

GAO

Report to the Ranking Member,
Subcommittee on Military Personnel,
Committee on Armed Services, House
of Representatives

February 2011

VA EDUCATION BENEFITS

Actions Taken, but Outreach and Oversight Could Be Improved



G A O

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Highlights of [GAO-11-256](#), a report to the Ranking Member, Subcommittee on Military Personnel, Committee on Armed Services, House of Representatives

Why GAO Did This Study

The U.S. Department of Veterans Affairs (VA) provided \$9 billion in education benefits to servicemembers and veterans in fiscal year 2010, mostly through the new Post-9/11 GI Bill. In providing education benefits, VA relies on State Approving Agencies (SAA) to approve schools; and on schools to report students' enrollment status. GAO was asked to determine: (1) what is known about the effectiveness of outreach to and support for individuals applying for VA education benefits, particularly those with disabilities; (2) the role of school officials and challenges they face in their role; and (3) how VA monitors and oversees states' and schools' implementation of these benefits. GAO reviewed VA reports and plans, conducted a nationally representative survey of school officials, interviewed VA and state officials in four states, and reviewed recent statutory changes to the Post-9/11 GI Bill.

What GAO Recommends

GAO recommends that VA establish outcome-oriented performance measures for outreach and support activities; improve communication with school officials; and undertake a systematic review of its oversight of SAAs and schools. VA concurred with four recommendations and concurred in principle with one recommendation aimed at strengthening oversight. VA noted a number of actions already taken in this area. GAO encourages VA to address all aspects of this recommendation moving forward.

View [GAO-11-256](#) or [key components](#). For more information, contact Daniel Bertoni at (202) 512-7215 or bertonid@gao.gov.

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What GAO Found

VA has various activities to reach out to and support individuals who are eligible for education benefits. For example, VA reaches eligible servicemembers through military separation briefings and has sponsored national marketing campaigns for the new Post-9/11 GI Bill. General awareness of VA education benefits among servicemembers and veterans is high, according to program stakeholders. In fiscal year 2010, more than 700,000 individuals were served by these programs. However, stakeholders also identified some limitations with VA's outreach and support. For instance, veterans' service organizations and school officials stated that some servicemembers and veterans may have difficulty determining which of VA's various programs may be right for them. In addition, VA primarily targets its outreach and support for its education benefits to the general population of servicemembers and veterans, not necessarily those with disabilities, because eligibility is based on length of military service and not disability status. Finally, little is known about the effectiveness of VA's outreach and support because VA has not established performance measures for these activities.

School certifying officials' core responsibilities—primarily certifying student enrollment to VA and reporting enrollment changes—have become more complex under the Post-9/11 GI Bill, and officials identified challenges such as obtaining timely, comprehensive policy guidance and training from VA. For example, school officials must determine the tuition and fees that the Post-9/11 GI Bill will cover, which varies based on the length of active-duty military service and other factors. In our survey, school officials reported performing roles beyond those specifically required by VA, such as helping students apply for benefits. Although the majority of school officials were generally satisfied with VA's implementation of the Post-9/11 GI Bill, they cited a range of challenges, such as the lack of a Post-9/11 GI Bill policy manual. In addition, although VA provides training through conferences and its Web site, many officials did not participate due to other job responsibilities, travel costs, and lack of awareness about training opportunities.

VA lacks comprehensive information on the effectiveness of its oversight of SAAs and schools. VA monitors SAAs, in part, by reviewing reports on the number of approved schools and completed site visits, but this approach has limitations. For example, VA has not set minimum standards for SAAs' reviews of student files during their site visits to schools and, therefore, lacks assurance that data collected from these file reviews are valid and comparable. Also, VA has not completed its own required school audits in recent years. Most recently, VA suspended its audits during fiscal year 2010 in order to reassign compliance staff to help process a backlog of Post-9/11 GI Bill claims. Although VA has resumed its audits, there are indications that it may not be able to complete all required audits in fiscal year 2011. Moreover, VA does not compile and review findings from its own or other entities' audits of schools that would, going forward, allow it to identify trends and better target its oversight of schools.

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Abbreviations

DTAP	Disabled Transition Assistance Program
Education	U.S. Department of Education
MGIB-AD	Montgomery GI Bill-Active Duty
MGIB-SR	Montgomery GI Bill-Selected Reserve
NCES	National Center for Education Statistics
Post-9/11 GI Bill	Post-9/11 Veterans Educational Assistance Act of 2008
REAP	Reserve Educational Assistance Program
SAA	State Approving Agency
TAP	Transition Assistance Program
VA	U.S. Department of Veterans Affairs
VR&E	Vocational Rehabilitation and Employment
WEAMS	Web Enabled Approval Management System

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G A O

Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

February 28, 2011

The Honorable Susan A. Davis
Ranking Member
Subcommittee on Military Personnel
Committee on Armed Services
House of Representatives

Dear Ms. Davis:

The U.S. Department of Veterans Affairs (VA) provided more than \$9 billion in education benefits to help more than 700,000 servicemembers and veterans pursue higher education or training in fiscal year 2010.¹ A significant portion of those funds were distributed through the Post-9/11 Veterans Educational Assistance Act of 2008 (Post-9/11 GI Bill),² which began offering benefits in August 2009 and increased education benefits for many individuals who served on active duty after September 10, 2001. The Post-9/11 GI Bill program added complexity to VA's education claims process because the benefits are highly individualized and based on factors such as length of service and the location of the school a servicemember or veteran is attending. The claims process also requires accurate and timely information from state agencies, known as State Approving Agencies (SAA), and institutions of higher learning (schools).³ In the first semester that Post-9/11 GI Bill benefits were available, servicemembers and veterans filed hundreds of thousands of claims, and

¹According to VA's 2010 Performance and Accountability Report, the \$9 billion includes benefits for more than 77,000 participants in the Vocational Rehabilitation and Employment program.

²Pub. L. No. 110-252, tit. V, 122 Stat. 2323, 2357-87 (to be codified at 10 U.S.C. §§ 16132a and 16163a, and 38 U.S.C. §§ 3015, 3020, 3301-3324, and 3674).

³The law defines an "institution of higher learning" as an institution offering postsecondary level academic instruction that leads to an associate or higher degree if the school is empowered by the appropriate state education authority under state law to grant an associate or higher degree, or in the absence of a state education authority if the school is accredited for degree programs by a recognized accreditor. 38 U.S.C. §§ 3313(b) and 3452(f). Institutions of higher learning can also be hospitals offering educational programs at the postsecondary level and recognized foreign educational institutions that offer courses leading to a standard college degree, or the equivalent. For the purposes of this report, we refer to institutions of higher learning as "schools." SAAs are state agencies that are responsible for reviewing and approving schools for participation in VA education benefit programs.

VA faced challenges processing these and its other education claims in a timely manner. In December 2009, for example, VA reported it took an average of 60 days to process an education claim, compared to its target of 24 days.

VA currently has four active education benefit programs for servicemembers and veterans, and individuals may be eligible for more than one of these programs.⁴ Some have raised questions about whether individuals fully understand the range of benefit options and whether they need assistance in determining the program that best fits their needs. Moreover, servicemembers and veterans with disabilities, such as those with post-traumatic stress disorder and traumatic brain injury, may have greater difficulty understanding and applying for VA education benefits. Individuals with disabilities also can receive education benefits under VA's Vocational Rehabilitation and Employment (VR&E) program.⁵ However, if they elect to receive Post-9/11 GI Bill benefits, they are ineligible for the case management, individualized counseling support, and other benefits that the VR&E program offers.

To obtain information on VA's implementation of these education benefit programs, you asked us to examine (1) what is known about the effectiveness of VA's outreach to and support for individuals applying for education benefits, particularly for servicemembers and veterans with disabilities, such as post-traumatic stress disorder and traumatic brain injury; (2) the role of school officials and the challenges they face in fulfilling their responsibilities for VA's education benefit programs; and (3) how VA monitors and oversees states' and schools' implementation of its education benefit programs. While our scope included VA's four active

⁴These programs include the Post-9/11 GI Bill, the Montgomery GI Bill-Active Duty, the Montgomery GI Bill-Selected Reserve, and the Reserve Educational Assistance Program. Although potentially eligible for multiple programs, individuals cannot receive benefits from more than one VA education program at the same time. 38 U.S.C. § 3322. VA also has two other programs: (1) the Survivors' and Dependents' Educational Assistance Program, which provides benefits to the spouse and children of servicemembers who, as a result of service, are seriously disabled, die, or are detained (38 U.S.C. §§ 3500-3566), and (2) the Marine Gunnery Sergeant John David Fry Scholarship, which provides Post-9/11 GI Bill benefits for children of servicemembers who die in the line of duty on or after Sept. 11, 2001 (Act of June 24, 2009, Pub. L. No. 111-32, § 1002, 123 Stat. 1859, 1889-90) (to be codified at 38 U.S.C. § 3311(b)(9) and (f)). However, we did not include these programs within the scope of this review.

⁵38 U.S.C. § 3104(a)(2).

education benefit programs, we had a particular focus on the Post-9/11 GI Bill, as it is the newest and most complex.

To address these objectives, we reviewed relevant federal laws, regulations, and other agency documents and conducted interviews with VA officials and key program stakeholders, including veterans service organizations and national organizations representing SAAs and school officials. For our first objective, we assessed VA's performance objectives and measures related to outreach and support for servicemembers and veterans against requirements of the Government Performance and Results Act of 1993,⁶ and key attributes for performance measures we developed in prior work.⁷ We also conducted two discussion groups with VA education beneficiaries enrolled in schools in Oklahoma and Virginia.⁸ For our second objective, we conducted a nationally representative web-based survey of school certifying officials—school employees who are responsible for verifying student enrollment for VA—in the 50 states and the District of Columbia. We drew a simple random sample of 273 certifying officials from VA's public Web Enabled Approval Management System (WEAMS) database of 6,403 active facilities,⁹ as of August 2010. We received a response rate of 71 percent.¹⁰ We assessed VA's coordination with these officials using government internal control standards for coordinating with external parties that have a significant impact on agency goals. For our third objective, we reviewed VA reports and data that offered a national perspective on VA's monitoring and oversight of SAAs and schools. We also examined VA's oversight activities in four states: California, Georgia, Kentucky, and Massachusetts. We selected these states—one in each of VA's four regions for processing education benefits—for reasons such as variation in the number of schools and students within a state that have been approved to participate in VA education benefit programs and program expenditures. In these

⁶Pub. L. No. 103-62, 107 Stat. 285.

⁷See GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

⁸We selected these schools because they represented different types of schools (2-year community college and 4-year public university, respectively) with relatively high veteran populations.

⁹"Facility" refers to a school or one of its campuses or units, such as a medical school.

¹⁰All estimates from our survey have a margin of error of plus or minus 7 percentage points, unless otherwise noted, at the 95 percent confidence level.

states, we interviewed relevant VA and state officials and reviewed the most recent audit and site visit reports from VA and SAAs for randomly selected schools.¹¹ We compared VA's policies and procedures to government internal control standards.¹² We assessed the reliability of VA's data on its toll-free hotline performance measures and active facilities by reviewing existing information about the data and the systems that produced them and interviewing knowledgeable agency officials. We determined that the data on performance measures were sufficiently reliable for the purposes of this report. We determined that the data on active facilities were not sufficiently reliable for our purposes, primarily due to missing data on school certifying officials, and we conducted additional work—including performing Internet searches and making telephone calls to schools to gather contact information for school certifying officials—to overcome this limitation. See appendix I for a more detailed description of our objectives, scope, and methodology.

We conducted this performance audit from February 2010 to February 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

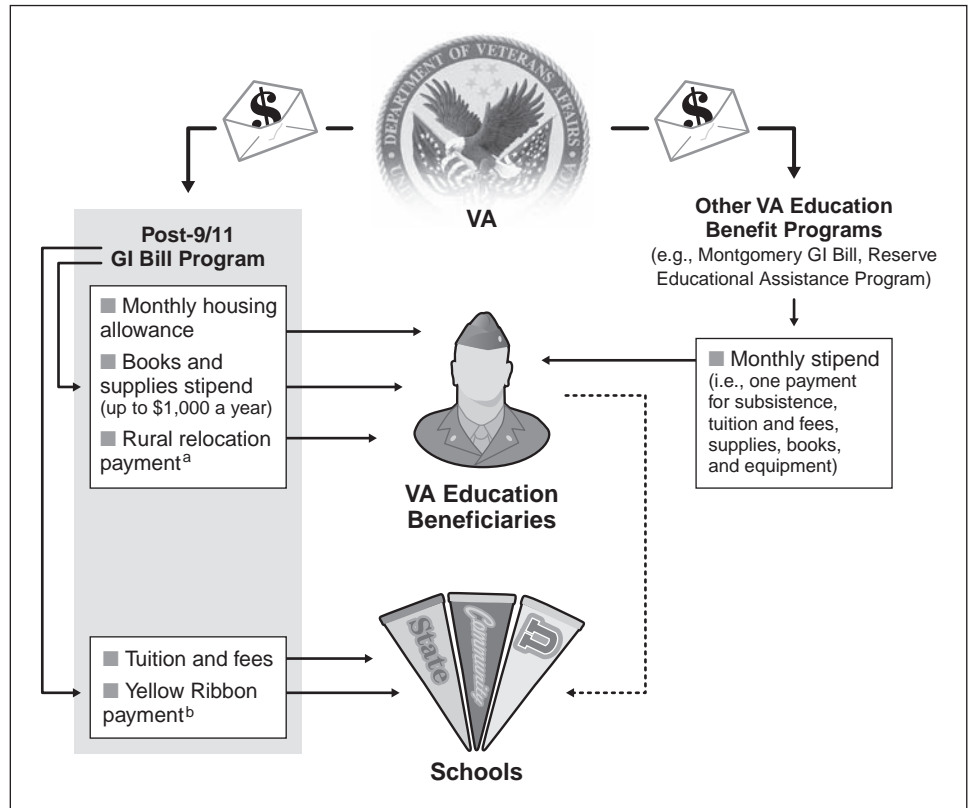
Background

On June 30, 2008, the Post-9/11 Veterans Educational Assistance Act of 2008, which established the new Post-9/11 GI Bill program, was signed by the President. The Post-9/11 GI Bill program adopted a new way for VA to deliver education benefits. Whereas VA's other education benefit programs provide a single, standard monthly payment directly to students enrolled in school, the Post-9/11 GI Bill requires VA to send multiple payments to both students and schools (see fig. 1).

¹¹We used VA data to randomly select 12 schools for each state: 2 public, 2 private nonprofit, and 2 private for-profit schools in each of the following two categories: (1) 2-year community or junior colleges and (2) colleges and universities offering 4-year degrees and graduate degrees. In Kentucky, we selected 10 schools because this state does not have any private, nonprofit 2-year community or junior colleges that are approved to receive VA's education benefits.

¹²GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

Figure 1: Types of Payments under the Post-9/11 GI Bill in Comparison to VA's Other Education Benefit Programs



Source: GAO analysis of VA documents.

^aVA provides a rural relocation payment to individuals who reside in a rural county and must relocate a distance of at least 500 miles, or an individual who must travel by air to attend school. 38 U.S.C. § 3318. These individuals are entitled to a single payment of up to \$500.

^bThrough the Yellow Ribbon G.I. Education Enhancement Program, which is part of the Post-9/11 GI Bill, schools enter into agreements with VA to pay a portion of the tuition and fees that exceed an individual's Post-9/11 GI Bill benefit. 38 U.S.C. § 3317. VA matches the schools' contribution. In order to be eligible for the Yellow Ribbon program, individuals must be eligible for the maximum Post-9/11 GI Bill benefit. That is, after September 10, 2001, they generally must have 36 months of active-duty service or 30 continuous days of active-duty service and discharged from active duty for a service-connected disability. 38 U.S.C. §§ 3311(b)(1) and (2), 3313(c)(1), and 3317(a).

Post-9/11 GI Bill benefits are based, in part, on an individual's length of active-duty service.¹³ In order to be eligible for the Post-9/11 GI Bill, individuals generally must have served at least 90 days on active duty after

¹³38 U.S.C. §§ 3311 and 3313.

September 10, 2001. However, in order to be eligible for the maximum benefits payable, individuals must have at least 36 months of aggregate active-duty service (see table 1). Those with less than 36 months of service receive a percentage of the maximum benefit payable. For example, if a veteran had 25 months of active-duty service, he or she would be eligible for 80 percent of the maximum allowable tuition and fee, housing, and book payments. In addition, in order to be eligible for the housing allowance, individuals must be enrolled in school more than half-time and taking at least one course on campus.¹⁴ Active-duty servicemembers are not eligible for the housing allowance or the books and supplies stipend.¹⁵

Table 1: Percentage of Maximum Post-9/11 GI Bill Benefits Based on Length of Active-Duty Service

Length of aggregate active-duty service after September 10, 2001	Percentage of maximum benefit payable
At least 36 months or at least 30 continuous days on active duty and discharged with service-connected disability	100%
At least 30 but less than 36 months	90%
At least 24 but less than 30 months	80%
At least 18 but less than 24 months	70%
At least 12 but less than 18 months	60%
At least 6 but less than 12 months	50%
At least 90 days but less than 6 months	40%

Source: 38 U.S.C. §§ 3311 and 3313.

The Post-9/11 GI Bill covers up to the full cost of tuition and fees for a program of education at any public school. However, these costs cannot exceed the highest undergraduate tuition and fee rates charged to in-state

¹⁴Under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, individuals pursuing distance learning half-time or more will be eligible for a portion of the housing allowance. Pub. L. No. 111-377, § 102(b), 124 Stat. 4109-10 (2011) (to be codified at 38 U.S.C. § 3313(c)(1)(B)). See appendix II.

¹⁵Under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, individuals on active duty pursuing a program of education more than half-time will be eligible for a books and supplies stipend. § 103(a)(2)(E), 124 Stat. 4111 (2011) (to be codified at 38 U.S.C. § 3313(e)(2)(B)). See appendix II.

residents by public schools in each state.¹⁶ The maximum tuition and fee rates, calculated separately for each state by its SAA, vary widely. Among states, the highest tuition rate for the 2010-2011 school year is \$1,549 per credit hour in Texas, while the lowest is \$99 per credit hour in Wyoming. The highest fee rate is \$85,255¹⁷ per term in Utah, while the lowest is \$310 in Washington, D.C. Veterans attending private schools or graduate programs may receive additional benefits to cover costs that exceed this amount, through VA's Yellow Ribbon program.¹⁸

Whereas the Post-9/11 GI Bill covers only education or training programs offered by institutions of higher learning, servicemembers and veterans can use VA's other education benefits to obtain education or training offered through non-college degree, certificate, on-the-job training, apprenticeship programs, flight, and other programs.¹⁹

In addition to the Post-9/11 GI Bill, VA has three other education benefit programs for servicemembers and veterans (see app. III for a description of these programs):

¹⁶By regulation, "fees" are defined as any mandatory charges (other than tuition, room, and board) that are applied by the institution of higher learning for pursuit of an approved program of education. 38 C.F.R. § 21.9505 (2009). Fees include, but are not limited to, health premiums, freshman fees, graduation fees, and lab fees. Fees do not include those charged for a study abroad course(s) unless the course(s) is a mandatory requirement for completion of the approved program of education. The Post-9/11 Veterans Educational Assistance Improvements Act of 2010 will eliminate the state maximum tuition and fee rates, and cap the tuition and fee benefits for private and foreign schools at \$17,500 per year. § 102(a)(1), 124 Stat. 4108-09 (to be codified at 38 U.S.C. § 3313(c)(1)). See appendix II.

¹⁷According to VA, all undergraduate program costs were taken into consideration to determine the highest in-state maximum tuition per credit hour and the maximum fees per term. As a result, the calculation of these rates may include the tuition for high cost programs, such as flight courses taken as part of a degree requirement or undergraduate pharmacy, nursing, and engineering charges.

¹⁸Through the Yellow Ribbon G.I. Education Enhancement Program, which is part of the Post-9/11 GI Bill, schools enter into agreements with VA to pay a portion of the tuition and fees that exceed an individual's Post-9/11 GI Bill benefit. 38 U.S.C. § 3317. VA matches the schools' contribution.

¹⁹38 U.S.C. §§ 3002, 3034(d), 3241(b), and 3491. Non-college degree programs and flight schools may be eligible for Post-9/11 GI Bill benefits if they are offered at an institution of higher learning. The Post-9/11 Veterans Educational Assistance Improvements Act of 2010 will allow individuals receiving Post-9/11 GI Bill benefits to pursue non-degree granting programs including resident training, distance learning, apprenticeships or other on-the-job training, flight training or correspondence training. § 105(b), 124 Stat. 4113-17 (to be codified at 38 U.S.C. § 3313(g)). See appendix II.

-
- Montgomery GI Bill-Active Duty;²⁰
 - Montgomery GI Bill-Selected Reserve;²¹ and
 - Reserve Educational Assistance Program.²²

Eligible individuals can receive up to 36 months of benefits under any one of VA's education programs.²³ However, one difference between the programs is that individuals under the Post-9/11 GI Bill have up to 15 years after they separate from the military to use the benefit.²⁴ VA's other education programs generally have a 10-year window to use benefits.²⁵ The Post-9/11 GI Bill also uniquely allows eligible servicemembers to transfer their benefits to a spouse or dependents.²⁶ In order to do so, servicemembers generally must commit an additional 4 years of military service.²⁷ Post-9/11 GI Bill benefits cannot be transferred to a dependent after separation from the military. Finally, in order to receive benefits

²⁰Veterans' Educational Assistance Act of 1984, Pub. L. No. 98-525, § 702, 98 Stat. 2492, 2553-63, (codified as amended at 38 U.S.C. §§ 3001-3036). The New GI Bill Continuation Act renamed the Veterans' Educational Assistance Act of 1984 the Montgomery GI Bill Act of 1984. Pub. L. No. 100-48, §2, 101 Stat. 331, 331. (1987) (codified at 38 U.S.C. § 101 note).

²¹Veterans' Educational Assistance Act of 1984, Pub. L. No. 98-525, § 705, 2492, 2564-67 (codified as amended at 10 U.S.C. §§ 16131-16137). The New GI Bill Continuation Act renamed the Veterans' Educational Assistance Act of 1984 the Montgomery GI Bill Act of 1984. Pub. L. No. 100-48, §2, 101 Stat. 331, 331 (1987) codified at 38 U.S.C. § 101 note).

²²Ronald W. Reagan National Defense Authorization Act for Fiscal Year 2005, Pub. L. No. 108-375, § 527(a), 118 Stat. 1811, 1890-94 (2004) (codified as amended at 10 U.S.C. 16161-16166).

²³10 U.S.C. §§ 16131(c)(2) and 16162(d)(1), and § 38 U.S.C. §§ 3013(e) and 3312. Servicemembers and veterans can combine benefits with other VA education benefits and receive up to 48 months of education benefits, but benefits cannot be received concurrently, and the eligibility periods cannot overlap. 38 U.S.C. § 3694.

²⁴38 U.S.C. § 3321(a).

²⁵38 U.S.C. § 3031(a). One exception is the Montgomery GI Bill-Selected Reserve. Reservists must generally use this benefit while still serving in the reserves, unless the separation is because of a disability. 10 U.S.C. § 16164.

²⁶38 U.S.C. § 3319. While the service branches are authorized to allow servicemembers in the Montgomery GI Bill-Active Duty, Montgomery GI Bill-Selected Reserve and the Reserve Educational Assistance Program to transfer benefits to dependents (38 U.S.C. § 3020), only the Army has offered such an option under the Montgomery GI Bill-Active Duty.

²⁷Servicemembers who have already served a 6-year commitment must agree to serve 4 additional years in the military to be able to transfer benefits. Servicemembers who have already served 10 years but are precluded from serving an additional 4 years can agree to serve the maximum additional years allowable.

under the Post-9/11 GI Bill, eligible individuals must make what is called an “irrevocable election” and relinquish their entitlement to any other VA education benefits.

On January 4, 2011, the president signed the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, which revises the Post-9/11 GI Bill program.²⁸ For example, the law expands the Post-9/11 GI Bill to cover non-degree granting programs, apprenticeships or other on-the-job training programs, flight training programs, and training by correspondence. The law also simplifies tuition and fee benefits by eliminating the state maximum tuition and fee rates and capping benefits at all private and foreign schools at \$17,500 per year. In addition, the law allows individuals enrolled exclusively online to receive a portion of the housing allowance, but also calculates the housing allowance for all beneficiaries based on their rate of pursuit (that is, the percentage of a full-time courseload). Many of these provisions are scheduled to take effect in the early fall of 2011. See appendix II for our overview of these changes.

Vocational Rehabilitation and Employment Benefits for Servicemembers and Veterans with Disabilities

Nearly 2 million servicemembers and veterans have served in military operations in either Afghanistan or Iraq since 2001, and some of these individuals may have disabilities incurred or aggravated due to their military service. In particular, post-traumatic stress disorder and traumatic brain injury are considered to be signature disabilities of these recent conflicts. Post-traumatic stress disorder can develop after military combat and exposure to the threat of death or serious injury.²⁹ Traumatic brain injury—an injury resulting from a blow or jolt to the head or a penetrating head injury that disrupts the normal function of the brain—is one of the most common wounds of the current military operations in Afghanistan and Iraq. The nature of these conflicts, especially the widespread use of improvised explosive devices, increases the likelihood that servicemembers will be exposed to incidents that can cause a traumatic brain injury.

²⁸Pub. L. No. 111-377, 124 Stat. 4106 (2011).

²⁹Post-traumatic stress disorder symptoms can be debilitating and include insomnia; intense anxiety; and difficulty coping with work, social, and family relationships. Symptoms may appear within months of the traumatic event or be delayed for years. Left untreated, post-traumatic stress disorder can lead to substance abuse, severe depression, and suicide.

We have previously found that veterans with disabilities are an emerging population in higher education, in part due to the enactment of the Post-9/11 GI Bill.³⁰ While some servicemembers and veterans with disabilities may be attending school using the Post-9/11 GI Bill or other VA education benefits, others may choose to attend school using benefits through VA's Vocational Rehabilitation and Employment (VR&E) program.³¹ The focus of VR&E is to provide employment for veterans with disabilities, and we have reported in the past that the majority of program participants chose to pursue employment through longer-term education and training, instead of more immediate employment through VR&E's job placement or other services.³² The benefits that VR&E participants receive are similar to those offered by the Post-9/11 GI Bill, but there are some key differences. For example, while both programs offer an allowance for living or housing expenses, the Post-9/11 GI Bill allowance may be more generous, depending on where an individual is attending school and other factors. On the other hand, while the Post-9/11 GI Bill pays tuition and fees up to a certain rate, the VR&E program pays full tuition, fees, books, supplies, and other expenses for educational programs, including those at private schools. If individuals elect to receive Post-9/11 GI Bill benefits, they are ineligible for the case management, individualized counseling support, and other benefits that the VR&E program offers.³³

³⁰GAO, *Higher Education and Disability: Education Needs a Coordinated Approach to Improve Its Assistance to Schools in Supporting Students*, [GAO-10-33](#) (Washington, D.C.: Oct. 28, 2009).

³¹To receive VR&E services, veterans with disabilities generally must have a 20 percent disability rating from VA and an employment handicap. Veterans with a 10 percent disability rating may also be entitled to receive services if they have a serious employment handicap. In addition, injured servicemembers may be eligible for VR&E services before being discharged from the military if they request a "memorandum rating" from VA and have one or more service-connected disabilities that are 20 percent or higher. VR&E vocational rehabilitation counselors determine entitlement to services, which generally provides a 12-year period of eligibility and up to 48 months of benefits.

³²GAO, *VA Vocational Rehabilitation and Employment: Better Incentives, Workforce Planning, and Performance Reporting Could Improve Program*, [GAO-09-34](#) (Washington, D.C.: Jan. 26, 2009).

³³Under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, individuals receiving VR&E benefits will be permitted to elect to receive the Post-9/11 GI Bill housing allowance in lieu of the VR&E allowance. § 205, 124 Stat. 4126 (to be codified at 38 U.S.C. § 3108(b)(4)). See appendix II.

Implementation of VA Education Benefit Programs by VA, States, and Schools

Within VA's Veterans Benefits Administration, the Education Service division provides policy and program guidance for VA's education benefit programs. Staff in VA's four regional processing offices implement the programs, including making benefit decisions and conducting oversight of schools.

State agencies and schools play key roles in helping implement VA's education benefit programs (see fig. 2). Specifically, VA contracts with SAAs to determine whether schools and training programs offer education of sufficient quality. SAAs review and approve individual education and training programs at schools leading to a degree, certificate, or diploma.³⁴ SAAs are created or designated by the governor of each state and staffed by state employees but are federally funded and responsible for approving and supervising those programs consistent with federal requirements.³⁵ While SAAs are responsible for approving programs at schools for VA education benefits, other government agencies also oversee schools, such as the U.S. Department of Education (Education) for the purposes of federal student financial aid under Title IV of the Higher Education Act of 1965, as amended.³⁶ In addition, schools may be licensed by states and approved by regional and national accrediting agencies.

School employees, known as school certifying officials, are required to certify students' enrollment status to VA and inform the agency of any changes during the semester, maintain students' files, and make them available for inspection by VA and the SAA, among other responsibilities. All schools approved to receive VA's education benefits must have a school certifying official. VA pays schools \$7 annually for each student receiving these benefits to help defray the costs associated with fulfilling reporting requirements.³⁷

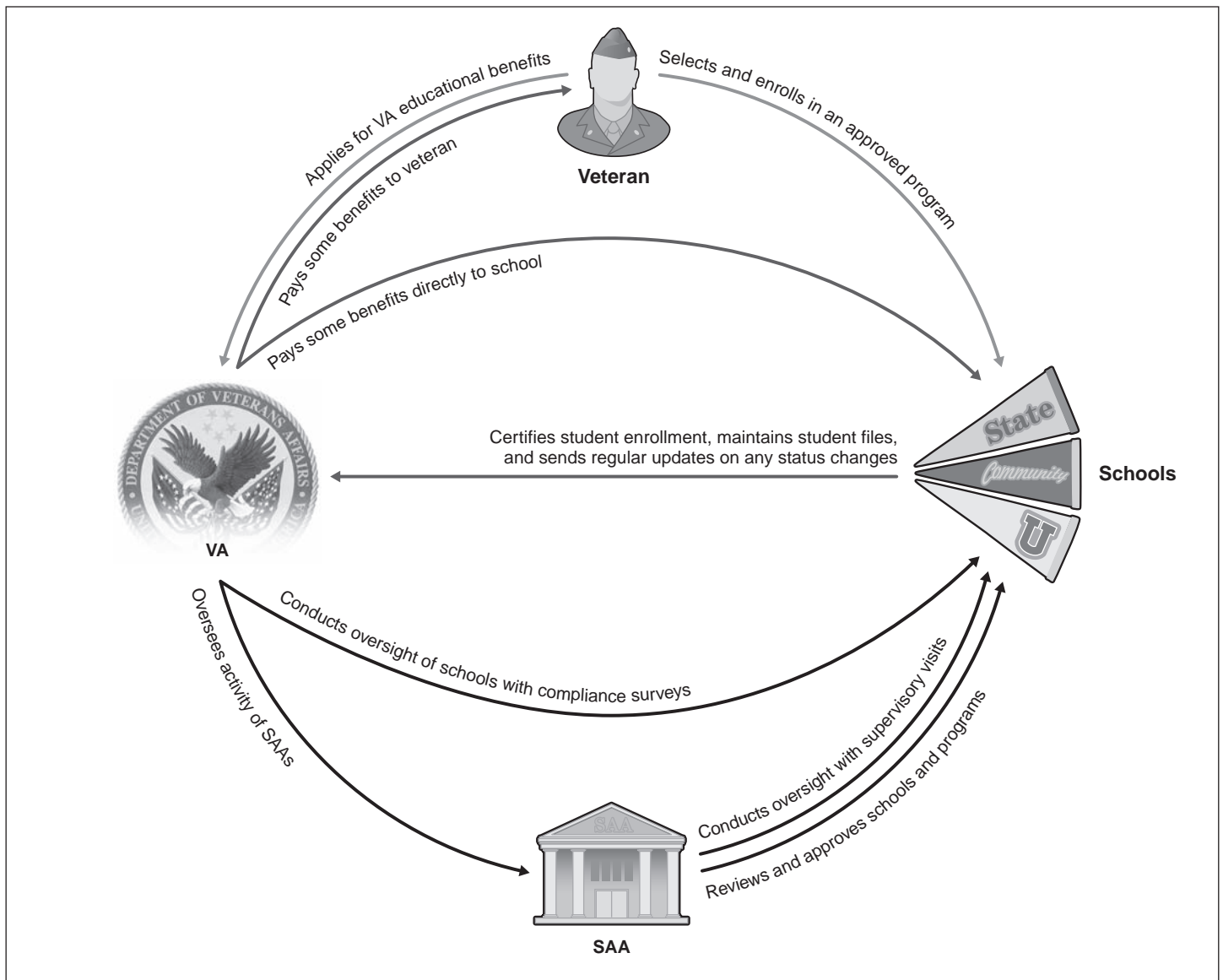
³⁴The Post-9/11 Veterans Educational Assistance Improvements Act of 2010 will limit SAAs' approval functions. § 203(a), 124 Stat. 4124-25 (to be codified at 38 U.S.C. § 38 U.S.C. § 3672(b)). Specifically, under the law, certain programs—such as those at schools that are accredited by agencies recognized by the Department of Education— will be deemed approved for VA education benefits. See appendix II.

³⁵38 U.S.C. §§ 3671-3679.

³⁶20 U.S.C. §§ 1001-1140d.

³⁷Under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, the fee will be increased from \$7 to \$12 per student. § 204(a), 124 Stat. 4126 (to be codified at 38 U.S.C. § 3684(c)). See appendix II.

Figure 2: Responsibilities of VA, SAAs, and Schools in Administering Education Benefits



Source: GAO analysis of VA documents.

VA Maintains Outreach and Support Activities but Does Not Assess Their Effectiveness

VA Has Various Activities to Reach Out to and Support Servicemembers and Veterans

VA has a variety of activities to reach out to and support servicemembers and veterans who may be eligible for education benefits. VA reaches out to eligible servicemembers by providing information at Transition Assistance Program (TAP) briefings offered at the time they separate from the military and has sponsored marketing campaigns for the new Post-9/11 GI Bill. VA's fiscal year 2010 campaign featured advertisements on Web sites like www.military.com, and magazines, such as Marine Corps Times, in addition to placing the Post-9/11 GI Bill logo and Web address on a NASCAR racecar.

VA provides support during the process of applying for education benefits by posting information on its Web site and through social media channels like Facebook, answering questions by phone and e-mail, and offering free educational and vocational counseling. For example, VA staff at the toll-free hotline, known as the Education Call Center, answer individuals' questions about benefits and can provide information on the status of their claims. VA's Web-based Right Now Web service provides similar services via secure e-mail. Educational and vocational counseling is provided by VA's VR&E program in VA's regional offices and is available to individuals who are eligible for VA education benefits, regardless of disability status. This counseling, which may include assessments of individuals' interests and aptitudes, is designed to help individuals select a career path and address any barriers to reaching educational or vocational goals. A senior VA official told us that the counseling does not typically include helping individuals determine which VA education benefit program to choose, if they are eligible for more than one. See table 2 for a summary of VA's current outreach and support activities for servicemembers and veterans who are eligible for education benefits. VA also is planning to provide

students with the ability to check the status of their education claim online and perform other self-service functions.³⁸

Table 2: VA Activities to Reach and Support Servicemembers and Veterans Applying for Education Benefits

Outreach activities	Support during the application process
Letters to servicemembers during the first 2 years of military service and upon separation	VA’s GI Bill Web site and social media portals like Facebook, Twitter, and YouTube
TAP briefings for active duty servicemembers at the time they separate and retire from the military	Telephone hotline for VA education benefits
National, regional, and local events for servicemembers and veterans	Right Now Web service
Advertising campaigns for the Post-9/11 GI Bill	Educational and vocational counseling for individuals eligible for VA education benefits
	Pamphlets and materials on VA education benefits

Source: GAO analysis of VA documents and information obtained through interviews with agency officials.

Program stakeholders—veterans service organizations, school officials, and students receiving VA education benefits—told us that VA has taken steps to enhance its outreach and support. For example, officials from veterans’ organizations and school officials said that VA’s new social media presence and marketing campaigns have helped reach younger servicemembers and veterans. In addition, stakeholders had positive feedback for a recent redesign of the GI Bill Web site that highlighted the three main steps in applying for Post-9/11 GI Bill benefits.

Program Stakeholders Identified Some Limitations in VA’s Outreach and Support

While program stakeholders told us that general awareness of VA education benefits among servicemembers and veterans was high, they also identified some limitations. For example, officials from veterans’ organizations told us that some individuals may have difficulty determining which VA education program may be right for them. Similarly, VA does not provide consumer information on various schools and programs, such as graduation rates or loan default rates, nor does it provide links on the GI Bill Web site to consumer-focused information

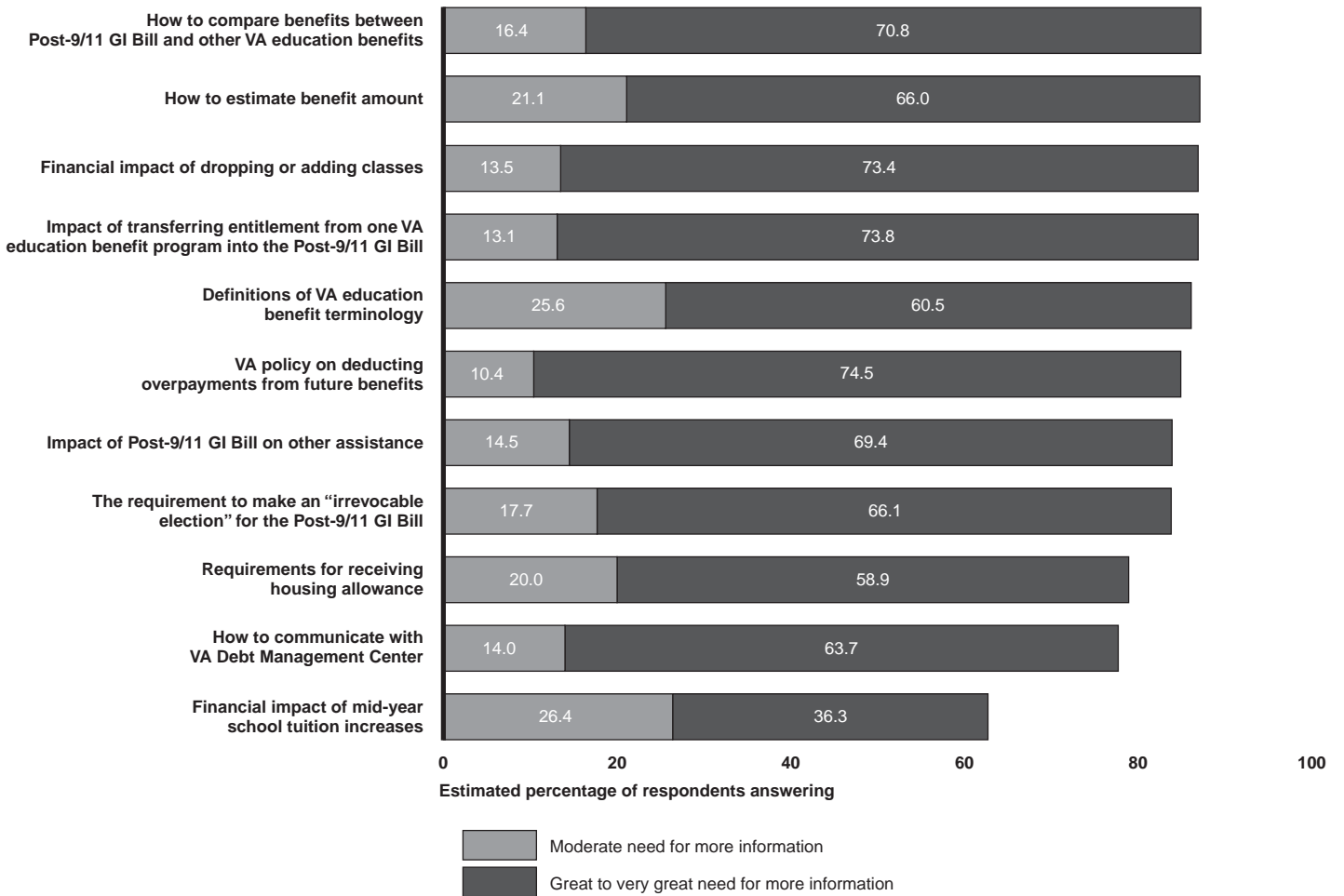
³⁸This capability was initially scheduled for December 2010. However, due to delays in implementing its long-term information technology solution for processing Post-9/11 GI Bill claims, VA reported that it will provide this functionality in a future release of the system or as a separate initiative. See GAO, *Information Technology: Veterans Affairs Can Further Improve Its Development Process for Its New Education Benefits System*, [GAO-11-115](#) (Washington, D.C.: Dec. 1, 2010).

generated by other entities. In contrast, Education's College Navigator Web site, launched in September 2007, aggregates information on student outcomes, including graduation and retention rates, loan default rates, as well as information on the costs of attendance and available scholarships.

Likewise, based on our survey, an estimated 74 percent of school certifying officials reported that servicemembers and veterans need more information on issues such as the impact of transferring from an existing VA education benefit program into the Post-9/11 GI Bill (see fig. 3).³⁹ School certifying officials and a veterans service organization official told us that making an informed choice is particularly important because the decision to use benefits under the Post-9/11 GI Bill is irrevocable. For instance, these stakeholders, as well as VA officials, told us that some students have transferred from the Montgomery GI Bill to the Post-9/11 GI Bill and, after doing so, realized that they would have had more months to use their benefits under the Montgomery GI Bill.

³⁹The 95 percent confidence interval for this estimate is (67.7, 80.0).

Figure 3: Aspects of the Post-9/11 GI Bill Where Servicemembers and Veterans Have a Moderate to Very Great Need for More Information, according to School Certifying Officials



Source: GAO survey of school certifying officials.

Note: All estimates in this figure have 95 percent confidence intervals of plus or minus 6.9 percentage points or less.

Several veterans service organization officials, students, and school officials also told us that TAP briefings are offered at a time when separating servicemembers may not be ready to hear about their education benefits. While some students we interviewed said the briefings were helpful, others told us that the slide presentation format was not effective and often provided too much information for them to readily digest. We reviewed the May 2010 version of the presentation, and about a third of the 247 slides in the presentation were dedicated to education benefits. VA

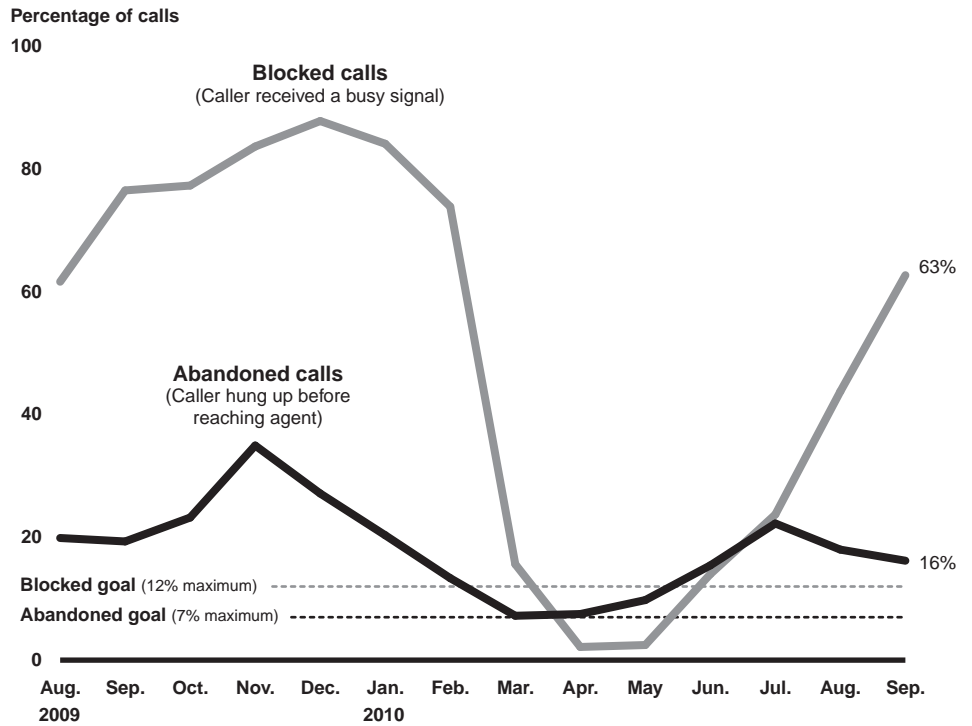
is in the process of redesigning TAP to make its presentation shorter and more effective in holding participants' attention.

Stakeholders also told us that servicemembers and veterans had difficulty getting through to VA staff at the toll-free hotline. Several of the students we interviewed said they waited a long time or had to call several times before speaking to a call center agent. Officials from a national association of school certifying officials, as well as nine officials in open-ended responses to our survey, also expressed concerns with long wait times. In addition, an official from this national association and 14 school officials in our survey also questioned the accuracy or consistency of information call center agents provide to students and schools. Our analysis of VA's toll-free hotline performance data from August 2009—the first month Post-9/11 GI Bill benefits were available—through the end of fiscal year 2010 showed that the average wait times for each month ranged from about 3 to 8 minutes. In addition, a high percentage of calls were blocked (received a busy signal) or abandoned (caller hung up before reaching a call center agent) during peak periods (see fig. 4). We found that the percentage of blocked calls was higher in months with high call volume—notably, in the months around the fall and spring enrollment periods. For example, in September 2010, there were 1.3 million calls placed to VA's toll-free hotline during business hours. Sixty-three percent of these calls were blocked, well in excess of VA's performance target of 12 percent.

To address high blocked-call rates, a VA official told us that the call center is planning to switch to a new phone system in fiscal year 2011 that has the capacity to handle more calls and offers more options, such as the ability for a caller to request an automated call-back from the system when he or she reaches the top of the queue. In addition, VA is beginning to track the average speed to answer calls,⁴⁰ as well as the proportion of abandoned calls that were terminated by the caller within 160 seconds, as the agency believes these calls were abandoned for reasons that were outside of the call center's control.

⁴⁰In comparison to the average wait time measure, the average speed to answer measure will not include calls that were abandoned.

Figure 4: VA's Education Call Center Monthly Performance Data, August 2009 – September 2010



Source: GAO analysis of performance data from VA's Education Call Center.

In addition, program stakeholders told us that awareness of VA's free educational and vocational counseling is very low. Most of the students and veterans service organization officials we interviewed were not aware that VA offered this service and an estimated 75 percent⁴¹ of school certifying officials we surveyed reported not being aware of VA's educational and vocational counseling. While the VR&E program conducts some outreach for this benefit among servicemembers and veterans with disabilities, VA education program officials told us they have not conducted much outreach to promote this service to the general population of eligible individuals beyond posting information on the GI Bill application and Web site.

⁴¹The 95 percent confidence interval for this estimate is (68.6, 80.7).

VA Targets Outreach and Support for Education Benefits to All Eligible Individuals, Not Necessarily to Those with Disabilities

Most of VA's outreach and support activities for education benefits are targeted to the general population of servicemembers and veterans, not necessarily to those with disabilities. VA education program and VR&E officials told us that the VR&E program conducts outreach to servicemembers and veterans with disabilities. Education program officials told us that they do not conduct targeted outreach to individuals with disabilities because eligibility for VA education benefits is based on length of military service, rather than disability status.⁴²

VR&E officials told us that they have a number of efforts to reach out to and support individuals with disabilities. For example, through the Coming Home to Work program, VR&E staff in VA's regional offices and in certain military treatment facilities work with servicemembers who are on medical hold or awaiting the medical board process to develop a plan for obtaining training and finding a job if they are unable to return to active duty. VR&E also offers Disabled Transition Assistance Program (DTAP) briefings, which are held in conjunction with TAP but focus solely on the VR&E program and educational and vocational counseling.⁴³ In addition to these outreach activities, VR&E counselors provide one-on-one support to individuals during the application process. For example, VR&E counselors usually meet face-to-face with individuals who are considering applying for VR&E benefits to explain the program. Counselors also may explain the difference between VR&E benefits and those available under VA's education benefit programs if an individual is eligible for both. For individuals who are found eligible for VR&E services, counselors also provide case management and support while they pursue education or training and look for employment. As mentioned previously, individuals who choose to receive benefits under the Post-9/11 GI Bill are not eligible for this case management and support.⁴⁴

VR&E has a new pilot program, called VetSuccess on Campus, currently operating at eight colleges and universities across the country. Through this program, VR&E counselors have offices on campus to provide vocational testing, career and academic counseling, and readjustment

⁴²Individuals with service-connected disabilities may be eligible for the maximum Post-9/11 GI Bill benefits with as few as 30 continuous days on active duty.

⁴³A VR&E official told us that, like TAP, DTAP is also being redesigned to be more effective.

⁴⁴However, under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, individuals receiving VR&E benefits may elect to receive the Post-9/11 GI Bill housing allowance in lieu of the VR&E allowance. See appendix II.

counseling services to support servicemembers and veterans. All servicemembers and veterans attending these schools are eligible for assistance, regardless of their disability status. According to a VR&E official, the VetSuccess on Campus office is designed to provide information and assistance on all benefits, including VR&E and VA education benefits. For example, if a student wants to apply for education benefits, the VR&E counselor can refer them to a point of contact within VA's education programs or walk them through the application process.

VA education program and VR&E officials told us that these two programs generally do not coordinate their outreach, but the agency has taken some steps in this area. VA education program officials told us they have coordinated with VR&E on policy and have provided some information, briefings, and training on VA education programs, but the two programs mostly conduct separate outreach efforts. For example, VA education program officials told us that they have provided information and materials to the VetSuccess on Campus program, but that has been the extent of their involvement with the program. However, in May 2010, VA established a new office—the Benefits Assistance Service. A Benefits Assistance Service official told us that, while the role of the office is still evolving, it is designed to provide guidance and coordination for outreach across veterans' benefit programs.⁴⁵

VA Has Few Efforts to Measure the Effectiveness of Outreach and Support Activities

Little is known about the effectiveness of VA's education outreach and support because VA currently does not have outcome-oriented performance measures for these activities. While VA has an agencywide performance objective to educate and empower veterans and their families through proactive outreach, the agency lacks specific performance measures to assess its efforts in relation to its education programs (see fig. 5). As required by law,⁴⁶ VA produces a biennial report on its outreach activities. However, this report is generally focused on the number and type of VA's education outreach activities rather than the results.⁴⁷ In addition, while VA's education program estimates the number of people who view or listen to a particular Post-9/11 GI Bill online, radio,

⁴⁵In fiscal year 2010, VA also established a National Outreach Office to coordinate outreach agencywide.

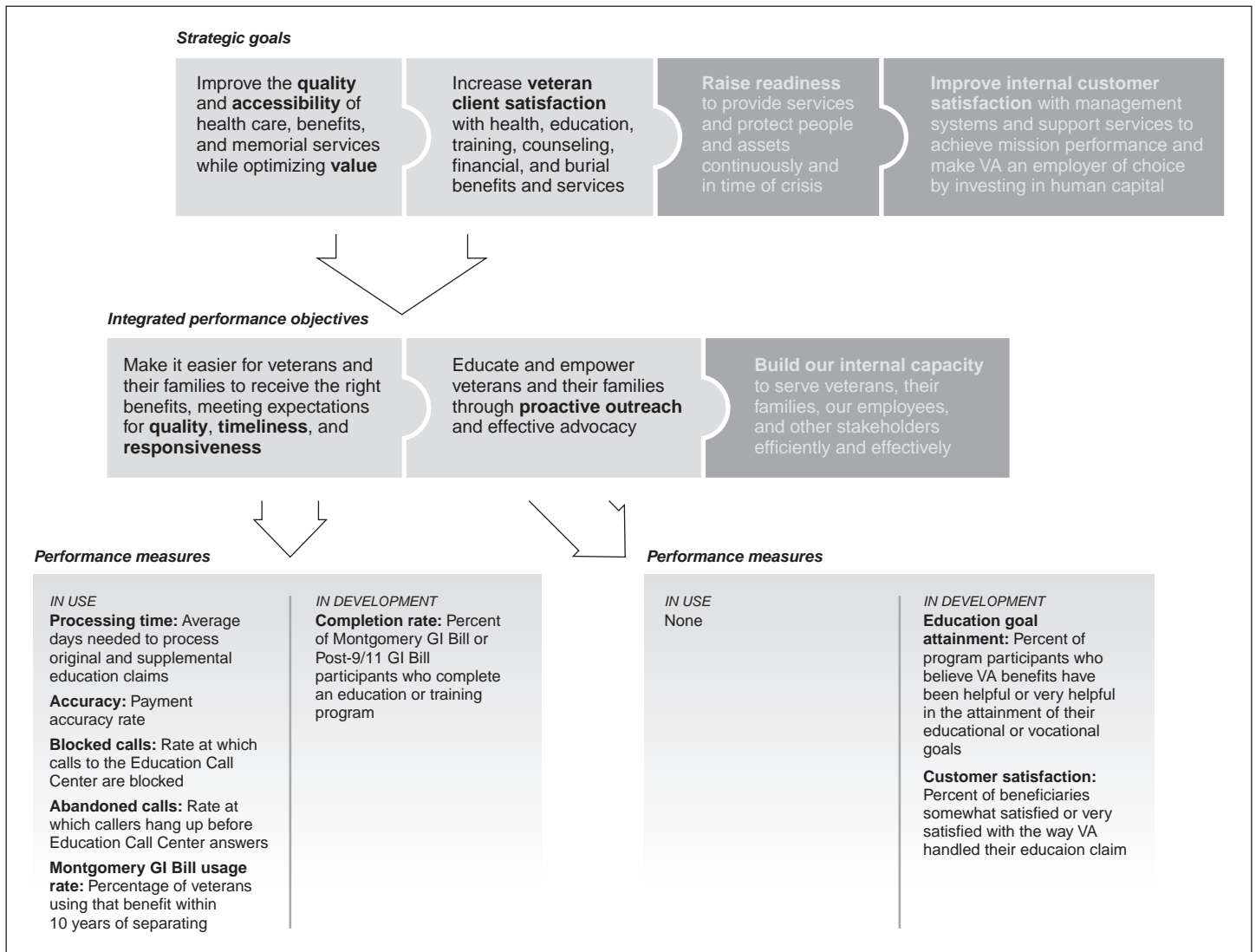
⁴⁶38 U.S.C. § 6308.

⁴⁷A senior VA official told us that the agency will be revising this biennial outreach report after fiscal year 2010 to provide more information on the effectiveness of VA's outreach.

or print advertisement, it has not determined the extent to which its outreach campaign has been effective in informing or changing the behavior of target audiences. We have found in prior work that key practices for consumer education campaigns include establishing outcome metrics to measure success in achieving the objectives of the campaign. In this instance, such metrics could be employed to evaluate how well VA's campaign influenced the attitudes and behaviors of servicemembers and veterans.⁴⁸

⁴⁸GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, [GAO-08-43](#) (Washington, D.C.: Nov. 19, 2007).

Figure 5: VA's Performance Goals, Objectives, and Measures Related to Outreach to and Support for Individuals Applying for Education Benefits



Source: GAO analysis of VA Strategic Plan Fiscal Years 2010-2014 and VA Fiscal Year 2010 Performance and Accountability Report.

Note: The strategic goals and performance objectives that are not directly related to VA's education benefit programs are shown in dark grey.

In addition, VA also does not have measures to assess the quality of the support it provides to individuals seeking education benefits. While VA has two performance measures on the percentage of toll-free hotline calls that are blocked or abandoned, it has not established a measure for the

accuracy of the information provided by call center staff. VA officials told us that call center supervisors review 5 calls per month for each staff member and assess, among other items, the accuracy of information they provide to callers. However, VA does not calculate accuracy for the call center as a whole but recently implemented a survey to assess callers' satisfaction with the call center. In addition, VA does not have performance measures for the timeliness and quality of answers provided to servicemembers' and veterans' questions through Right Now Web. A VA official told us they try to respond to inquiries within 5 days and have data on the number of inquiries that have been pending for longer than this time period, but do not track the average response time for all inquiries. In our prior work, we found that agency performance measures should cover governmentwide priorities, such as the quality of service.⁴⁹ Although VA lacks such measures for its call center or Right Now Web, other federal programs have made them a part of their quality assurance process. For example, Education's Office of Federal Student Aid has established a target to provide correct answers the first time for 95 percent of the calls to its Customer Support Center for schools, students, parents, and others receiving federal student loans, and measures its progress toward meeting this target.⁵⁰

School Certifying Officials' Roles Have Become More Complex and Challenging

⁴⁹GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

⁵⁰Education's Office of Federal Student Aid officials reported that it monitors a minimum of 1 percent of all interactions per month. Of those interactions monitored, 95 percent must be error-free. Office of Federal Student Aid officials reported that they do not make their standards, which are standards for contractor performance, available to customers because they were not intended to inform the public. See GAO, *Managing for Results: Opportunities to Strengthen Agencies' Customer Service Efforts*, [GAO-11-44](#) (Washington, D.C.: Oct. 27, 2010).

The Complexity of School Officials' Roles Has Increased Along with Their Workload

School certifying officials' core VA responsibilities have become more complex and time-consuming with the implementation of the Post-9/11 GI Bill. These officials are required to report the enrollment of each student receiving VA education benefits, including the credit hours, tuition, fees, and the beginning and end dates of terms, among other duties (see table 3). According to school certifying officials we interviewed, certification was simpler and took less time per student prior to the Post-9/11 GI Bill. For example, under the Montgomery GI Bill, certifying officials typically had to report tuition and fees only if a student was enrolled less than half-time or was on active duty. Moreover, although certifying officials' roles have become more complex and time-consuming, they often do not perform VA responsibilities full time. Based on our survey, an estimated 83 percent⁵¹ serve as school certifying officials in addition to other responsibilities.

Table 3: School Certifying Officials' Required Responsibilities before and after the Post-9/11 GI Bill

Required responsibilities before the Post-9/11 GI Bill	Required responsibilities after the Post-9/11 GI Bill
<ul style="list-style-type: none"> Report credit hours Report tuition and fees (if enrollment is less than half-time or student is on active duty) Update credit hours within 30 days if student's enrollment changes 	<ul style="list-style-type: none"> Report credit hours Report tuition and fees Subtract tuition and fees covered by non-Title IV federal sources (e.g., Department of Defense Tuition Assistance) Subtract military and other tuition discounts Determine whether courses are being taken online or on campus and report credit hour totals for each separately Update credit hours, tuition and fees within 30 days if student's enrollment changes Report Yellow Ribbon school contributions for tuition and fees (if school participates in Yellow Ribbon program)
<ul style="list-style-type: none"> Review courses to ensure applicability to student's program of study 	<ul style="list-style-type: none"> Review courses to ensure applicability to student's program of study
<ul style="list-style-type: none"> Monitor student progress and report unsatisfactory progress 	<ul style="list-style-type: none"> Monitor student progress and report unsatisfactory progress
<ul style="list-style-type: none"> Maintain student records 	<ul style="list-style-type: none"> Maintain student records
<ul style="list-style-type: none"> Keep the SAA informed of program and academic changes 	<ul style="list-style-type: none"> Keep the SAA informed of program and academic changes

Source: GAO analysis of VA documents.

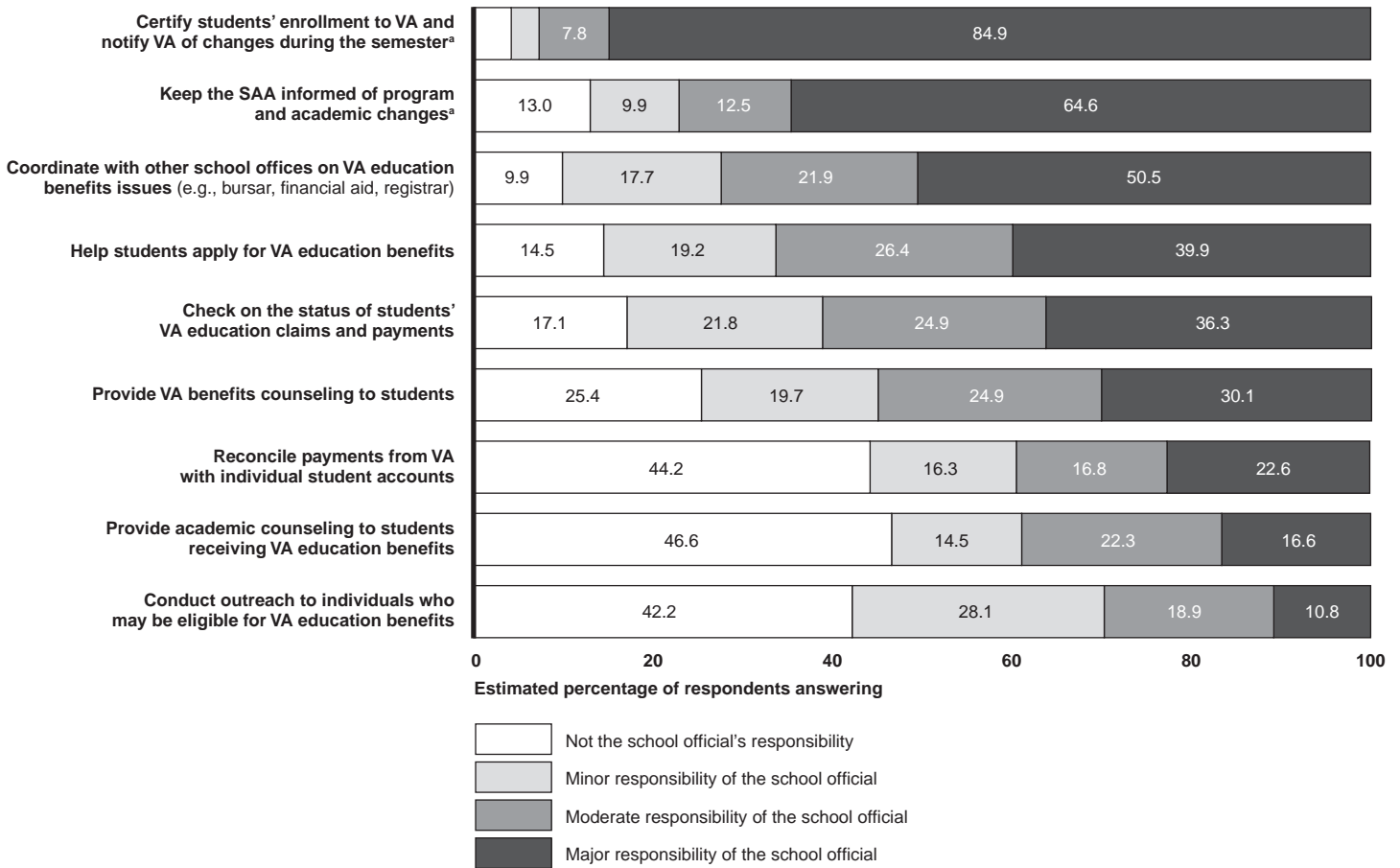
Note: Title IV generally refers to title IV of the Higher Education Act and student aid programs administered by the Department of Education. 20 U.S.C. §§ 1070-1099c-2.

⁵¹The 95 percent confidence interval for this estimate is (77.1, 88.1).

According to our survey, school certifying officials have several other major program responsibilities they fulfill in addition to those specifically required by VA (see fig. 6). For example, we estimate that 51 percent⁵² of school certifying officials consider coordinating with other campus offices, such as the school business office, on benefits issues as a major responsibility. Those we interviewed also said that this coordination has become necessary with Post-9/11 GI Bill tuition and fee payments being sent directly to schools. Often, this is the first time that school certifying officials have had to interact with the business office and other campus offices. For example, school officials reported that business offices have received (1) payments for amounts that were different from what the school certifying official had reported to VA, (2) duplicate payments for the same student, and (3) other payments that did not have adequate information to identify the student or term. School officials we interviewed reported that they often serve as the liaison between VA and the school business office, because the business office may not be familiar with VA education benefit program policies.

⁵²The 95 percent confidence interval for this estimate is (43.5, 57.5).

Figure 6: School Certifying Officials' Reported Responsibilities for VA Education Benefit Programs



Source: GAO survey of school certifying officials.

Note: All estimates in this figure have 95 percent confidence intervals of plus or minus 7 percentage points or less.

^aRequired by VA.

In addition, we estimate that nearly 40 percent⁵³ of school certifying officials view helping students apply for VA education benefits as one of their major responsibilities. Although VA considers this support a voluntary activity, school certifying officials stated they often get questions from servicemembers and veterans because they are frequently the only people students interact with face-to-face to get answers to their

⁵³The 95 percent confidence interval for this estimate is (33.1, 46.7).

questions about VA education benefits. A majority of school certifying officials (64 percent⁵⁴) in our survey reported it would be helpful or very helpful to receive more information about how to help servicemembers and veterans select the right VA education benefit program when they are eligible for multiple programs.

School certifying officials' workload also has grown as a result of their additional required and voluntary responsibilities and greater numbers of students receiving VA education benefits. School certifying officials we interviewed, as well as eight certifying officials in open-ended responses to our survey, told us that their workloads have grown due to factors such as greater reporting requirements for the Post-9/11 GI Bill and efforts needed to resolve payment issues. According to VA's 2010 performance and accountability report, the number of participants in VA education benefit programs has increased from about 460,000 in 2008 to 634,000 in 2010,⁵⁵ an increase of 38 percent. VA and school officials we interviewed attributed this increase to the Post-9/11 GI Bill. For example, one school official we interviewed said she had certified 25 percent more veterans than prior to Post-9/11 GI Bill implementation.

⁵⁴The 95 percent confidence interval for this estimate is (57.8, 71.1).

⁵⁵VA officials cautioned that these numbers may not be unique counts of participants, as an individual may be counted as receiving benefits under two different programs.

**School Certifying Officials
Were Generally Satisfied,
but Reported a Lack of
Comprehensive Policy
Guidance, among Other
Challenges**

Although about 62 percent⁵⁶ of school certifying officials stated they were generally or very satisfied with VA's implementation of the Post-9/11 GI Bill, officials identified a range of challenges in fulfilling their responsibilities under the program (see fig. 7). About 33 percent⁵⁷ of school certifying officials cited great or very great challenges in checking on the status of students' VA claims and payments. For example, in interviews and in comments to our survey, school officials discussed delays in expected payments and difficulty getting through to VA's toll-free hotline when they had questions.

In addition, school certifying officials cited challenges due to the lack of a comprehensive source of policy information on the Post-9/11 GI Bill program, such as a VA policy manual. An estimated 32 percent⁵⁸ of school officials in our survey stated that the lack of a manual was a great or very great challenge, and an additional 23 percent⁵⁹ stated this was a moderate challenge. VA has not created a policy manual for the Post-9/11 GI Bill since the program was implemented, nor has the agency published a policy or procedural manual for any of its other education benefits programs.⁶⁰

⁵⁶The 95 percent confidence interval for this estimate is (55.6, 69.1).

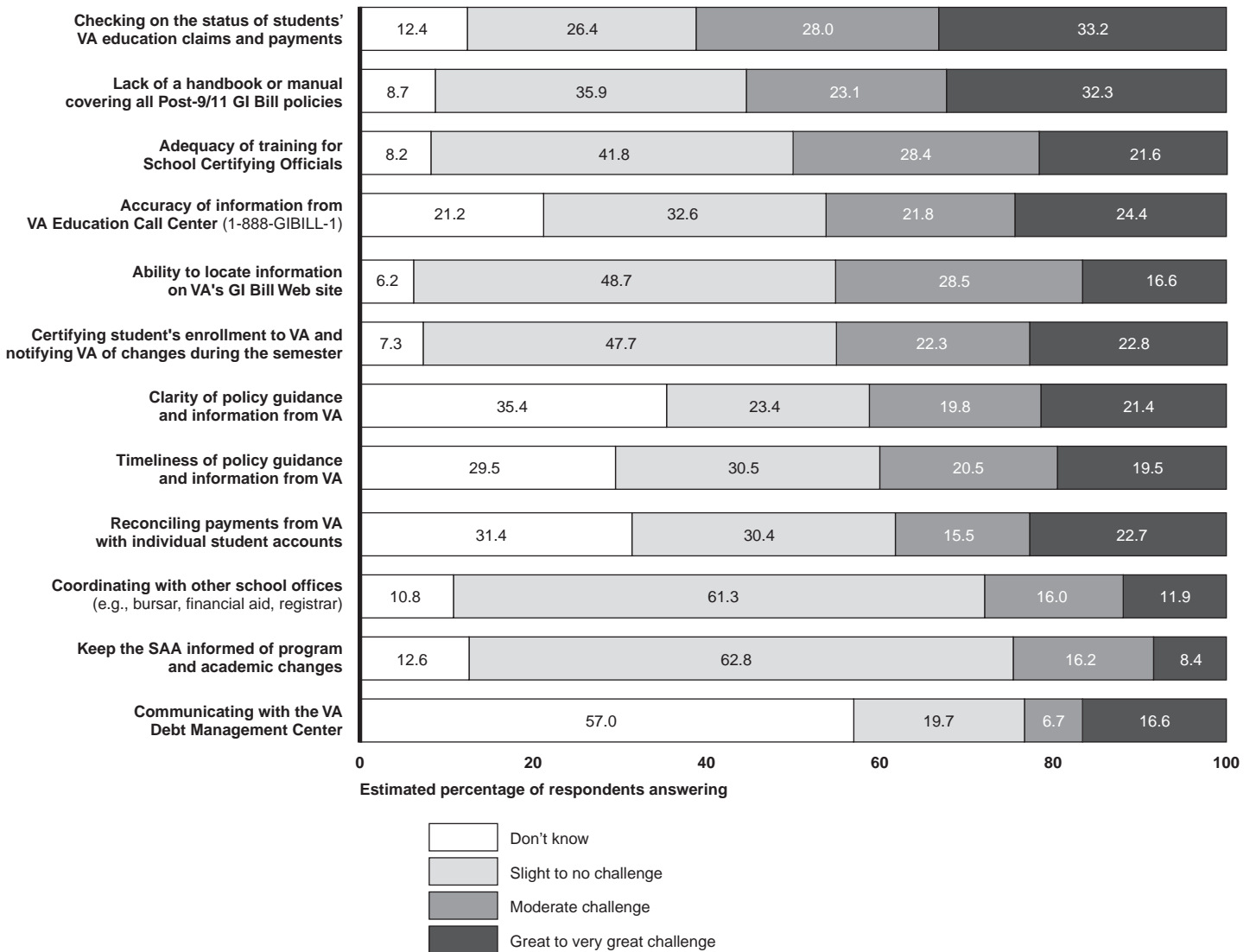
⁵⁷The 95 percent confidence interval for this estimate is (26.6, 39.7).

⁵⁸The 95 percent confidence interval for this estimate is (25.8, 38.8).

⁵⁹The 95 percent confidence interval for this estimate is (17.2, 28.9).

⁶⁰VA officials told us that the agency does not currently plan to develop a policy manual on the Post-9/11 GI Bill for school certifying officials, but would consider developing one if they saw a need.

Figure 7: School Certifying Officials' Reported Challenges in Fulfilling Responsibilities for the Post-9/11 GI Bill Program



Source: GAO survey of school certifying officials.

Note: All estimates in this figure have 95 percent confidence intervals of plus or minus 7 percentage points or less.

VA provides policy information to certifying officials through policy advisories, but we found an example where the information in such advisories may not provide sufficient guidance. Specifically, VA issued a policy advisory in October 2009 to clarify how school certifying officials

should report tuition and fee charges when the student is receiving discounted tuition or other tuition assistance. This policy advisory explains that school officials should deduct non-Title IV federal assistance before reporting tuition and fees to VA.⁶¹ However, the advisory does not include a complete list of federally funded tuition assistance programs. For example, although certain National Guard tuition assistance programs are federally funded, they are not included on the list. One school certifying official we spoke with said that school officials may not know whether tuition assistance provided by the National Guard is provided with federal or state funds. As a result, schools may find it difficult to ensure that students are not receiving funds from both VA and other federally funded programs for the same courses.

VA officials told us that school certifying officials generally receive policy advisories via e-mail from their state's VA education liaison representative, but this approach may not be sufficient for providing consistent and timely policy information. For example, some officials from schools with campuses in more than one state told us that the timeliness of providing these advisories can vary among education liaison representatives. In addition, a senior VA official told us that some education liaison representatives expand on VA policy advisories to assist schools within their state, although others do not. Further, VA has not catalogued all policy advisories sent to school officials in a central location accessible to all schools. In contrast, Education's Office of Federal Student Aid provides policy and other program information to schools through a Web site (Information for Financial Aid Professionals). The Web site was developed to provide schools with electronic access to operational and policy guidance to administer the Title IV student financial aid programs. Schools can sign up to receive regular bulletins that compile all information distributed to schools.

In addition, school certifying officials faced challenges in obtaining adequate training on the Post-9/11 GI Bill, in part because they reported that they were too busy with other job responsibilities or were unaware of training opportunities. VA training opportunities are available through several channels: one-on-one training provided by VA education liaison representatives; conferences; and an online training module available on

⁶¹Under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, school officials will have to deduct scholarships and state, institutional, and employer-based aid, in addition to non-Title IV federal aid. See appendix II.

VA's Web site. However, school certifying officials were not always able to participate. While an estimated 65 percent⁶² received training on the Post-9/11 GI Bill, mostly through VA conferences, others stated they did not attend because they were too busy with other job responsibilities. In addition, two school certifying officials and an SAA official we interviewed told us that sometimes school officials cannot attend training conferences due to the cost of travel. Moreover, an estimated 85 percent⁶³ of school certifying officials had not taken VA's online training module, mostly because they were unaware it was available. Of those who stated they did complete the online training, about half of the officials said that it was effective or very effective. While VA considers taking VA-sponsored training a part of school certifying officials' responsibilities, VA does not track the extent to which school officials participate in any training.

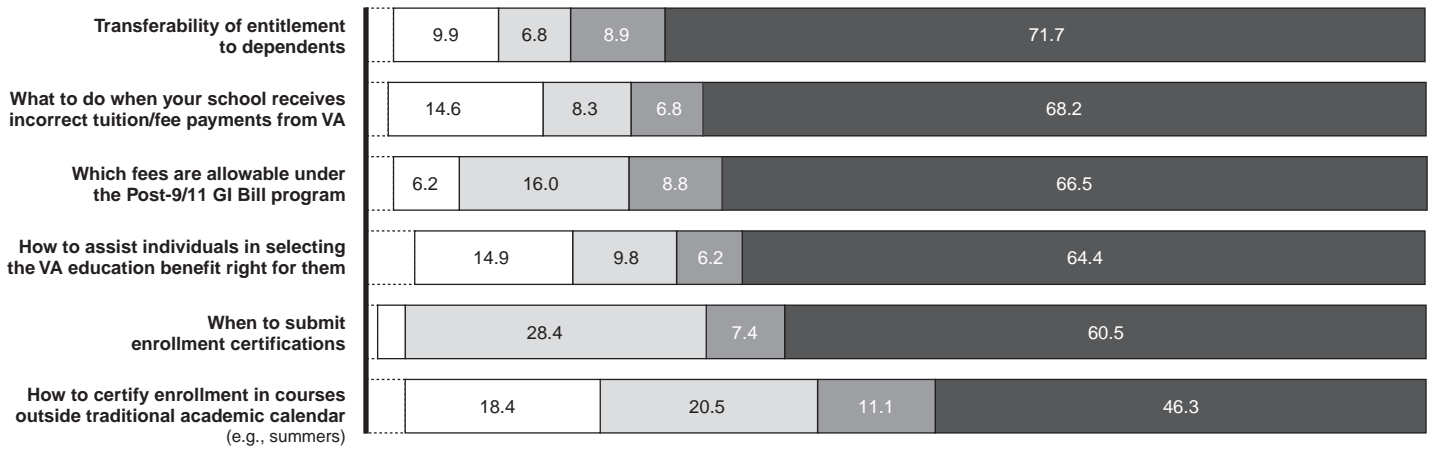
School certifying officials also reported needing more information or training on several topics pertaining to the Post-9/11 GI Bill (see fig. 8). For example, 72 percent⁶⁴ of school certifying officials said it would be helpful or very helpful to receive more information on the transferability of entitlement to a spouse or dependents. School officials also indicated they need more information on which fees are allowable under the Post-9/11 GI Bill; when to submit enrollment certifications; and what steps to take when they receive an incorrect payment.

⁶²The 95 percent confidence interval for this estimate is (58.7, 71.9).

⁶³The 95 percent confidence interval for this estimate is (79.0, 89.7).

⁶⁴The 95 percent confidence interval for this estimate is (65.4, 78.0).

Figure 8: Aspects of the Post-9/11 GI Bill Where School Certifying Officials Reported That More Information Would Be Helpful



Estimated percentage of respondents answering

- Don't know
- Not applicable to my role
- Not to slightly helpful
- Moderately
- Helpful to very helpful

Source: GAO survey of school certifying officials.

Note: All estimates in this figure have 95 percent confidence intervals of plus or minus 7 percentage points or less.

Finally, an estimated 84 percent⁶⁵ of school certifying officials have not received training from any source on working with servicemembers and veterans with disabilities. An estimated 59 percent⁶⁶ of school officials said it would be helpful or very helpful to receive information on the unique needs of this population. VA officials told us the education program has not developed training or guidance to help school officials better serve those with disabilities. By comparison, Education is funding efforts to provide some supports to staff working with servicemembers and veterans with disabilities. Education recently announced grants to establish Centers of Excellence for Veteran Student Success at 15 schools across the country. The program is designed to improve support to veterans in

⁶⁵The 95 percent confidence interval for this estimate is (77.6, 88.5).

⁶⁶The 95 percent confidence interval for this estimate is (52.3, 66.2).

postsecondary education by coordinating services including personal or mental health counseling and disabilities services. In particular, some grantees plan to conduct training to help school staff understand the challenges veterans with disabilities often face.

VA Lacks Comprehensive Information on the Effectiveness of Its Oversight of States and Schools

VA Monitors States' Approval and Supervision of Schools, but Its Approach Has Limitations

VA monitors SAAs' performance in approving and supervising schools through a range of oversight activities, such as reviewing reports SAAs submit on their activities (see table 4). Pursuant to their contracts with VA, SAAs approve schools to receive VA education benefits and generally visit them annually to ensure they continue to meet VA standards in areas such as course quality, school financial stability, and student progress.⁶⁷ To oversee these activities, VA reviews reports that SAAs prepare after each site visit, known as supervisory visits, as well as quarterly and annual reports on their activities. On an annual basis, VA also convenes a Joint Peer Review Group to assess each SAA's performance, and, in fiscal year 2009, VA started conducting onsite visits at SAAs.

⁶⁷ As mentioned earlier, under the Post-9/11 Veterans Educational Assistance Improvements Act of 2010, some programs will be deemed approved for benefits and, therefore, will not need to be approved by SAAs. See appendix II.

Table 4: VA Oversight Activities for SAAs

Oversight activity	Frequency	Description
SAA approval notices	As provided to VA	VA reviews and takes appropriate actions on all SAA approval notices for education and training programs seeking approval to receive education benefits.
SAA supervisory visit reports	As provided to VA	VA reviews and takes appropriate actions, as needed, on all SAA supervisory visit reports based on their site visits to previously approved schools, in order to monitor and ensure their continued approval.
SAA activity reports	Quarterly	VA reviews SAA quarterly reports, which contain information on the number of completed approval notices and supervisory visits, among other data.
Joint Peer Review Group	Annually	VA convenes a Joint Peer Review Group, comprised of both VA and SAA officials, to review each SAA's performance. This review is based on an annual SAA self-evaluation and VA's assessment of the SAAs' performance.
VA site visits to SAAs	Planning to conduct about 5-10 visits per year	VA conducts site visits at SAAs to assess their organization, fiscal management, outreach, and approval processes, and provides recommendations to ensure that SAAs are fulfilling their contractual requirements.

Source: GAO review of VA documents and interviews with VA officials.

Note: In addition to the activities listed above, VA also reviews SAA annual contract proposals, which include their business plans, and SAA invoices requesting VA reimbursement.

In general, VA's oversight activities indicate that the majority of the 57 SAAs have fulfilled their responsibilities to VA.⁶⁸ For example, all but 3 and 10 of the SAAs in fiscal years 2009 and 2010, respectively, received VA's highest rating of "satisfactory" as part of VA's annual Joint Peer Review Group. In addition, VA's six site visits to SAAs in fiscal year 2010 generally resulted in positive findings with relatively few discrepancies. Furthermore, in recent years, most SAAs met VA's standard to visit a minimum of 80 percent of active schools.⁶⁹ However, 12 and 9 SAAs, respectively, did not meet this standard in fiscal years 2009 and 2010.

Despite these activities, we identified several limitations that may hamper the effectiveness of SAAs' oversight of schools. For example, while VA requires SAAs to visit 80 percent of approved schools, it has not otherwise identified, nor does it require SAAs to use, any risk-based factors to

⁶⁸Some states have more than one SAA with separate responsibilities to approve specific types of programs, such as on-the-job and apprenticeship programs.

⁶⁹VA only requires SAAs to conduct site visits at active schools (i.e., approved schools with at least one VA education beneficiary enrolled).

develop their site visit schedules.⁷⁰ A risk-based approach could help VA better target SAAs' oversight of schools to assure continued program integrity.⁷¹ In our review of four selected states, we found that the SAAs took different approaches to scheduling their visits. For example, one SAA told us that they prioritize schools with higher numbers of VA beneficiaries. Another SAA we spoke with considered multiple factors in addition to the number of VA beneficiaries, and targeted, for example, newly approved schools and for-profit schools. Finally, two of the four SAAs we spoke with identified schools' geographic locations as a key factor in prioritizing schools for site visits, in order to minimize travel costs.

In addition, VA lacks standards for how SAAs should conduct site visits at schools, which raises questions about the validity of the findings and makes it difficult to compare across schools and SAAs. In particular, VA has not set minimum standards for the review of student files. In our four selected states, we found variation in the percentage of student files that SAAs reviewed. For example, in one state, we found that SAA officials generally reviewed a non-random selection of 10 student files, regardless of the number of VA education beneficiaries at the school. In comparison, the number and percentage of student files for another SAA selected varied from visit to visit, among the reports we reviewed.⁷² In addition, we found that all four SAAs sometimes or always allow schools to select the student files for review. This approach, however, undermines the independence of the review because schools may not choose the most complex student files for the SAAs' review.⁷³ Absent standards, VA lacks assurance that the data collected from these file reviews by different SAAs are valid, comparable, and useful for determining whether schools are in compliance with federal requirements.

⁷⁰VA can require SAAs to visit individual schools with known problems during a given year.

⁷¹Government internal control standards call for management to comprehensively identify risks and consider all significant interactions between the entity and other parties. For example, risk identification methods could include considering findings from audits and other assessments. GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

⁷²SAAs in our four states generally did not review more than 15 student files, regardless of the number of VA education beneficiaries.

⁷³Government internal control standards call for the separation of key duties and responsibilities among different people to reduce the risk of error or fraud, such as responsibilities for reviewing transactions. [GAO/AIMD-00-21.3.1](#).

VA Suspended Its Required Audits of Schools in Fiscal Year 2010

Federal law requires VA to monitor and oversee schools through audits, called compliance surveys.⁷⁴ Each year, VA is required to conduct onsite audits at one-third of each region's approved schools,⁷⁵ and in fiscal year 2009, VA conducted nearly 2,600 audits nationwide. One of VA's four regional processing offices handles school and program approvals for foreign schools, but VA does not currently conduct audits of foreign schools receiving its education benefits.⁷⁶

While the purpose of SAAs' site visits is to ensure that schools remain in compliance with federal requirements for VA education benefits, VA's audits focus more on the accuracy of benefit payments to schools and students under all of its education benefit programs (see table 5 for a comparison of SAA site visits and VA audits). For the Post-9/11 GI Bill, VA audits must include a review of multiple payment types made to both schools (e.g., tuition and fee payments) and students (e.g., housing allowances and books and supplies stipends). In order to determine the accuracy of these payments, VA randomly selects student files to identify discrepancies.⁷⁷ For example, a payment error may occur when school officials do not report changes in students' credit hours to VA in a timely manner.⁷⁸

⁷⁴38 U.S.C. § 3693.

⁷⁵VA audits can be conducted remotely to make more efficient use of time and travel funds.

⁷⁶According to VA officials, as of fall 2010, there were approximately 152 active foreign schools that had at least one VA education beneficiary.

⁷⁷During these audits, VA must review student files for at least 10 percent of the veterans and eligible persons currently enrolled under VA's education benefit programs at a school. The maximum sample size is 50 student files, and the minimum sample size is 10 student files or the total number of veterans and eligible persons currently enrolled, whichever is less.

⁷⁸According to VA guidance, when an audit identifies payment errors, VA compliance staff must make a referral by submitting a memo within 30 days of the audit's completion, over the signature of a senior VA official, to the appropriate division within VA in order to request corrective action and a response when the action is completed. This action is recorded and tracked in VA's data system, the Benefits Delivery Network.

Table 5: Comparison of SAA Site Visits and VA Audits of Schools

	SAA site visits	VA audits
Key goals	<ul style="list-style-type: none"> • Monitor approval status: Determine whether schools and programs remain qualified and equipped to furnish education or training; and remove the program from the approved list if it no longer meets the approval criteria. • Technical assistance: Answer specific questions, help identify solutions to problems, provide guidance or intervention on issues that are, or could become, a matter of non-compliance with approval standards or certification requirements. • Follow-up on problems: Resolve discrepancies or refer them to VA. 	<ul style="list-style-type: none"> • Payment accuracy: Verify the accuracy of education benefit payments. • Technical assistance: Assist school officials in better understanding their responsibilities and VA's procedural requirements. • Compliance: Determine whether eligible individuals or schools have fulfilled their responsibilities and requirements. • Follow-up on problems: Assure that proper action is promptly taken to correct discrepancies.
Frequency	<p>Annually conduct site visits at:</p> <ul style="list-style-type: none"> • A minimum of 80 percent of all active schools and training establishments, including: <ul style="list-style-type: none"> ○ institutions of higher learning, ○ non-college degree programs and correspondence schools, ○ flight schools, and ○ on-the-job training and apprenticeship programs. 	<p>Annually conduct audits at:</p> <ul style="list-style-type: none"> • A minimum of 33 percent of active institutions of higher learning, non-college degree programs and correspondence schools each year, regardless of the number of VA education beneficiaries enrolled. • All active flight schools. • Ten percent of active on-the-job training and apprenticeship programs.

Source: VA's M22-4 Education Procedures Manual and other documents and SAA interviews.

Despite the federal requirement to conduct monitoring and oversight, in fiscal year 2010, VA suspended its audit program in order to reassign compliance staff to help process a backlog in Post-9/11 GI Bill claims.⁷⁹ As a result, VA did not complete several thousand audits during the critical first full year of this new program. According to VA officials, VA's compliance staff did not fully resume their audits until fiscal year 2011. In preparation to reinstate these audits, VA provided training to staff in June 2010 and conducted several preliminary audits following this training. Each of the 18 preliminary school audits identified at least one error among the files reviewed for students receiving Post-9/11 GI Bill benefits, and these errors varied in their scope and magnitude. For example:

- In South Carolina, a school incorrectly made a refund of \$1,123 to a student who reduced his credit hours from six to three. The school should

⁷⁹Some VA officials also stated that VA needed time to create policies and develop training for how to conduct audits under the new Post-9/11 GI Bill.

have returned the funds to VA because the audit revealed the reduction in credit hours occurred prior to the start of the school's term.

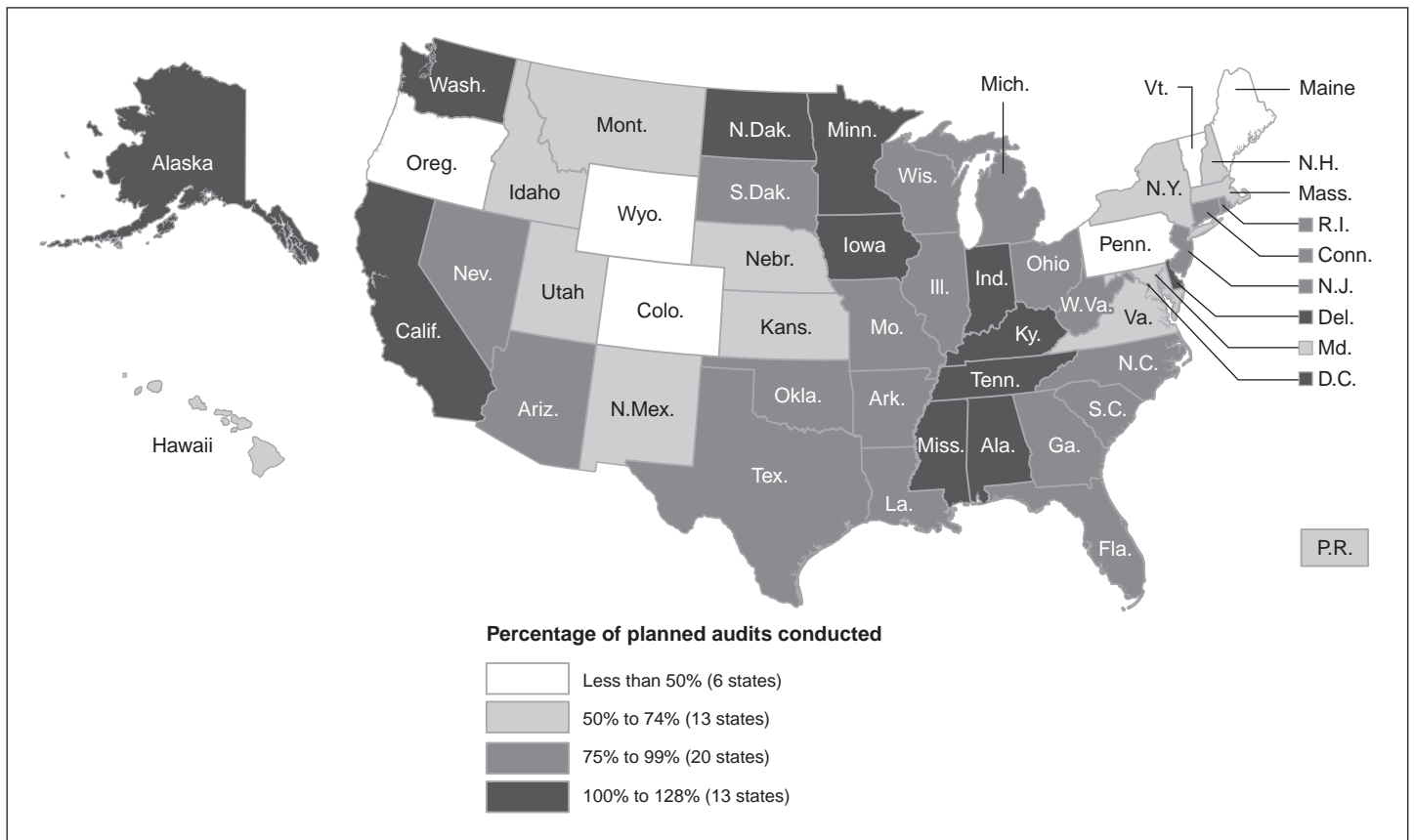
- In New Jersey, a school failed to notify VA that a student did not attend a term because he returned to active duty, which resulted in an overpayment to the school of \$4,680.
- In Arizona, a school certified tuition charges to VA without subtracting the military and other discounts offered to students. In 9 of the 20 student files reviewed, VA found overpayments to the school totaling nearly \$20,000.

Although VA has resumed its audits of schools, there are indications that it may not be able to complete all required audits in fiscal year 2011. VA officials told us that these audits, compared to those conducted prior to implementation of the Post-9/11 GI Bill, are taking longer to complete. VA officials indicated that, given their current resources, it would be challenging for them to complete all required audits in fiscal year 2011. Moreover, one VA regional processing office completed an analysis of the time needed to review files for students receiving benefits under the Post-9/11 GI Bill and found that it would require at least four additional full-time staff, beyond those already assigned, to accommodate the additional workload.⁸⁰ Furthermore, even in the fiscal year prior to the Post-9/11 GI Bill, VA failed to complete over 15 percent of the more than 3,000 audits that were planned nationwide. In addition, we found that the percentage of completed audits varied greatly among individual states and that VA completed all of its planned audits in only 13 states (see fig. 9).⁸¹ Going forward, VA plans to include audits that it did not conduct in fiscal year 2010 into its schedules for the next 2 years.

⁸⁰VA is required to assign at least one education compliance specialist to conduct these audits for every 40 audits that are required each year. 38 U.S.C. § 3693(a).

⁸¹In seven states, VA completed more than 100 percent of the audits it had originally planned for the year.

Figure 9: Percentage of Planned VA Audits Conducted, by State, in Fiscal Year 2009



Source: GAO analysis of VA data.

Note: In this figure, we refer to the District of Columbia and Puerto Rico as states when presenting the results of our analyses.

Finally, VA lacks a comprehensive and nationwide approach to ensure that individual schools have been audited in a timely manner. VA has a database, known as WEAMS,⁸² to track information about the dates in which audits occurred, but not all of VA’s compliance staff enter information into it, and officials said that VA does not require them to do so. We found that nearly half of the 6,500 schools listed in the database

⁸²WEAMS stands for Web Enabled Approval Management System and serves as VA’s database of educational and job-training programs, which provides approval information used to determine servicemembers’ and veterans’ eligibility to benefits for training offered by these programs.

were missing a date for the most recent audit. In addition, based on our review of reports, when available, for 46 randomly selected schools in four states,⁸³ we found that 6 schools in three states had not been audited by VA since at least fiscal year 2006, even though these schools had active VA education beneficiaries.⁸⁴ In fact, in one state we found that the most recent audit report for a public university with about 240 VA education beneficiaries dated back to 1997.⁸⁵

VA Does Not Systematically Compile and Review Findings of School Audits

VA does not systematically consider the findings of its own or other entities' audits of schools when carrying out its oversight. For example, VA prepares a report on each school audit, but does not compile the overall findings for all audits, such as types of discrepancies and payment errors. Likewise, while SAAs provide some information on the outcomes of their visits in individual site visit reports, neither the SAAs nor VA summarize them on a quarterly or annual basis. Such summary information could be used to identify common errors among schools and evaluate trends over time.⁸⁶ As a result, VA lacks a comprehensive, national picture of schools' performance in a given year or over time.

Furthermore, VA officials told us they do not consider the results of monitoring or audits conducted by other entities, such as Education's Office of Federal Student Aid, in determining which schools they should audit. To monitor schools receiving Title IV funds, the Office of Federal Student Aid conducts program reviews each year at schools that it identifies as high-risk, and requires schools to submit annual independent

⁸³Three schools had not yet been audited by VA because they were recently approved to receive VA education benefits. In addition, VA could not locate any audit reports for one of the schools we randomly selected.

⁸⁴We estimate that each of these schools should have been scheduled for an audit, at the latest, in fiscal year 2009. In three states, we also identified schools that we estimate should likely have been audited in fiscal year 2010, but VA did not complete these audits due to its suspension of this oversight mechanism.

⁸⁵Given the number of errors found at this school, the report suggested a follow-up audit in fiscal year 1999. While VA had additional documents on file indicating that audits were conducted again in 1999 and 2002, it had no reports on file for these audits. According to a VA official, the VA position responsible for conducting these audits was vacant for an 18-month period, and many records went unaccounted for during this time.

⁸⁶Government internal control standards call for internal control monitoring that assesses performance over time. Furthermore, these standards indicate that operating information is needed to determine whether agencies are achieving their compliance requirements under various laws and regulations (see [GAO/AIMD-00-21.3.1](#)).

compliance audits. Moreover, the Office of Federal Student Aid reviews financial statements for all schools on an annual basis. It compiles the results of its various oversight mechanisms in a data system used to track its monitoring and enforcement activities at schools.⁸⁷ The Office of Federal Student Aid has additional oversight measures for for-profit schools and, according to its 5-year Strategic Plan, is exploring ways to adapt its oversight to the unique challenges presented by for-profit and distance-learning programs.⁸⁸ VA officials told us, by comparison, that they have not adopted different oversight practices for for-profit schools and distance-learning courses. VA education program officials told us that they support, in general, looking across its individual school audits and taking other government entities' audit findings into consideration to enhance their oversight of schools.

Conclusions

The Post-9/11 GI Bill enhanced education benefits for servicemembers, veterans, and their dependents. Between fiscal year 2009 and 2011, VA estimates it will triple the amount it pays in education benefits each year, from \$3.6 billion to nearly \$10 billion. The majority of these funds will be paid under the Post-9/11 GI Bill, and expenditures are poised to grow beyond 2011 due to the rising cost of higher education. Given this potential for growth, it is important to ensure that VA has a process in place that provides timely and accurate benefits to those who are truly eligible, while also ensuring program integrity. With major statutory changes to the Post-9/11 GI Bill taking effect in the early fall of 2011, VA has an opportunity to reexamine and adjust its management approach to the program, particularly in regard to its oversight and quality assurance activities. These upcoming changes also require VA to effectively educate and inform all of the players in the process—servicemembers, veterans, and state and school officials.

Given that program stakeholders identified some areas where servicemembers and veterans may need more information about VA education benefits, it will be important for VA to have better measures of the effectiveness of its outreach and support. These measures could provide key information to help VA strengthen and inform future program

⁸⁷This data system is called the Postsecondary Education Participants System (PEPS).

⁸⁸U.S. Department of Education, Federal Student Aid, *Federal Student Aid: Strategic Plan, FY 2011-15* (Washington, D.C.: September 2010).

and resource decisions, improve critical program activities, and help verify that resources are being used responsibly.

In addition, the Post-9/11 GI Bill has increased the workloads for school certifying officials, who play a critical role in ensuring servicemembers and veterans receive the right benefits in a timely manner. Establishing timely and comprehensive channels for communicating policy information and guidance on this new and complex program and raising awareness of available training opportunities would help provide school officials with the tools to effectively fulfill their roles in implementing VA education benefits. Moreover, school certifying officials are a key point of contact on campus for students receiving benefits, and some of these students may have physical and cognitive disabilities. With increased awareness of how to meet the needs of those with disabilities, school certifying officials may be able to help ensure that these students have adequate support as they transition into a school setting.

VA has also faced challenges in meeting the increased demand for Post-9/11 GI Bill benefits, and has had to make a number of trade-offs as it focused on reducing the backlog of education claims, such as curtailing its oversight of schools. As a result, VA did not take sufficient steps to ensure program integrity and minimize waste, fraud, and abuse in its education benefit programs. As VA renews its oversight of schools, our work has found some early indications of continuing challenges, including difficulty completing required audits of schools. As a result of upcoming legislative changes to the role of State Approving Agencies, VA has an opportunity to systematically review the federal-state oversight structure and resource allocation. By undertaking such a review, VA may be able to achieve greater efficiencies and to strike a balance between the need to process claims in a timely manner while ensuring program integrity.

Recommendations for Executive Action

To improve VA's outreach and support for eligible servicemembers and veterans, communication with school officials, and oversight of its education benefit programs, we recommend that the Secretary of Veterans Affairs take the following five actions:

- Develop outcome-oriented performance measures for outreach to servicemembers and veterans who are seeking VA education benefits. This could include measures of VA's success in reaching out to target populations, including servicemembers and veterans with disabilities, and in addressing areas where more information about education benefits may be needed.

-
- Establish performance measures for the quality of information provided by VA's toll-free hotline and for the timeliness and quality of its Right Now Web service.
 - Provide more timely, accessible, and comprehensive education program policy information. This could include developing and maintaining an online policy manual for the Post-9/11 GI Bill and providing e-mail updates to school certifying officials nationwide.
 - Increase efforts to make school certifying officials aware of available training opportunities, including VA's online training module, and consider providing information for school certifying officials on working with servicemembers and veterans with disabilities.
 - Undertake a systematic review of VA's and SAAs' oversight of schools, focusing on opportunities to improve resource allocation, adopt risk-based approaches, consider cost-effective ways to oversee foreign schools, and evaluate the results of its oversight activities on a routine basis.

Agency Comments and Our Evaluation

We provided a draft of this report to VA for review and comment. In its comments, VA generally agreed with our conclusions, concurred with four of our recommendations, and concurred in principle with the fifth recommendation. Specifically, with regard to our recommendation to establish outcome-oriented performance measures for outreach to servicemembers and veterans seeking education benefits, VA reported that it will develop performance measures for a new communications tool it is creating to provide specialized information on VA benefits. In response to our second recommendation to establish performance measures for the quality of information provided by VA's toll-free hotline and for the timeliness and quality of its Right Now Web service, VA noted that it will develop a national standard and policies for monitoring the quality and timeliness of customer service for its education benefits. In order to provide more timely, accessible, and comprehensive education program policy information, VA stated that it will meet with school certifying officials and other stakeholders to develop a plan for improving policy information dissemination. Regarding raising awareness of training opportunities for school certifying officials, VA reported that it will examine how it is currently relaying information to these officials and look for improvements and alternative mechanisms. Collectively, these efforts should help improve VA's outreach and support for eligible servicemembers and veterans and enhance communication with school officials.

VA concurred in principle with our fifth recommendation to undertake a systematic review of VA's and SAA's oversight of schools. In its response, VA noted that it recently acquired an independent assessment of the SAAs' activities by a private contractor. In addition, VA mentioned that it submitted recommended changes to SAAs' activities as part of a legislative package, provisions of which have been enacted as part of the Post-9/11 Veterans Educational Assistance Improvements Act of 2010. These changes, effective August 1, 2011, reduce SAAs' responsibilities for school approval by allowing VA to rely on accreditations already in place by Education. As a result, VA indicated that it will have more flexibility in utilizing SAAs to provide additional outreach, training, and oversight of school officials. However, VA's written comments did not respond to all of the areas of a systematic review that we are encouraging VA to focus on, including improving agency resource allocation, adopting a risk-based approach to better target oversight activities, considering cost-effective ways to oversee foreign schools, and routinely evaluating oversight results. We believe that directing sustained management attention to these additional areas, in conjunction with recent legislative changes, will help ensure program integrity. VA's comments are reproduced in appendix IV.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days after its issue date. At that time we will send copies of this report to the Secretary of Veterans Affairs, relevant congressional committees, and other interested parties. In addition, this report will also be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or bertonid@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix V.

Sincerely yours,



Daniel Bertoni
Director, Education, Workforce
and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

The objectives of our report were to examine: (1) what is known about the effectiveness of VA's outreach to and support for individuals applying for education benefits, particularly for servicemembers and veterans with disabilities, such as post-traumatic stress disorder and traumatic brain injury; (2) the role of school officials and the challenges they face in fulfilling their responsibilities for VA's education benefit programs; and (3) how VA monitors and oversees states' and schools' implementation of its education benefit programs. While our scope included all of VA's active education benefit programs, we had a particular focus on the Post-9/11 GI Bill program, as it is the newest and most complex.

VA's Outreach and Support for Eligible Servicemembers and Veterans

To address our first research objective, we reviewed relevant federal laws, regulations, and agencywide plans and reports regarding outreach to and support for eligible servicemembers and veterans and conducted interviews with VA officials. Specifically, we reviewed statutory requirements for outreach, which is defined as: "the act or process of reaching out in a systematic manner to proactively provide information, services, and benefits counseling to veterans, and to the spouses, children, and parents of veterans who may be eligible to receive benefits under the laws administered by the Secretary, to ensure that such individuals are fully informed about, and receive assistance in applying for, such benefits."¹ VA is also required to produce a biennial report to Congress and a biennial outreach plan on its outreach efforts.² We reviewed the most recent outreach report, for 2010, and an outreach plan for fiscal year 2010-2011, among other relevant documents. In addition, we interviewed VA officials responsible for outreach and support within VA's Education Service; Education Call Center; Vocational Rehabilitation and Employment Service; Benefits Assistance Service; and the Office of the Assistant Secretary for Public and Intergovernmental Affairs, including the National Outreach Office.

In addition, we assessed VA's current and planned performance objectives and measures related to outreach and support by comparing them to requirements in the Government Performance and Results Act of 1993³ and

¹38 U.S.C. § 6301(b)(1).

²38 U.S.C. § 6308.

³Pub. L. No. 103-62, 107 Stat. 285 (codified as amended at 5 U.S.C. § 306; 31 U.S.C. §§ 1115-1119, and 9703 and 9704, and 39 U.S.C. §§ 2801-2805).

key attributes for performance measures GAO has developed in prior work.⁴ For example, one of the key attributes is “linkage,” which refers to the extent to which the measure is aligned with division and agencywide goals and mission and clearly communicated throughout the organization. In addition, another key attribute is the extent to which each measure covers a governmentwide priority, such as the quality, timeliness, and cost of service. We assessed the reliability of VA’s data for its toll-free hotline performance measures by reviewing existing information about the data and the systems that produced them and interviewing knowledgeable agency officials. We determined that the toll-free hotline performance measures data were sufficiently reliable for the purposes of this report.

We also gained the perspectives of program stakeholders on the effectiveness of VA’s outreach and support, including servicemembers and veterans receiving VA education benefits, veterans service organizations, and school officials. Specifically, we conducted two discussion groups with VA education beneficiaries enrolled in schools in Oklahoma and Virginia. We selected these schools because they represented different types of schools (2-year community college and 4-year public university, respectively) with relatively high veteran populations. We worked with school officials to identify students for these discussion groups, including students with disabilities. We also interviewed representatives of three national veterans service organizations. In addition, we interviewed (1) school certifying officials at the two schools where we conducted discussion groups of students and a predominately online university, (2) representatives from a national group representing school certifying officials, and (3) conducted a nationwide survey of school certifying officials. See below for more information on this survey.

Roles and Challenges of School Certifying Officials

To address our second research objective, we reviewed relevant federal laws, regulations, and agency documents and interviewed VA officials. We also interviewed national groups representing State Approving Agencies (SAA) and school certifying officials, as well as veterans service organizations and students receiving VA education benefits, regarding the roles of school certifying officials. We assessed VA’s coordination with these officials using government internal control standards for coordinating with external parties that have a significant impact on agency

⁴GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

goals. We also assessed VA's survey of SAAs and school certifying officials on the effectiveness of VA's communications and training initiatives for the Post-9/11 GI Bill. The survey was fielded in August 2009 and again in April 2010. We determined that the results of this survey were not sufficiently reliable for our use, due to a low response rate and the lack of a nonresponse analysis.

In addition, we selected a simple random sample of 273 facilities from VA's public Web Enabled Approval Management System (WEAMS) database of 6,403 active facilities, as of August 2010, and conducted a Web-based survey of each facility's school certifying official. "Facility" refers to a school or one of its campuses or units, such as a medical school. In order to be an "active facility," a facility must have at least one educational or training program approved to receive VA education benefits. We matched this public data with internal VA data from the same system to obtain the facility code and names of the school certifying official assigned to the facility. We assessed the reliability of WEAMS data by reviewing documentation and interviewing officials knowledgeable about the data, and conducting electronic testing. We determined that the data from the WEAMS database were not sufficiently reliable for our purposes, primarily due to missing data on school certifying officials, and thus we conducted additional work to overcome this limitation. Specifically, VA has not required that all fields be populated, and, as a result, there are fields with missing information, including the school certifying official's name and e-mail address fields. Twenty-seven percent of the facilities in our sample had either an incorrect name listed or no name listed for the school certifying official. To improve the accuracy and completeness of the data, we conducted additional research, including performing Internet searches and making telephone calls to schools, to obtain complete contact information for nearly all school certifying officials.⁵

Although they are not required to do so, schools may request to have multiple facilities listed separately in VA's WEAMS database to account for different campus locations or degree programs within the school. Each facility listed separately must have a designated school certifying official and the capacity to maintain students' records. In some cases, a school may have the same school certifying official for several or all of its facilities. Our sample included three facilities within a school that had the

⁵Through our research, we were able to obtain deliverable e-mail addresses for all but three facilities (about 1 percent) in the sample.

same school certifying official. In this case, we contacted the official to determine whether the official preferred to complete all three questionnaires or ask another school certifying official at the campus to participate. The official responded to two of the questionnaires and designated another school certifying official to respond to the third questionnaire.

After we drafted the questionnaire, we asked for comments from knowledgeable school certifying officials, internal GAO subject matter experts, and GAO survey methodologists. We conducted four pretests with school certifying officials to help ensure that (1) the questions were clear and unambiguous, (2) terminology was used correctly, (3) the questionnaire did not place an undue burden on agency officials, (4) the information could feasibly be obtained, and (5) the survey was comprehensive and unbiased.

We chose the four pretest sites to include major subgroups: public and private institutions; community colleges and 4-year colleges and universities; and locations across a wide geographic area. We conducted one pretest in person and three over the phone. We made changes to the content and format of the questions after each of the pretests, based on the feedback we received.

We administered this Web-based questionnaire through a secure server. Just prior to activating the final survey, we sent an e-mail announcement of the survey to an official at each of the 273 facilities on August 23, 2010. In this e-mail, we asked each official if he or she was the correct respondent and if not, we asked for a referral to the appropriate official. Officials were notified that the questionnaire was available online and were given unique passwords and usernames on August 27, 2010. We sent follow-up e-mail messages on September 13 and 22, 2010, to those who had not yet responded. We contacted all remaining nonrespondents by telephone, starting September 20, 2010. The questionnaire was available online until October 7, 2010.

In all, we received 195 completed surveys, for a response rate of 71 percent. We conducted a nonresponse bias analysis by comparing respondents and nonrespondents on school type, which was available in the WEAMS data. We determined that respondents and nonrespondents did not differ significantly on this characteristic. Unless otherwise noted, the margin of error associated with the confidence intervals of our survey estimates is no more than plus or minus 7 percentage points at the 95 percent level of confidence.

Survey results based on probability samples are subject to sampling error. The sample we drew for our survey is only one of a large number of samples we might have drawn. Because different samples could have provided different estimates, we express our confidence in the precision of our particular sample results as a 95 percent confidence interval. This is the interval that would contain the actual population values for 95 percent of the samples we could have drawn. As a result, we are 95 percent confident that each of the confidence intervals in this report will include the true values in the study population.

In addition to sampling errors, surveys are also subject to nonsampling errors. The practical difficulties of conducting any survey may introduce such errors. For example, difficulties in how a particular question is interpreted, in the sources of information that are available to respondents, and in how the data are entered into a database or are analyzed can introduce unwanted variability into survey results. We took steps in the development of the questionnaire, the data collection, and the data analysis to minimize these errors. For example, a social science survey specialist designed the questionnaire, in collaboration with GAO staff with subject matter expertise. As we mentioned earlier, the draft questionnaire was pretested and was reviewed by experts in the subject matter area and by a second GAO social science analyst. When data were analyzed, an independent analyst verified the statistical program used for the analysis. Since this was a Web-based survey, respondents entered their answers directly into the electronic questionnaire, thereby eliminating the need to have the data keyed into a database and avoiding data entry errors.

VA Oversight of States and Schools

Finally, to address our third research objective, we reviewed relevant federal laws and regulations, as well as available reports and other information that offered a national perspective on VA's oversight of SAAs and schools and interviewed VA officials. We also interviewed representatives from national organizations representing SAAs and school officials. Regarding oversight of SAAs, we obtained and reviewed the contract between VA and its 57 SAAs for fiscal year 2010. In addition, we reviewed the state-by-state results of VA's Joint Peer Review Group from fiscal years 2009 and 2010, which annually evaluates SAA performance. We also obtained data from VA on the number of SAA supervisory visits to schools, by state, in fiscal years 2009 and 2010. Regarding oversight of schools, we obtained data on the number of VA audits, known as compliance surveys, conducted in fiscal years 2009 and 2010. Finally, we reviewed national data on these audits from VA's WEAMS database.

In addition to national reports and data, we examined VA's monitoring and oversight activities in four states: California, Georgia, Kentucky, and Massachusetts. We selected these states for a number of reasons, including geographic location, as well as to obtain variation in: (1) the number of schools within a state that have been approved to participate in VA education benefit programs, (2) program expenditures, and (3) the number of VA education beneficiaries. In addition, we made sure that one of our four states (Kentucky) had a VA education liaison representative based at a VA office located outside of the assigned state, as this is the situation for 17 states. For each of the four states, we conducted interviews with relevant VA and SAA officials and reviewed the most recent oversight reports from VA and the SAA for randomly selected schools. We used VA's WEAMS data to randomly select 12 schools for each of our four states, using their numeric facility codes: two public, two private nonprofit, and two private for-profit schools in each of the following two categories: 2-year community or junior colleges and colleges and universities offering 4-year degrees and graduate degrees. We found that some of our selected schools did not have a current SAA supervisory visit or VA compliance survey report on file because it was a newly approved school and had not yet been scheduled for either one or both of these types of site visits (see table 6). Overall, we reviewed 43 SAA supervisory visit reports and 40 VA compliance survey reports.

Table 6: Summary of the Number of SAA Supervisory Visit and VA Compliance Survey Reports at Selected Schools in Four States

State	SAA Supervisory Visit Reports	VA Compliance Survey Reports
California	Reviewed reports from 10 out of 12 selected schools: <ul style="list-style-type: none"> Two (2) newly approved schools did not yet have a report on file. These schools included: one private, nonprofit 2-year community or junior college and one private, for-profit college or university offering 4-year degrees and graduate degrees. 	Reviewed reports from 10 out of 12 selected schools: <ul style="list-style-type: none"> Two (2) newly approved schools did not yet have a report on file. These schools included: one private, nonprofit 2-year community or junior college and one private, for-profit college or university offering 4-year degrees and graduate degrees.
Georgia	Reviewed reports from 12 out of 12 selected schools.	Reviewed reports from 10 out of 12 selected schools. <ul style="list-style-type: none"> Two (2) newly approved schools did not yet have a report on file. These schools included one private, for-profit 2-year community or junior college; and one private, for-profit college or university offering 4-year degrees and graduate degrees.
Kentucky^a	Reviewed reports from 9 out of 10 selected schools. <ul style="list-style-type: none"> One (1) newly approved private, for-profit 2-year community or junior college did not yet have a report on file. 	Reviewed reports from 9 out of 10 selected schools. <ul style="list-style-type: none"> One (1) newly approved private, for-profit 2-year community or junior college did not yet have a report on file.
Massachusetts	Reviewed reports from 12 out of 12 selected schools.	Reviewed reports from 11 out of 12 selected schools. <ul style="list-style-type: none"> One (1) private, for-profit 2-year community or junior college did not yet have a report on file.
Total number of reports reviewed	43 reports	40 reports

Source: GAO analysis of SAA and VA reports.

^aIn Kentucky, we selected 10 schools because this state does not have any private, nonprofit 2-year community or junior colleges that are approved to receive VA's education benefits.

Overall, we compared VA's policies and procedures related to its monitoring and oversight of SAAs and schools to government internal control standards.⁶ In addition, we compared VA's oversight performance in relation to its own standards. For example, we examined data on the percentage of VA audits, known as compliance surveys, against its requirement to conduct these audits at a percentage of active schools and

⁶GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

training establishments each year. Overall, among all the different types of schools—including on-the-job training and apprenticeship programs, as well as flight schools—VA has an annual goal to complete a minimum number of required compliance surveys.⁷ We compared the percentage of completed surveys for regional processing offices and individual states against this standard to assess VA's performance in fulfilling their oversight responsibilities in fiscal year 2009. Finally, we reviewed reports and other information on Education's Office of Federal Student Aid's oversight efforts of schools, in order to identify alternative oversight approaches and mechanisms used by another federal agency responsible for administering student aid.

⁷On an annual basis, according to VA's guidance, it should audit at least 33 percent of active institutions of higher learning, non-college degree, and correspondence schools each year. In addition, it must survey all flight schools and 10 percent of active on-the-job training and apprenticeship establishments.

Appendix II: Overview of Post-9/11 Veterans Educational Assistance Improvements Act of 2010

On January 4, 2011, the President signed the Post-9/11 Veterans Educational Assistance Improvements Act of 2010,¹ which revises the Post-9/11 GI Bill program, established in 2008. Some major provisions of the new law are summarized below:

Eligibility of servicemembers and veterans:

- Expands current definition of active duty service under the Post-9/11 GI Bill to include National Guard activation for events like national emergencies. § 101(a)(1), 124 Stat. 4107 (to be codified at 38 U.S.C. § 3301(1)(C)). This provision is retroactive to August 1, 2009, but benefits will not be paid until October 1, 2011. § 101(d)(1), 124 Stat. 4108.

Eligible programs:

- Allows payment of benefits for the pursuit of non-degree granting programs including apprenticeships or other on-the-job training, flight training, or training by correspondence. § 105(b), 124 Stat. 4113-17 (to be codified at 38 U.S.C. § 3313(g)). This provision becomes effective October 1, 2011. § 105(d), 124 Stat. 4117.

Amount of benefit payments:

- Replaces the current state-by-state system of limits on payments to institutions of higher education with a two-tiered payment system. Costs of in-state tuition and fees are covered for public schools. Tuition and fee payments are capped at \$17,500 a year for non-public or foreign schools. § 102(a)(1), 124 Stat. 4108-09 (to be codified at 38 U.S.C. § 3313(c)(1)(A)). This provision becomes effective with respect to distance learning on October 1, 2011, and otherwise on August 1, 2011. § 102(c), 124 Stat. 4110.
- Provides for payment of tuition and fees after the application of any waiver of, or reduction in tuition and fees; and any scholarship or other federal, state, institutional, or employer-based assistance. § 102(a)(1)(B) and 103(a)(2)(D), 124 Stat. 4110-11 (to be codified at 38 U.S.C. § 3313(c)(1)(A) and (e)(2)(A)). This provision becomes effective August 1, 2011, with respect to veterans, but March 5, 2011, with respect to active duty personnel. § 102(c)(1) and 103(c)(1), 124 Stat. 4112.

¹Pub. L. No. 111-377, 124 Stat. 4106 (2011).

- Provides the monthly housing allowance for (1) more than half-time study in pursuit of a degree; (2) pursuing a program of education in a foreign country; and (3) more than half-time study solely by distance learning. Limits the monthly housing stipend by prorating the payment to the rate of pursuit (based on number of course hours taken). For example a half-time student will receive 50 percent of the current housing allowance. § 102(b), 124 Stat. 4109-10 (to be codified at 38 U.S.C. § 1330(c)(1)(B)). Individuals pursuing distance learning exclusively will receive half of the housing allowance to which they would otherwise be entitled. This provision becomes effective with respect to distance learning on October 1, 2011, and otherwise on August 1, 2011. § 102(c), 124 Stat. 4110.
- Provides a books and supplies stipend for individuals on active duty pursuing a program of education more than half-time. § 103(a)(2)(E), 124 Stat. 4111 (to be codified at 38 U.S.C. 3313(e)(2)(B)). This provision becomes effective on October 1, 2011. 103(c)(2), 124 Stat. 4112.

Servicemembers and veterans with disabilities:

- Enables individuals who are entitled to the Vocational Rehabilitation and Employment program and the Post-9/11 GI Bill to receive the Post-9/11 GI Bill housing allowance in place of the Vocational Rehabilitation and Employment subsistence allowance. § 205(a), 124 Stat. 4126 (to be codified at 38 U.S.C. § 3108(b)(4)). This provision becomes effective on August 1, 2011. § 205(b), 124 Stat. 4126.

Role of State Approving Agencies (SAA):

- Grants the Secretary of Veterans Affairs the authority to use SAAs for such compliance and oversight purposes as it considers appropriate. § 203(b), 124 Stat. 4125 (to be codified at 38 U.S.C. § 3673(d)). This provision becomes effective on August 1, 2011. § 203(e), 124 Stat. 4126.

Other provisions:

- Allows certain education and training programs and courses with an existing approval from or offered by certain federal, state or local agencies—such as institutions accredited by agencies recognized by the U.S. Department of Education—to automatically receive approval for VA’s education benefit programs. § 203(a), 124 Stat. 4124-25 (to be codified at 38 U.S.C. § 3672(b)(2)). This provision becomes effective on August 2011. § 203(e), 124 Stat. 4126.

- Increases the amount of fees generally paid by the VA to participating educational institutions from \$7 to \$12 per student for providing information concerning an individual's enrollment in a program of education. § 204(a), 124 Stat. 4126 (to be codified at 38 U.S.C. § 3684(c)). Requires institutions to use these fees solely for making such certifications or for otherwise supporting programs for veterans. § 204(b), 124 Stat. 4126 (to be codified at 38 U.S.C. § 3684(c)). These provisions become effective on October 1, 2011. § 204(c), 124 Stat. 4126.

Appendix III: Comparison of VA Education Benefit Programs

Program name	Purpose	Education programs covered and types of payments	FY 2010 (Estimated)		FY2011 (Estimated)	
			Expenditures	Participants	Expenditures	Participants
Post-9/11 GI Bill (enacted 2008) ^a	Provides individuals with active-duty service after September 10, 2001, tuition and fees, housing allowance, and books and supplies stipend. Benefit amounts are based on length of active-duty service, the location of the school attended, and other factors. For example, in the 2010-2011 academic year, a veteran with 36 months of active-duty service taking 12 credits at a school in Fairfax, VA, can receive up to \$4,242 per term for tuition, up to \$3,969 per term in fees, \$1,941 per month for housing, and up to \$1,000 per year for books and supplies.	<u>Eligible Programs and Training</u> <ul style="list-style-type: none"> Institutions of higher learning One licensing or certification exam (e.g., to become a licensed practical nurse or plumber) Tutorial assistance <u>Types of Payments</u> <ul style="list-style-type: none"> Tuition and fees Housing allowance Books and supplies stipend One-time rural relocation allowance 	\$7.4 billion	461,676	\$8.6 billion	510,149

**Appendix III: Comparison of VA Education
Benefit Programs**

Program name	Purpose	Education programs covered and types of payments	FY 2010 (Estimated)		FY2011 (Estimated)	
			Expenditures	Participants	Expenditures	Participants
Montgomery GI Bill-Active Duty (MGIB-AD) (enacted 1984)	Provides a monthly benefit to four categories of individuals based on service in active or reserve components of the Armed Forces. The amount is the same, regardless of where a school is located. In fiscal year 2011, the benefit is \$1,426 per month for full-time study. ^b	<u>Eligible Programs and Training</u> <ul style="list-style-type: none"> • Institutions of higher learning • Non-college degree programs • Apprenticeship and on-the-job training • Flight training • Correspondence courses • Licensing and certification exams • Tutorial assistance <u>Types of Payments</u> <ul style="list-style-type: none"> • One monthly payment for subsistence, tuition and fees, supplies, books, and equipment 	\$574 million ^b	63,500 ^b	\$434 million	40,630
Montgomery GI Bill-Selected Reserve (MGIB-SR) (enacted 1984)	Provides a monthly benefit payment for Reservists, including the National Guard, who agree to serve for 6 years. In fiscal year 2011, the benefit is \$337 per month for full-time study.	<u>Eligible Programs and Training</u> <ul style="list-style-type: none"> • Institutions of higher learning • Non-college degree programs • Apprenticeship and on-the-job training • Flight training • Correspondence courses • Licensing and certification exams • Tutorial assistance <u>Types of Payments</u> <ul style="list-style-type: none"> • One monthly payment for subsistence, tuition and fees, supplies, books, and equipment 	\$245 million	93,886	\$274 million	103,581

Appendix III: Comparison of VA Education Benefit Programs

Program name	Purpose	Education programs covered and types of payments	FY 2010 (Estimated)		FY2011 (Estimated)	
			Expenditures	Participants	Expenditures	Participants
Reserve Educational Assistance Program (REAP) (enacted 2004)	Provides benefits to Reservists with at least 90 days of consecutive active-duty service after September 10, 2001. In fiscal year 2011, the benefit is \$1,140.80 per month for full-time study, with at least 2 years of consecutive active-duty service.	<u>Eligible Programs and Training</u> <ul style="list-style-type: none"> • Institutions of higher learning • Non-college degree programs • Apprenticeship and on-the-job training • Flight training • Correspondence courses • Licensing and certification exams • Tutorial assistance <u>Types of Payments</u> <ul style="list-style-type: none"> • One monthly payment for subsistence, tuition and fees, supplies, books, and equipment 	\$61 million	14,514	\$56 million	13,379

Sources: Congressional Research Service, Educational Assistance Programs Administered by the U.S. Department of Veterans Affairs, 7-5700 (Washington, D.C.: Feb. 1, 2010); and VA documents.

Note: Although VA has published data on the total expenditures for VA education benefits and the number of participants for FY 2010, those data are not broken out by program. As such, we are presenting VA's FY 2010 budget estimates in the table above.

^aOn January 4, 2011, the President signed the Post-9/11 Veterans Educational Assistance Improvements Act of 2010 (Pub. L. No. 111-377), which revises the Post-9/11 Veterans Educational Assistance Act enacted in 2008 (known as the Post-9/11 GI Bill). See appendix II for a summary of the major provisions of the new law.

^bThe maximum monthly benefit amounts for VA education benefits other than the Post-9/11 GI Bill will be adjusted annually based on the annual average cost of undergraduate tuition as determined by the National Center for Education Statistics (NCES).

^cEstimated costs for MGIB-AD includes costs for the Post-Korean Conflict and Vietnam Era GI Bill (ch. 34).

Appendix IV: Comments from the U.S. Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS
Washington DC 20420
February 9, 2011

Mr. Daniel Bertoni
Director, Education, Workforce
and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Bertoni:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office's (GAO) draft report, "**VA EDUCATION BENEFITS: Actions Taken, but Outreach and Oversight Could Be Improved**" (GAO-11-256). VA generally agrees with GAO's conclusions and concurs with four recommendations and concurs in principle with one recommendation to the Department.

The enclosure specifically addresses GAO's recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,


John R. Gingrich
Chief of Staff

Enclosure

Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report:
**VA EDUCATION BENEFITS: Actions Taken, but
Outreach and Oversight Could Be Improved**
(GAO-11-256)

GAO Recommendation: To improve VA's outreach and support of eligible service members and veterans, communication with school officials, and oversight of its education benefits program, we recommend that the Secretary of Veterans Affairs take the following five actions:

Recommendation 1: Develop outcome-oriented performance measures for outreach to service members and veterans who are seeking VA education benefits. This could include measures of VA's success in reaching out to target populations, including service members and veterans with disabilities, and in addressing areas where more information about education benefits may be needed.

VA Response: Concur. The Veterans Benefits Administration's (VBA) Benefits Assistance Service (BAS), through the eBenefits portal, is creating an early communication tool to provide specialized VA benefit information to Servicemembers and Veterans upon various trigger events. These events may include when eligibility may occur for VA benefits or services such as transfer of entitlement to the Post 9/11 GI Bill. BAS will develop performance measures associated with the early communication tool. Anticipated deployment of the tool is scheduled for June 30, 2011, and performance measure implementation for September 30, 2011.

Recommendation 2: Establish performance measures for the quality of information provided by VA's toll-free hotline and for the timeliness and quality of its Right Now Web service.

VA Response: Concur. VBA's Education Service will develop a national standard and policies for monitoring the quality and timeliness of customer service.
Target Completion Date: December 31, 2011.

Recommendation 3: Provide more timely, accessible, and comprehensive education program policy information. This could include developing and maintaining an online policy manual for the Post-9/11 GI Bill and providing e-mail updates to school certifying officials nationwide.

VA Response: Concur. During upcoming meetings with school certifying officials and other stakeholders, VBA will assess and develop a plan for improved timely, accessible, and comprehensive education program policy information dissemination.
Target Completion Date: June 30, 2011.

Recommendation 4: Increase efforts to make school certifying officials aware of available training opportunities, including VA's online training module, and consider

1

Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report:
***VA EDUCATION BENEFITS: Actions Taken, but
Outreach and Oversight Could Be Improved***
(GAO-11-256)

providing information for school certifying officials on working with service members and veterans with disabilities.

VA Response: Concur. VBA will examine the ways in which training opportunities and knowledge are currently relayed to school certifying officials and look for improvements and alternative mechanisms of contact (e.g., the GI Bill Web site, the VA-Once Web site, etc.) in addition to the traditional Education Liaison Representative/Chief Education Liaison Officer method. Target Completion Date: March 31, 2011.

Recommendation 5: Undertake a systematic review of VA's and SAAs' oversight of schools, focusing on opportunities to improve resource allocation, adopt risk-based approaches, consider cost-effective ways to oversee foreign schools, and evaluate the results of its oversight activities on a routine basis.

VA Response: Concur in principle. VBA previously identified the same issue and addressed the concern through recent acquisition of an independent assessment of the state approving agencies' (SAA) activity by a private contractor. Additionally, VA submitted recommended changes to the SAAs' activity as part of its legislative proposal package submitted to Congress in March 2010. Congress enacted provisions of this proposal as part of Public Law 111-377. These changes reduce the SAAs' responsibilities for school approval by allowing VA to rely on accreditations already in place by the Department of Education. As a result, VA will have more flexibility in how to best utilize the SAAs to provide additional outreach, training, and oversight to school officials. These provisions will be effective August 1, 2011.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Daniel Bertoni (202) 512-7215 or bertonid@gao.gov

Staff Acknowledgments

In addition to the contact named above, the following staff members made important contributions to this report: Brett Fallavollita, Assistant Director; Rachael C. Valliere, Analyst in Charge; Dana Hopings; Heddi Nieuwsma; and Max Yurkofsky. Also, Greg Wilmoth, Stu Kaufman, Carl Barden, and Cathy Hurley provided guidance on the study's design and data analysis; Craig Winslow provided legal advice; and James Bennett created the report graphics. In addition, Susannah Compton advised the team on writing the report; and Joel Green, James Lloyd, Wayne Sylvia, Eve Weisberg, and Amber Yancey-Carroll verified our findings.

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