

GI Bill® Feedback System

EDUCATION SERVICE



VETERANS BENEFITS ADMINISTRATION | JANUARY 2015

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Executive Summary

In January 2014 the Department of Veterans Affairs (VA), in collaboration with the Departments of Defense (DoD) and Education (ED), launched the GI Bill Feedback System and began accepting complaints about educational institutions. This fulfilled a key provision of the President's Executive Order on Principles of Excellence (PoE) by creating a consumer protection measure for beneficiaries of education benefits (including the GI Bill). Between the launch on January 30, 2014, and November 4, 2014, VA has received and reviewed 2,254 complaints. Of those complaints, 1,434 were PoE-related complaints against schools. VA has closed 312, and the remaining complaints are actively being worked. As a result of the most serious complaints, VA conducted 42 targeted risk-based program reviews, resulting in the withdrawal of VA's approval of two programs.

Purpose

The purpose of this report is to provide information about VA's administration of the GI Bill Feedback System and to report to the public on complaint findings. The report provides information on how and why the system was created, the complaint intake process, targeted risk-based reviews, and available data. This report may be quoted or cited without restriction. Institutional-level data about the number of complaints received, and by what type, may be reviewed on the GI Bill Comparison Tool (www.benefits.va.gov/gibill/comparison).

Understanding the Principles of Excellence

The President signed Executive Order 13607 -- *Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members* on April 27, 2012. The Principles of Excellence (PoE) were established to strengthen oversight, enforcement, and accountability within VA's Post-9/11 GI Bill and DoD's Tuition Assistance Programs for educational institutions serving Veterans, Service Members, and dependents who receive funding from federal Veteran and military educational benefit programs.

PoE was also intended "to ensure our Service Members, Veterans, spouses, and other family members have the information they need to make informed decisions concerning their well-earned federal military and Veterans' educational benefits."

Implementation of the PoE:

- Provides information about the financial cost and quality of educational institutions;
- Prevents abuse and deceptive recruiting practices; and
- Ensures that educational institutions provide high-quality academic and student support

Implementation is a joint effort between VA, DoD, ED, Consumer Financial Protection Bureau (CFPB), Department of Justice (DOJ), and the Federal Trade Commission (FTC).

Introduction to the GI Bill Feedback System

January 2014 marked the beginning of a new opportunity in Veteran consumer protection. VA, in partnership with DoD, ED, FTC, DOJ, and CFPB, launched the GI Bill Feedback System. This system allows VA, with state and federal agencies, to work with educational institutions to address issues on behalf of Veterans, Service Members, and dependents utilizing VA educational benefits.

The GI Bill Feedback System allows recipients of VA educational benefits to submit complaints against educational institutions or employers they believe have acted erroneously, deceptively, with misleading recruiting practices, or in some other way have failed to follow the PoE.

VA does not investigate all complaints, but instead serves primarily as the facilitator between the student and school for complaint resolution. Submitted complaints reside in FTC's Sentinel Database (<http://www.ftc.gov/enforcement/consumer-sentinel-network>) and may be reviewed by state and federal law enforcement agencies including DOJ and State Attorneys General.

Complaint Intake Process

Individuals who wish to submit a complaint can do so on their own behalf, on behalf of someone else, or anonymously by visiting the GI Bill Feedback System at benefits.va.gov/gibill/Feedback.asp. To submit a complaint, an individual identifies which education benefit is being used, selects an issue category, provides his or her complaint narrative and desired outcome, identifies the school, and provides contact information.

A VA Complaint Case Manager reviews the complaint to determine if the complaint is PoE related, if it should be referred to another agency, or if the complaint warrants further review by VA and State Approving Agency (SAA) officials.

Routine PoE-related complaints are monitored and managed by VA complaint case managers. An automated email is sent to the complainant notifying him or her that the case is being handled. The complaint case manager may provide updates or request additional information from the complainant throughout the process.

The case manager forwards the complaint to the educational institution identified in the complaint for the school to review and provide a response.

VA requests that institutions provide an email response to the complaint on school letterhead to VA within 60 days. VA reviews and forwards the response to the complainant.

A complaint is considered non-PoE or flagrant by a VA complaint case manager based on the following criteria:

Non-PoE complaints

- Focuses on VA’s handling of education benefits
- Does not involve the institution or employer
- Is incoherent or spam
- Complaint is a duplicate of another

Serious or flagrant complaints

- Indicates serious or significant fraud or abuse
- Submitted by a whistleblower
- As otherwise determined by the VA complaint case manager

Serious or flagrant complaints are given increased scrutiny by VA and may lead to a targeted risk-based program review, or be referred to VA’s Office of Inspector General.

Complaints that are not related to VA education benefits, such as Title IV financial aid or DoD Tuition Assistance, are referred accordingly to DoD or ED. PoE related complaints are forwarded to the institution identified for resolution.

Anonymous complaints may or may not be forwarded to an institution, depending on the nature of the complaint. If there is no information about the complainant, there is no plausible

way the institution would be able to resolve or respond to the issue. The complaint will generally be “Closed” as “Information Only,” but will still be forwarded to the FTC database.

If a complaint is determined to be non-PoE related, the case will be “Closed” and assigned a resolution code of “Invalid,” and an email will be provided to the complainant advising of such. In these cases, complainants are instructed to submit their issue through a VA customer service portal. They are encouraged to call the GI Bill Hotline (1-888-GIBILL-1) or to send an email to a customer service representative via the GI Bill website (www.benefits.va.gov/gibill).

Targeted Risk-Based Program Reviews

A targeted risk-based program review is a short, often no notice, compliance survey conducted at a school that has received a serious complaint. This review focuses on the complainant’s reported issue, but can be expanded to a full standard compliance survey.

A targeted risk-based program review can result from a number of sources to include complaints, facility self-reported violations, previous compliance survey data, VA management mandates, information received from other government agencies, enforcement actions mandated by law, or lawsuits against an institution.

Since January 2014, VA has conducted 42 targeted risk-based program reviews as a result of complaints from the GI Bill Feedback System. Of the reviews directed, 14 are in progress, 17 were closed as unsubstantiated based on VA’s findings, and 11 resulted in a negative finding or corrective action at the institution. Two programs have been withdrawn from GI Bill participation, and two have been referred to VA’s Office of Inspector General for criminal investigation. The number of these types of reviews by type of institution is provided in the table below.

Targeted Risk-Based Reviews by Institution Type

Public	Private for-profit	Private not-for-profit
4	36	2

Complaint Data

The following information represents “Closed” complaints between January 30, 2014, and November 4, 2014. This information is also available in the individual school detail of the GI Bill Comparison Tool located at www.benefits.va.gov/gibill/comparison.

As of November 4, 2014, VA has received 2,254 complaints; 1,434 were POE-related from 975 separate institutions and campuses. VA has closed 312 of these complaints and 1,122 remain active.

Total Complaints Received					
Total	PoE Related	# Institutions		# Closed	# Active
2,254	1,434	975		312	1,122
		Public	338		
		Private For-Profit	394		
		Private Not-for-Profit	116		
		Not reported	127		

Closed Complaints by Issue(s)	
Issue(s)	# Complaints
Financial Issues (e.g. Tuition/Fee Charges)	157
Other	108
Quality of Education	78
Recruiting/Marketing Practices	45
Refund Issues	42
Transfer of Credits	29
Student Loans	26
Post-graduation Job Opportunities	23
Grade Policy	23
Change in Degree Plan/Requirements	19
Release of Transcripts	16

Complaint data are reflected in the chart below, ordered by number of closed complaints. The complaint data are between January 30, 2014, and November 4, 2014. Data on the number of students are from VA's 2013 Annual Reporting Fee report.

Educational Institution	# Students	# Campuses	# Complaints	Type
University of Phoenix	55,474	86	27	Private-for profit
Devry/Keller	16,822	87	17	Private-for profit
ITT Technical Institute	16,825	145	8	Private-for profit
Cuyahoga Community College	1,170	3	4	Public
Kaplan University	9,456	52	4	Private-for profit
The Art Institute	10,079	46	4	Private-for profit
Pima Medical Institute	756	13	3	Private-for profit
Central Piedmont Community College	873	1	3	Public
University of the Incarnate Word	932	1	3	Private
Pima Community College	1,955	2	3	Public
Miami-Dade College	2,518	5	3	Public
Virginia College	3,137	27	3	Private-for profit
Florida State College-Jacksonville	3,751	3	3	Public
Colorado Technical University	5,984	5	3	Private-for profit
Universal Technical Institute	6,032	11	3	Private-for profit
American Public University	15,833	1	3	Private-for profit
Pace University	304	3	2	Private
Cedar Valley College	468	1	2	Public
Johnson Community College	616	2	2	Public
Daytona State College	1,053	1	2	Public
Florida International University	1,057	1	2	Public
Texas Tech University	1,148	4	2	Public
University of Cincinnati	1,187	2	2	Public
Brown Mackie College	2,064	28	2	Private-for profit
Argosy University	2,176	19	2	Private-for profit
American Business and Technology University	2,342	1	2	Private-for profit
Keiser University	2,859	16	2	Private
Texas A&M	4,434	11	2	Public
Saint Leo University	5,624	23	2	Private
Central Texas College	5,876	22	2	Public
Liberty University	7,619	1	2	Private
Strayer University	11,579	82	2	Private-for profit

All institutions with at least two complaints are listed; institutions with multiple locations have been combined.

Complaint data are reflected in the chart below, ordered by number of closed complaints in ascending order of beneficiary population. The complaint data are between January 30, 2014, and November 4, 2014.

Educational Institution	# Students	# Campuses	# Complaints	Type
Pace University	304	3	2	Private
Cedar Valley College	468	1	2	Public
Johnson Community College	616	2	2	Public
Daytona State College	1,053	1	2	Public
Florida International University	1,057	1	2	Public
Texas Tech University	1,148	4	2	Public
University of Cincinnati	1,187	2	2	Public
Brown Mackie College	2,064	28	2	Private-for profit
Argosy University	2,176	19	2	Private-for profit
American Business and Technology University	2,342	1	2	Private-for profit
Keiser University	2,859	16	2	Private
Texas A&M	4,434	11	2	Public
Saint Leo University	5,624	23	2	Private
Central Texas College	5,876	22	2	Public
Liberty University	7,619	1	2	Private
Strayer University	11,579	82	2	Private-for profit
Pima Medical Insititute	756	13	3	Private-for profit
Central Piedmont Community College	873	1	3	Public
University of the Incarnate Word	932	1	3	Private
Pima Community College	1,955	2	3	Public
Miami-Dade College	2,518	5	3	Public
Virginia College	3,137	27	3	Private-for profit
Florida State College-Jacksonville	3,751	3	3	Public
Colorado Technical University	5,984	5	3	Private-for profit
Universal Technical Institute	6,032	11	3	Private-for profit
Americian Public University	15,833	1	3	Private-for profit
Cuyahoga Community College	1,170	3	4	Public
Kaplan Universsity	9,456	52	4	Private-for profit
The Art Institute	10,079	46	4	Private-for profit
ITT Technical Institute	16,825	145	8	Private-for profit
Devry/Keller	16,822	87	17	Private-for profit
University of Phoenix	55,474	86	27	Private-for profit

All institutions with at least two complaints are listed; institutions with multiple locations have been combined. Data on the number of students are taken from VA's 2013 Annual Reporting Fee report.

Complaint data are reflected in the chart below, ordered by number of closed complaints and includes the types of complaints. The complaint data are between January 30, 2014, and November 4, 2014. An individual may select more than one complaint issue and has a free-text “other” category to describe his or her complaint type.

School	# Complaints	Financial Issues	Quality of Education	Recruiting/Marketing Pract.	Refund Issues	Transfer of Credits	Student Loans	Post-graduation Job Opportunities	Grade Policy	Change in degree plan/req.	Release of Transcripts	Other
University of Phoenix	27	16	10	4	2	3	0	2	3	2	1	10
Devry/Keller	17	12	2	3	1	2	4	2	0	0	0	4
ITT Technical Institute	8	5	6	4	1	4	2	2	2	0	1	2
Cuyahoga Community College	4	0	3	0	2	0	2	0	0	0	0	4
Kaplan University	4	4	1	1	0	1	1	1	0	1	0	0
The Art Institute	4	2	2	1	2	1	0	2	1	0	0	2
Pima Medical Institute	3	1	3	1	1	0	1	0	0	0	0	3
Central Piedmont Community College	3	2	1	0	1	0	0	0	0	0	0	1
University of the Incarnate Word	3	3	0	0	0	1	0	0	0	0	0	2
Pima Community College	3	1	1	0	1	1	0	0	0	1	1	1
Miami-Dade College	3	0	0	1	0	0	0	0	0	1	0	2
Virginia College	3	3	0	0	0	1	0	0	0	0	0	2
Florida State College-Jacksonville	3	0	1	0	0	0	0	0	0	0	0	2
Colorado Technical University	3	0	2	0	0	0	1	0	1	1	0	0
Universal Technical Institute	3	2	0	0	0	0	1	0	0	0	0	0
American Public University	3	1	2	0	0	0	0	0	0	0	0	1
Pace University	2	1	0	0	1	0	0	0	0	0	1	0
Cedar Valley College	2	1	0	0	0	0	0	0	0	0	0	2
Johnson Community College	2	2	0	1	1	0	0	1	0	0	0	0
Daytona State College	2	0	1	1	0	1	1	0	2	1	0	0
Florida International University	2	1	0	0	0	0	0	0	0	0	0	1
Texas Tech University	2	0	1	0	0	0	0	0	2	0	0	1
University of Cincinnati	2	1	1	1	0	1	0	0	0	0	0	0
Brown Mackie College	2	1	1	1	1	1	0	1	1	0	0	2
Argosy University	2	0	1	0	0	0	0	1	0	0	0	0
American Business and Technology University	2	0	0	1	0	0	0	0	0	0	0	1
Keiser University	2	2	0	2	2	0	1	1	0	1	1	0
Texas A&M	2	1	0	1	1	0	0	0	0	1	0	1
Saint Leo University	2	1	1	0	0	0	0	0	0	0	0	1
Central Texas College	2	0	0	0	0	0	0	0	0	0	0	2
Liberty University	2	0	1	0	0	0	0	0	0	0	0	1
Strayer University	2	1	0	0	0	0	0	0	0	0	0	1

All institutions with at least two complaints are listed; data by complaint type and number are shown by column. Chart colors do not impact value.

As of November 4, 2014, VA has processed and closed 312 complaints against 259 separate institutions and/or campuses.

Number of Closed Complaints by Institution Type		
Public	Private for-profit	Private not-for-profit
124	96	39

Limitations

This report does not suggest the prevalence of the issues described as they relate to the entire Veteran education benefit cohort. The information provided illustrates where there is a mismatch between Veteran expectations and actual service delivered.

Information and Questions

- Questions about the GI Bill Complaint System and subsequent data may be directed to VA's Education Service at (202) 461-9800 or 22.VBACO@va.gov.
- Information about the Department of Defense Postsecondary Education Complaint System is available at <http://www.militaryonesource.mil/voluntary-education/complaint>.
- Information about the Department of Education's Postsecondary Complaint System is available at <https://www.studentaid.gov/types/grants-scholarships/military#complaint>.