensure that quality training programs are not barred from participation.

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.⁶

The American Legion supports this draft legislation *as currently written*.

Draft Legislation - Class Evaluation Act

To amend title 38, United States Code, to provide for a requirement relating to the timing of the payment of educational assistance under the Post- 9/11 Educational Assistance Program of the Department of Veterans Affairs, and for other purposes

This bill is an attempt to ensure overpayments, which often result in hardships for veterans and their families, will be reduced. This bill mandates that School Certifying Officials cannot certify enrollment earlier than 7 days after the beginning of the term, which is often at or after the drop/add date at institutions.

The American Legion is concerned that this bill could have an adverse effect on housing allowance payments by delaying their payment to the veteran. Many institutions today use a “dual certification” system whereby they certify many of their veterans early with zero tuition and fees, which allows them to address the overpayment risk while ensuring that veterans receive their housing allowance in a timely fashion. It is important that this bill does not adversely impact timely payment of housing. We do agree that veterans should never be assessed a late fee in such circumstances beyond his or her control.

The American Legion does not support this draft legislation.

Draft Legislation

To amend title 38, United States Code, to clarify and expand eligibility for the Edith Nourse Rogers STEM Scholarship

A dual degree is when you study two, usually very different, fields at the same time and receive two separate degrees (one per discipline). The history of the dual degree program dates back 60 years as a strategy to attack the problem of balancing liberal and technical studies in order to provide a "useful purpose in the education of engineers so greatly needed in our national economy."⁷

⁶ American Legion Resolution No. 318 (2016): [Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education](#)

⁷ “The three-two plan of engineering education”, forward by Homer D. Babbidge, Jr (1961) <https://files.eric.ed.gov/fulltext/ED544086.pdf>

The Edith Nourse Rogers STEM Scholarship is a provision of the *Colmery Act, or Forever GI Bill*, that gives extra benefits to students training in the high-demand fields of Science, Technology, Engineering, and Math (STEM). Obtaining a degree in these areas may require more training than other fields. This provision of the Forever GI Bill aims to help cover that difference and give additional incentive for students who choose the careers our society needs most.

This draft bill would expand the Rogers STEM Scholarship program to include nursing residency programs and dual degree programs, and The American Legion believes the latter to be an important component to create sustainable STEM pathways for veterans.

This legislation is a common-sense proposal to expand the aperture of the Rogers STEM Scholarship and better equip our veterans to meet the needs of America's modern workforce.

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.⁸

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to improve the Edith Nourse Rogers STEM Scholarship program

In order to successfully compete on the global stage, America must develop innovative solutions to incentivize and promote involvement in STEM fields. The American Legion believes veterans are primed to meet this challenge, and we are proud to champion the inclusion of the Edith Nourse Rogers STEM Scholarship Program in the Forever GI Bill.

The Rogers STEM Scholarship provides up to nine months of additional Post-9/11 benefits to veterans and Fry Scholars pursuing undergraduate STEM degree or teaching certification. While this is a historic first step incentivizing veterans training in critical occupational fields, its limitation to undergraduate degrees and teaching certificates significantly subdues its effects. This is especially pronounced in healthcare fields that require not only master's degrees, but postgraduate training required to obtain specialization.

This draft bill would move the goal post by expanding eligibility of the Rogers STEM Scholarship to include individuals enrolled in these medical residency programs.

⁸ American Legion Resolution No. 318 (2016): [*Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*](#)

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.⁹

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to provide for the treatment by the Department of Veterans Affairs of for-profit educational institutions converted to non-profit educational institutions

The American Legion believes that all educational and training programs in all sectors of education should be held to a high standard of quality and administration. For the past several years, Congress has mandated that for-profit institutions receive a slightly higher degree of oversight and certainly veterans who have been unfairly targeted or been the victims of certain bad actors in this sector are examples of why this has been needed. Indeed, the precipitous failure of such for-profit institutions as ITT, Corinthian, and more recently, Argosy, justify taking additional steps to protect our veterans and their families. As such, for-profit schools have received additional oversight in years past.

The American Legion believes that even after these institution receive approval to operate as non-profit establishments, which is becoming a trend, they deserve increased oversight for an additional period of time. However, given the costs of that oversight and the other federal and state agencies, (accreditors, Department of Education, Internal Revenue Service, etc.), we recommend that VA (and SAAs) only be required to provide more rigorous oversight of newly approved converted non-profit institutions for a period not to exceed 5 years, rather than the 10 years included in the bill. After that time, SAAs possess the authority to require additional reasonable criteria, to include requiring an institution to meet the higher standards of CFR 22. 3676.

The American Legion supports this draft legislation *with the recommended change*.

Draft Legislation

To direct the Secretary of Veterans Affairs to provide electronic certificates of eligibility to persons who are entitled to educational assistance under certain educational assistance programs of the Department of Veterans Affairs

Certificates of eligibility (COEs) are critical to veterans and the educational institutions they attend. They provide documentary evidence of a veteran's right to participate in the GI Bill educational programs. Already, healthcare information and eligibility is digitally available to patients across the nation and digital access to COE's will not only inform veterans of their benefit

⁹ American Legion Resolution No. 318 (2016): [*Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*](#)

but encourage use of the same. Likewise, veterans can easily supply educational institutions, in which they enroll, a copy of the document, thus ensuring those institutions of their eligibility in the program and needed information, which will allow institutions to provide better advising to the veteran. We would also point out that the Secretary's VA Committee on Education listed this as their first recommendation in 2019. They stated:

“The Committee recognizes that gaining access to education benefits begins with the GI Bill Certificate of Eligibility (COE). The Committee recommends VA work with DOD to ensure every separating servicemember is provided with a COE upon retirement/separation. This recommendation will align with emerging VA policies, concerning the provision of Certificates of Eligibility to Institutions of Higher Learning by student-veterans, that are based on the Veterans Benefits and Transition Act of 2018 (Public Law 115-407) which was signed into law on December 31, 2018.”

Years after leaving service, many veterans often don't know if they have GI Bill eligibility or how much they have. With the implementation of the Forever GI Bill, providing digital access to a copy of the COE is critical. It will ensure the veteran is aware of the status of their GI Bill benefits, create a VA record that will be available for review whenever the veteran applies for benefits (no expiration date for many), and might help provide VA contact information for eligible Veterans to allow for ongoing communications.

Through *Resolution No. 318: Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*, The American Legion supports any legislative proposal that improves the Post-9/11 GI Bill.¹⁰

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to require the Secretary of Veterans Affairs to collect and include certain student outcome information in the GI Bill comparison tool of the Department of Veterans Affairs, and for other purposes

The GI Bill comparison tool has been a successful innovation that has been incredibly helpful to veterans in choosing the best institutions to meet their educational needs while simultaneously encouraging institutions to provide quality instruction and adequate resources to ensure veteran success. The American Legion offered input and consultation in helping VA develop the tool to make it as useful as possible to academic-minded veterans.

Information provided in the comparison tool includes veteran enrollment data, school participation in the Principles of Excellence program, graduation rates, and caution flags to warn veterans of information of which they should be aware. Though an excellent source of information, the tool is

¹⁰ American Legion Resolution No. 318 (2016): [*Ensuring the Quality of Servicemember and Veteran Student's Education at Institutions of Higher Education*](#)

not without its limitations, with the major one being that it provides little in the way of outcome data to allow veterans to make the best informed choice.

This bill will mandate that VA enter into a Memorandum of Understanding with the Department of Education and the Internal Revenue Service to ensure meaningful information regarding student outcomes at institutions with programs approved for the GI Bill will be available to student veterans. These outcomes will include such critical data as persistence rate, average number of years to complete a degree or certificate, average salary for graduates and graduation rate.

The American Legion supports this bill, as it is critical to enhancing the ability of veterans to choose the proper educational programs to ensure their success. We would suggest that VA make clear on the comparison tool website whether the information refers to the entire student population or veteran students only. Also, educational institutions should be able to freely review this information and provide their concerns as to accuracy and presentation to the Department of Veterans Affairs.

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to authorize the Secretary of Veterans Affairs to provide or assist in providing a second vehicle adapted for operation by disabled individuals to certain eligible persons

Currently, veterans with certain service-connected disabilities are eligible for one-time grants toward the purchase of an automobile or for financial assistance to purchase adaptive equipment for an existing automobile to make it safe or legal for the veteran's use.

Section 3903(a) of title 38 stipulates that "no eligible person shall be entitled to receive more than one automobile or other conveyance under the provisions of this chapter, and no payment shall be made under this chapter for the repair, maintenance, or replacement of an automobile or other conveyance. Additionally, Section 3903(a)(2) authorizes the Secretary of Veterans Affairs to provide or assist in providing an eligible person with a second automobile, or other conveyance in the event the vehicle or conveyance previously provided was destroyed as a result of a natural or other disaster, and through no fault of the eligible person.

This policy places grave limitations on certain families of disabled veterans whose economic situation places them at a disadvantage. The law does not account for the age of the vehicle, required modifications, and the effect of mechanical issues not caused by a natural disaster. Furthermore, the current law does not account for the time it would take to receive approval for and to purchase a replacement vehicle in the event of the one vehicle being destroyed.

The draft bill would allow VA to provide or assist in providing an eligible veteran with a second automobile or other conveyance if 10 years have elapsed since the date on which the veteran received the first such automobile, other conveyance, or relevant assistance.

American Legion Resolution No. 16: *Department of Veterans Affairs Automobile Allowance Program* (2017) calls on Congress to pass legislation to permit veterans to receive automobile allowance grants every 10 years from the original application for the benefit or when a medical professional provides documentation indicating certain adaptations or improvements in current adaptations are required.¹¹ This bill is in keeping with our resolution.

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to increase the frequency of benefits under the automobile assistance program of the Department of Veterans Affairs

Currently, veterans with certain service-connected disabilities are eligible for one-time grants toward the purchase of an automobile, or for financial assistance to purchase adaptive equipment for an existing automobile, to make it safe or legal for the veteran's use.

However, veterans may live in excess of a half century beyond the initial receipt of the automobile allowance grant, and would likely be required to purchase numerous vehicles during their lifetime. In addition, the veteran's service-connected conditions may increase in severity, requiring additional adaptations to vehicles.

American Legion Resolution No. 16: *Department of Veterans Affairs Automobile Allowance Program* (2017) calls on Congress to pass legislation to permit veterans to receive automobile allowance grants every 10 years from the original application for the benefit or when a medical professional provides documentation indicating certain adaptations or improvements in current adaptations are required.¹² This bill is also in keeping with our resolution.

The American Legion supports this draft legislation *as currently written*.

Draft Legislation

To amend title 38, United States Code, to reduce the loan fees paid by certain veterans who have been affected by major disasters and are obtaining a new loan guaranteed, insured, or made by the Secretary of Veterans Affairs, and for other purposes

According to a Congressional Research Report (CRS), "The Department of Veterans Affairs (VA) has assisted veterans with homeownership since 1944, when Congress enacted the loan guaranty program to help veterans returning from World War II purchase homes. The loan guaranty program

¹¹ American Legion Resolution No. 16 (2017): [Department of Veterans Affairs Automobile Allowance Program](#)

¹² American Legion Resolution No. 16 (2017): [Department of Veterans Affairs Automobile Allowance Program](#)

assists veterans by insuring mortgages made by private lenders, and is available for the purchase or construction of homes as well as to refinance existing loans.”¹³

The costs of VA direct and loan guaranty programs are supported, in part, by fees paid by the borrowers. The amount of a borrower’s fee is based on several factors, one of which is whether the borrower is accessing the guaranty for the first time or entering into a subsequent loan. Fees on initial loans are less than on subsequent loans.¹⁴

This draft bill would allow veterans living in major disaster areas (as declared by the President) to secure another property when it has been destroyed through natural disaster, using VA home loan program as if it were an initial loan rather than a subsequent loan.

Natural disasters are extremely challenging for the people directly affected. Allowing veterans the ability to rebuild their lives, in part, by availing themselves of VA home loan program at the lowest possible cost, is an important way Congress can help them to eventually recover and go on to rebuild their quality of life.¹⁵

On a concluding note, however, The American Legion reiterates its long held opposition to VA home loan funding fees.¹⁶ The aforementioned CRS report provides a short history of the matter:

“Veterans were not always charged fees as part of the loan guaranty transaction and, in general, fees were not required prior to 1982. When the loan guaranty program was created, it was considered a benefit or entitlement for veterans. However, in 1982, VA administrator wrote a letter to the Speaker of the House, together with draft legislation, suggesting that VA require veterans to pay a 0.5% fee on the principal balance of each loan. The letter expressed concern regarding the “costs to the taxpayers of operating the program,” and noted that “paying claims on the approximately 3.7 percent of the loans resulting in foreclosure are significant.” Despite objections from veterans groups, Congress instituted the fee as part of the Omnibus Budget Reconciliation Act of 1982 (P.L. 97-253). The fee was to be in effect for transactions entered into from FY1983 through FY1985, with an exemption for veterans with service-connected disabilities. Congress continued the fee beyond FY1985, and after the fee was raised to 1% as part of the Deficit Reduction Act of 1984 (P.L. 98-369), Congress began to institute the more complicated fee schedule that exists today, with fees varying based on amount of down payment and whether the veteran received a loan guaranty or direct loan.”¹⁷

Funding fees collected each year virtually always exceed the costs of operating the program with the excess monies used to pay for other federal government programs and expenses. The latest examples of one or more houses of Congress passing bills “temporarily” raising the fees that

¹³ Libby Perl (2018) *VA Housing: Guaranteed Loans, Direct Loans, and Specially Adapted Housing Grants* (CRS Report No. R42504). Retrieved from: <https://fas.org/sgp/crs/misc/R42504.pdf>

¹⁴ Ibid (page 27)

¹⁵ American Legion Resolution No. 377: [Support for Veteran Quality of Life](#)

¹⁶ American Legion Resolution No. 314: [Support Elimination of the VA Home Loan Funding Fee](#)

¹⁷ Libby Perl (2018) *VA Housing: Guaranteed Loans, Direct Loans, and Specially Adapted Housing Grants* (CRS Report No. R42504). Pages 27-28. Retrieved from: <https://fas.org/sgp/crs/misc/R42504.pdf>

veterans pay for home loans in order to fund other veterans benefits are The Blue Water Navy Vietnam Veterans Act and the Ryan Kules Specially Adaptive Housing Improvement Act.¹⁸ This is an abhorrent practice that needs to stop.

The American Legion supports this draft legislation *as currently written*.

CONCLUSION

Chairman Levin, Ranking Member Bilirakis, and distinguished members of the subcommittee, The American Legion thanks you for your leadership and for allowing us the opportunity to explain the position of our nearly two million members. Questions concerning this testimony can be directed to Mr. Jeffrey Steele, Senior Legislative Associate, in The American Legion's Legislative Division at (202) 861-2700, or jsteele@legion.org.

¹⁸ Katy O'Donnell. [Congress sparks veterans' ire with mortgage fee hike](#). Politico. October 10, 2019.