



US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

Veterans Are Receiving Concurrent Monthly Housing Allowance Payments while Participating in Certain VA Educational Programs

Management Advisory
Memorandum

23-03303-56

January 30, 2024

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QUALITY STANDARDS

The Office of Inspector General (OIG) has released this management advisory memorandum to provide information on matters of concern that the OIG has gathered as part of its oversight mission. The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation, excluding follow-up.

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DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20001



December 29, 2023¹

MANAGEMENT ADVISORY MEMORANDUM

TO: Joshua Jacobs, Under Secretary for Benefits
Veterans Benefits Administrations (020)

FROM: Larry Reinkemeyer, Assistant Inspector General
VA Office of Inspector General's (OIG) Office of Audits and Evaluations (52)

SUBJECT: Veterans Are Receiving Concurrent Monthly Housing Allowance Payments
while Participating in Certain VA Educational Programs

During a review related to VA's Veteran Employment Through Technology Education Courses (VET TEC) pilot program, the VA Office of Inspector General (OIG) discovered VA is paying concurrent monthly housing allowance benefits to veterans who are simultaneously enrolled in Post-9/11 GI Bill and VET TEC educational courses or training programs. Based on the legislation that created the VET TEC pilot program and the governing law for VA's educational benefits, such as the Post-9/11 GI Bill, concurrent payments are not prohibited. The Veterans Benefits Administration (VBA) is not violating any laws or regulations when providing concurrent payments to a veteran for Post-9/11 GI Bill and VET TEC educational benefits.² There is no statutory authority prohibiting concurrent payment to a veteran for Post-9/11 GI Bill and VET TEC educational benefits. However, the legislation that established VET TEC is inconsistent with other VA educational benefits programs that prohibit concurrent payments of educational benefits under more than one law administered by VA and certain other federal benefit programs. Under other VA educational programs, individuals are required to select one program from which to receive educational assistance at a time.³ Thus, veterans would only receive one housing allowance payment per month, if applicable.

Congress and VBA initiated the process to continue the VET TEC program following the pilot, which will end in April 2024. This memorandum is meant to convey the information necessary for VBA and Congress to determine if additional actions are warranted to address this

¹ This memorandum was sent to the Veterans Benefits Administration on December 29, 2023, to provide the opportunity for review and comment.

² The VET TEC pilot program was established by the Harry W. Colmery Veterans Educational Assistance Act of 2017, Pub. L. No. 115-48, 131 Stat. 973, 986 (2017) § 116; 38 U.S.C. §§ 3033, 3322, and 3681.

³ 38 U.S.C. §§ 3033, 3322, and 3681.

inconsistency prior to the continuation of the program.⁴ The OIG is taking no additional steps at this time.

Post-9/11 GI Bill Program

The Post-9/11 GI Bill program is administered by VBA's Education Service and helps veterans, their spouses, and their children pay for school or job training. These benefits help veterans regain the educational opportunities they may have missed while serving in the military.

To be eligible for these benefits, claimants must meet one of the following eligibility requirements:

- Served at least 90 days on active duty (either consecutively or with breaks in service) on or after September 11, 2001, and were honorably discharged.
- Received a Purple Heart on or after September 11, 2001, and were honorably discharged.
- Served for at least 30 continuous days on or after September 11, 2001, and were honorably discharged with a service-connected disability.
- Be a dependent child using benefits transferred by a qualifying veteran or service member.⁵

Veterans (or their dependents) enrolled in a Post-9/11 GI Bill program may be eligible to receive 36 to 48 months of full-time educational benefits (also known as entitlement), which can include tuition, a monthly housing allowance, and a stipend for books and supplies. Those enrolled more than half-time are entitled to a monthly housing allowance for the days they attend school over the course of the enrollment term. If the veteran attends in-person, the housing allowance payment will be equal to the monthly military basic allowance for housing for an E-5 with dependents, based on the zip code where the veteran physically attends the educational program.⁶ From August 1, 2023, to July 31, 2024, the national average for the basic housing allowance for an E-5 with dependents was \$2,109 (ranging from \$996 to \$4,644). If the veteran attends training

⁴ This memorandum provides information that has been gleaned from OIG data analyses and provided to VBA to determine if VBA should take additional action on what appear to be errors leading to a relatively small number of overpayments that represent a significant amount of money.

The OIG issues management advisory memoranda when exigent circumstances or areas of concern are identified by OIG hotline allegations or in the course of its oversight work, particularly when immediate action by VA can help reduce further risk of harm to veterans or significant financial losses. Memoranda are published unless otherwise prohibited from release or to safeguard protected information.

⁵ A reservist who lost educational benefits when the Reserve Educational Assistance Program ended in November 2015 may qualify to receive restored benefits under Chapter 33 (the Post-9/11 GI Bill).

⁶ E-5 is the fifth enlisted paygrade in the United States military. "E-5 Basic Pay Rate - Enlisted Military Payscales" (web page), accessed June 27, 2023, <https://www.federalpay.org/military/grades/e-5>.

online only, the housing allowance payment will be half of the national average for the basic allowance for housing for an E-5 with dependents (\$1,054.50).

VET TEC

In 2017, Congress created VET TEC, a five-year pilot educational program.⁷ The VET TEC pilot program began in April 2019 and is scheduled to end in April 2024. VET TEC is administered by VBA's Education Service but is separate from the Post-9/11 GI Bill program. The goal of the VET TEC program is to provide veterans with the opportunity to pursue high-technology training, such as computer programming and data processing. The program pairs participating veterans and eligible service members with industry-leading and high-technology training providers to help participants enhance their skills or acquire new ones to enter the job market. The VET TEC program has an annual budget of \$45 million.⁸

To be eligible for VET TEC, a veteran must have at least one day of unexpired GI Bill entitlement benefits remaining. Participation in the program does not count against the veteran's GI Bill entitlement.⁹ Program requirements allow an eligible veteran to participate in VET TEC once every 18 months. If a veteran starts an approved VET TEC program, the veteran will have an 18-month waiting period from the last date of attendance or completion before they can reapply.¹⁰

VA pays the cost of classes and training, and veterans also receive monthly housing allowance payments during the training period. As with the Post-9/11 GI Bill requirements, the housing allowance is also based on the monthly military basic allowance for housing for an E-5 with dependents and whether the veteran attends training in-person or online.

The VET TEC program has 31 approved training providers. As of February 2023, about 8,600 participants have graduated from the program, and around 4,000 have secured meaningful employment within 57 days of graduating.¹¹

⁷ Harry W. Colmery Veterans Educational Assistance Act of 2017 § 116.

⁸ The VET TEC program was initially funded with a budget of \$15 million per year with an increase to \$45 million by the Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020, Pub. L. No. 116-315, 134 Stat. 4932, 5017 (2021) § 4302.

⁹ Harry W. Colmery Veterans Educational Assistance Act of 2017 § 116. VBA Annual Benefits Report Fiscal Year 2022.

¹⁰ If the veteran withdrew from a previous VET TEC program because the veteran was called to active duty, then VA may waive this rule.

¹¹ Meaningful employment is defined as employment in a new career or promotion in an existing career that is supported by the program of study. VA, *VET TEC Certifying Officials Handbook*, vol. 3.2, March 2023.

Veterans Receiving Concurrent Monthly Housing Allowance Payments

The OIG team selected a sample of 30 unique veterans who simultaneously attended Post-9/11 GI Bill and VET TEC courses and found that all received concurrent monthly housing allowance payments.¹² Those veterans received a total of about \$164,500 in concurrent payments. Based on this sample, the team estimated about 208 veterans received concurrent payments from April 1, 2019, to February 28, 2023, for a total of \$1.1 million.¹³ The team also estimated these veterans received an additional \$3,100 on average in monthly housing allowance payments.

The OIG identified 249 unique veterans who had overlapping enrollment days for Post-9/11 GI Bill and VET TEC courses from April 1, 2019, through February 28, 2023. These veterans received monthly housing allowance payments totaling about \$863,700 for Post-9/11 GI Bill courses and over \$1.1 million for VET TEC courses. Table 1 shows the number of concurrent or overlapping days of Post-9/11 GI Bill and VET TEC courses taken by veterans.

Table 1. Veterans with Concurrent Days of Post-9/11 GI Bill and VET TEC Courses

Number of concurrent days	Number of veterans
1–9	16
10–25	27
26–50	70
51–100	86
>100	50
Total	249

Source: OIG analysis of data obtained from VBA's enrollment system.

The team reviewed the sampled veterans' enrollments, attendance, and payments for each of the Post-9/11 GI Bill and VET TEC courses using various VBA systems.¹⁴ Appendix A provides

¹² Even though the team reviewed a sample of unique veterans, for the purposes of the review, the team reviewed all corresponding courses that had an overlap in enrollment days for each sampled veteran's Post-9/11 GI Bill and VET TEC course or training program.

¹³ The team used April 1, 2019, as the beginning of the review period because that was when the VET TEC program started.

¹⁴ The VBA systems were the Image Management System, Long Term Solutions, Share, and the Finance and Accounting System. Share is a Microsoft Windows-based application that interfaces with other VBA systems and databases.

additional information about the scope and methodology of this review. Appendix B includes the statistical sampling methodology. Below are two examples illustrating veterans who received concurrent monthly housing payments.

Example 1

A veteran was enrolled in two Post-9/11 GI Bill courses (from August 21, 2021, through December 16, 2021, and from January 3, 2022, through March 18, 2022,) as well as a VET TEC course from October 4, 2021, through February 4, 2022. The courses overlapped from October 4, 2021, through December 16, 2021 (73 days), and January 3, 2022, through February 4, 2022 (32 days), for a total of 105 days. From August 21, 2021, through March 18, 2022 (about seven months), the veteran received 13 monthly housing allowance payments—five for the VET TEC course (totaling \$7,953.00) and eight for the two Post-9/11 GI Bill courses (totaling \$8,893.27). The veteran received a total of \$16,846.27 in housing allowance payments, of which \$12,713.14 was received for the 105-day period of overlap.

Example 2

A veteran was enrolled in a VET TEC course from October 3, 2020, through March 7, 2021, and a Post-9/11 GI Bill course from January 10, 2021, through April 24, 2021. The courses overlapped from January 10, 2021, through March 7, 2021, for a total of 58 days. From October 3, 2020, through April 24, 2021 (about seven months), the veteran received 10 monthly housing allowance payments—six for the VET TEC course (totaling \$8,973.50) and four for the Post-9/11 GI Bill course (totaling \$12,919.20). The veteran received a total of \$21,892.70 in housing allowance payments, of which \$10,935.32 was received for the 58-day period of overlap.

VBA Attempted to Prevent Concurrent Monthly Housing Allowance Payments

In March 2022, VBA held a two-day VET TEC summit with the goals of (1) discussing VET TEC and employer consortium successes, inefficiencies, and policies; (2) examining approvals and compliance and establishing benchmarks and requirements for training providers and employers; and (3) defining the training provider scorecard data requirements and standardizing a process to improve return on investment. This summit identified 30 topics with actions for change or improvement. One of those actions included discontinuing the concurrent monthly housing allowance payments for veterans attending Post-9/11 GI Bill and VET TEC courses simultaneously.

In August 2022, VBA proposed a new policy that would prohibit veterans from receiving Post-9/11 GI Bill and VET TEC program benefits simultaneously, which would have also eliminated these concurrent monthly housing allowance payments. However, following a review by the VA’s Office of General Counsel, which determined concurrent payments were not prohibited by law, the Office of General Counsel stated, “We do not recommend publishing it or implementing this new policy prohibiting concurrent receipt” and “considering that the new policy is not ‘veteran-friendly’ as it reduces benefits, we believe there would be a high risk of litigation associated with the new policy. Accordingly, we recommend rescinding it.” As a result, VBA’s Education Service ended its effort to establish a new policy prohibiting concurrent payments.

Continuation of VET TEC as a VA Educational Program

Congress introduced bills to amend the law and continue VET TEC as a VA educational program in 2023.¹⁵ Although these bills allow a limited number of veterans to continue pursuing high-technology training, neither prevents the concurrent receipt of educational benefits, including monthly housing allowance payments. The bills would require veterans to use their educational entitlement for the program, whereas during the pilot, veterans only needed to *have* entitlement and enrollment did not count against the veteran’s educational entitlement.¹⁶ Therefore, if either bill is enacted as currently written, a veteran could receive two monthly housing allowance payments while taking VET TEC and Post-9/11 GI Bill courses, but they would be using entitlement for both and, therefore, drawing down their 36 to 48 months of entitlement at a faster rate.

According to the current law,

No person may receive benefits concurrently under two or more of the provisions of law listed below: (1) Chapters 30 [Montgomery GI Bill], 31 [Veteran Readiness and Employment], 32 [Post-Vietnam Era Veterans’ Educational Assistance], 34 [Veterans’ Educational Assistance], 35 [Survivors’ and Dependents’ Educational Assistance], and 36 [Administration of Educational Benefits] of this title.¹⁷

¹⁵ Continue VET TEC Authorization Act of 2023, S. 1877, 118th Cong. (2023); VET-TEC Authorization Act of 2023, H.R. 1669, 118th Cong. (2023). The House of Representatives bill was introduced March 21, 2023, and passed in the House of Representatives on May 24, 2023. The Senate bill was introduced June 8, 2023, and as of January 19, 2024, it was still pending.

¹⁶ Continue VET TEC Authorization Act of 2023, S. 1877, 118th Cong. (2023); VET-TEC Authorization Act of 2023, H.R. 1669, 118th Cong. (2023); Harry W. Colmery Veterans Educational Assistance Act of 2017 § 115.

¹⁷ 38 U.S.C. § 3681(b)(1).

However, this provision does not include Post-9/11 GI Bill benefits (Chapter 33).¹⁸ The Post-9/11 GI Bill includes a provision barring the duplication of educational assistance benefits but does not include Chapter 36, Administration of Educational Benefits—which is where pending legislation is proposing to include the VET TEC program.¹⁹ Thus, concurrent monthly housing allowance payments would still be allowed in this scenario, unlike with other VA educational benefits programs.

In March 2023, the executive director for VBA’s Education Service testified about the pending legislation to continue the VET TEC program.²⁰ VBA testified in support of the House bill with amendments, such as not limiting the number of veterans who can participate in the program each year and modifying how veterans’ entitlement would be charged for using the program compared to other educational programs. VBA stated,

This provision [charging entitlement] would be inequitable as it would allow some beneficiaries [veterans] who have already used all their VA educational benefits to receive more entitlement, while others would lose out on their remaining entitlement under other VA educational program[s].

VBA’s testimony did not address the fact that the bill would still allow for the continuation of concurrent monthly housing allowance payments, despite its prior efforts to address this matter through a policy change and its concerns about inequities arising from other aspects of the bills.

Conclusion

With the VET TEC pilot program ending in April 2024 and legislation pending to continue it as a VA educational program, VBA and Congress have an opportunity to consider whether new iterations of the VET TEC program should continue to allow veterans to receive concurrent monthly housing allowance payments while simultaneously attending Post-9/11 GI Bill and VET TEC programs.

Requested Action

The OIG requests that VBA inform the OIG what actions, if any, VBA takes to address the inconsistency with veterans being allowed to receive concurrent educational benefits when attending Post-9/11 GI Bill and VET TEC courses simultaneously.

¹⁸ 38 U.S.C. § 3681.

¹⁹ 38 U.S.C. § 3322.

²⁰ *Legislative Hearing, Before Subcommittee on Economic Opportunities, House Committee on Veteran Affairs, 118th Cong. (March 30, 2023)* (statement of Joseph Garcia, Executive Director Education Service, Veterans Benefit Administration).

VA Management Comments

In response to the memorandum, the under secretary for benefits was concerned with the description in the first paragraph related to the implementation of statutory language in the VET TEC authorization and Post-9/11 GI Bill's Chapter 33 of Title 38. Therefore, VBA requested the language be revised to state clearly that the statute "severely limits implementation" as there is nothing prohibiting the simultaneous receipt of Post-9/11 GI Bill and VET TEC benefits. For full VA Management Comments, see appendix C.

OIG Response

To address the under secretary's request and comments, the OIG made minor editorial changes to the first paragraph to clarify that there is no statutory authority prohibiting the use of Post-9/11 GI Bill and VET TEC benefits concurrently.

Appendix A: Scope and Methodology

Scope

The review scope included all veterans participating in both Veteran Employment Through Technology Education Courses (VET TEC) and Post-9/11 GI Bill courses with overlapping enrollment days from April 1, 2019, to February 28, 2023. The total population included 249 unique veterans with a total of \$2,007,914 in monthly allowance housing payments (\$863,706 for Post-9/11 GI Bill courses and \$1,144,208 for VET TEC courses).

Methodology

The VA Office of Inspector General (OIG) team determined if concurrent monthly allowance housing benefits were paid for courses that veterans attended simultaneously while using VET TEC and Post-9/11 GI Bill educational benefits. To do this, the team assessed the legislation that created the VET TEC program and the governing law for VA's educational benefits, such as the Post-9/11 GI Bill. The team conducted interviews with Veterans Benefits Administration (VBA) Education Service staff to discuss the development and implementation of VBA's VET TEC program and the allowance of concurrent educational assistance benefits, specifically regarding the concurrent payment of monthly housing allowance benefits. Additionally, the team obtained veteran enrollment data from VBA's enrollment system, VA Online Certification of Enrollment, to select a sample of unique veterans who simultaneously attended a Post-9/11 GI Bill and VET TEC course to determine if VBA paid monthly housing allowance benefits for both programs.

Based on the legislation that created the VET TEC program and the governing law for VA's educational benefits, such as the Post-9/11 GI Bill, duplicate payments are not currently prohibited; therefore, the team determined that performing an internal control step was not necessary.

Fraud Assessment

The OIG team assessed the risk that fraud, violations of legal and regulatory requirements, and abuse could occur during this review. The team exercised due diligence in staying alert to any fraud indicators and did not identify any instances of fraud or potential fraud during this review.

Data Reliability

The team obtained data from VA Online Certification of Enrollment, VBA's Corporate Database, and the Benefits Delivery Network system for all veterans participating in and receiving monthly housing allowance payments for both VET TEC and Post-9/11 GI Bill

educational programs from April 1, 2019, to February 28, 2023.²¹ The team determined whether any data were missing from key fields and assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements.

Additionally, for each sample reviewed, the team compared data, such as educational institution name, the course's beginning and ending date, and dates and amounts of payments, against information contained electronically in VBA's The Image Management System, Finance and Accounting System, Long Term Solution, and Share systems.²² The data were sufficiently reliable for the review objective. The data appeared to be complete and accurate for their intended purpose of determining, based on the specified parameters, whether concurrent monthly housing allowance payments were issued to recipients participating in both VET TEC and Post-9/11 GI Bill education programs.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*, except for the follow-up requirement.

²¹ Benefits Delivery Network is a suite of mainframe applications that collectively make up VA's primary claims processing, tracking, and payment systems.

²² Share is a Microsoft Windows-based application that interfaces with other VBA systems and databases.

Appendix B: Statistical Sampling Methodology

Approach

To accomplish the objective, the VA Office of Inspector General (OIG) team reviewed a statistical sample of veterans' records with overlapping enrollment days in Veteran Employment Through Technology Education Courses (VET TEC) and Post-9/11 GI Bill courses from April 1, 2019, to February 28, 2023. All veterans were eligible to be selected, regardless of number of concurrent days.

Population

The review population included 249 unique veterans with a total of \$2,007,914 in monthly housing allowance payments with overlapping enrollment days from April 1, 2019, to February 28, 2023 (\$863,706 for Post-9/11 GI Bill courses and \$1,144,208 for VET TEC courses). For the purposes of the review, the team estimated the population to be 208 veterans. The difference between the review population and the estimated population occurred when the team excluded six of the reviewed records because they did not have overlapping enrollment days resulting in concurrent monthly housing allowance payments. Because the excluded sample records represent others in the original review populations that may also be out of scope, the team estimates the population eligible for review to be about 208.

Sampling Design

Using the population of records with overlapping enrollment days, the team selected a simple random sample of 30 records. All veterans were eligible to be selected, regardless of number of concurrent days.

Weights

Samples were weighted to represent the population from which they were drawn, and the weights were used in the estimate calculations. For example, the team calculated the error rate estimates by first summing the sampling weights for all sample records that contained the given error, then dividing that value by the sum of the weights for all sample records.

Projections and Margins of Error

The projection is an estimate of the population value based on the sample. The associated margin of error and confidence interval show the precision of the estimate. If the OIG repeated this audit with multiple sets of samples, the confidence intervals would differ for each sample but would include the true population value approximately 90 percent of the time.

The OIG statistician employed statistical analysis software to calculate estimates, margins of error, and confidence intervals that account for the complexity of the sample design.

The sample size was determined after reviewing the expected precision of the projections based on the sample size, potential error rate, and logistical concerns of the sample review. While precision improves with larger samples, the rate of improvement decreases significantly as more records are added to the sample review.

Figure B.1 shows the effect of progressively larger sample sizes on the margin of error.

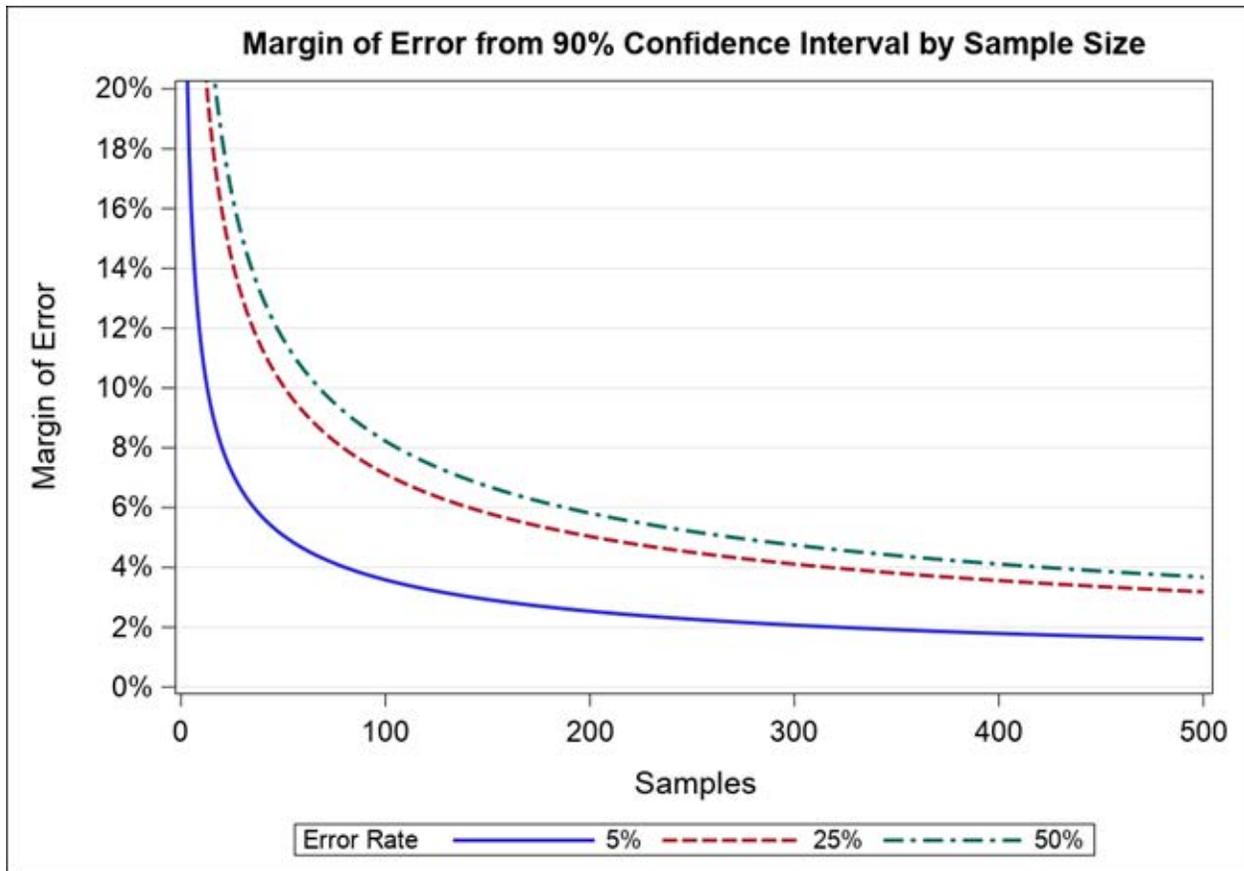


Figure B.1. Effect of sample size on margin of error.

Source: VA OIG statistician's analysis.

Projections

Table B.1 details the OIG team's statistical estimates for the number of veterans receiving concurrent monthly housing allowance payments; the total amount paid in concurrent monthly housing allowance; and the average extra amount paid each month to a veteran who simultaneously participated in VET TEC and Post-9/11 GI Bill courses.

Table B.1. Statistical Projections Summary for Concurrent Monthly Housing Allowance Payments

Estimate name	Estimate	90 percent confidence interval			Sample size
		Margin of error	Lower limit	Upper limit	
Number of veterans receiving concurrent monthly housing allowance payments (in the review scope)	208	27	181	234	30
Total amount of concurrent monthly housing allowance payments	\$1,138,068	\$261,029	\$877,039	\$1,399,097	30
Average amount by veteran for extra monthly housing allowance payments	\$3,121	\$670	\$2,450	\$3,791	30

Source: VA OIG analysis of statistically sampled veteran records with overlapping enrollment days in VET TEC and Post-9/11 GI Bill courses from April 1, 2019, to February 28, 2023.

Note: Projections and confidence intervals may not total precisely due to rounding.

Appendix C: VA Management Comments

Department of Veterans Affairs Memorandum

Date: January 16, 2024

From: Under Secretary for Benefits (20)

Subj: Office of Inspector General (OIG) Draft Management Advisory Memorandum –Veterans Are Receiving Concurrent Monthly Housing Allowance Payments while Participating in Certain VA Educational Programs [Project No. 2023-03303-AE-0129]

To: Assistant Inspector General for Audits and Evaluations (52)

1. The Veterans Benefits Administration (VBA) has reviewed the OIG draft Management Advisory Memorandum — Veterans Are Receiving Concurrent Monthly Housing Allowance Payments while Participating in Certain VA Educational Programs and provides the attached response.

The OIG removed point of contact information prior to publication.

(Original signed by)

Joshua Jacobs

Attachment

**Veterans Benefits Administration Comments on OIG Management Advisory Memorandum:
Veterans Are Receiving Concurrent Monthly Housing Allowance Payments while Participating in
Certain VA Educational Programs**

VBA provides the following comments in response to the Management Advisory Memorandum:

VBA is concerned with the description in the introductory paragraph related to the implementation of statutory language in the VET TEC authorization (PL115-48, section 116) and Chapter 33 of Title 38, United States Code.

VBA requests the language be revised to state clearly that the wording of the statutes severely limits implementation as there is no bar to receipt of Chapter 33 while also receiving VET TEC benefits. Any attempt to withhold Chapter 33 benefits from a beneficiary based solely on the beneficiary's current enrollment in VET TEC would be a violation of the law. VBA agrees with the VA's Office of General Counsel, as quoted on page 6 of the report, that providing a policy prohibiting concurrent receipt would not be Veteran-friendly and would result in a high risk of litigation. VBA is concerned that the current language implies the inconsistency identified is the result of a VBA choice of process rather than an implication of the law as it is written.

Page 1, paragraph 1, 3rd through 5th sentences:

“The Veterans Benefits Administration (VBA) is not violating any laws or regulations when providing concurrent payments to a veteran for Post-9/11 GI Bill and VET TEC educational benefits. However, this process is inconsistent with other VA educational benefits programs that prohibit concurrent payments of educational benefits under more than one law administered by VA and certain other federal benefit programs. Under other VA educational programs, individuals are required to select one program from which to receive educational assistance at a time.”

VBA Comment: VBA requests changes in the language to more clearly identify the limitations caused by the statutes for withholding concurrent payments. VBA recommends the following revision:

“The Veterans Benefits Administration (VBA) is not violating any laws or regulations when providing concurrent payments to a veteran for Post-9/11 GI Bill and VET TEC educational benefits. There is no statutory authority prohibiting concurrent payment to a veteran for Post-9/11 GI Bill and VET TEC educational benefits. The current laws, as written, regarding Post-9/11 GI Bill and VET TEC create an inconsistency compared to other VA educational benefits programs that explicitly prohibit concurrent payments of educational benefits under more than one law administered by VA and certain other federal benefit programs. Other VA educational programs require individuals to select one program from which to receive educational assistance at a time; thus, allowing only one housing allowance payment per month, if applicable.”

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

OIG Contact and Staff Acknowledgments

Contact	For more information about this management advisory memorandum, please contact the Office of Inspector General at (202) 461-4720.
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