



ENLISTED ASSOCIATION OF THE NATIONAL GUARD OF THE UNITED STATES

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The Honorable Michael J. Missal
Inspector General
The Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20571:

Dear Mr. Missal,

The recent audit from the Office of the Inspector General, "VA's Oversight of State Approving Agency Program Monitoring for Post-9/11 GI Bill Students," reported severe amounts of improper payments throughout the proprietary sector.

The report, however, does not clarify under what conditions these payments are considered improper. Following the definition established by OMB guidance of "improper payments," an improper payment is defined as "any payment that was made to an ineligible recipient. In addition, *when an agency's review is unable to discern whether a payment was proper as a result of insufficient or a lack of documentation, this payment must also be considered an improper payment.*"¹

Since Student Veterans are present in every sector of higher education, it is important to disaggregate the 83% of improper payments in the proprietary sector in order to identify the following:²

1. How many improper payments were categorized as such because of the bureaucratic failings on the part of State Approving Agencies;
2. How many improper payments were categorized as such because of compliance problems, such as lack of documentation;
3. How many of these improper payments were made to non-degree granting programs;
4. How many of these improper payments were made to degree granting programs; and,
5. How many of these improper payments were categorized as such because of poor academic quality?

New programs innovating more quickly than a State Approving Agent's ability to review is no indication that these programs are a disservice to Student Veterans, or undeserving of Post-9/11 GI Bill benefits. Furthermore, it is evident that both the Veterans Benefits Administration and State Approving Agencies are not practicing sufficient oversight of Post-9/11 GI Bill eligible programs, and much reform is necessary in order to safeguard the benefits of Student Veterans. While the Enlisted Association of the National Guard plans to provide recommendations on best practices moving forward for both VBA and SAAs, it is most important to safeguard Student Veterans, and ensure that Student Veterans remain in programs that provide real value-added. We look forward to your response so that we can come alongside VA to best serve Student Veterans.

Daniel Elkins
Legislative Director
Enlisted Association of the National Guard of the United States

¹ Emphasis Added

² Page ii, VA OIG 16-00862-179