



DEPARTMENT OF VETERANS AFFAIRS  
OFFICE OF INSPECTOR GENERAL  
WASHINGTON, DC 20420



March 6, 2019

Daniel Elkins  
Legislative Director  
Enlisted Association of the National Guard of the United States  
1 Massachusetts Avenue NW, Suite 880  
Washington, DC 20001-1401

Dear Mr. Elkins:

I appreciate your interest in the work of the Department of Veterans Affairs Office of Inspector General (OIG) and the audit of “*VA’s Oversight of State Approving Agency Program Monitoring for Post-9/11 GI Bill Students.*”

In your letter dated January 29, 2019, you requested the OIG provide additional information about the improper payments made to the schools in its sample. As you correctly noted in your letter and related press release, the OIG did not comment in the report on the number of improper payments attributable to the poor quality of the education programs. The OIG did not discuss the quality of the education programs because that was not the objective of this particular audit, which examined if VA and the State Approving Agencies effectively reviewed and monitored education programs in accordance with Title 38 of the United States Code and ensured only eligible programs enrolled Post-9/11 GI Bill students.

To answer your questions, I have provided information below about the ineligible or potentially ineligible programs the OIG identified at for-profit schools:

1. How many improper payments were categorized as such because of the bureaucratic failings on the part of State Approving Agencies?

The OIG assumes you are asking how many cases it identified where the SAAs improperly approved a program; did not approve program modifications, or did not do so timely; or did not identify potentially erroneous, deceptive, or misleading advertisements. The OIG identified 18 of these types of cases at 15 for-profit schools in its sample, totaling about \$1,492,000 in improper payments.

2. How many improper payments were categorized as such because of compliance problems, such as lack of documentation?

The OIG is unsure what you consider a compliance problem. However, the OIG audit team identified three ineligible programs at two for-profit schools that lacked documentation to support their approvals. In one case, the audit team could not locate the business license for one for-profit school that had two programs approved by the SAA in

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July 2014 and the school dissolved five months later. In the second case, the audit team could not locate the catalog, proof of financial soundness, and business license for one for-profit school that had a program approved in 2008. The OIG considered the \$7,600 paid for students in these three programs to be improper payments because neither the schools, the SAAs, or VBA could provide supporting documentation for the programs' eligibility during the audit.

3. How many of these improper payments were made to non-degree-granting programs?

The OIG identified \$1,175,000 in improper payments at 14 for-profit schools with 20 non-degree-granting programs.

4. How many of these improper payments were made to degree-granting programs?

The OIG identified \$316,000 in improper payments at one for-profit school with nine degree-granting programs.

5. How many of these improper payments were categorized as such because of poor academic quality?

None of the improper payments identified by this audit were based on the programs' poor academic quality. An assessment of academic quality would have exceeded the audit's objective, which was to evaluate whether VA oversight of the State Approving Agencies was sufficient to ensure compliance with Title 38 requirements.

I hope this information answers your questions. If you require additional clarification or information about this report, please feel free to email [Janet.Mah@va.gov](mailto:Janet.Mah@va.gov) or contact Janet Mah at 310-567-2287.

Sincerely,



LARRY M. REINKEMEYER  
Assistant Inspector General  
for Audits and Evaluations